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Report on Sequential Approach to Site Selection For
CARE (Little Court) Ltd

PROPOSED SPECIALIST DEMENTIA CARE
VILLAGE
CENTRE OF SEARCH: HAVERHILL, SUFFOLK

February 2021

The care. logo features the word "care." in a lowercase, sans-serif font. Below it, in a smaller, all-caps, sans-serif font, is the text "CENTRAL AND REGIONAL ESTATES LTD". The logo is contained within a white rectangular box.

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1 **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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2 INTRODUCTION

- 2.1 This report details the sequential approach to site selection adopted in respect of proposals for a specialist dementia care village in the Haverhill area of West Suffolk by CARE (Little Court) Ltd ('CARE').
- 2.2 The sequential approach having been adopted, the site selected for the proposed development is Little Court on Haverhill Road at Little Wratting, approximately 2 km north east of Haverhill town centre.
- 2.3 A full planning application has been submitted to West Suffolk Council ("The Council") for the following:
- "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."*
- 2.4 This report forms part of the planning application submission and should be read in conjunction with the suite of documents that support the submission.
- 2.5 The proposals comprise a care village which would accommodate 120 people living with severe dementia. Residents would live in groups in 6-bedroom apartments based on a model developed by Hogeweyk in Holland which has received worldwide acclaim.
- 2.6 Care related uses are not 'main town centre uses' per the National Planning Policy Framework (NPPF). Nonetheless, a sequential approach to site selection has been adopted to ensure that the site chosen for the proposed development is the most suitable taking into account all relevant considerations.
- 2.7 This report is split into 6 sections. The next section details the development proposals being advanced by CARE. Section 3 details the national and local planning policy and guidance relating to the sequential approach to site selection. Section 4 details the site identification, assessment and selection process adopted in relation to CARE's proposals. Section 5 sets out the assessment's analysis and findings and the report's conclusions are presented in Section 6.

3 DEVELOPMENT PROPOSALS

- 3.1 The development proposals are based on a model for the care of severe and end of life dementia sufferers which was developed by Hogeweyk in Holland and 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.
- 3.2 The model takes the form of a ‘village’ which accommodates 120 people living with severe dementia. Residents 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.
- 3.3 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.
- 3.4 The care village comprises the following:
- 20 x 6-bedroom apartments (providing 120 resident places in 5 separate buildings)
 - Central amenity building of circa 1,500m² containing:
 - Shop
 - café/restaurant
 - pub
 - communal hall
 - offices for dementia outreach
 - accommodation for circa 16 staff
 - Club/hobby/treatment/counselling rooms (circa 200m² total)
 - Vehicle parking (circa 65 spaces)
 - A comprehensive and integral landscaping scheme (structural and internal)

4 PLANNING POLICY

4.1 This section identifies the main elements of national and local planning policy and guidance which are relevant to the sequential approach to site selection in the context of the proposed development. It is not intended to be an exhaustive study for the reasons of brevity and proportionality.

4.2 This methodology adopted for the site selection process was designed to address the requirements of relevant policies and to follow the relevant guidance wherever possible.

DEVELOPMENT PLAN

4.3 The relevant parts of the development plan comprise:

- Core Strategy (December 2010);
- Rural Vision 2031 (September 2014);
- Haverhill Vision 2031 (September 2014);
- Joint Development Management Policies Document (February 2015); and
- Proposals Maps (February 2015).

4.4 The main policies and pieces of supporting text from the development plan which are relevant to the application of the sequential approach to site selection in this case are set out below.

JOINT DEVELOPMENT MANAGEMENT POLICIES DOCUMENT (JDMPD)

4.5 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.”

4.6 This supporting text precedes **Policy DM23 - Special Housing Needs**, which 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*

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- 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.”*

MATERIAL CONSIDERATIONS - PLANNING PRACTICE GUIDANCE

- 4.7 The Planning Practice Guidance (PPG) has been prepared with the usual application of the sequential test in mind. However, the PPG is concerned with the practical application of the test and is therefore, in most part, relevant to the sequential site selection principle as it may apply to any type of development.
- 4.8 The sequential test and its application are covered in the Government’s Planning Practice Guidance (PPG) within the ‘Assessing proposals for out of town centre development’ sub section of the ‘Town centres and retail’ section under the heading ‘Sequential test’. The following paragraphs are relevant.

“What is the sequential test?

The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations (with preference for accessible sites which are well connected to the town centre). It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.

Paragraph: 009 Reference ID: 2b-009-20190722

Revision date: 22 07 2019”

“How should the sequential test be used in decision-making?

It is for the applicant to demonstrate compliance with the sequential test (and failure to undertake a sequential assessment could in itself constitute a reason for refusing permission). Wherever possible, the local planning authority is expected to support the applicant in undertaking the sequential test, including sharing any relevant information. The application of the test will need to be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites will need to be discussed between the developer and local planning authority at the earliest opportunity.

The checklist below sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- *with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning clearly.*

- *is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.*
- *if there are no suitable sequentially preferable locations, the sequential test is passed.*

In line with paragraph 86 of the National Planning Policy Framework, only if suitable sites in town centre or edge of centre locations are not available (or expected to become available within a reasonable period) should out of centre sites be considered. When considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account.

Compliance with the sequential and impact tests does not guarantee that permission will be granted - all material considerations will need to be considered in reaching a decision.

Paragraph: 011 Reference ID: 2b-011-20190722

Revision date: 22 07 2019”

“How should locational requirements be considered in the sequential test?”

Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.

Paragraph: 012 Reference ID: 2b-012-20190722

Revision date: 22 07 2019”

MATERIAL CONSIDERATIONS - CASE LAW

Tesco Stores Ltd v Dundee City Council [2012] UKSC 13

- 4.9 The question of suitability was considered by the Supreme Court in *Tesco Stores Ltd v Dundee City Council*. The ruling held that if a site is not suitable for the commercial requirements of the developer in question, then it is not a suitable site for the purposes of the sequential test. In addition, provided the applicant has demonstrated flexibility with regard to the scale of the project, they should not have to alter or reduce the size of the proposed development so that it can be made to fit an alternative site.

Commentary

- 4.10 The application of the above policy, guidance and case law to the sequential assessment undertaken in relation to the subject proposals is considered below.
- 4.11 The supporting text for Policy DM23, i.e. JDMPD paras. 5.7 and 5.8, is directly relevant to the proposed development because it envisages exactly the scenario that CARE finds itself in. It explains the need for a sequential approach to site selection for proposals like those being advanced by CARE because, critically, it acknowledges that *“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”*.

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- 4.12 Policy DM23 provides a policy tool to deal with proposals involving the extension of care facilities outside of designated centres. It explains 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”*. Criteria a., b., c. and d. relate to the proposals being designed to meet the needs of residents, provision of appropriate amenity space, access to public transport and local facilities, and avoiding over concentration of similar accommodation in the locality.
- 4.13 Unfortunately, despite the supporting text for Policy DM23 noting the possibility of suitable sites for very specialised care homes (like that proposed) not existing within the Towns, Key Services Centres or Local Service Centres/Primary Villages, the policy does not address this issue in the case of new care facilities, only extensions. While the reason for this is not known it is a significant omission. It is assumed it is not a deliberate omission given the supporting text which precedes it.
- 4.14 The Policy’s failure to address circumstances where the need exists for new specialist care facilities outside Towns, Key Services Centres or Local Service Centres/Primary Villages means that proposals intended to address such a need fall to be considered in the light of any other development plan policies that are relevant and/or any material considerations. The supporting text to Policy DM23, while not policy itself, suggests that a sequential approach to site selection should still be adopted in such cases.
- 4.15 The Planning Practice Guidance, while drafted with sequential assessments for main town centre uses in mind, provides some useful direction. One example is: *“Where appropriate, the potential suitability of alternative sites will need to be discussed between the developer and local planning authority at the earliest opportunity”*. This reflects part of CARE’s reasoning for preparing a report on its sequential approach to site selection for submission as part of its pre-application enquiry.
- 4.16 Some of the general guidance in the paragraph ‘How should the sequential test be used in decision-making?’ remains relevant and useful in this case despite the fact that the proposed use is not a main town centre use. The main points of relevance are that:
- Where a proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre;
 - Flexibility should be shown in relation to the format and/or scale of the proposal; and (the underlying tenet of the sequential approach to site selection)
 - Only if suitable sites in town centre or edge of centre locations are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 4.17 The paragraph ‘How should locational requirements be considered in the sequential test’ provides a further useful point, which is that *“Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations”*. This need not apply only to main town centre uses and is relevant to care uses also (as is reflected in paragraph 5.7 of the JDMPD).
- 4.18 In relation to the case law cited above (Tesco v Dundee) the key point of note is that applicants and decision makers must show flexibility in the application of the sequential test. Development models must allow a degree of flexibility such that they at least have a prospect of being capable of being located on anything other than the perfect site. At the same time decision makers must accept that significant alterations to a proposal to meet particular site requirements may render the proposal unviable.

5 SITE IDENTIFICATION, ASSESSMENT & SELECTION - PROCESS

5.1 Planning policy requirements dictate that any proposals for main town centres uses need to pass the sequential test, i.e. demonstrate that there are no other sites which are available and suitable for the proposed development which lie closer to a relevant centre. In this case the proposed use is not a main town centre use (as defined by the NPPF) but the sequential approach to site selection has been adopted anyway to ensure compliance with both the Council's spatial strategy (which seeks to concentrate most types of development in the district's main towns and to a lesser extent the key service centres and other centres) and Policy DM23. Sites within and around Haverhill have therefore been assessed for their availability and suitability to accommodate development of the type and size proposed.

METHODOLOGY

5.2 The sequential approach adopted to selecting site was based on the following methodology:

1. Establish search area
2. Trawl for sites / identify potential sites within search area, including by reference to the following:
 - a) Development plan (allocated sites)
 - b) Strategic Housing and Economic Land Availability Assessment (SHELAA) (sites that have been promoted as being available for development/redevelopment)
 - c) Online planning application viewer (suitable planning consents being sought or which have been secured but which have not been built out)
 - d) Property sales websites/databases (properties/land for sale within the search area)
 - e) Satellite imagery (vacant/derelict land/premises)
 - f) Site visit/inspection/drive-by (vacant/derelict land/premises)
3. Screen potential sites against exclusionary criteria
4. Assess remaining sites for their suitability against qualitative criteria and exclude unsuitable sites
5. Adopt most sequentially preferable site from sites remaining or repeat steps 2 - 5 if no sites remaining

5.3 Parts of this methodology are covered in more detail below.

SEARCH AREA

5.4 The search area is centred on Haverhill. This is because:

- CARE is based in Haverhill. Whilst acknowledging that other locations will subsequently be identified for delivery of the CARE model, the company believes that the first village should be located close to where it is based so as to ensure that the construction and operation of its first facility can be closely managed and monitored. This is essential for achieving 'proof of concept' in the UK.
- Organisations such as The Haverhill Dementia Action Alliance, who are a small group of people raising awareness of dementia locally and working towards a dementia friendly town are very active and are widely supported, not least by the local authority, local

community and the local MP, Matthew Hancock. There is a good level of awareness of dementia locally and a desire to respond to the demand that the disease places on the local area. Locating the care village at Little Court will support and build upon these local initiatives and will enable the village to benefit from them.

- 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).
- Haverhill has a large labour force which includes the skilled and managerial labour which the care village will need.
- Recent and continuing housing growth in Haverhill has provided a good choice of homes which will be a clear benefit for staff and their families. In addition, property prices are lower in Haverhill than in some other parts of Suffolk and Cambridgeshire, meaning local housing will be relatively accessible and affordable for staff.
- Haverhill is well served by services and facilities - another advantage for staff and, to a lesser extent, residents of the care village. Various initiatives are afoot to grow and improve these as the town grows.
- Haverhill has good road links with the rest of Suffolk and into Essex and Cambridgeshire.

5.5 No limits have been placed on the search area. The site search started in the town centre and worked outwards until a suitable site was found. Once a suitable site was found some known and obvious sites which were located further from the centre of Haverhill were still assessed to ensure that they did not offer any operational or other benefits which were significant enough to justify overriding the sequential approach.

SITE SIZE

5.6 The CARE model is based on the Hogeweyk model which has been extensively tested (and is now fully operational on multiple sites) in Holland. The model is based on a care village comprising:

- 20 x 6 bedroom apartments (providing 120 resident places in 5 separate buildings)
- Central amenity building of circa 1,500m² containing:
 - Shop
 - café/restaurant
 - pub
 - communal hall
 - offices for dementia outreach
 - staff accommodation for circa 16 staff
- Club/hobby/treatment/counselling rooms (circa 200m² total)
- Vehicle parking (circa 70 spaces)

5.7 Feasibility layout work has shown that a 1 ha, regular shaped site would be optimal for delivering the CARE model.

5.8 Because of the necessarily dense (relatively speaking) nature of the proposed development, sites significantly smaller than 1 ha would make the model impossible to deliver. Accordingly, and with a view to showing as much flexibility as possible, a lower site size threshold of 0.9 ha has been adopted.

5.9 Greater flexibility can be shown in relation to the upper size threshold for sites that can be considered suitable because partial site purchases or reduced land prices might make larger sites feasible. In addition, in some circumstances other development options may exist for the surplus land and may be able to be delivered through partnering arrangements for example. Beyond a certain size however, larger sites become unduly onerous for a multitude of reasons and are simply not feasible. An upper site size threshold of 2.5 ha has therefore been adopted.

TRAWL FOR / IDENTIFICATION OF POTENTIAL SITES

5.10 Based on a review of the information sources listed at 4.2 above 12 sites were identified.

5.11 These 12 sites have been ascribed the references A to L and are set out in the proformas presented in Appendix 1.

ASSESSMENT OF SITES

5.12 The sites identified through the process outlined in section 5 were assessed against the criteria below in order of their proximity to Haverhill town centre before a suitable site was found. The remaining sites (3 no.) were assessed for the sake of completeness after a suitable site was found (as explained at para. 4.5 above).

Exclusionary criteria

- Availability
- Size (0.9 ha - 2.5 ha)
- Irregular shape (such that it reduces usable area of site below 0.9 ha)
- Presence of immovable constraints (such that they reduce usable area of site below 0.9 or divide site significantly)
- Planning designations (where these would not allow the proposals and cannot be overcome through exception or challenge)

Qualitative criteria

- **Good noise environment** - low risk of noise disturbance, particularly during evenings, at night and early mornings

This is important because:

- Noise is a stressor and causes confusion for those living with dementia; it can result in shock or fright (which carries accident and injury risks) - this is contrary to the quiet, calm, familiar environment on which the CARE model is based
- Noise during the evening has the potential to effect sleep patterns - encouraging natural sleep patterns is a critical part of the CARE model

Implications for site selection:

- Quieter areas are likely to be more suitable
- Urban areas where peak noise events (vehicle accelerations, deliveries, gatherings etc) are more likely are likely to be less suitable
- Sites with main roads nearby will need to be big enough to allow sufficient set back (albeit the more constant noise of a main road in an unrestricted setting is likely to be less problematic than peak noise events)

- **Sustainable transport** - accessible by sustainable transport (for both staff and visitors)
- **Minimal activity around the site**
 - This is important because:
 - The wrong kind of sensual stimulus (loud or irregular noises, movement and activity/proximity of ‘strangers’, odour) is particularly harmful to those living with dementia
 - It is unlikely to be possible to create the quiet, calm, familiar environment on which the CARE model is based where such stressors exist
 - Implications for site selection:
 - Locations within settlements are more likely to entail a greater number of negative stimuli
 - Edge of settlement or out of settlement locations are likely to be more suitable
 - More urban sites will need to be big enough to incorporate a buffer which mitigates sufficiently the effects of any harmful stimuli
- **Immediate surroundings** - calming environment / outlook for residents / patients
 - This is important because:
 - While it supports residents’ individual medical regimens the CARE model itself does not involve medical intervention - it is instead based on holistic social and preventative care
 - People with dementia don’t lose the ability to use their senses, and in some cases their senses are heightened; it is their brain’s interpretation of their senses which is altered - the best environment for people living with dementia is therefore a calm, simple environment, preferably with good access to nature
 - The generation which is now in need of residential care spent more time outdoors in the earlier parts of their lives; reference to earlier phases of life is known to be of particular importance to those living with dementia and to their health and quality of life
 - Implications for site selection:
 - This may be a lesser determinant of site location than some of the other criteria in view of the fact that the CARE model necessitates an inward looking community; however, half of the village’s windows will face outwards meaning that a quieter, more rural and/or more natural environment is preferable
 - Presence/proximity of vegetation and wildlife (including views of countryside) provide healthy/beneficial stimulation of residents’ senses; the natural environment is ever changing meaning that it provides a permanent source of healthy stimulation
 - Access to daylight/sunlight and outward views will afford appreciation of the seasons, time of day and the weather; this helps to establish and maintain good sleep/wake cycles which is important for those living with dementia
 - An edge of settlement or countryside location will be more familiar to many residents than an urban environment
- **Space for ‘ancillary’ aspects of village** - sufficient space for suitable outdoor spaces, community facilities & landscaping, and for layout which provides the necessary sense of enclosure for residents
 - This is important because:
 - Having freedom to roam is a key aspect of the CARE model
 - Spending time outdoors is a key aspect of the CARE model
 - Living an active, stimulating life is a key aspect of the CARE model

- Connectivity with nature is a key aspect of the CARE model
- Their condition means that in most cases it is not possible for people with severe dementia to live safely or enjoyably in places where use of normal public facilities and spaces is possible/necessary; the CARE model re-creates these facilities and spaces on a smaller scale to create a safe but familiar environment which does not overwhelm residents
- Implications for site selection:
- Site needs to be big enough to allow space for: 1) recreation of a town/village street and square environment with identifiable character areas; 2) provision of facilities; 3) landscape planting; and 4) a layout which provides the necessary sense of enclosure for the foregoing
 - Facilities required: shop, hall, pub, restaurant, hobby rooms (the hall and pub will double as hobby rooms but hobby rooms are provided in the outdoor areas too, e.g. for gardening related activities and summer events)
 - Key elements of external areas within the village: small village square linked by streets leading to small park, outdoor market space, outdoor event/venue space, space for outdoor games and exercise, vegetable garden and greenhouse, water/water feature, outdoor seating, variety of planting types
- Provision of the facilities and external spaces which are necessary to deliver the care model means that the village needs to be of a certain minimum size to make it and them viable
- **Prominence / visibility** - good visibility from main road if possible.

5.13 It should be noted that the above qualitative criteria are based on best practice (developed at Hogeweyk in Holland - see paragraph 3.2 above) for the type of care which the proposed development is intended to deliver. Because it is a new approach to caring for people living with dementia, and because there are very few places where it occurs, there is little scientific and medical evidence to support its approach, methods and use (despite much of it appearing to be common sense, and there being strong experiential and anecdotal evidence to support it). One of the reasons that it is so important to deliver facilities like that proposed is so that sufficient opportunities are created for the scientific and medical research which is required to prove the effectiveness of such facilities, and to refine their approach and methods.

5.14 Site visits/inspections/drive-bys were undertaken to verify information from other sources where necessary.

5.15 Site assessment pro-formas for each site are presented at Appendix 1. A map showing the locations of the 12 sites assessed can be found at Appendix 2.

6 SITE IDENTIFICATION, ASSESSMENT & SELECTION - ANALYSIS & FINDINGS

6.1 As detailed at paragraph 4.10 above, 12 potential sites were identified. The sites were assessed using the methodology detailed at section 5 and the proformas presented at Appendix 1. The key analysis points and findings from this assessment process are summarised below.

SUMMARY OF SITE ANALYSIS

6.2 The table below summarises the site analysis set out in the site proformas.

Site	Distance from centre of Haverhill	Available	Suitable
A	30 m	✗	✗ (as a result of exclusionary and qualitative criteria)
B	60 m	✗	✗ (as a result of exclusionary and qualitative criteria)
C	80 m	✗	✗ (as a result of qualitative criteria)
D	320 m	✗	✗ (as a result of qualitative criteria)
E	610 m	✗	✗ (as a result of qualitative criteria)
F	1.2 km	✗	✗ (as a result of qualitative criteria)
G	1.4 km	✗	✗ (as a result of qualitative and possibly exclusionary criteria)
H	1.9 km	✗	✓ (though site is not particularly prominent/visible)
I	1.9 km	✓	✓ (though access to public/sustainable transport is not as good as Haverhill)
J	2.6 km	✗	✗ (as a result of exclusionary and qualitative criteria)
K	9.9 km	✗	✗ (as a result of qualitative and possibly exclusionary criteria)
L	10.4 km	✗	✗ (as a result of qualitative criteria)

SUMMARY OF FINDINGS

6.3 As is evident from the table, only one site, Site I (Little Court, Little Wratting), emerges from the site assessment process as both suitable and available. Site H was found to be suitable and is of equal to Site I in terms of sequential preferability, in view of the fact that it lies the same distance from the centre of Haverhill, but it is not available. Significant efforts by CARE to purchase the site were unsuccessful.

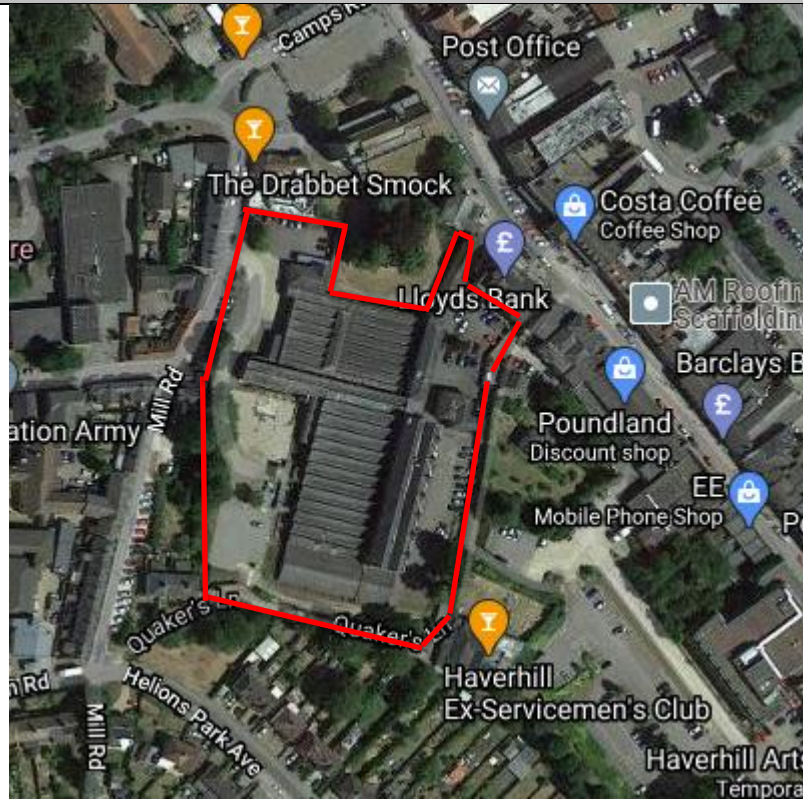
6.4 Sites J, K and L lie further from Haverhill town centre than Site I (and are therefore sequentially less preferable) but were assessed in case they were both available and suitable *and* could offer significant benefits which might outweigh adherence to the sequential approach to site selection. All three sites were found to be neither available nor suitable and were therefore not considered further.

7 SUMMARY & CONCLUSIONS

- 7.1 This report documents the sequential approach to site selection adopted in respect of proposals for a specialist dementia care village in the Haverhill area of West Suffolk by CARE (Little Court) Ltd ('CARE').
- 7.2 The care village will accommodate 120 people living with severe dementia. Residents will live in groups in 6-bedroom apartments within a wider safe environment in which they will have the personal freedom to live as natural a life as their condition allows
- 7.3 The sequential approach to site selection was conducted in accordance with the relevant planning policy and guidance, the most relevant of which is JDPMD DM23 - Special Housing Needs (which should be read together with its supporting text - JDPMD paragraphs 5.7 & 5.8).
- 7.4 The Haverhill area was chosen for the proposed development for a multitude of reasons, not least that CARE is based in Haverhill and close oversight of the construction and operation of its first facility is considered essential to achieving 'proof of concept' for its care model in the UK.
- 7.5 As part of the sequential approach to selecting a site 12 possible sites were identified within the chosen area. Of these 12 sites only two (Sites H & I) were found to be suitable. Of the two suitable sites only one was available, Site I. Site I is Little Court, Little Wrattling.
- 7.6 In the absence of any other available *and* suitable sites from the list of sites assessed Site I satisfies the sequential test as no sequentially preferable sites were identified (a sequentially preferable site would have to be available *and* suitable *and* closer to the centre of Haverhill than Site I).
- 7.7 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. As a result of establishing Site I (Little Court, Little Wrattling) as the optimal site CARE have secured control of the site and having assessed the site from both an environmental and technical perspective, have prepared and submitted a planning application for the Site.

APPENDIX 1 - SITE PROFORMAS

Site A: Chantry Mill, High Street, Haverhill



Site area	Current use	Site owner (if known)
1.2 ha	Mixed; fabrication, warehousing, offices	Gurteen
Distance from centre of Haverhill		
30m		
Allocated in development plan?		SHELAA entry
<ul style="list-style-type: none"> • Yes • Haverhill Vision 2031 Policy HV7 - Mixed Use Development of Brownfield Land • Site b - Chantry Mill, High Street • Allocated for mixed use development which may include residential development and commercial uses (including retail) and car parking 		WS581
Extant/valid planning permission(s)		
<ul style="list-style-type: none"> • For existing use (assumed) • Partial demolition of existing listed buildings 		
Commentary on availability and suitability		
<p>Availability</p> <p>Not available:</p> <ul style="list-style-type: none"> • remains operational with no alternative facilities/ site(s) identified • Site not on market nor has been marketed in recent times 		

Suitability

Exclusionary criteria:

- **Layout - Large listed buildings across site render model undeliverable**

Qualitative criteria:

- Risk of noise disturbance from busy town centre area
- Risk of noise disturbance non-conforming uses involving anti-social hours activities/operations
- Risk of noise disturbance from existing residential development at close proximity (on three sides)
- Limited outlook to calming environment
- Site size offers limited scope for additional structural landscaping which would be necessary in urban context

Note:

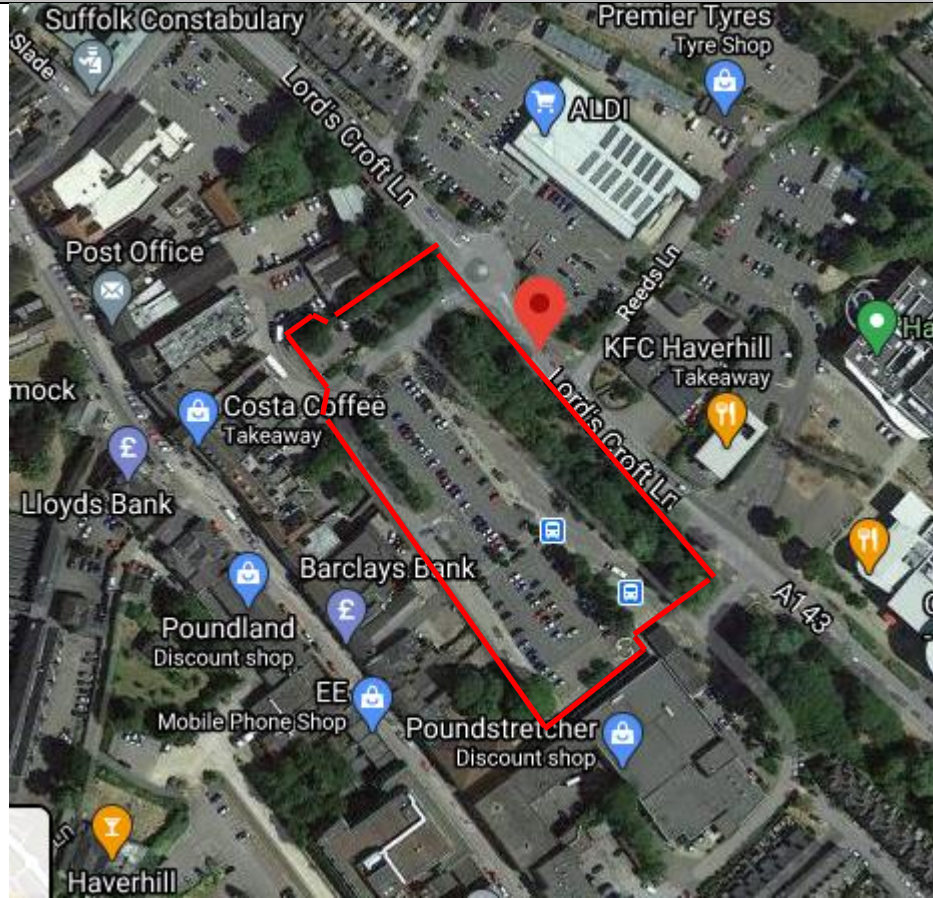
While the following matters have not been factored into the assessment of this site they are worth noting.

- Town centre land values may render the proposed development unviable
- Proposals may constitute sub-optimal use of town centre land as they are by necessity inward facing (and therefore do not provide scope for active frontages) and will dilute retail, leisure and community uses

Sources

- West Suffolk online planning application viewer
- SHELAA Haverhill Central
https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/shelaa-settlement-maps-and-site-proformas.cfm

Site B: Brook Service Road/Car Park, Haverhill



Site area	Current use	Site owner (if known)
0.8 ha	Car park/service road	West Suffolk Council
Distance from centre of Haverhill		
60m		
Allocated in development plan?		SHELAA entry
<ul style="list-style-type: none"> • Yes • Haverhill Vision 2031 Policy HV7 - Mixed Use Development of Brownfield Land • Site e - Brook Service Road/Car Park • Allocated for mixed use development which may include residential development and commercial uses (including retail) and car parking 		WS668
Extant/valid planning permission(s)		
For existing use (assumed)		
Commentary on availability and suitability		
<p>Availability</p> <p>Not available:</p> <ul style="list-style-type: none"> • remains in use as car park, service road and bus stop(s) serving town centre, no 		

- replacement/alternatives exist/have been identified
- Site not on market nor has been marketed in recent times

Suitability

Exclusionary criteria:

- Size - below minimum threshold

Qualitative criteria:

- Shape - compounds below threshold size issue
- Risk of noise disturbance from busy town centre area
- Risk of noise disturbance non-conforming uses involving anti-social hours activities/operations
- Limited outlook to calming environment
- Site size offers no scope for additional structural landscaping which would be necessary in urban context

Note:

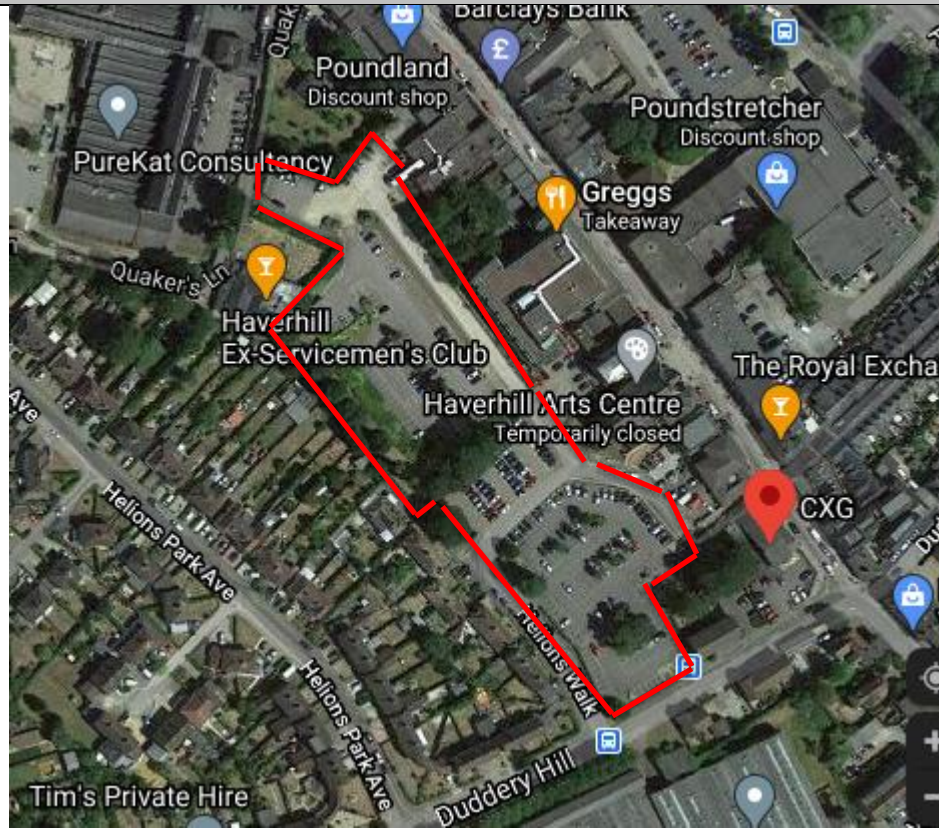
While the following matters have not been factored into the assessment of this site they are worth noting.

- Town centre land values may render the proposed development unviable
- Proposals may constitute sub-optimal use of town centre land as they are by necessity inward facing (and therefore do not provide scope for active frontages) and will dilute retail, leisure and community uses

Sources

- West Suffolk online planning application viewer
- SHELAA Haverhill Central
https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/shelaa-settlement-maps-and-site-proformas.cfm

Site C: Cleales/Town Hall Car Park, Haverhill



Site area	Current use	Site owner (if known)
1.3 ha	Car park	
Distance from centre of Haverhill		
80m		
Allocated in development plan?		SHELAA entry
<ul style="list-style-type: none"> • Yes • Haverhill Vision 2031 Policy HV7 - Mixed Use Development of Brownfield Land • Site d - Cleales/Town Hall Car Park • Allocated for mixed use development which may include residential development and commercial uses (including retail) and car parking 		N/A
Extant/valid planning permission(s)		
For existing use (assumed)		
Commentary on availability and suitability		
<p>Availability</p> <p>Not available:</p> <ul style="list-style-type: none"> • remains in use as car park serving town centre, no replacement/alternatives exist/have been identified • Site not on market nor has been marketed in recent times 		

Suitability

Qualitative criteria:

- Site shape would make delivery of CARE model difficult and would lose benefits associated with it
- Risk of noise disturbance from busy town centre area
- Risk of noise disturbance non-conforming uses involving anti-social hours activities/operations
- Risk of noise disturbance from existing residential development at close proximity (on three sides)
- Limited outlook to calming environment
- Site size offers limited scope for additional structural landscaping which would be necessary in urban context

Note:

While the following matters have not been factored into the assessment of this site they are worth noting.

- Town centre land values may render the proposed development unviable
- Proposals may constitute sub-optimal use of town centre land as they are by necessity inward facing (and therefore do not provide scope for active frontages) and will dilute retail, leisure and community uses

Sources

- West Suffolk online planning application viewer

Site D: Wisdom Factory, Colne Valley Road, Haverhill



Site area	Current use	Site owner (if known)
1.5 ha	Mixed use; former factory, currently warehousing/offices	Wisdom
Distance from centre of Haverhill		
320m		
Allocated in development plan?		SHELAA entry
<ul style="list-style-type: none"> • Yes • Haverhill Vision 2031 Policy HV7 - Mixed Use Development of Brownfield Land • Site a - Wisdom Factory, Duddery Hill • Allocated for mixed use development which may include residential development and commercial uses (including retail) and car parking 		WS104
Extant/valid planning permission(s)		
For existing use (assumed)		
Commentary on availability and suitability		
<p><u>Availability</u> Not available - remains operational (status confirmed by Wisdom 24/8/2020)</p> <p><u>Suitability</u> <i>Qualitative criteria:</i></p>		

-
- Risk of noise disturbance from busy town centre area
 - Risk of noise disturbance non-conforming uses involving anti-social hours activities/operations
 - Risk of noise disturbance from existing residential development at close proximity (on three sides)
 - Limited outlook to calming environment

Note:

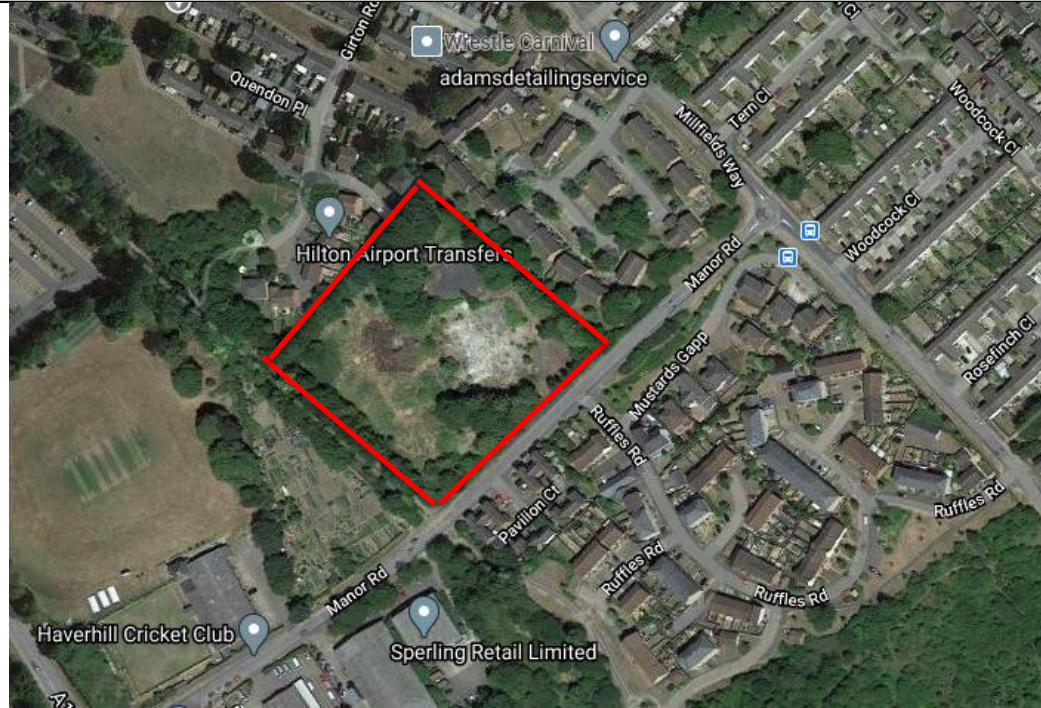
While the following matters have not been factored into the assessment of this site they are worth noting.

- Town centre land values may render the proposed development unviable
- Proposals may constitute sub-optimal use of town centre land as they are by necessity inward facing (and therefore do not provide scope for active frontages) and will dilute retail, leisure and community uses

Sources

- West Suffolk online planning application viewer
- SHELAA Haverhill South
https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/shelaa-settlement-maps-and-site-proformas.cfm
- Direct enquiries

Site E: Westfield Primary School, Haverhill



Site area	Current use	Site owner (if known)
1.2 ha	Vacant	West Suffolk Council
Distance from centre of Haverhill		
610m		
Allocated in development plan?		SHELAA entry
<ul style="list-style-type: none"> • Yes • Haverhill Vision 2031 Policy HV6 - Housing on Brownfield Sites • Site c - Westfield Primary School • Allocated for residential development • Indicative capacity 30 dwellings 		WS100
Extant/valid planning permission(s)		
<ul style="list-style-type: none"> • DC/18/2299/FUL • Applicant: Barley Homes • Decision Dated October 2019 		
Commentary on availability and suitability		
<p><u>Availability</u> Not available - recently brought forward by Barley Homes with plans approved to develop it for residential use</p> <p><u>Suitability</u> <i>Qualitative criteria:</i></p>		

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| <ul style="list-style-type: none">• Risk of noise disturbance from existing residential development at close proximity (on three sides)• Limited outlook to calming environment• Site size offers limited scope for additional structural landscaping which would be necessary in urban context• Lack of prominence due to location in residential neighbourhood (i.e. no through/non-local traffic) |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Sources

- | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">• West Suffolk online planning application viewer• SHELAA Haverhill Central
https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/shelaa-settlement-maps-and-site-proformas.cfm |
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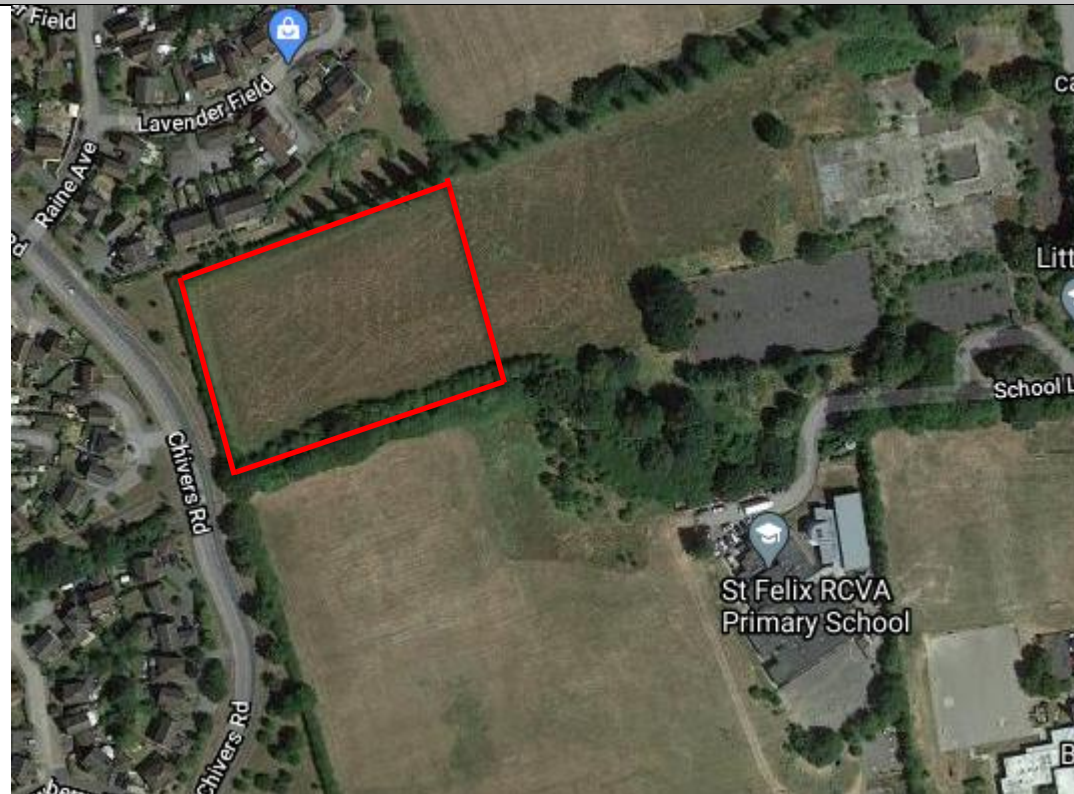
Site F: land at Great Wilsey



Site area	Current use	Site owner (if known)
Area outlined in red (1.5 ha) has outline planning permission for extra care residential use (use class C2/C3) as part of the wider masterplan (parcel A4) for Great Wilsey	Agricultural	Controlled by option holders
Distance from centre of Haverhill		
1.2 km		
Allocated in development plan?		SHELAA entry
<ul style="list-style-type: none"> • Yes • Haverhill Vision 2031 Policy HV4 - Strategic Site - north-east Haverhill • As part of 138ha of land allocated for development to include: <ul style="list-style-type: none"> - around 2,500 dwellings; - two primary schools; - two local centres including retail, community and employment uses (with use classes A1/A2/A3/A4/A5, B1 and D1/D2); - open space; 		N/A

<ul style="list-style-type: none"> - landscaping; and - associated infrastructure 	
Extant/valid planning permission(s)	
<ul style="list-style-type: none"> • Outline planning permission (wider site): DC/15/2151/OUT • Reserved matters permissions - various (wider site): for spine road, first phase of development (which does not include parcel A4) and infrastructure to support delivery of first phase • Land use parameters plan shows parcel outlined in red on above plan is zoned for extra care residential use (use class C2/C3) 	
Commentary on availability and suitability	
<p><u>Availability</u></p> <p>Not available:</p> <ul style="list-style-type: none"> • Enquiries of selling agent have indicated that there is no timescale for release of parcel A4 to the market <p><u>Suitability</u></p> <p><i>Qualitative criteria:</i></p> <ul style="list-style-type: none"> • The Great Wilsey proposals involve the construction of 2500 dwellings over a period of 15 years - this is likely to result in significant levels of noise in vicinity of parcel A4 for a considerable period and a high probability of harmful noise impacts on residents of the home • Risk of noise disturbance from residential development at close proximity on three sides (medium and long term) • Lack of prominence due to location in what will be a predominantly residential neighbourhood (i.e. no through/non-local traffic) 	
Sources	
<ul style="list-style-type: none"> • West Suffolk online planning application viewer 	

Site G: Land East of Chivers Road Haverhill Suffolk



Site area	Current use	Site owner (if known)
1.1 ha	Former school grounds	West Suffolk Council
Distance from centre of Haverhill		
1.4 km		
Allocated in development plan?		SHELAA entry
<ul style="list-style-type: none"> • Yes • Haverhill Vision 2031 Policy HV5 - Housing on Greenfield Sites • Site c - Former Castle Hill Middle School field, Chivers Road • Allocated for residential development • Indicative capacity 30 dwellings 		WS099
Extant/valid planning permission(s)		
<ul style="list-style-type: none"> • DC/19/0479/FUL • 26 residential units 		
Commentary on availability and suitability		
<p><u>Availability</u> Not available - planning permission for residential development recently secured</p> <p><u>Suitability</u> <i>Exclusionary criteria:</i></p>		

-
- Presence of potentially immovable constraint - site split by footpath/cycleway rendering secure village model undeliverable without diversion

Qualitative criteria:

- Risk of noise disturbance from existing residential development at close proximity (on two sides)
- Limited outlook to calming environment
- Site size offers limited scope for additional structural landscaping which would be necessary in urban context
- Lack of prominence due to location in residential neighbourhood (i.e. no through/non-local traffic)

Sources

- West Suffolk online planning application viewer
<https://planning.westsuffolk.gov.uk/online-applications/applicationDetails.do?keyVal=POEY1GPDMM700&activeTab=summary>

Site H: Woodlands Hotel, Coupals Road, Haverhill



Site area	Current use	Site owner (if known)
1.2 ha	Vacant	Unknown (recently sold)
Distance from centre of Haverhill		
1.9 km		
Allocated in development plan?		SHELAA entry
No		N/A
Extant/valid planning permission(s)		
For most hotel use (assumed)		
Commentary on availability and suitability		
<p><u>Availability</u></p> <p>Not available:</p> <ul style="list-style-type: none"> • site marketed in 2018 • CARE made above asking price offer of £650,000 unconditionally, with an uplift of £650,000 (conditional upon change of use to our C2 use) • the offer was unsuccessful on the grounds vendor wished to proceed with another party (it is understood that the preference was to retain a hotel/restaurant use) <p><u>Suitability</u></p> <p>Suitable</p> <p><i>Exclusionary criteria:</i></p>		

-
- None triggered

Qualitative criteria:

- Meets all bar prominence / visibility criterion due to location on minor road

Sources

- West Suffolk online planning application viewer
<https://planning.westsuffolk.gov.uk/online-applications/applicationDetails.do?keyVal=POEY1GPDMM700&activeTab=summary>
- Direct enquiries

Site I: Little Court, Little Wratting



Site area	Current use	Site owner (if known)
2.4 ha	Dwelling with equine facilities	Mr & Mrs Whiting
Distance from centre of Haverhill		
1.9 km		
Allocated in development plan?		SHELAA entry
No		N/A
Extant/valid planning permission(s)		
For existing use (assumed)		
Commentary on availability and suitability		
<p><u>Availability</u> Available</p> <p><u>Suitability</u> Suitable</p> <p><i>Exclusionary criteria:</i></p> <ul style="list-style-type: none"> • None triggered <p><i>Qualitative criteria:</i></p> <ul style="list-style-type: none"> • Meets all though access to public/sustainable transport is not as good as central Haverhill (but could likely to be made acceptable) 		
Sources		
<ul style="list-style-type: none"> • West Suffolk online planning application viewer https://planning.westsuffolk.gov.uk/online-applications/applicationDetails.do?keyVal=POEY1GPDMM700&activeTab=summary 		

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- Direct enquiries

Site J: Haverhill Research Park (west of Three Counties Way)



Site area	Current use	Site owner (if known)
5.54 ha	Vacant	Controlled by Jaynic (developer/promoter)

Distance from centre of Haverhill
2.6 km

Allocated in development plan?	SHELAA entry
<ul style="list-style-type: none"> • Yes • Haverhill Vision 2031 Policy HV10 - Strategic Employment Site - Hanchet End, Haverhill • Allocated for class B1 use comprising: <ul style="list-style-type: none"> - light industrial, research and office use; - units for new and small firms involved in high technology and related activities; or - low density development with extensive landscaping 	WS096

Extant/valid planning permission(s)
For research park (in line with allocation)

Commentary on availability and suitability
<p><u>Availability</u></p> <p>Not available - enquiries of developer (26/8/2020) confirm that the site is subject to a planning appeal proposing residential use and will not be made available for other uses, e.g. care village.</p> <p><u>Suitability</u></p> <p><i>Exclusionary criteria:</i></p> <ul style="list-style-type: none"> • Planning designation - adjacent areas of Haverhill Research Park, close to roundabout (currently being built out), were raised with planning authority at an earlier date as potential care home sites and it was indicated that they were unlikely to receive officer support for this use

Qualitative criteria:

- Risk of noise disturbance from existing residential, leisure and school development and proposed commercial/residential
- Limited outlook to calming environment (assuming undeveloped surroundings are to be developed)
- Lack of prominence due to location in residential neighbourhood (due to location of access point and landscaping, despite site bordering main road)

Sources

- West Suffolk online planning application viewer
- Jaynic websites:
<https://www.jaynic.co.uk/projects/haverhill-research-park.php>
<http://www.westofthreecountiesway-haverhill.co.uk/>
- SHELAA Haverhill Central
https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/shelaa-settlement-maps-and-site-proformas.cfm
- Direct enquiries

Site K: Land to the north and south and immediately adjacent to Bartlow Road, Linton



Site area	Current use	Site owner (if known)
North parcel: 0.775 Ha South parcel: 2.73 Ha	Agricultural	
Distance from centre of Haverhill		
9.9 km		
Allocated in development plan?		SHELAA entry:
No		
Extant/valid planning permission(s)		
<ul style="list-style-type: none"> No but site is subject of outline planning application for 55 dwellings S/2073/19/OL Decision pending 		
Commentary on availability and suitability		
<p><u>Availability</u> Not available - current planning application indicates intention to deliver as residential development</p> <p><u>Suitability</u> <i>Exclusionary criteria:</i></p> <ul style="list-style-type: none"> Size - smaller parcel is below minimum size threshold, larger parcel is above maximum size threshold 		

Qualitative criteria:

- Risk of noise disturbance from existing residential development at close proximity and residential development which would need to be delivered alongside proposals to allow purchase of whole site (much larger than required for proposals)
- Lack of prominence (because sites do not have a frontage on A1307)

Sources

- South Cambridgeshire online planning application viewer

Site L: Land off Cavendish Road, Clare



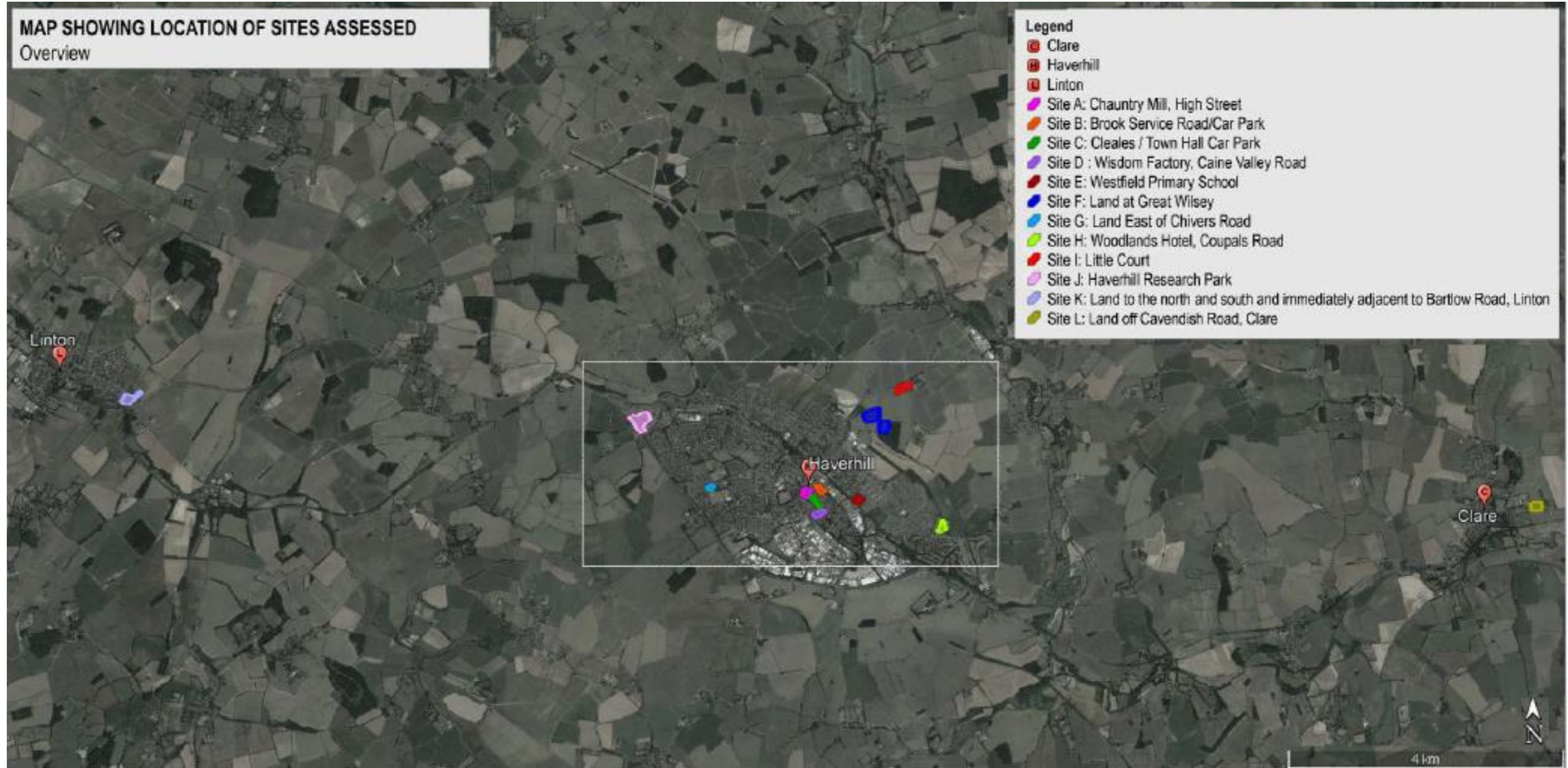
Site area	Current use	Site owner (if known)
2.2 ha	Agricultural/Equine	
Distance from centre of Haverhill		
10.4 km		
Allocated in development plan?		SHELAA entry
<ul style="list-style-type: none"> • Yes • Rural Vision 2031 Policy RV11 - Clare • Site b - Land of Cavendish Road • Allocated for residential development • Indicative capacity 64 dwellings 		WS076
Extant/valid planning permission(s)		
<ul style="list-style-type: none"> • No but site is subject of planning application for 53 dwellings • DC/17/1252/FUL • Decision pending 		
Commentary on availability and suitability		
<p><u>Availability</u> Not available - allocated for housing, grant of planning permission for 53 units understood to be imminent</p> <p><u>Suitability</u> <i>Qualitative criteria:</i></p>		

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| <ul style="list-style-type: none">• Risk of noise disturbance from existing residential and school development and residential development which would need to be delivered alongside proposals to allow purchase of whole site (much larger than required for proposals)• Limited public/sustainable transport options for staff |
| Sources |
| <ul style="list-style-type: none">• West Suffolk online planning application viewer |

APPENDIX 2 - MAPS SHOWING LOCATIONS OF SITES ASSESSED

MAP SHOWING LOCATION OF SITES ASSESSED

Overview



MAP SHOWING LOCATION OF SITES ASSESSED
Overview of sites in and around Haverhill town centre



- Legend**
- Haverhill
 - Site A: Chantry Mill, High Street
 - Site B: Brook Service Road/Car Park
 - Site C: Cleales / Town Hall Car Park
 - Site D: Wisdom Factory, Caine Valley Rd.
 - Site E: Westfield Primary School
 - Site F: Land at Great Wilsey
 - Site G: Land East of Chivers Road
 - Site H: Woodlands Hotel, Coupals Road
 - Site I: Little Court
 - Site J: Haverhill Research Park