

To Development Management
From Planning Policy
Date 3 September 2021
Reference DC/21/0315/FUL
Proposal Specialist dementia care village for up to 120 residents, including: 20 x 6 bedroom apartments provided within five buildings; central amenity building containing shop, restaurant, pub, communal hall, offices and staff accommodation; club/hobby rooms; treatment/counselling rooms; vehicle and cycle parking; landscaping proposals and associated works
Location Little Court, Haverhill Road, Little Wratting, CB9 7UD

This policy response focusses on the acceptability or otherwise of the principle of the proposed use and matters relating to the need for the provision of older persons and specialist dementia housing.

NPPF (2021)

Chapter 1, states at para 2 'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise'.

Para 12 states 'The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted'.

Chapter 2, Achieving sustainable development states 'Plans and decisions should apply a presumption in favour of sustainable development'.

Chapter 5 addresses Delivering a sufficient supply of homes. Para's 60 to 62 are in particular relevant here, as quoted below.

60. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

61. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

62. Within this context, 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).

PPG – Housing for older and disabled people

Para 16 states as follows;

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.

St Edmundsbury Core Strategy - policies CS4, CS12 and CS13 (adopted 2010)

Policy CS4 classifies Little Wratting as countryside, which is not afforded a settlement boundary.

Policy CS12 identifies Haverhill as a town suitable for strategic growth and identifies land north east of the town as a strategic greenfield site for release. Bullet (a) seeks to maintain the identity and segregation with it and Little Wratting.

Policy CS13 states that development outside of defined settlements will be strictly controlled prioritising protecting and enhancing the countryside and promoting sustainable diversification of the rural economy.

JDMPD (adopted 2015)

Policies DM5 and DM27 seek to protect the countryside from unsustainable development and specify criteria where residential uses may be appropriate such as where it is small in scale. The proposed use does not accord with the approach to protecting the countryside from unsustainable development. It would result in intensification compared to the existing use as residential dwelling, stables, menage and paddocks by proposing large scale development to accommodate up to 120 residents.

Policy DM23: Special Housing Needs 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.

Para 5.7 of JDMPD requires a sequential approach to site selection, although this is not included within the policy wording itself. Policy DM23 only permits new accommodation on sites "*deemed appropriate for residential development by other policies contained within (the JDMPD) and other adopted Local Plans*", but the scheme must meet certain criteria. The site is located in the countryside where residential development is not normally permitted (see policies DM5, DM27, CS4 and CS13). Development therefore of specialist accommodation in a countryside location, represents a departure from the development plan. Para 5.7 mentions the sequential test. The applicant did not apply a sequential test in a conventional manner but instead applied various environmental factors -such as "a good noise (quiet) environment, minimal activity around the site, and immediate surroundings", which steered the site to a countryside location, as part of the "specialist care model". Normally, sequentially preferable sites are those located in larger settlements which includes towns, key service centres, local service centres and primary villages. The applicants have not fully explored opportunities to locate the proposal in a sustainable settlement which would be a sequentially preferable location.

Policy DM23 requires that new schemes meet the following criteria, which are considered in term below:

a. the proposed development is designed to meet the specific needs of residents including requirements for disabled persons where appropriate; and

The proposal seeks permission for Use Class C2 - a residential institution. The applicant states it provides bespoke Hogeweyk model dementia care. It comprises 20x 6-bedroom apartments totalling 120 residents with ancillary facilities such as a pub, restaurant, village hall and shop, vehicle parking and landscaping. The applicants state that the care village has been designed specifically to meet the needs of its future occupants (Planning statement 5.4). To reduce its scale buildings will be 2-storey high with lowered eaves. Selected environmental factors were led to the choice of a countryside site. There is a social objective to the developments' design to encourage integration of residents. The proposal complies with this criterion.

b. includes appropriate amenity space for residents of an acceptable quantity and quality; and

External squares are proposed of an intimate scale allowing easier negotiation and recognition for residents including recreational space. A Landscape and Visual impact Assessment has informed the design. The scheme provides "space for ancillary roaming." The proposal appears to comply with this criterion also.

c. the location of the development is well served by public transport, community and retail facilities; and

The site makes provision for bespoke facilities for use by residents and their families such as a pub, restaurant, village hall and shop for use by residents and visitors. Works will need to be undertaken to widen the existing access. Residents will not drive, but staff and visitors will. 65 on-site car parking spaces are proposed including disabled facilities and EV charging spaces.

The site is near to Haverhill and the Great Wilsey Park development, currently under construction. Public transport is currently limited, but the applicants anticipate that this will change as further development is built out. The bus route between Haverhill to Bury St Edmunds passes the site, and the applicants hope that there may be scope to install request stops in the vicinity of the site. The applicants also propose that they may provide a minibus for transport to and from work for staff living in Haverhill and Bury St Edmunds highlighted in the Travel Plan. The applicant has not however demonstrated with sufficient certainty that the proposed improvements to accessibility will and can be delivered.

The applicants suggest that they could enable the upgrade of an existing Public Right of Way that runs along the eastern edge of the site, changing it from pedestrian-only to cyclist also. Accessibility to the site would be improved by the delivery of this enhanced footpath and cycleway, however there would need to be certainty of its delivery in order for it to be taken into consideration.

A workplace travel plan is proposed.

The applicant's TA concludes that the residual cumulative impacts of the development would not be severe. However, this is subject to all the above measures being implemented, some of which requires consent from SCC as Highway Authority. Without them the site lies in a less accessible countryside location. The proposal has not satisfactorily addressed this criterion.

d. the proposed development does not create an over concentration of similar accommodation in any one street or area.

The applicants state that the nearest care home catering specifically for dementia is Brookwood Manor at Little Waldingfield near Sudbury. This is 18 miles or 37 minutes' drive from the site. However, the 5-year land supply Appendix 8 (communal accommodation) reveals that there is existing provision and pipeline schemes for care homes, and there is also existing dementia care provision in Haverhill and elsewhere in the district so it is not reasonable to state that the Sudbury site is the only such dementia care home in the vicinity of the site. This criterion is discussed further below.

Assessment of need

Policy DM23 requires assessment of need to be clearly demonstrated in countryside locations. The applicant states that the proposal is based on an extensive needs study and a sequential approach to site selection. They feel that there is a need for the development and no other sites in the area are capable of accommodating this type of development proposal in the area. They consider that the principle of development, despite the site being in the countryside should be acceptable if the benefits outweigh the harm. This approach is reinforced because the PPG states that *"if there is an unmet need for specialist housing, local authorities should take a positive approach to schemes that address this need."* The applicant believes that

the submitted Statement of Need shows there is unmet need for dementia care and specialist dementia case locally and in the wider West Suffolk area. The applicants state that the development plan policies are silent on specialist care policies, which is not accepted, as Policy DM23 applies. The applicants consider that the site's proposed use is optimal, and the proposed development should be considered acceptable in principle.

The applicants' Statement of Need assessment states (Planning Statement 5.76, or Statement of Need s10) there is evidence of dementia specific care beds in the locality.

5YHLS – published in Sept 2020

The five-year housing land supply report published in September 2020 demonstrates there is 5.6 years supply of housing land.

Appendix 8 – identifies a number of sites with planning permission for older person accommodation, which shows a good supply coming forward to meet needs. Please see: [2020-5YHLS-report-with-appendices-3.pdf \(westsuffolk.gov.uk\)](https://www.westsuffolk.gov.uk/2020-5YHLS-report-with-appendices-3.pdf)

The 5YHLS will be updated in due course and will reflect the following recent completions;

DC/18/1808/RM – Tut Hill, BSE, 66 bed care home, completed

DC/17/2676/FUL - Fordham Road, Kininvie, Newmarket for 63no. bed care home for the elderly completed on 16.4.21.

DC/18/1561/FUL – loss of care home (8 units), Half Moon House, 2 High Street, Clare, completed

DC/16/0876/FUL - Camps Road, Haverhill, 50 sheltered retirement apartments, completed

DC/15/1354/FUL – The Beeches, High Street, Ixworth, to provide 10 bedrooms, commenced

Two schemes have recently been implemented in Haverhill, Westbourne Court and Weavers Court. These add to the existing provision of care including Cleves Place, The Meadows and The Hay Wain which specifically provide for dementia care in Haverhill.

In the local West Suffolk area specific dementia care is currently also provided within recent completions at: Fornham House, Fornham St Martin; Brampton Manor, (previously known as Kininvie), Newmarket; and The Beeches, Ixworth.

Population data

Population data regarding Little Wratting does not support that Little Wratting area will have a greater need for elderly accommodation than surrounding parts of West Suffolk. It does not have a population that is ageing greater than surrounding areas and does not have an older than average elderly population.

Housing Mix Study (under preparation)

The council has commissioned an evidence-based study to assess the housing mix needs of the district, this study will inform the West Suffolk Local Plan.

The study is due to be completed this summer. We have however liaised with West Suffolk CCG and also we have assessed the supply of specialist older person accommodation identified under Appendix 8 of the 5YHLS (Sept 2020).

West Suffolk Clinical Commissioning Group (CCG) comments

The CCG liaised with Suffolk County Council Adult Community Services regarding demand and need. They state that there is specific demand for complex dementia care in the locality. Occupancy rates in care facilities, particularly specialist care facilities are high. There is a need to access outside space. Sometimes individuals are moved away from their local community in order to facilitate their needs. There is only limited capacity for placing people with complex dementia in homes in Haverhill area.

Conclusions

The site lies in the countryside and is afforded protection from unsustainable development. The proposals have been considered against national policy and guidance which support the provision of housing to meet the needs of older people. However, the proposals do not accord with the presumption in favour of sustainable development enshrined in national policy and there is a clear conflict with the up-to-date local plan such that permission should not usually be granted.

The adopted local plan policies in the Core Strategy and the Joint Development Management Policies Document are clear that housing for special needs groups should be considered against DM23 and other local plan policies including general housing policies in particular DM5 and DM27. These seek to protect the countryside from unsustainable development and specify criteria where residential may be appropriate such as where it is small in scale. The proposal fails to meet all of the criteria set out in policy DM23. Given the scale of the application proposal and the unsustainable location of the site in Little Wratting, a settlement classified as countryside, there is no justification for departing from these policies.

The PPG states where there is an unmet need, a positive approach should be taken, however given the existing provisions of older persons care homes, including in Haverhill and the supply of older person provision coming forward as set out in the 5YHLS (Sept 2020) and updated in this response, this does not justify significant weight being applied in the planning balance to address unmet needs. It does afford some weight however, as there is a need for specialist facilities in the Haverhill area. The CCG liaised with Suffolk County Council Adult Community Services find that there is only limited capacity for placing people with complex dementia in homes in Haverhill area.

A study is currently being undertaken to identify housing need for different housing groups including older persons, however given the existing provision and supply of accommodation to meet the needs of older people coming forward, it would not alter this policy response. The proposals fail to meet all of the criteria in policy DM23 and represent a departure from policy due to its unsustainable location in the countryside and failure to meet all of the criteria which allow an exception to this approach. The PPG (para 016) expects a positive approach to proposals which meet unmet needs,

so regardless of the fact not all criteria in DM23 have been met, the need argument should be afforded weight. PPG para 016 also states the decision makers should consider the location, which is a countryside location and considered unacceptable for the reasons set out above.