

RAPLEYS

Planning Statement on behalf of
CARE (Little Court) Ltd

LITTLE COURT, HAVERHILL ROAD, LITTLE WRATTING, HAVERHILL, CB9 7UD

February 2021

Our Ref: SGP/20-01437

care.
CENTRAL AND REGIONAL ESTATES LTD

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Appendices

Appendix 1 Pre-application response letter - 19th October 2020

QUALITY ASSURANCE

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2008.



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1 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Rapleys LLP in support of a full planning application in relation to proposals for a specialist dementia care village at Little Court, Haverhill Road, Little Wrattling (“The Site”) on behalf of CARE (Little Court) Ltd (CARE) (“The Applicant”).
- 1.2 Namely, this planning application seeks approval for:
“Specialist dementia care village for up to 120 residents, including central amenity building (shop, restaurant, pub, communal hall, treatment/counselling rooms, offices and staff accommodation), club/hobby rooms, vehicle parking, landscaping proposals and associated works.”
- 1.3 The Site falls within the administrative area of West Suffolk Council (“the Council”) and its extent is shown on the Site Plan enclosed as part of this application.
- 1.4 CARE was founded in 2017 with the goal of the bringing the unique Hogeweyk dementia care concept to the UK.
- 1.5 CARE has chosen the Haverhill area as the location for its first care village. The village will be the first complete Hogeweyk style care facility in the country.
- 1.6 Having adopted a sequential approach to site selection, and have considered a number of potential sites, CARE has identified Little Court as the optimal site for its first care village.
- 1.7 This application comprises the following documents
- Site Plan (Ref: 4100_00_00_EX_A-0010)
 - Site Location Plan (Ref:4100_00_00_EX_A-0011)
 - Existing and proposed plans, section and elevations prepared by Jordan and Bateman
 - Design and Access Statement, prepared by Jordan and Bateman
 - Statement of Need, prepared by Rapleys LLP
 - Report on Sequential Approach to Site Selection, prepared by Rapleys LLP
 - Landscape and Visual Impact Assessment, prepared by David Jarvis Associates
 - Arboricultural Report, prepared by LSDP
 - Transport Assessment, prepared by Cannon
 - Travel Plan, prepared by Cannon
 - Flood Risk Assessment and Drainage Strategy, prepared by Cannon
 - Utilities and Wastewater Assessment, prepared by Cannon
 - Energy and Sustainability Statement, prepared by Element Sustainability
 - Preliminary Ecological Appraisal, prepared by Greenwillows Associates Ltd
 - Phase 1 Desk Study and Preliminary Risk Assessment, prepared by Geosphere Environmental Ltd
- 1.8 This Planning Statement explores the key planning considerations relevant to the Site’s development and is structured as follows:
- About ‘CARE’ and the ‘CARE’ concept

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- The Site
 - Pre-application engagement
 - The Proposals
 - Planning Policy
 - Planning Assessment
 - Summary and Conclusions.

1.9 The Statement concludes that the proposed development accords with the development plan when read as whole and that the planning balance weighs in favour of the proposed development and as such, planning permission should be granted without delay, in accordance with the relevant planning law and paragraph 11 of the NPPF.

2 ABOUT 'CARE' AND THE 'CARE' CONCEPT

- 2.1 CARE was founded in 2017 with the goal of the bringing the unique Hogeweyk dementia care concept to the UK. It proposes to secure planning permission for and build specialist dementia care villages which will be run by a sister company.
- 2.2 CARE will secure finance, seek and secure land, obtain planning permissions for and design and construct state of the art care homes for people living with severe dementia.
- 2.3 CARE is owned and run by architect, Philip Jordan, and chartered surveyor, Stuart Harris, and is based at Chantry Mill in Haverhill. Both Philip and Stuart have longstanding connections to the Haverhill area.
- 2.4 CARE has recently secured funding for a development programme which involves the delivery of at least 5 care villages by 2030.
- 2.5 The proposals forming this planning application submission form part of this first tranche of delivery.

THE 'CARE' CONCEPT

- 2.6 The key concept of the CARE model is “living life as normal”. In practice this means:
- Small group living;
 - Meaningful occupation;
 - Social Activities; and
 - Freedom to roam within a safe, secure environment.
- 2.7 The village will be based on the model developed by Hogeweyk in Holland which has received worldwide acclaim. The Directors of CARE have been working with the Directors of Hogeweyk to develop the concept for the UK market.
- 2.8 The village will accommodate 120 people living with severe dementia. Residents will live in groups in 6-bedroom apartments, sharing day to day life with those who have similar backgrounds and values and socialising with others in the village who have common interests.
- 2.9 The primary objective of the model is to provide an environment where residents are safe and are therefore allowed as much personal freedom to live as natural a life as their condition allows. The buildings are arranged around streets and squares which provide safe, secure spaces for the residents to use. Experienced staff are on hand to provide care and guidance as necessary.
- 2.10 The village will provide facilities, clubs and activities for residents including a pub, restaurant, supermarket, village hall and hobby rooms. Residents' care programmes will allow and encourage them to remain active and engaged.
- 2.11 The layout of the village will provide small and intimate squares and streets to help residents feel at ease; large spaces are known to breed nervousness and insecurity in those living with dementia. These external spaces are crucial to allowing freedom to wander for residents in a manner which both feels safe and secure and is safe and secure. The streets and squares will all contain memorabilia and sensory landscaping to provide beneficial mental stimuli and thereby contribute to the wellbeing of residents.
- 2.12 Having the freedom to roam in a village setting allows residents to experience the changing weather and seasons which stimulates their memories and reactions. Further, it encourages exercise and, consequently, improves fitness and sleep.

2.13 The re-creation of normal life and the ability to allow residents to pursue a hobby or interest, or go to the shop, pub, restaurant or café, or to watch a film in the village hall gives them back their lives in a form unimaginable in a conventional care setup.

2.14 At present there are no other homes or villages in the UK offering anything similar to what is proposed at Little Court. Small group living is rare in conventional care homes. Even most new homes are based on hotel style layouts with rooms off corridors and central dining and recreation facilities. This approach has significant shortcomings for general care but particularly so for dementia care. Further issues with this conventional approach have been highlighted by the COVID-19 pandemic.

OPERATION

2.15 The proposed care village will be operated by a subsidiary of CARE which will be employee owned. The company will employ over 150 staff who will benefit from enhanced salaries, employee benefits and a profit share from the performance of the business.

3 THE SITE

LOCATION

- 3.1 The site lies immediately to the south of Haverhill Road in Little Wratting, 1.9km north east of Haverhill town centre (see aerial photograph below).



DESCRIPTION

- 3.2 The site is the residential property known Little Court. It extends to 2.4 hectares and is roughly rectangular in shape.
- 3.3 Little Court comprises a large 2 storey dwelling with a stable and manège to the east, paddocks to the south and tennis court to the west. It is accessed from the A143 to the north.

SURROUNDINGS

- 3.4 To the north of the site is Haverhill Road with open countryside beyond.
- 3.5 To the east is Broadlands Hall School for children with special educational needs beyond which lie three detached dwellings.
- 3.6 To the south is open countryside. The majority of this land, which stretches between the site and Haverhill, is due to be developed to deliver a sustainable urban extension of Haverhill, known as Great Wilsey.
- 3.7 To the west of the site is a single dwelling with a large garden and number of outbuildings. Beyond this lies open countryside. The majority of which is also due to be developed as part of Great Wilsey.
- 3.8 To the north is the Broadland School and three further detached dwellings.

SITE HISTORY

- 3.9 Little Court was built in 1935 as a wedding present for the son and daughter-in-law of the local Gurteen family. The property stands on a south-facing, private plot of 2.4 hectares and

was built of brick and rendered elevations under a thatched roof. The property remains very much as originally designed and constructed.

PLANNING DESIGNATIONS

3.10 The West Suffolk Policies Maps (Haverhill - Inset 3) show the site as:

- lying within 'Countryside'
- lying outside but close to the settlement boundary of Haverhill, as extended by strategic greenfield development site allocation HV4 (see section 6 - Planning Policy and Guidance); and
- having no other planning designations.

PLANNING HISTORY

3.11 A review of the Council's planning application website finds the following relevant planning history pertaining to the Site:

- DC/15/1887/FUL - On the 8th December 2015 planning permission was granted for the provision of detached outbuilding on the site comprising a machinery store, hay store and tack store. These proposals have not been implemented on the site.
- DC/13/0181/FUL - Planning permission was granted for the retention and completion of a block of 14 no. stables and a menage on the site on the 13th March 2014. The stables and menage permitted by this planning permission currently exist on the site.

4 PRE-APPLICATION ENGAGEMENT

- 4.1 At paragraph 39 of the National Planning Policy Framework, it is acknowledged that early engagement has significant potential to improve the efficiency and effectiveness of the planning application process for all parties involved.
- 4.2 CARE has engaged extensively with various stakeholders over the past 18 months (including local dementia groups and charities, local clinical commissioning groups, local doctors' groups, Suffolk County Council, local members and MPs). All responses have been positive and supportive of the chosen location (as well as the proposals more generally).
- 4.3 A meeting was held with West Suffolk Council on the 6th October 2020 with a written response provided by the local authority on the 19th October 2020.
- 4.4 The pre-application response letter is enclosed as Appendix A to this Statement. The key points provided within this response are summarised below:
- The key policies are DM23 'Special Housing needs' due to the nature of the development proposed and DM5 'Development in the Countryside', due to the sites location outside the settlement envelope
 - In the context of the type of development proposed it is noted that Planning Practice Guidance states that "where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need."
 - More detail is required in terms of the medical standards or requirements in relation to what is a very specialised care proposal
 - A number of benefits associated with the development have been highlighted which could weigh in its favour. Any application should seek to clearly set these out in sufficient detail, evidenced appropriately to ensure the local planning authority can carry out a robust assessment and weight them accordingly.
 - In order to meet the requirements of policy DM45 an application would need to be accompanied by a Transport Assessment and Travel Plan setting out the likely transport implications and identifying the physical and managerial measures necessary to address them transport implications.
 - The incorporation of an appropriate sustainable drainage system would be required to meet policy DM6 of the Joint Development Management Policies Document and policy CS2 of the Core Strategy
 - The potential for any impact of the proposals on the designated heritage asset at Great Wilsey farm should be assessed
 - It appears from the submitted information that there is an intention to target energy efficiency and high levels of sustainability and we would encourage the submission of an energy statement with an application to set out the details and explain the design process.
- 4.5 The proposals forming part of this application submission have sought to respond to the points raised in the pre-application advice in full as set out in the remainder of this statement.
- 4.6 A Statement of Community involvement (SCI) has been prepared and forms part of this planning application submission. The SCI details the community engagement work that has been carried out in connection with the development proposals and analyses and reports on the feedback received.

5 THE PROPOSALS

PROPOSED DEVELOPMENT

5.1 This application seeks full planning permission for the following:

- 20 no. six-bedroom apartments to be provided within five separate buildings (providing accommodation for up to 120 residents)
- Central amenity building containing:
 - Shop
 - Café / restaurant
 - Pub
 - Communal hall
 - Offices for dementia outreach
 - Accommodation for circa 16 members of staff
- Creation of a series of Club / hobby / treatment / counselling rooms
- Provision of vehicle parking (65 spaces) and cycle parking
- Comprehensive and integral landscaping scheme (structural and internal)

USE

5.2 The proposals will comprise a Class C2 ‘residential institution’ use with supporting ancillary functions. As the range of proposed facilities and functions that will support and be ancillary to the main Class C2 use, the proposed development as a whole will be C2 use.

LAYOUT, DESIGN AND MASSING

5.3 The care village is proposed to occupy a ‘L’ shaped area of land, extending to 1 hectare, at the eastern end of the applicant’s 2.4 hectare ownership.

5.4 The layout of the proposed care village is heavily influenced by the way it needs to function for its future occupants.

5.5 It is intentionally and necessarily primarily inwards looking. The buildings are arranged around streets, courtyards and squares which will be extensively landscaped with sensory planting and will be open for residents to access freely.

5.6 Streets and squares will be small and intimate because large spaces without boundaries are known to cause nervousness and disorientation in those living with dementia (due to a reduced ability to process their environment). It is common for people living with dementia to walk close to walls and other significant features which can provide reference points and a feeling of safety.

5.7 The external spaces proposed are therefore intended to provide a smaller version of the streets and squares that residents would have been familiar with before the onset of their disease. They will allow residents to navigate more easily around the village and will encourage them to engage in the everyday activities they previously enjoyed.

5.8 The village will include a shop, a pub, a restaurant and a village hall. The provision of these facilities makes an important contribution to allowing residents to live as normal and as full a life as possible.

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- 5.9 The buildings providing the accommodation will form the boundary of the site. Gaps between buildings will be discreetly fenced and planted to provide the safe and secure environment required.
 - 5.10 While the accommodation will be dual aspect, access to living areas will be via the internal courtyards and streets (which will themselves be access through the staffed main entrance) allowing residents to wander at will in a safe and secure environment.
 - 5.11 Buildings will be laid out in irregular groups around the streets and courts.
 - 5.12 The main design principle is to provide a screened built environment that acts as a backdrop and spatial definition for stimulating internal landscaped courtyards. There will be six, main, distinct and bespoke character areas within the site.
 - 5.13 The built form comprises two storey buildings to provide a low-key scale of development. Eaves have been designed to be as low as possible to reduce the perceived scale of the built form.
 - 5.14 The appearance of the buildings and proposed steep pitched roofs have been taken from the local vernacular, as have the proposed material palette. The buildings containing the apartments will have a vertical board-on-board cladding arrangement and rendered sections in off-white colour. The majority of the cladding is proposed to be timber. The proposed communal building and activity pavilions will have dark horizontal tongue-and-groove cladding.
 - 5.15 Further details of the layout, design and massing can be found in the accompanying Design and Access Statement.

ACCESS AND PARKING

- 5.16 A Transport Assessment (TA) has been undertaken to inform the application scheme. The TA examines the site and proposed development's accessibility, sustainability and transport impacts.

Access

- 5.17 The proposed development will be served by a priority T junction at the same location as the existing site access. The existing access will be widened to enable two vehicles to pass. The existing levels of visibility in both directions are considered appropriate in the context of the 60 mph speed limit on Haverhill Road.
- 5.18 The proposed access has been designed to accommodate a refuse vehicle (likely to be the largest service vehicle that would need to access the site). Swept path analysis has been undertaken to demonstrate that access to the designated bin storage area to the northwest of the building can be achieved.

Cars

- 5.19 The nature of the proposed use dictates that the site will be staffed 24 hours a day with the staff spread across several shift patterns. Residents will not own or have access to vehicles. It has been estimated that 55 staff would be on site at any one time with car parking provisions provided to reflect this.
- 5.20 Overall, 65 car parking spaces are proposed which includes 5 disabled bays and 13 electric charging enabled bays. This is sufficient to accommodate staff who drive to work and visitors to the site.

TRANSPORT

Public transport

- 5.21 The site is considered to be well located in relation to Haverhill town centre and the planned growth areas, primarily the Great Wilsey Park development, which are now under construction. Although public transport serving the local area is currently limited, it is anticipated that this will change as development on the growth areas close to the site takes place.
- 5.22 The bus route between Haverhill and Bury St Edmunds passes the site. Given the distance between the existing bus stops on Haverhill Road and the site there may be scope to provide request stops in the vicinity of the site. This would be feasible in terms of site ownership.

Staff transport

- 5.23 The application scheme includes the provision of a minibus for transport to and from work for staff living in the Haverhill and Bury St Edmunds areas.

Walking

- 5.24 There is a comprehensive network of Public Rights of Way (PROW) in the local area, one of which runs along the eastern boundary of the site. It is proposed to provide a pedestrian and cycle link from the proposed development directly to this right of way. Although the right of way is currently a footpath only, it is considered a suitable and desirable route for cyclists. Upgrade of the right of way to a bridleway is proposed.

Cycling

- 5.25 The application scheme includes the provision of a pool of 5 electric bikes for staff use for travelling to and from work. 20 no. covered secure cycle parking spaces will be provided along with locker and shower facilities.
- 5.26 The TA concludes that the residual cumulative impacts of the proposals would not be severe.
- 5.27 Having regard to the foregoing the application scheme is compliant with the relevant development plan, transport, highways and NPPF policy (see section 6 below) and is acceptable in transport and highways terms.
- 5.28 Travel Plan
- 5.29 A Workplace Travel Plan (WTP) has been prepared in accordance with best practice and guidance.
- 5.30 The objective of the Travel Plan is to reduce the reliance on single occupancy car users, to reduce demand for car parking and to maximise the use of other more sustainable forms of travel such as walking, cycling and car sharing, by future staff and visitors.
- 5.31 It is proposed that a number of specific 'hard' and 'soft' Travel Plan measures will be implemented including the following:
- It is proposed to provide 5 electric bikes for staff to use on loan to travel to and from work
 - Walking and cycling maps and leaflets will be distributed amongst staff and could be made available in communal staff areas within each occupied unit
 - The intended provision of a mini-bus to be use to collect staff from Haverhill and Bury St Edmunds

- The appointment of a Travel Plan Co-ordinator to take responsibility for the development and management of the Travel plan and ensure its delivery
- The provision of sheltered and secure cycle storage, locker and shower facilities provided for staff
- Every new employer will be made aware of the Travel Plan with contact made from the Co-ordinator within the first weeks of starting

ENERGY EFFICIENCY AND SUSTAINABLE DESIGN

5.32 An assessment of the proposed developments sustainability and energy efficiency has been undertaken and is the basis of the Sustainability and Energy Statement which forms part of the application. The statement seeks to ensure that all practicable measures have been taken in order to deliver a sustainable form of development at the site which seeks to mitigate any environmental impacts.

5.33 The following strategies are proposed to be adopted:

- High performance thermal insulation
- Thermally efficient windows
- High levels of air tightness
- Mechanical ventilation with heat recovery
- No mechanical cooling
- Low energy and LED lighting
- Split system heat pumps

5.34 The assessment considers the potential for incorporation of renewable energy technologies in the proposed development. The following solutions have been considered appropriate and form part of the application scheme:

- Photovoltaic panels (PV)
- Solar hot water
- Air source heat pumps

5.35 The provision of enhanced building fabric specification, plus efficient mechanical and electrical servicing allied to renewable technologies, will achieve a significant improvement above current Building Regulation Part L2A (2013).

5.36 The Statement demonstrates that the building emission rate reduction will be at least 7.5% better than building regulation requirements. The proposals are therefore considered to provide a significant improvement above current building regulation standard (Part L2A 2013).

5.37 Having regard to the foregoing the application scheme is both compliant with and exceeds the relevant industry standards and development plan and NPPF policy (see section 6 below). It is therefore acceptable in sustainability and energy terms.

EMPLOYMENT

5.38 The proposed village will employ up to 165 staff. 132 (80%) will be medical staff, which includes Practice Nurses, Senior Support Workers and Home Support Workers. In addition to the medical element of the workforce, there will be 33 staff (20%) associated with the maintenance, running and management of the village.

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- 5.39 The staff will work on a shift basis with an estimated 55 staff on site at any one time.
- 5.40 Daytime operation will comprise two shifts, with the morning shift starting between 6:00 and 9:00 and the afternoon shift starting between 13:30 and 16:30. The night shift will commence between 21:30 and 23:30.

LANDSCAPE AND VISUAL IMPACT

- 5.41 A landscape and visual impact assessment has been undertaken to inform the preparation of the application scheme. In line with the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) the assessment work was instructed at the outset of the project to ensure that the relevant landscape and visual considerations were addressed through the design process. The assessment finds:
- There are no statutory or non-statutory landscape designations either within the site or within the identified study area.
 - Notwithstanding the foregoing, the features and elements within the site inherently hold some value to landscape and nature conservation.
 - The value of the local landscape condition is assessed as medium-low.
 - The scenic quality of the area around the site is considered to be medium.
 - The application site contains characteristic landscape elements that are broadly typical of and common to those described in the published landscape character assessments.
 - Overall, the site and the study area, including their contextual landscape character, value and perceptual aspects are deemed to be medium value.
 - Landscaping mitigation and enhancement forms an integral embedded component of the development which has been informed by the landscape assessment.
 - The greatest effects on landscape character and features would be limited to those within the site which would be of moderate significance during the construction phase but only of minor significance thereafter.
 - The local landscape condition and scenic quality would experience an effect of minor significance in both the construction and operational phases, although this effect has been assessed generally as being contained within the site.
 - The effects on visual amenity as a result of the proposals are likely generally to be contained within areas in the immediate vicinity of the site and specifically to areas beyond the south eastern boundary where the significance of effects immediately post-construction would be moderate.
 - The effects on visual amenity would reduce with time as a result of the enhanced management of the boundary hedgerows and the growth of the proposed tree planting within the site.
- 5.42 The assessment concludes that the proposed development is compliant with national and local planning policy relating to landscape and visual matters and would contribute to the landscape enhancement measures contained in the local landscape character assessment guidelines.
- 5.43 Having regard to the foregoing the application scheme is acceptable from a landscape and visual impact perspective.

FLOOD RISK AND DRAINAGE

- 5.44 A Flood Risk Assessment (FRA) and Drainage Strategy has been prepared to inform, and as part of, the design process for the application scheme.
- 5.45 The FRA confirms that:
- the site is located within Flood Zone 1, where there is a low probability of flooding;
 - the site is not at risk of surface water flooding as shown on the surface water flood mapping;
 - the geology of the area dictates that groundwater flooding is not a realistic threat to the site; and
 - the site is not located within a reservoir inundation area.
- 5.46 The Drainage Strategy arrived at is based on the following key elements:
- Attenuation crates beneath the proposed car park in the north draining the car park and part of the northernmost building;
 - The car park to be formed from permeable / porous macadam which will filter water prior to entering the crates (through a stone distribution layer / perforated pipe network);
 - A grassed attenuation basin, approximately 1.2m deep with 1 in 3 side slopes;
 - Internal footpaths and hard landscaping will be formed from permeable / porous resin bound gravel.
- 5.47 The surface water management scheme provides sufficient on-site attenuation to manage the 1 in 100 annual probability storm plus 40% climate change allowance.
- 5.48 Having regard to the foregoing the application scheme is compliant with the relevant industry standards and guidance and the relevant development plan and NPPF policy (see section 6 below). It is therefore acceptable in flood risk and drainage terms.

ECOLOGY

- 5.49 A preliminary ecological appraisal of the site has been undertaken to inform the preparation of the application scheme. It is documented in the Preliminary Ecological Appraisal Report which forms part of the application.
- 5.50 The purpose of the appraisal, which included a site walkover, was to identify the potential impacts the proposed development of the site on notable and/or protected species and habitats. The Appraisal finds:
- In terms of any statutory designations the Haverhill Railway Walks Local Nature Reserve is located approximately 1.7km from the site.
 - With regard to non-statutory designations, there are six Country Wildlife Sites located within 1km and 1.9km of the site.
 - Impacts on these sites are not anticipated as a result of the development proposals.
 - There is negligible bat roost potential within the stable block and barn structures currently on the site.

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- All of the site's tree have negligible bat roost potential, save for one the Horse Chestnut trees which was considered to have low potential.
 - Of the three water bodies located within the zone of influence of the proposed works one was assessed as having 'good' potential for supporting great crested newts (GCN), another as having 'excellent' potential, and the last as 'poor'.
 - The habits onsite could support nesting birds during the breeding season, including the existing buildings.

5.51 In view of the above findings the Report makes a number of recommendations. These are:

- Several recommendations in relation to bats, including Phase 2 surveys and the provision of bat roost boxes and the implementation of bat friendly planting.
- Phase 2 great crested newt surveys of the identified waterbodies in order to confirm the presence / absence of great crested newts.
- Vegetation clearance and any building demolition should avoid the bird breeding season (late February to August). If this is not practicable, then an experienced ecologist should undertake a breeding bird survey to ascertain the amount of birds using the site and where they are so they can be avoided.

5.52 The Report concludes that:

- Following mitigation and / or enhancement measures, the residual impact in relation to nesting birds would be minor beneficial;
- Subject to the outcome of further survey work, following mitigation / enhancement the residual impact on bats is assessed as being beneficial;
- With regard to badgers, hedgehogs, harvest mouse, and hazel dormouse following mitigation / enhancement, no significant effect is anticipated.

5.53 Conclusions, and possibly further recommendations, in respect of GCN will follow the outcome of the recommended Phase 2 survey work. The survey work has been scheduled to be undertaken in line with seasonal requirements.

5.54 Having regard to the foregoing the application scheme is compliant with the relevant industry standards and guidance and the relevant development plan and NPPF policy (see section 6 below) to the extent that it can be in advance of the Phase 2 surveys recommended. The result of the further survey work are expected to demonstrate full compliance with the relevant standards, guidance and policy. The application scheme is therefore likely to be acceptable in respect of ecology related matters.

ARBORICULTURE

5.55 An Arboricultural Report has been undertaken to inform the preparation of the application scheme.

5.56 The Report includes a Tree Survey which indicates the following:

- The vegetation on the site mostly relates to its 20th century domestic usage, rather than historical agricultural features.
- None of the trees on the site are of any special individual merit, but collectively, those on the periphery provide screening and enclosure of the site and contribute to the countryside surroundings.
- There are no Tree Preservation Orders (TPO) covering the site.

- 7 no. trees will need to be removed to allow the proposed development to occur.
- The removal of trees at the northern boundary will have no significant impact on the contribution of the group.
- 2 of the trees to be removed are 'C' category trees with no special merit.
- The works to facilitate the excavation of a trench for the installation of a surface water drain will avoid significant trees within the group and the necessary clearance will not have a significant impact on the contribution of the group
- New tree and hedgerow planting is proposed at the northern and southern site boundaries where scrub and bramble will be removed to allow additional planting to take place.

5.57 In view of the fact that:

- the application scheme minimises loss of trees and hedgerow;
- the application scheme does not affect any trees covered by TPOs;
- the trees to be removed to allow the development to take place are of lower value; and
- the application scheme involves new tree and hedgerow planting;

it is compliant with the relevant development plan and NPPF policy (see section 6 below) and is acceptable in respect of arboriculture related matters.

GROUND INVESTIGATION

5.58 A Phase 1 Desk Study and Preliminary Risk Assessment has been undertaken to support the planning application. It provides an assessment of the environmental sensitivity of the site and the surrounding area in relation to any suspected or known contamination which may affect the site and the development proposals.

5.59 The Assessment finds two potential contaminant sources and pathways to potential receptors. These are:

1. Made Ground associated with the previous development, and
2. The proximity of tank and storage containers both on and off-site.

5.60 The Assessment recommends that a preliminary intrusive ground investigation is undertaken to determine the extent of any potential contamination within the soil strata, and subject to the outcome of this, the groundwater.

5.61 As identified in the Assessment the contamination risks can be investigated and, if contamination is present, it can be remediated. The investigation, and remediation if appropriate, can be secured by planning condition making the application scheme compliant with industry standards and guidance and the relevant planning policy. It is therefore acceptable from a contaminated land perspective.

HERTAGE

5.62 Paragraph 3.37 to 3.9 of LVIA deals with Cultural Heritage and identifies the Scheduled Monument (SM) comprising a rectangular field earth work and moat located at Great Wilsey farm to the south of the application site.

5.63 The LVIA finds:

- Whilst the SM is considered to be of “very high” sensitivity, the relationship of its setting and the wider landscape is compromised by trees and scrub to its north eastern and north western edge and by buildings associated with the farm complex beyond which prevents intervisibility between the site and the SM
- The SM is circa 0.7km to the south of the site thereby further reducing the effect of the development proposals on its setting
- In the context of the scale of the far larger approved Great Wilsey residential development, this would render any significant effects of the proposed development on the altered setting of the SM to a negligible level

5.64 The LVIA identifies other cultural heritage assets as being located within the settlements of Great Wrattling, Little Wrattling and Kedington. There is no intervisibility between these cultural heritage assets and the site by virtue of their distance, landform and tree cover. They have therefore been omitted from further assessment.

5.65 The LVIA concludes that the proposed development would have a negligible effect of significance on the setting of the SM within the context of the far larger consent development at Great Wilsey Park.

5.66 The application scheme is therefore acceptable in heritage terms.

ARCHAEOLOGY

5.67 Initial advice has been sought from Suffolk County Council Archaeological Service as to the site’s archaeological interest or potential. The Archaeological Service has confirmed that the site is close to the location of a medieval roadside settlement.

5.68 The Service has advised that an archaeological investigation will be required prior to any development taking place but that this could be conditioned.

5.69 The application scheme is therefore acceptable in respect of archaeology related matters.

LOCATION

5.70 CARE is a new company formed for the specific purpose of bringing the Hogeweyk model of Dementia care to the UK and establishing it as part of the UK’s dementia care offer. The proposed development will be CARE’s first scheme.

5.71 CARE centred its search for a site for its first scheme on Haverhill. Its reasons for choosing Haverhill are set out in section 3 of the Statement of Need.

5.72 Once it had chosen Haverhill as its area of search CARE adopted a sequential approach to site selection. The process it followed is fully documented in the Sequential Assessment. The Assessment concludes:

- As part of the sequential approach to selecting a site 12 possible sites were identified;
- Of these 12 sites only two were found to be suitable;
- Of the two suitable sites only one was available - Little Court, Little Wrattling;
- In the absence of any other available and suitable sites from the list of sites assessed, Little Court satisfies the sequential test as no sequentially preferable sites were identified; and
- The adoption of the sequential approach to site selection has enabled CARE to establish the optimal site for their proposed development taking into account all of the relevant considerations.

5.73 A number of criteria were used to assess the potential sites identified. One of the qualitative criteria employed was the need for calm surroundings. This is a key criterion given the specialist nature of the proposed care village. Because movement and noise can be unsettling to people living with dementia, particularly those with severe dementia, it is important to have a low or manageable risk of external movement and noise impacts.

NEED

5.74 CARE was established for the specific purpose of addressing the UK's lack of dementia care whose focus is on facilitating normal life and maximising quality of life. It has been obvious to CARE's founders for some time that there is a longstanding need for this kind of care in the UK.

5.75 To confirm its understanding CARE has commissioned a detailed assessment of the need for the proposed care village. This is set out in the Statement of Need.

5.76 The statement concludes that:

- The predicted rapid increase in the over 65s population is likely to continue to drive demand for all types of care over the next 10 years and beyond;
- The number of people within a 20 minute drive of Little Court who are expected to require care will rise by 1,615 to 5,060 by 2028;
- Within 10 miles of Little Court the number of people requiring care is expected to rise by 374 to 967;
- Estimates of national need for additional dementia specific care beds by 2025/6 vary between 56,000 and 70,000;
- There will be over 8,000 people living with dementia within 20 minutes of the site by 2028 and 1,760 within 10 miles of the site by the same date;
- On the assumption that just 5% of those with dementia require specialist accommodation and care of the type being proposed by CARE, more than 650 care villages (at 120 beds each) would be required across the UK over the next 20 years;
- In West Suffolk 13 such villages would be required over the same period;
- There is currently an undersupply of 229 care beds within 10 miles of Little Court and this will increase to a shortfall of 603 beds over the next 8 years, or nearly 1,500 beds within 20 minutes of Little Court, if no new provision is made;
- Dementia specific care needs within both 10 miles and 20 minutes' drive of Little Court are completely unmet and will remain so unless new provision is made;
- Multiple factors point to a level of need both nationally and locally of which only a small part would be met by the proposed care village; and
- There is significant latent demand that would support the provision, across the UK, of many facilities like that proposed at Little Court.

5.77 It is therefore the case that there is a clear existing need for the proposed development, both nationally and locally, that will only increase for the foreseeable future

6 PLANNING POLICY

- 6.1 This section identifies the main elements of national and local planning policy which are relevant to the proposed development.
- 6.2 Section 70(2) of the Town and Country Planning Act 1990 requires Local Planning Authorities to have regard to the provisions of the Development Plan (so far as material to the application) and to any other material considerations in the determination of planning applications.
- 6.3 Moreover, Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that “*if regard is to be had to the Development Plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise*”.

LOCAL PLANNING POLICY

- 6.4 The relevant parts of the development plan comprise:
- Core Strategy (December 2010);
 - Joint Development Management Policies Document (February 2015);
 - Rural Vision 2031 (September 2014);
 - Haverhill Vision 2031 (September 2014); and
 - Proposals Maps (February 2015).
- 6.5 The main policies from the development plan which are relevant to the principle of the proposed development are set out below.

Core strategy

- 6.6 **Policy CS1 - St Edmundsbury Spatial Strategy** - Opportunities to use previously developed land and buildings for new development will be maximised through a sequential approach to the identification of development locations in settlements. The towns of Bury St Edmunds and Haverhill will be the main focus for the location of new development.
- 6.7 **Policy CS3 Design and Local Distinctiveness** - Proposals for new development must create and contribute to a high quality, safe and sustainable environment. Proposals will be expected to address, as appropriate, the following components:
- detailed heritage and conservation design appraisals and information;
 - consideration of protection of the landscape and historic views;
 - an understanding of the local context and an indication of how the proposal will enhance the area and improve community safety;
 - protection of the natural and historic environment;
 - in proposals for housing, the density and mix of housing;
 - provision or enhancement of open space, play, leisure and cultural facilities;
 - access and transport considerations.
- 6.8 **Policy CS7 Sustainable Transport** - The Council will develop and promote a high quality and sustainable transport system across the borough and reduce the need for travel through spatial planning and design. All proposals for development will be required to provide for

travel by a range of means of transport other than the private car in accordance with the following hierarchy:

- Walking
- Cycling
- Public Transport (including taxis)
- Commercial vehicles
- Cars

6.9 Policy CS9 Employment and the Local Economy - Provision will be made for development that will aim to deliver at least 13,000 additional jobs in the borough by 2026. Employment land east of Suffolk Business Park, Bury St Edmunds (68.28 hectares) and Hanchett End at Haverhill (12 hectares) (Proposals Map, Key Diagram and Appendix 5) is allocated to enable the delivery of additional jobs in sustainable locations in the towns of Bury St Edmunds and Haverhill. Employment growth will also be achieved by the allocation of land for employment uses in mixed use developments in Bury St Edmunds, Haverhill, and the Key and Local Service Centres, and through policies supporting growth in the rural economy, retail, leisure and tourism. Existing General Employment Areas in or near Key Service Centres or Local Service Centres will continue to be protected and promoted for employment uses. In the south of the borough, growth will be concentrated in Haverhill so that it can continue to meet the local employment needs in the Greater Cambridge area, particularly those of research and development and bio-technology industries.

Policies in Development Plan Documents will set criteria for the continued encouragement of sustainable employment development and tourism development opportunities (including conversion of suitable buildings) in villages and rural areas.

6.10 Policy CS12 Haverhill Strategic Growth - An Area Action Plan DPD will be prepared for Haverhill that will provide a co-ordinated spatial planning framework for the whole town including the release of larger, strategic, greenfield, sites.

In addition, it will be necessary to release a larger, strategic greenfield site at Haverhill to deliver the development strategy of the Local Development Framework. Subject to other relevant policies, in particular CS2, the site will be released in a phased manner, having regard to the spatial strategy in Policy CS1, and the need to ensure that all essential infrastructure is in place before any development is occupied and that agreements are in place to deliver the desirable infrastructure required as a result of the development. Land on the north-eastern edge of Haverhill will:

- Maintain the identity and segregation of Kedington and Little Wratting;
- Provide new high quality strategic public open space and recreation facilities;
- Protect by appropriate means the Scheduled Ancient Monument at Wilsey Farm;
- Provide improved public transport, foot and cycle links to the town centre and other locally significant leisure, employment and service destinations;
- Deliver additional education, community and leisure facilities to meet the needs of this development and is located in a way that can achieve positive integration with the wider area;
- Deliver around 2,500 homes of mixed tenure and size, including affordable homes; and

- Provide opportunities for B1 use class local employment.

6.11 Policy CS13 Rural Areas - Development outside the settlements defined in Policy CS4 will be strictly controlled, with a priority on protecting and enhancing the character, appearance, historic qualities and biodiversity of the countryside while promoting sustainable diversification of the rural economy. Policies in the Development Management DPD and Rural Site Allocations DPD will set out detailed uses which are appropriate in rural areas.

Joint Development Management Policies Document (JDMPD)

6.12 Policy DM5 Development in the Countryside - Areas designated as countryside will be protected from unsustainable development. A new or extended building will be permitted, in accordance with other policies within this Plan, where it is for:

- purposes directly related to agriculture or forestry;
- affordable housing for local needs in accordance with other policy;
- development relating to equine related activities and the horse racing industry;
- essential small scale facilities for outdoor sport or recreation or other uses of land which preserve the openness, appearance and character of the countryside, leisure activities, and new tourism facilities;
- a dwelling for a key worker essential to the operation of agriculture, forestry or a commercial equine-related business in accordance with the requirements of Policy DM26;
- small scale residential development of a small undeveloped plot, in accordance with policy DM27; or
- the replacement of an existing dwelling on a one for one basis where it can be demonstrated that:
 - the proposed replacement dwelling respects the scale and floor area of the existing dwelling, and,
 - the curtilage of the development is only greater than the curtilage of the existing dwelling where it can be justified with reference to Policy DM25.

Proposals for economic growth and expansion of all types of business and enterprise that recognises the intrinsic character and beauty of the countryside will be permitted where:

- it will not result in the irreversible loss of best and most versatile agricultural land (grades 1, 2 and 3a);
- there will be no significant detrimental impact on the historic environment, character and visual amenity of the landscape or nature conservation and biodiversity interests; and
- there will be no significant adverse impact on the local highway network.

6.13 Policy DM13 Landscape features - Development will be permitted where it will not have an unacceptable adverse impact on the character of the landscape, landscape features, wildlife, or amenity value.

Areas of particular landscape sensitivity, including Special Landscape Areas (as defined on the Policies maps) have been identified. These areas, and other valued landscapes such as The Brecks and the Stour Valley (subject of a management and delivery plan through the Dedham Vale AONB and Stour Valley Project) have, by reason of their landform, historic

landscape importance and/or condition, a very limited capacity to absorb change without a significant material effect on their character and/or condition. However, individual proposals within or adjacent to these areas will be assessed based on their specific landscape and visual impact.

All proposals for development should be informed by, and be sympathetic to, the character of the landscape. Landscape Character Types are identified in the Suffolk Landscape Character Assessment.

However, the 'Type' boundaries are only indicative, being mapped for the whole county at a scale of 1:50,000. Therefore, the character of the site and setting of a proposal should be individually assessed.

All development proposals should demonstrate that their location, scale, design and materials will protect, and where possible enhance the character of the landscape, including the setting of settlements, the significance of gaps between them and the nocturnal character of the landscape.

Developers/applicants will be required to submit, where appropriate, landscaping schemes with applications for planning permission and for the approval of reserved matters.

Where any harm will not significantly and demonstrably outweigh the benefit of the proposal, development will be permitted subject to other planning considerations.

However, it is essential that commensurate provision must be made for landscape mitigation and compensation measures, so that harm to the locally distinctive character is minimised and there is no net loss of characteristic features.

Where this is not possible development will not be permitted.

6.14 **Section 5** of the JDMPD is entitled Housing and Homes. Under a subheading, Special Housing Needs, it states:

5.7 The relatively high and growing elderly population in the areas make it likely that the need for specialist accommodation, such as nursing homes and communal housing for elderly people, will continue and increase as a specific housing need that will need to be met during the plan period. It may be that space and/or other medical standards or requirements will mean that some very specialised care homes cannot find suitable sites or buildings within the Towns, Key Services Centres or Local Service Centres/Primary Villages. In these cases developers will need to provide evidence of why other sequentially preferable buildings and sites are, or have been found to be, unsuitable and must also demonstrate the need for the facility in the particular locality.

5.8 The changing emphasis towards community rather than hospital care has also increased the need for individual accommodation for people who require support and/or supervision to live in, or be rehabilitated into, the community. It is important that flats for elderly people, sheltered housing, group/shared community care accommodation and nursing homes have access to adequate amenity space, and are provided in sustainable locations accessible on foot or by public transport so that residents can access services and facilities, and in accessible locations for employees/care workers.

6.15 This supporting text precedes Policy DM23 - Special Housing Needs. The policy itself states as follows:

Proposals for new or extensions to existing accommodation for elderly and/or vulnerable people will be permitted on sites deemed appropriate for residential development by other policies contained within this and other adopted Local Plans, provided that such schemes meet the following criteria:

-
- a) *the proposed development is designed to meet the specific needs of residents including requirements for disabled persons where appropriate; and*
 - b) *includes appropriate amenity space for residents of an acceptable quantity and quality; and*
 - c) *the location of the development is well served by public transport, community and retail facilities; and*
 - d) *the proposed development does not create an over concentration of similar accommodation in any one street or area. Proposals for extensions to existing specialist accommodation outside areas otherwise suitable for residential development will be permitted providing a need can be clearly demonstrated and the proposals meet criteria a., b., c. and d. above.*

Rural Vision 2031

6.16 Paragraph 5.1:

5.1 Vision 2031 starts by looking at 10 different themes, illustrated in the diagram below, which are closely interlinked. The key challenges for each theme are identified below, but many of these apply to several of the themes.

An ageing population: Nearly a quarter of the rural population is aged over 65. People may need their homes to be improved, adapted and kept warm as they get older. They are increasingly likely to need health care services and in some instances specialist residential care. Many do not have cars and are reliant upon public transport or friends and family.

Haverhill Vision 2031

6.17 Paragraph 2.29:

2.29 The population of Haverhill is ageing, though this is less of an issue at present than elsewhere as the town has a generally younger population. More services and facilities to keep older people fit and healthy will be needed, as well as wider access to services as people require assistance or greater levels of medical care. The thermal comfort of homes will need to be improved and homes may need to be adapted.

6.18 Paragraph 3.4:

Key challenges for Haverhill

3.4 Vision 2031 starts by looking at ten different themes, but actually the themes turn out to be very closely interlinked and their aspirations taken together add up to a vision for the town. The key challenges for each theme are identified, but many of these apply to several of the themes. These are the key challenges:

*a. **Provision of housing:** There is a significant demand for new housing in Haverhill to meet the needs of existing residents and a growing population. A variety of different house types and tenures will be required to meet needs and address affordability issues.*

...

*d. **An ageing population:** Population projections suggest that by 2031 over a quarter of local residents will be aged 65 or over. Older people may need their homes to be improved, adapted and kept warm. They are likely to need health care services. Many of them would like jobs and they would also like leisure services tailored for them. This is less of a problem for Haverhill than for many other places, as Haverhill still has a relatively young population, but it is nonetheless an issue.*

6.19 Policy HV4: Strategic site - North-east Haverhill

138ha of land at north-east Haverhill as identified on the Policies map is allocated for development in accordance with the provisions of Policy CS12 of the Core Strategy. A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).

Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.

If planning application(s) to develop all or part of the site come forward in advance of the provision of the North-West Relief Road, permission will not be granted unless it is demonstrated that the transport impacts can be satisfactorily mitigated without the Relief Road.

6.20 Paragraph 12.1:

Aspiration 19

AN AGEING POPULATION IS ADEQUATELY PROVIDED FOR.

12.13 Increased calls on healthcare generally, and from the ageing population in particular, mean that innovative and cost-effective methods of delivering care to people in their own homes need to be explored. This links to the issues we have raised in the Homes and Communities section. Older people who feel isolated may also need opportunities to socialise; for example, day centres and lunch clubs, and an increasing numbers of carers will need support. Those reliant on public transport need help to access services.

12.14 The actions to this aspiration are:

- a) Encourage self-help and volunteering to help provide services for older people.*
- b) Support affordable community transport initiatives.*
- c) Work with developers and local partners, and use development management policies, to implement the 'lifetime neighbourhoods' concept in Haverhill.*

6.21 An important point of note, and of direct relevance to the determination of the application, is that the development plan makes no provision for new care development despite a district, regional and national need position which is already very serious but is also rapidly worsening.

NATIONAL PLANNING POLICY - THE NATIONAL PLANNING POLICY FRAMEWROK (NPPF)

6.22 The national tier of planning policy is provided by the National Planning Policy Framework (NPPF) (2019), which is supplemented by Planning Practice Guidance (PPG). The NPPF is a material consideration in this instance and therefore, where it is relevant to this planning application, must be taken into account.

6.23 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking this means approving development proposals that accord with the Development Plan without delay, and where the Development Plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against policies in the framework taken as a whole, or specific policies in the NPPF indicate development should be restricted.

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- 6.24 **Paragraph 61** states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).
- 6.25 **Paragraph 78** stipulates that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.
- 6.26 **Paragraph 83** notes that Planning policies and decisions should enable, inter alia:
- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
 - ...
 - d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- 6.27 **Paragraph 84** requires that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.
- 6.28 The principle of the proposed development is considered against these policies in the assessment section below.

PLANNING POLICY GUIDANCE

Housing for older and disabled people - 26 June 2019

- 6.29 **Paragraph: 019 Reference ID: 63-019-20190626**

How can for the needs of people with dementia be addressed?

Evidence has shown that good quality housing and sensitively planned environments can have a substantial impact on the quality of life of someone living with dementia. People with dementia need to have access to care and support to enable them to live independently and homes need to be designed with their needs in mind.

Local planning authorities should consider design principles when developing new housing in the context of the wider built environment, especially housing aimed at people with dementia. Characteristics of a dementia-friendly community include, but are not limited to:

- easy to navigate physical environment
- appropriate transport
- communities shaped around the views of people with dementia and their carers
- good orientation and familiarity

- reduction in unnecessary clutter
- reduction in disorienting visual and auditory stimuli

There should be a range of housing options and tenures available to people with dementia, including mainstream and specialist housing. Innovative and diverse housing models should be considered where appropriate.

6.30 Paragraph: 001 Reference ID: 63-001-20190626

Why is it important to plan for the housing needs of older people?

The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.

6.31 Paragraph: 005 Reference ID: 63-005-20190626

What evidence can plan-makers consider when identifying the housing needs of people with disabilities?

Multiple sources of information may need to be considered in relation to disabled people who require adaptations in the home, either now or in the future. The Census provides information on the number of people with a long-term limiting illness and plan-makers can access information from the Department for Work and Pensions on the numbers of Personal Independence Payment (replacing Disability Living Allowance) / Attendance Allowance benefit claimants. Whilst these data sources can provide an indication of the number of disabled people, not all of the people included within these counts will require adaptations in the home. Applications for Disabled Facilities Grant (DFG) will provide an indication of levels of expressed need, although this will underestimate total need, as there may be a large number of people who would want or need an adaptation, but would not have applied to the DFG.

Engagement at all levels can help plan-makers identify the housing needs of people with disabilities. This could include with occupational therapists and specialist access or inclusive design officers. Discussions with disabled people and disabled people's groups can also provide insights into the types of impairments and number of people likely to require accessible homes in the future.

6.32 Paragraph: 006 Reference ID: 63-006-20190626

How can the housing requirements of particular groups of people be addressed in plans?

Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.

6.33 Paragraph: 012 Reference ID: 63-012-20190626

Do plans need to make specific provision for specialist housing for older people?

Plans need to provide for specialist housing for older people where a need exists. Innovative and diverse housing models will need to be considered where appropriate.

Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.

Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.

6.34 Paragraph: 013 Reference ID: 63-013-20190626

Do plans need to allocate sites for specialist housing for older people?

It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing. The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation). Factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres.

6.35 Paragraph: 016 Reference ID: 63-016-20190626

What factors should decision makers consider when assessing planning applications for specialist housing for older people?

Decision makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people. Local planning authorities can encourage the development of more affordable models and make use of products like shared ownership. Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.

7 PLANNING ASSESSMENT

7.1 This section provides an assessment of the key planning considerations relevant to the determination of the application and is informed by the preceding review of local and national planning policy.

THE PRINCIPLE OF DEVELOPMENT

7.2 The proposals comprise the creation of a specialist dementia care village on a countryside site (i.e. not within a designated settlement boundary).

7.3 In line with the established tenets of the planning system it is therefore incumbent upon the applicant to demonstrate first that there is need for the proposed development (to justify any harm it may cause, provided this of an acceptable level) and, second, that there are no more suitable sites on which to locate it (which might include sites where the proposed development would cause less harm).

7.4 While these principles are not enshrined in the letter of the West Suffolk Local Plan's policies they are reflected in the supporting text for Policy DM23 - Special Housing Needs (JDMPD paragraph 5.7; the policy itself only deals with extensions to existing specialist accommodation) which sets out the approach it expects developers of specialist care schemes like that proposed to take. It states:

"It may be that space and/or other medical standards or requirements will mean that some very specialised care homes cannot find suitable sites or buildings within the Towns, Key Services Centres or Local Service Centres/Primary Villages. In these cases developers will need to provide evidence of why other sequentially preferable buildings and sites are, or have been found to be, unsuitable and must also demonstrate the need for the facility in the particular locality."

7.5 The proposed development is based on both a detailed needs study and a sequential approach to site selection. These demonstrate a clear need for the proposed development and that no sites which are more suitable for accommodating it exist within the area of search. Accordingly, subject to any harm the development would cause being of an acceptable level, the principle of the proposed development in general planning terms is acceptable.

7.6 Further, it should be noted that the Planning Practice Guidance advises that *"Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need"*. The Statement of Need which forms part of the application identifies a significant unmet need for dementia care and specialist dementia care in both the local area and the wider West Suffolk area. The local planning authority should therefore take a positive 'in principle' stance in respect of the application scheme.

LIMITED POLICY PROVISION FOR ELDERLY AND DEMENTIA SPECIFIC CARE

7.7 Aside from Policy DM23 there is nothing in the local plan to deal with the significant and rising need for both elderly and dementia specific care. It can be seen from the Statement of Need how acute this need is.

7.8 Various parts of the 'Housing for older and disabled people' section of the Planning Practice Guidance are relevant here (see section 6 above). Key extracts are:

"an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking."

"Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people."

“They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.”

“Plans need to provide for specialist housing for older people where a need exists. Innovative and diverse housing models will need to be considered where appropriate.”

“Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing.”

- 7.9 The presence of a single policy (Policy DM23) which, in effect, says that proposals for accommodation for elderly people will be permitted in areas deemed appropriate for residential development does not address the spirit or thrust of the Planning Practice Guidance and its various allusions to consideration of such needs at a strategic scale. The plan does not quantify the need for older peoples housing or specialist accommodation, it does not make specific provision for innovative and diverse housing models (like that proposed), and it does not allocated any sites.
- 7.10 Further, the existence of only one, generic policy which meets the identified need for elderly and dementia specific care means that proposals aimed at doing so must necessarily go through the same process which CARE is going through unless they involve sites which are deemed appropriate for residential development by other policies in the development plan. Because certain types of specialist care, including that proposed, are not necessarily well suited to many residential areas (see paragraphs 7.13 - 7.15 below) this means that Policy DM23 is unlikely to provide for them. This makes schemes like that proposed, and providers like CARE, who are prepared to go through the process of demonstrating acceptability even more important (when, in view of how acute the need is, there is a clear case that not only should provision be made for this type of development in strategic plans but, for the foreseeable future, should be a strategic priority for them).
- 7.11 The absence of any development plan policies which act at a strategic level and reflect the important aspects of the Planning Practice Guidance set out above, and the absence of any development plan policies which deal with new specialist care proposals which cannot normally be located in residential areas (and the effect that these factors may have) is a significant factor weighing in favour of carefully researched and assessed, and properly informed and designed proposals such as the application scheme.

LOCATION

- 7.12 The sequential approach to site selection was used to identify the application site and to establish it as the optimal site for the proposed development. The methodology adopted accords with the stipulations of the supporting text to Policy DM23 which deals with new specialist housing developments.
- 7.13 The sequential approach adopted is documented in full in the Report on sequential approach to site selection. The criteria employed to assess the various potential sites identified are set out at paragraph 5.12 of the Report. Three of these (‘Good noise environment’, ‘Minimal activity around the site’, and ‘Immediate surroundings’) steered the selection of the site to an ‘out of centre’, and in this case ‘countryside’, location. The commentary provided with each criterion at paragraph 5.12 explains its relevance and justifies its use in the assessment. The three criteria referred to reflect the operational and environmental parameters which are an intrinsic part of the specialist care model proposed.
- 7.14 The model on which the application scheme is based receives support from the Planning Practice (PPG) in this regard. The relevant parts of the ‘Housing for older and disabled people’ section of the PPG state:

“Evidence has shown that good quality housing and sensitively planned environments can have a substantial impact on the quality of life of someone living with dementia.”

“Characteristics of a dementia-friendly community include, but are not limited to:

...

- reduction in disorienting visual and auditory stimuli”*

“Innovative and diverse housing models should be considered where appropriate.”

- 7.15 In view of the fact that the correct criteria have been applied (and are justified in the Report on sequential approach to site selection and by the PPG) and a policy compliant methodology has been correctly applied, the decision maker can be confident that the application site is the optimal site for the proposed development taking into account the relevant planning policy and material considerations. The location of the proposed development is therefore acceptable in principle.

LAYOUT, DESIGN AND MASSING

- 7.16 The scheme design has been landscape led. Early consideration of the application site was informed by a landscape and visual baseline assessment and associated design guidance. This identified maximum height parameters, positive design references to draw on, suitable materials and architectural principles and styles and retention of as much of the site’s existing trees and hedgerows as possible.
- 7.17 The scheme design both heeds the early advice and achieves another important design requirement; meeting the operational and environmental requirements of the care model on which the application scheme is based. It also identifies, again through early assessment, a number of opportunities to ensure a sustainable development and incorporate them into the proposals. The result is a high quality, functional design which respects and responds positively to its surroundings and is sustainable.
- 7.18 The application scheme therefore complies with policy CS13 of the development plan and section 12 of the NPPF. Further, in accordance with paragraphs 127 and 130 of the NPPF, the scheme design is not just a reason for the decision maker not to object to the proposals, it is a factor weighing in favour of them.

LANDSCAPE AND VISUAL IMPACT

- 7.19 As explained above the proposals have been informed by consideration of the relevant landscape and visual matters from the outset and have responded to them. Where the scheme has not been able to respond positively to these considerations due to design constraints, landscape mitigation and enhancement has been adopted and forms an integral embedded component of the proposals.
- 7.20 As a result of this approach almost all of the landscape and visual effects of the proposed development will be very localised. Equally importantly, the significance of these effects will be no more than moderate during and immediately following the construction phase and no more than minor in the operational phase. In addition, the visual effects would reduce with time as a result of the mitigation and enhancement works.
- 7.21 The application scheme therefore complies with policies DM5 and DM13 of the development plan and section 15 of the NPPF.

HIGHWAYS AND TRANSPORT

- 7.22 The application scheme has been the subject of detailed assessment in respect of highways and transport matters and has fully addressed the pre-application advice received in this regard. It also reflects the independent design advice received.
- 7.23 The scheme provides safe means of access for all potential users of the scheme which comply with the relevant design standards. Further, the scheme incorporates or proposes numerous sustainable transport measures such connection to the local public rights of way network, electric pool bikes, a staff minibus and a travel plan.
- 7.24 The relevant documents which form part of the development confirm these matters and demonstrate that the effects of the proposed development in transport terms would not be severe. Despite the site's countryside location therefore, the application scheme is acceptable in highways and transport terms and includes a number of beneficial initiatives which demonstrate that the scheme goes beyond what is simply necessary in transport terms and seeks a development which is as sustainable as possible.

ENERGY EFFICIENCY AND SUSTAINABLE DESIGN

- 7.25 The design of the application scheme has considered sustainability and energy efficiency from the outset. The Sustainability and Energy Statement documents the findings of the iterative energy efficiency and sustainability assessment process and the specific measures ultimately adopted. It also details a number of other aspects of the development which contribute intrinsically to its sustainability.
- 7.26 The result of the assessment process and the design responses is that the scheme achieves standards in excess of planning policy and building regulations requirements and responds appropriately to the Council's climate emergency declaration.
- 7.27 The proposed development is therefore sustainable development and benefits from the presumption in favour of such development afforded by the NPPF.

BENEFITS OF THE PROPOSED DEVELOPMENT

- 7.28 The benefits of the application scheme are numerous and significant. They are as follows:
- Provision of high-quality specialist dementia care to meet an acute and rising need;
 - Creation of the UK's first care facility based on the life-enhancing Hogeweyk model of care for people living with Dementia (which has the potential to make Haverhill a centre for excellence and research in the development of dementia care);
 - The provision of outreach, day care and other local dementia community engagement programmes to help, educate and improve the lives of local people living with dementia and their carers;
 - Engagement with local care commissioners and providers to share knowledge and best practice, and to the provision of a new option which they can add to the network of services and providers that they rely upon to help them respond to general and acute specialist care needs (which will improve the flexibility and resilience of the network and the specificity it can offer);
 - Creation of 165 jobs based on an employee-owned company model (the majority of which will be medical, skilled and managerial roles); and
 - Provision of new facilities which will be open to the public (restaurant, communal hall etc);

- A economic boost for the local construction industry and its supply chain;
- An economic boost for businesses and services who will supply the business during its operational phase;
- Biodiversity net gain delivered through ecological enhancement measures;
- Energy efficiency and sustainability credentials which exceed planning policy and regulatory requirements, thereby helping to reduce the environmental cost of meeting the need for specialist dementia care.

SUSTAINABILITY

7.29 The proposed development will meet the economic objective of sustainable development very effectively in view of its significant employment offering. In so doing, it will cause minimal environmental harm, as has been demonstrated by extensive assessment work. Further, it will offer the potential for environmental enhancement through new landscape planting and management measures and ecologically aware management practices.

7.30 It is sustainability's social objective to which the scheme is of greatest significance however. It has the potential to offer a completely new way of viewing and responding to Dementia as a condition. It means that dementia need not be a life sentence and enables life for those who have it to go on despite it. Continuing a normal life also means less segregation and more social integration. Accordingly, for reasons which are less than typical in the consideration of what comprises sustainable development, the proposed development, is a sustainable and important development.

PLANNING BALANCE AND OVERALL CONCLUSION

7.31 Planning law requires that development proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Despite the development plan containing supporting text which is directly relevant to the proposed development, it does not cater for new care facilities like that proposed which cannot necessarily be located in areas considered suitable for residential development, and lacks a strategic approach to addressing the acute need for elderly and dementia care which is a current phenomenon, both nationally and locally.

7.32 In view of the development plan's limited applicability to the proposed development (albeit the proposed development is fully compliant with the plan to the extent that it does apply), determination of the proposed development's acceptability falls mainly to what the material considerations indicate. In this case they show that:

- a compelling need for the development exists;
- that the site selected is the most suitable of those available;
- that the assessment and design approach mean that the harm caused by the development is minimal and is within acceptable limits (as has been demonstrated through extensive assessment work); and
- that the development will yield significant benefits.

The proposals also clearly represent sustainable development, not least because of their significant social benefits.

7.33 It is therefore the case that in addition to the application scheme's compliance with the development plan, where it applies, the benefits of the scheme significantly outweigh the limited harm it would cause. As a result, the planning balance weighs firmly in favour of granting planning permission for the proposed development.

8 SUMMARY AND CONCLUSIONS

- 8.1 This Planning Statement is one of a number of documents forming part of a full planning application for the provision of a specialist dementia care village at Little Court, Haverhill Road, Little Wratting.
- 8.2 The proposals are based on a unique model for specialist dementia care pioneered at Hogeweyk in Holland. They have the potential to transform the lives of those with severe dementia, allowing them to live life as normal despite their condition.
- 8.3 The application scheme is the result of an iterative design process informed by extensive environmental and technical assessment work and pre-application engagement with the local planning authority and highway authority.
- 8.4 The iterative design process has delivered a high quality application scheme. The assessments and summaries set out in the statement demonstrate that:
1. The application scheme accords fully with all of the policies of the development plan which are relevant to it, and therefore that planning permission should be granted pursuant to section 38 (6) of the Planning and Compulsory Purchase Act 2004;
- and notwithstanding the foregoing:
2. Any harm the application scheme may cause would be limited;
 3. The application scheme will deliver numerous significant benefits;
 4. The benefits of the scheme significantly outweigh the limited harm it would cause meaning that the considerations material to the determination of the application indicate that planning permission should be granted
- and therefore that, in any event:
5. Planning permission should be granted in accordance with section 38 (6) of the Planning and Compulsory Purchase Act 2004 and paragraph 11 of the National Planning Policy Framework.
- 8.5 In view of the foregoing the local planning authority is respectfully requested to grant planning permission for the proposed development.

Appendix 1: Pre-application response letter - 19th October 2020

Richard Sykes-Popham
50/60
Station Road
Cambridge
CB1 2JH

Case Officer: Penny Mills
Direct Line: 01284 757367
Email: penny.mills@westsuffolk.gov.uk

Reference: PREAPP/20/383

Today's date: 19 October 2020

Dear Sir/Madam

Pre application response

Proposal: specialist dementia care village

Location: Little Court, Haverhill Road, Little Wratting

Thank you for your pre-application enquiry received on 30.09.2020. This letter follows the discussions of our meeting held on Tuesday 6 October.

The following comments are made on the basis of the information provided and the issues raised may not be exhaustive. Should you submit a planning application, other issues may arise which could affect the outcome of any application.

All planning applications are assessed against the policies within the Statutory Development Plan for the district.

On 1 April 2019 Forest Heath District Council merged with St Edmundsbury Borough Council to become a single Authority, West Suffolk Council. The development plans for the merged local planning authorities were carried forward to the new Council by Regulation. The Development Plans remain in place for the new West Suffolk Council and, with the exception of the Joint Development Management Policies document (which had been adopted by both Councils), set out policies for defined geographical areas within the new authority. It is therefore necessary to consider this proposal with reference to policies set out in the plans produced by the now dissolved St Edmundsbury Borough Council.

The Development Plan relevant to the former St Edmundsbury area of West Suffolk currently comprises: the Core Strategy 2010; the Vision 2031; the former St Edmundsbury area policies map; and, the Joint Development Management Policies Document (Feb 2015). Copies of the plans and their policies can be found on the Council's website using the following link:

http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/stedmundsburylocalplan.cfm

The policies which are most relevant to your proposal are:

Planning and Regulatory Services, West Suffolk Council, West Suffolk House, Western Way, Bury St Edmunds, Suffolk, IP33 3YU

Joint Development Management Policies Document:

- Policy DM1 – Presumption in Favour of Sustainable Development
- Policy DM2 – Development Principles and Local Distinctiveness
- Policy DM5 - Development in the Countryside
- Policy DM6 – Flooding and Sustainable Drainage
- Policy DM7 – Sustainable Design and Construction
- Policy DM10 – Impact of Development on Sites of Biodiversity and Geodiversity Importance.
- Policy DM11 – Protected Species
- Policy DM12 – Mitigation, Enhancement, Management and Monitoring of Biodiversity.
- Policy DM13 – Landscape Features
- Policy DM14 – Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards.
- Policy DM20 – Archaeology
- Policy DM22 – Residential Design
- Policy DM23 – Special Housing Needs
- Policy DM41 – Community facilities and Services
- PolicyDM44 – Rights of Way
- Policy DM45 – Transport Assessments and Travel Plans
- Policy DM46 – Parking Standards

St Edmundsbury Core Strategy 2010

- Policy CS1 – Spatial Strategy
- Policy CS2 – Sustainable Development
- Policy CS3 – Design and Local Distinctiveness
- Policy CS4 – Settlement Hierarchy and Identity
- Policy CS7 – Sustainable Transport
- Policy CS13 – Rural Areas

Principle of Development and conformity with policy

When we met, we discussed the key Development Plan policies in terms of the principle of the development.

Aside from the policies within the Core Strategy which define areas considered as countryside and strictly controls development in those locations (policies CS4 and CS13 respectively), the key policies are DM23 'Special Housing needs', due to the nature of the development proposed and DM5 'Development in the countryside', due to the location outside the settlement envelope.

We discussed the supporting text to policy DM23, which recognises that there may be situations where very specialised care homes cannot find suitable sites or

buildings within appropriate settlements. However, the policy itself only supports proposals for new accommodation on sites deemed appropriate for housing by other policies contained within the development plan.

Paragraph 4.18 of the submitted Sequential Report advises that policy DM23 provides the policy tool to deal with care proposals outside designated centres stating that: "proposals for extensions to existing specialist accommodation outside areas otherwise suitable for residential development will be permitted providing a need can be clearly demonstrated and the proposals meet criteria a., b., c., and d above".

I believe this to be a misinterpretation of the policy. The policy is clear in its wording that new accommodation will be permitted on sites deemed appropriate for residential development. The final paragraph of the policy quoted above is only relevant to extensions to existing specialist accommodation, which is not the case here.

The planning statement refers to a policy vacuum in terms of meeting elderly and dementia specific care. I have already advised that I do not believe this to be the case, as all types of specialist housing needs are covered by policy DM23. As such, I do not agree with the statement that "the absence of policies to meet the established need for elderly and dementia care and the effect that this may have is a significant factor weighing in favour of the proposals", as stated in paragraph 7.9 of the Planning Statement. However, meeting an identified need could be a factor that weighs in favour of the proposal.

Turning to policy DM5, this policy sets out the types of development which, in accordance with other policies in the plan, could be acceptable in the countryside. Specialist housing provision is not referred to within this policy.

When we met, I suggested the possibility that the development may garner some support by the final paragraph of policy DM5, which supports proposals for economic growth and expansion of all types of business and enterprise. I have subsequently discussed this with my colleagues at some length and the consensus is that this part of the policy would not support the type of development proposed here, which is primarily a residential one.

In light of the above, should an application for the development be made to the local planning authority it is likely that it would be treated as a departure and would be advertised as such. It would mean that any such application would ultimately be determined by the Planning Committee in line with the Council's scheme of delegation.

The statutory status of the development plan as the starting point for decision making dictates that where an application departs from the plan, it should only be approved where there are material considerations that clearly indicate otherwise.

The planning balance is a matter of judgement and there are no clearly defined thresholds over which the material considerations weighing in favour of a proposal would tip the balance to indicate that a departure from the plan is appropriate. However, in the context of the type of development proposed it is noted that Planning Practice Guidance states that “where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.”

In determining an application for this development, the local planning authority would assess the detail of the proposal, taking into account all relevant planning policies, identifying those areas that either accord or conflict with the plan. Any harm arising from the development would be identified along with relevant material considerations weighing in its favour. It is only once all these factors have been weighed in the final planning balance that a decision could be made as to the acceptability or otherwise of the development.

The sequential approach.

The supporting text of policy DM23 gives a clear indication that the evidence as to why other sequentially preferable buildings and sites are unsuitable will be an important consideration in this case.

Following our discussions, I have looked through the sequential report in more detail and have some additional comments, which are set out below.

The sequential report references a number of policies which, although they involve a sequential approach to development, are not relevant to these proposals. Policy CS10 relates to retail, leisure, cultural and office provision and as such the sequential approach it sets out, with a focus on retaining the vitality and viability of town centres, is not relevant to this development. Similarly, policy DM35 is not relevant to this proposal, nor are the paragraphs of the NPPF from section 7 relating to the vitality of town centres.

I am not sure how helpful it is to include these within your report to then confirm later (paragraph 4.16) that they do not apply in this case.

Having discussed the nature of the development with you at length, it seems that the key issue here is the specific locational requirements for this development. That being the need for a quiet, rural location free from other noise, including domestic noises, rather than town centre or suburban, location.

This is briefly picked up in the qualitative criteria set out under paragraph 5.12, but it would be helpful to have more information in relation to this aspect and why the proposed site meets this very specific criteria and others don't. In addition, it would be beneficial to have supporting medical evidence or expert statements in relation to the need for a particular environment for those suffering with dementia.

As it stands, I think more detail is required in terms of the medical standards or requirements referred to in the supporting text to policy DM23, in relation to this very specialised care proposal.

The benefits of the development

A number of benefits associated with the development have been highlighted which could weigh in its favour. Any application should seek to clearly set these out in sufficient detail, evidenced appropriately to ensure the local planning authority can carry out a robust assessment and weight them accordingly.

You have highlighted that this is a unique development and the first of its kind in the United Kingdom. The statement of need submitted with the pre-application request highlights that there has been extensive engagement with key stakeholders including local clinical commissioning groups.

The statement notes that all responses have been positive and supportive, but the detail of these responses is not included. It would be extremely helpful to have sight of any specific letters of support from these bodies as part of your submission. It would be particularly helpful to have the thoughts of these expert bodies in relation to the model proposed and the need in the area.

The statement of need includes evidence in relation to demographics and the general care provision within West Suffolk. I have spoken with Planning Policy and they are providing an additional response in respect of the need and the work that is taking place in support of the new local plan. I will forward these to you once they have been received which is expected to be next week.

You indicated that the development would employ over 150 staff. The contribution this development would make to local employment would be an important consideration and it would be helpful to have more information in relation to what this would look like in terms of the types of jobs being created.

Highways

I previously sought the advice of my colleagues at the highway authority regarding this site.

The precise access arrangements are not entirely clear in the package of information provided and I would advise that you seek some specific advice from Highways in terms of the access requirements here.

The general advice I received is attached separately, but the points raised include specific requirements for access width and visibility as well as the need for pedestrian and cycle access to the site and an appropriate parking layout.

They have advised that the amount of parking should be evidenced in relation to the use and the Suffolk Guidance for Parking 2019 rather than evidence referring to similar sites in other areas.

Facilitating sustainable modes of transport to the site will be key not just in terms of the acceptability of the site to the local highway authority but also in terms of the local planning authority's assessment against development plan policies. Policies DM2 and DM46 both seek to reduce the over-reliance on the car and promote more sustainable forms of transport. This is an increasingly important area, highlighted by the publication of Local Transport Note 1/20 and the Government's 'Gear Change' document, which set out what is described as a bold vision for cycling and walking.

The submitted information indicates that improved pedestrian and cycle access to the site would be provided as well as a new uncontrolled crossing. Improving the sustainable transport links to the site would be an essential part of any proposal. The precise detail of how this could be achieved would need to be the subject of further detailed discussion with the local highway authority. I would also advise speaking with the public rights of way team regarding the potential for improving connectivity to the existing public right of way network here. In this regard I would suggest contacting Andrew.woodin@suffolk.gov.uk or Claire.dickson@suffolk.gov.uk in the first instance.

In order to meet the requirements of policy DM45 an application would need to be accompanied by a Transport Assessment and Travel Plan setting out the likely transport implications and identifying the physical and managerial measures necessary to address them transport implications.

At this stage and without further engagement with the highway authority it is not possible to confirm whether any financial contributions in relation to off-site highways improvements would be required.

I would be happy to facilitate a further pre-app meeting with the local highway authority to discuss highways issues in more detail. However, we would need a proposed block plan layout for the development clearly showing the access, parking and circulation within the site in order for us to have a meaningful discussion.

Trees and ecology

The site contains a number of existing trees and any application will need to be accompanied by a full tree survey and arboricultural impact assessment and method statement. The tree survey should also specifically include a check for any trees that could have a veteran status.

Trees and woodland are noted as comprising the strongest visual component to external views in the submitted landscape note provided. As such any proposed loss of trees on the site could have a significant adverse affect on the character of the area. Conversely, any additional planting to improve woodland structure could strengthen the appearance of woodland blocks in the locality.

I note and welcome the intention for any application to be informed and supported by an ecology survey and any species specific surveys that may be required. Given the nature of the site and the surrounding area it is likely that the site is used by bats. The existing stable buildings would be demolished and that the development would have an impact on the existing trees. I would therefore suggest that it is likely that bat surveys would be required.

Given the time of year, the nature of surveys required may have an impact on the timing of a planning application.

In addition to seeking to protect species and biodiversity, development plan policies also seek to enhance biodiversity, commensurate with the scale of the proposals.

I should highlight that the requirement for biodiversity net gain for planning applications will be included in the Environment Bill. This Bill was being considered by a Public Bill Committee but due to current circumstances the sittings of the Committee have been suspended until further notice. The Committee is now scheduled to report by Tuesday 1 December 2020.

Flood risk/drainage

The incorporation of an appropriate sustainable drainage system would be required to meet policy DM6 of the Joint Development Management Policies Document and policy CS2 of the Core Strategy. This work can have a significant impact on the design, layout and landscaping of a proposal and as such I would suggest that this is investigated at an early stage in the design process.

Suffolk County Council has produced a local SuDs guide which may be helpful to you. Whilst much of this is focused on larger scale residential schemes, the principles would still be relevant to your proposal. The Suds guide and other related documents can be found on the following link: <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/>

A Sustainable Drainage Systems (SuDs) Proforma would be required as part of the application for this development. A copy can be downloaded from the Suffolk County Council Website using the above link.

SuD measures must be shown on all relevant plans submitted, in order to demonstrate how SuDs integrate with any planned open spaces, landscaping, roads, trees and buildings. Plans should identify multifunctional SuDs for example, those which enhance biodiversity or improve water quality. Details should be

submitted that include any soakage test results and calculations, drainage, design layout and calculations (including summary on Suffolk County Council SW Drainage Proforma), proposals for protection of SuDs and watercourses during construction, details of adoption and maintenance.

Design, Landscape and visual impact

Policy DM2 of the Joint Development Management Policies Document requires all development to recognise and address key features, characteristics, landscape/townscape character, local distinctiveness and special qualities of an area to maintain or create a sense of place and local character. In addition, policy DM13 seeks to prevent development that would have an unacceptable adverse impact on the character of the landscape, landscape features, wildlife or amenity value.

This site occupies a prominent position outside the boundary of the town and development here could have significant impact on the wider landscape and visual amenity.

I am pleased to see that this issue has been noted and a landscape and visual impact assessment would be carried out and would help to inform the design.

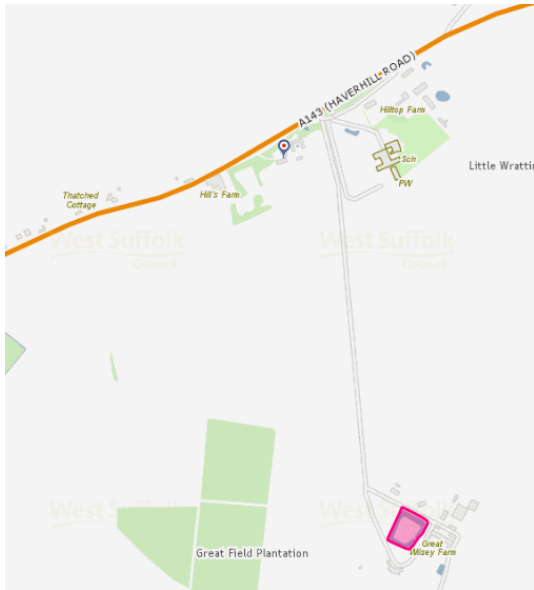
The landscape technical note has identified key views as a result of a desk-based assessment. I would suggest that the final section of views is refined through the field survey. As part of this I would suggest that the intervisibility from the Scheduled monument site is checked.

There are no detailed drawings at this stage, however the indicative drawings and the information provided suggests that the development would be a maximum of 2 storeys, incorporating elements of rural distinctiveness. A simple palette of materials would be preferable as would some variety in the built form and roof hight to create some visual interest.

The landscape note suggests a minimum of 5 metres from retained trees. However, the visuals provided appear to show buildings that are quite close to the boundaries. It will be important to retain sufficient space around the buildings, both to ensure the protection of existing landscape features and to allow for new planting.

Listed Buildings/conservation/archaeology

As identified in the submitted documents, there are no designated heritage assets on the site.



The closed designated heritage asset is the Moated Site at Great Wilsey farm. This is to the southeast of the proposed site, highlighted in pink on the map.

It is probable that the distance between these sites, the topography and intervening future development at NE Haverhill would prevent the development of this site having any affect on this site or its setting. However, the potential for any impact should be assessed and you may wish to seek advice from Historic England in this regard.

<http://list.historicengland.org.uk/resultsingle.aspx?uid=1020175>

I note and welcome the fact that you have sought the advice of the County Archaeological Service.

Sustainability

You will be aware that West Suffolk, like many other Councils, has declared a climate emergency. The National Planning Policy Framework also has an Environmental objective at its heart, including mitigating and adapting to climate change, in line with the provisions and objectives of the Climate Change Act 2008.

Policy DM7 of the Joint Development Management Policies Document requires all new development to adhere to the broad principles of sustainable design and construction and optimise energy efficiency. Policy CS2 also aims to secure sustainable design and construction seeking to reduce carbon neutral development where feasible and viable, ensure water efficiency and minimise the use of resources.

It appears from the submitted information that there is an intention to target energy efficiency and high levels of sustainability and we would encourage the submission of an energy statement with an application to set out the details and explain the design process.

We would suggest designing to address the Performance Gap of buildings. A lot of developers have used organisations like the National Energy Foundation - <http://www.nef.org.uk/about-us/press-releases/nef-launches-expert-guide-to-help-close-the-performance-gap>

They have a process that works with the developer, design team and construction process to help the building design out the issues that will stop the building achieving the energy efficiency level that the current Part L compliance process seems to create.

This approach has been shown to help reduce costs of construction and also reduce the operational costs and emissions from the building once occupied.

Separate to its specific role as the local planning authority, the Council can provide support for energy initiative in a number of ways. In this regard I have sought the advice of the Council's Energy Advisor. He has suggested several initiatives, which are provided below on a without prejudice basis, as part of the separate support and services provided by the Council outside the planning process.

- The Council could support the cost of implementation of renewable energy technologies via a power and heat purchase agreement. This is a long-term arrangement where the Council will pay the capital cost and then recharge for power or heat to recover our costs – more information here:

https://www.westsuffolk.gov.uk/Business/Start_and_Grow_Your_Business/upload/WSC-Solar-for-business-leaflet.pdf

<https://www.westsuffolk.gov.uk/protecting-our-environment/businessenergy.cfm?aud=resident>

- Depending on your timescales, the renewable heat incentive the Government subsidy that ends in March 2022 may be of interest to you. If so, you would need to secure a Tariff Guarantee from Ofgem - https://www.ofgem.gov.uk/system/files/docs/2020/07/guide_to_tariff_guarantees_july_2020.pdf

If you wanted to discuss any of these measures in more detail or the provision of an energy statement more generally then please contact the Council's Energy Advisor Oliver Ingwall-King directly at Oliver.Ingwall-King@westsuffolk.gov.uk

S106

It is difficult at this stage to confirm the likely heads of terms that may be required as part of a S106 agreement. It is possible that there could be contributions in relations to highways or public rights of way. This would need to be discussed in more detail with the County Council.

It is also possible that the development would attract contributions relating to health. The local NHS Clinical Commissioning Group should be able to provide further advice in this regard.

Based on our discussions and the information provided so far it would appear that the use would clearly fall within use class C2 and therefore would not attract the requirement for affordable housing.

Standing Anglian Water advice

Used Water Network

If it is the intention to dispose of foul sewage to a mains sewer, and/or surface water, we strongly advise them to undertake a pre planning assessment with Anglian Water. This assessment will detail network capacity, identify connection points and any potential asset encroachment. This assessment should then be submitted with any future planning application.

Information can be found on our website:

<https://www.anglianwater.co.uk/developers/>

Surface Water Drainage

Anglian Water would expect surface water from the proposed development site to be disposed of using sustainable drainage systems. Connection to main sewers would only be considered acceptable when evidence is provided, as part of the planning application, to show that the surface water hierarchy has been followed. This evidence should include trial pit logs from infiltration tests and investigations in respect of discharging to a watercourse.

If the applicant would like Anglian Water to consider adopting any on-site SuDS the Expression of Interest form, available on our website, should be completed as soon as possible.

<http://www.anglianwater.co.uk/developers/suds.aspx>

As with any proposal, the only way to fully test the merits of the proposed development would be through the submission of a formal planning application.

Please see the attached list of relevant documents required, this is to be used as guidance only. It may be when an application is submitted it comes to light further information is required, that has not been highlighted on this list.

The above comments are made at Officer level only and do not prejudice any future decision, which may be taken by this Planning Authority. I hope this information is useful to you, and if you require any further advice please do not hesitate to contact me. The information contained in this letter is based on the information provided and the current policy context. Any future changes in National and Local Policies will not be reflected in this response.

Yours faithfully

Penny Mills
Principal Planning Officer

SUBMISSION CHECKLIST

You will need to provide the following information in order for your application to be validated (Please use the corresponding validation checklist when submitting your application)

- Completed application form, signed and dated
- Completed Ownership Certificate (A, B, C or D as applicable) as required by Article 12 of the Town and Country Planning (Development Management Procedure) (England) Order 2010

N.B. In addition, where Ownership Certificates B, C or D have been completed, notices as required by Article 11 of the Town and Country Planning (Development Management Procedure) (England) Order 2010 must be given and/or published in accordance with this Article

- A location plan which identifies the land to which the application relates drawn to an identified scale and showing the direction of North. The site should be edged in red and any other adjoining land owned or controlled by the applicant edged in blue. Location plans should be to a scale of either 1:1250 or 1:2500 (*If based on OS data, the Plan needs to contain the relevant OS licence information as required by copyright law*)
- A copy of other plans and drawings or information necessary to describe the subject of the application, this may include:
 - Block plan of the site showing any site boundaries to a scale of 1:100 or 1:200
 - Existing and proposed elevations to a scale of either 1:50 or 1:100
 - Existing and proposed floor plans to a scale of either 1:50 or 1:100
 - Existing or proposed site sections and finished floor and site levels to a scale of either 1:50 or 1:100
 - Roof plans to a scale of either 1:50 or 1:100
- The appropriate fee

In addition, you may be required to provide the following:

<p>Draft Heads of Terms (S106) Officer Notes May be appropriate – to be informed by further discussions</p>	<p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p>
<p>Design statement/development brief Officer Notes Whether as part of the Design and Access statement or as a stand alone document a discussion of the design rationale and design process would be helpful.</p>	<p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p>
<p>Design & Access Statement Officer Notes</p> <hr/>	<p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p>
<p>Heritage statement / Heritage Impact Assessment Officer Notes Will be dependant on response from archaeology and assessment of any impact on the SAM</p>	<p>YES <input type="checkbox"/> NO <input type="checkbox"/></p>
<p>Transport Statement / Assessment Officer Notes</p> <hr/>	<p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p>
<p>Daylight / Sunlight assessment Officer Notes</p> <hr/>	<p>YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></p>
<p>Landscaping details Officer Notes</p> <hr/>	<p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p>
<p>Flood risk assessment Officer Notes</p> <hr/>	<p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p>
<p>Retail / Leisure impact assessment Officer Notes</p> <hr/>	<p>YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></p>

Open space assessment	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>
Officer Notes No formal requirement for public open space but an explanation of the design process and intended use for any open spaces on site would be helpful.				
Landscape & Visual impact assessment	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Officer Notes				
<hr/>				
Tree survey / Arboricultural impact assessment	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Officer Notes Advise this includes a check for veteran trees				
Biodiversity survey and report	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Officer Notes				
<hr/>				
Noise impact assessment / Acoustic report	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>
Officer Notes I think this is unlikely given the nature of the location/usebut I will check with our Public Health and Housing Officer and get back to you				
Air quality assessment	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>
Officer Notes I think this is unlikely but I will check with our Environment Officer and get back to you.				
Sustainable Drainage Strategy	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Officer Notes				
<hr/>				
Horse racing industry impact assessment	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>
Officer Notes				
<hr/>				
Ventilation, Extraction details and Refuse disposal details	YES	<input checked="" type="checkbox"/>	NO	<input type="checkbox"/>
Officer Notes				
Structural survey	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>

Officer Notes

Lighting scheme / Light pollution assessment

YES X NO

Officer Notes

Impact on bats likely to be important

Affordable housing statement

YES NO X

Officer Notes

Environmental Impact Assessment

YES NO X

Officer Notes

There has not been a request for a formal screening opinion so I cannot formally confirm. Although the scale of the proposal makes this unlikely. In the absence of a screening opinion request the application would be screened in accordance with the Regulations

Existing and proposed car parking and access arrangements

YES X NO

Officer Notes

Land contamination assessment

YES X NO

Officer Notes

Statement of community involvement

YES X NO

Officer Notes

Information on any engagement that has taken place and responses received would be useful.

Planning Statement

YES X NO

Officer Notes

Energy Statement

YES X NO

Officer Notes

Viability Assessment

YES NO X

Officer Notes

Marketing Assessment
Officer Notes

YES NO

Joinery, window and door details
Officer Notes

YES NO

Travel plan
Officer Notes

YES NO

If you require guidance on the context of the above reports/information, please view the Guidance on our website (http://www.westsuffolk.gov.uk/planning/planning_applications/chooseplanningapp.cfm)