

Former Woodlands Hotel, Coupals Road, Haverhill

Planning Statement

In support of:

Demolition of existing buildings, erection of a 64no. Bed care home (use class c2), together with access, parking, landscaping and associated works

On behalf of:

Country Court Care Homes 5 Limited

July 2023

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SCHEDULE OF PLANNING APPLICATION DOCUMENTS

Application Document	Author	Date
Planning Application Form and Certificate	Freeths LLP	-
Planning Statement	Freeths LLP	May 2023
Design and Access Statement	WGP Architects	June 2023
Structural Inspection Report	Glyme Structures	June 2022
Transport Statement	Connect Consultants	June 2023
Flood Risk and Drainage Assessment	BSP	July 2023
Ecological Appraisal	FPCR	February 2023
Biodiversity Net Gain Assessment	FPCR	June 2023
eDNA Results	FPCR	July 2023
Landscape and Visual Appraisal	FPCR	May 2023
Arboricultural Impact Assessment	Oakfield Arboricultural Services	June 2023
Settings Assessment	Cotswold Archaeology	February 2023
Planning Need Assessment	Carterwood	February 2023
Development Consultancy Report	Knight Frank	February 2023
MEP Design Intent	iTS	March 2023
Sustainability Statement	iTS	May 2023
Health Impact Checklist	Freeths	May 2023

SCHEDULE OF DRAWINGS

Drawing Title	Drawing Reference
Site Location Plan	421_PL_01_101 Rev B
Existing Site Plan	421_PL_01_100 Rev -
Existing Layout	421_PL_01_210 Rev A
Existing Elevations	421_PL_01_320 Rev B
Existing Site Tree Survey Plan	421_PL_01_200 Rev B
Proposed Site / Block Plan	421_PL_00_100 Rev B
Holistic Design Strategy Coordination Plan	421_PL_00_200 Rev K
Proposed Plan - Ground Floor	421_PL_00_210 Rev F
Proposed Plan - First Floor	421_PL_00_211 Rev F
Proposed Plan - Second Floor	421_PL_00_212 Rev E
Proposed Plan - Third Floor	421_PL_00_213 Rev E
Proposed Roof Plan	421_PL_00_214 Rev C
Proposed Section A-A and B-B	421_PL_00_310 Rev A
Proposed Section C-C and D-D	421_PL_00_311 Rev A
Proposed Elevations - South East and North West	421_PL_00_320 Rev C
Proposed Elevations - South West and North East	421_PL_00_321 Rev B
Landscape Masterplan	11119-FPCR-XX-XX-DR-L-0003-P07

EXECUTIVE SUMMARY

1. Planning permission is sought for the demolition of the existing buildings on site and the erection of a 64no. bed care home (Use Class C2) at the Former Woodlands Hotel, Coupals Road, Haverhill.
2. As the Council cannot demonstrate a five year supply of housing, in accordance with paragraph 11(d) of the NPPF, the tilted balance applies. The proposed development has a number of economic, social and environmental benefits, and there are no adverse impacts of the proposed development which would significantly and demonstrably outweigh these benefits.
3. The benefits of the proposed development can be summarised as follows:
 - **Economic:** The development will have economic benefits in respect of job creation, both during construction and over the operational life time of the development.
 - **Social:** Care homes are an important part of overall healthcare provision, particularly for those with advanced care needs. As such there are significant social benefits arising from the development of a care home, including significant savings to the NHS as a result of removing bed blocking within hospitals, reduced falls at home, improved wellbeing and a reduction in loneliness. The proposed care home provides a highly attractive living environment that has been specifically designed to accommodate resident's complex needs. The proposal will make a contribution to housing supply in a context where the LPA is unable to demonstrate the required five year housing supply.
 - **Environmental:** The development will make an effective and efficient use of a previously developed, and vacant site in a sustainable location. The site is derelict and has a negative impact on the visual appearance of the area. Realistically a proposal of this nature is what is required to trigger the required change to the appearance of this site. It will be built to the necessary sustainable standards via an energy efficient design and fabric first approach to ensure a long-term responsible approach to building management, use of natural resources, carbon emissions and waste management.
4. Further, the site constitutes previously developed land, and it is considered that the re-development of this previously developed land, for a purpose where there is a clear identified need, complies with the positive approach advocated by paragraph 123 of the NPPF.

5. Indeed, the proposed care home would assist in meeting the existing and increasing shortfall of care beds in the market catchment, and would also provide dedicated dementia care provision, where there is currently a substantial under provision in the local authority area. Further, it is clear that the proposed size of the care home in this case (i.e. to deliver 64no. beds) is the appropriate size in order to ensure it can be viably delivered and operate successfully. This should be afforded significant weight in the decision-making process.
6. As such, overall, the principle of the proposed development is considered to be acceptable, and will ensure the long-term viable use of a vacant previously developed site.
7. The proposed development is also acceptable in design terms and from a technical point of view. Indeed, there has been a collaborative approach to design, grounded in site characteristics and the scheme will provide high quality, sustainable development delivering contemporary accommodation, relating harmoniously within the existing landscape setting of the site.
8. Overall, the need for the care home, along with other economic, social and environmental benefits of the proposed development are substantial. As the proposed development constitutes sustainable development for the purposes of NPPF paragraph 11, and there are no adverse impacts which significantly and demonstrably outweigh the benefits, the application should be approved.

1. INTRODUCTION & BACKGROUND

1.1. This Planning Statement has been prepared on behalf of Country Court Care Homes 5 Limited (“CCCH”) in support of an application for full planning permission for the demolition of the existing buildings on site and the erection of a 64no. bed care home (Use Class C2) at the Former Woodlands Hotel, Coupals Road, Haverhill (“the site”).

1.2. The description of development is as follows:

“Demolition of the existing buildings on site, and the erection of a 64no. bed care home (Use Class C2), together with access, car parking, landscaping and associated works.”

1.3. This Statement will describe the site and its locality; consider the prevailing planning policy; and assess the proposed development. The Statement will identify the relevant components of the Development Plan and other material considerations that would justify the grant of planning permission.

1.4. The remainder of this Statement is set out as follows:

- **Section 2:** provides a description of the Site and the surrounding area, together with the site’s planning history, and an overview of the pre-application engagement undertaken;
- **Section 3:** provides a description of the Proposed Development;
- **Section 4:** sets out an overview of the relevant planning policy context of the site and the Proposed Development;
- **Section 5:** sets out an assessment of the Proposed Development against the Statutory Development Plan and material considerations; and
- **Section 6:** provides an overall summary and conclusions

2. KEY BACKGROUND CONTEXT

Application Site and Surrounding Area

- 2.1. The site comprises the former Woodlands Hotel, which is located to the north of Coupals Road, to the eastern edge of Haverhill. The extent of the application site is shown edged in red on the Site Location Plan (dwg ref. 421_PL_01_101 Rev A) submitted with the application.
- 2.2. The former hotel buildings and car park remain in situ on the site, although the hotel has been vacant since 2018, and therefore the site has fallen into disrepair – a Structural Inspection Report (Glyme Structures) is submitted with this application, confirming that the existing fabric is not suitable for re-use. The remainder of the site comprises dense, overgrown shrubs and trees.
- 2.3. The site is currently accessed via two junctions – one main access junction from Coupals Road leading to the former hotel building, and another (also from Coupals Road) leading to a former secondary car park. The main access will be upgraded/amended in order to provide a suitable and safe access to the proposed development, and the secondary access will be closed.
- 2.4. To the east of the application site is an area of green space, which is designated as a village green. Woodlands Cottage (Grade II listed) is located beyond this (to the south-east), followed by open countryside. To the north is also open countryside, which benefits from outline planning permission (ref. DC/15/2151/OUT) for residential led development of up to 2,500 dwellings, along with two primary schools and local centres – a number of reserved matters and discharge of condition applications have been submitted. To the south of the application site is Haverhill Golf Club, and to the west is a rectangular field which is used by Haverhill Golf Club as their driving range/practice area.
- 2.5. The driving range/practice area separates the site from the urban edge of Haverhill, which comprises residential development at Roman Way, Justinian Close and Marcus Close. There is a permissive footpath which runs to the south of the driving range/practice area, linking the application site to the urban area.
- 2.6. The site is not located in a Conservation Area. Woodlands Cottage, a Grade II listed 18th-19th century thatched cottage, is located 70 metres south-east of the site. Pope

Mill Farmhouse and Barn, Grade II listed, are located around 330 metres to the south of the site. The site is in Flood Zone 1. In terms of designations, it is located outside of the defined settlement boundary, and is therefore a countryside location.

Planning History

- 2.7. Braintree Council's online register of planning applications has been consulted and there is no planning history of relevance to this proposed development. Planning history relates to the former use of the site as a hotel / restaurant only.

Pre-Application Engagement

- 2.8. Development of this site has been the subject of extensive pre-application discussions with the Council. The feedback received has informed the final design development of the proposals. For clarity, there have been five previous pre-application submissions (refs. 19/60149/PREAPP, 19/60220/PREAPP, 20/60301/PREAPP, 22/60089/PREAPP, and most recently, 22/60254/PREAPP).
- 2.9. Each submission built on the feedback received, with the final pre-application submission reaching a point where the Council confirmed it was satisfied that the Applicant has developed a scheme in terms of layout, design and appearance which could be supported by Officers if a planning application was submitted.
- 2.10. A brief summary of each pre-application advice request is provided below for reference:

19/60149/PREAPP

- 2.11. The Council made clear that demonstration of need would be critical to establishing the principle of development, given its countryside location. The Council also confirmed that the development of the site for a hotel and care home in two separate buildings (as previously proposed) would raise concerns regarding intensity of the use, and consideration should be given to providing a single building accommodating both uses.

19/60220/PREAPP

- 2.12. Following on from previous pre-application advice, the development proposals subsequently removed the hotel element, now being solely for a care home. The Council confirmed that in principle they could support a care home on this site, subject to demonstrating that it is viable and that there is a need.
- 2.13. There were some comments made in relation to design including a concern over the extent of the frontage, proximity to trees, location of car parking and internal layout and further discussions were therefore strongly encouraged.

20/60301/PREAPP

- 2.14. This submission attempted to address the Council's previous comments on design, and took a new direction with a more traditional approach to the front block of the building, inspired by the form of typical agricultural buildings, albeit with the flat roofed contemporary form of the building as originally proposed to the rear.
- 2.15. The Council, in its pre-application response, however confirmed that the design of the care home had taken a 'wrong turn' and that the traditional approach to the front element of the building created a visual dysfunction or conflict between the two main components of the development. Accordingly, the Council advised that the design had become confused and there needed to be better integration throughout. A clear direction was given that the scheme should be contemporary in appearance throughout and take the lead from the previous work presented on the rear blocks of the scheme.

22/60089/PREAPP

- 2.16. This submission, although including further information on care home need and a structural report, was predominately prepared in order to further advance design following receipt of the Council's advice under pre-application ref. 20/60301/PREAPP.
- 2.17. The project team reflected on the Council's feedback, and it was agreed to take a step back in the level of detail provided, to first seek an agreement to proposed massing/form and style, building up to a final design. This pre-application submission

was the first step of this process. This submission explored the massing of a contemporary flat roof scheme throughout.

- 2.18. The Council, in its pre-application advice, confirmed that the proposal, as submitted, was of sufficient quality to be supported at Officer level, albeit noted some more detailed design points which required further consideration, such as internal reconfiguration and integration of the roof garden walls.

22/60254/PREAPP

- 2.19. Following on from the Council's previous pre-application advice, this follow up submission was submitted as the final pre-application submission, ahead of preparing a formal planning application. This submission focussed on demonstrating that the design development minimises the embodied energy of the development, minimises the loss of trees as far as possible, and on the façades and material treatment to ensure a high-quality scheme which relates well with the existing landscape.
- 2.20. The Council, in its pre-application advice, confirmed that officers are satisfied that the Applicants have developed a scheme in terms of layout, design and appearance which can be supported if a planning application were to be submitted.
- 2.21. For clarity, the design of each pre-application scheme is provided in Section 3 of the Design and Access Statement prepared by WGP Architects and Appendix 1 of this document reviews the previous pre-application comments received from the Council, and details how the final proposals have responded to each of these.

3. THE PROPOSAL

3.1. The application seeks full planning permission for the demolition of the existing buildings on site and the erection of a 64no. bed care home (Use Class C2). The proposed development is explained in full in the accompanying Design and Access Statement, prepared by WGP Architects, and the associated architectural and landscape scheme drawings. This section will briefly summarise that information.

Amount

3.2. As noted above, the former hotel buildings and car park remain in situ on the site, although the hotel has been vacant for a significant period of time, and therefore the site has fallen into disrepair. The existing fabric is not suitable for re-use and as such, the existing built form will be demolished as part of this application.

3.3. The proposed care home will provide 64no. beds, which will all have en-suites. It will provide accommodation for the elderly, specifically for those with dementia, with the capacity for all care needs to be met on site.

3.4. As the proposal is for a care home for residents with complex care needs, it is unlikely that residents will leave the site very often. As such, facilities are provided on site for residents and their visitors which include, a central lounge, café and activity spaces. The building also contains administrative functions associated with the care home such as offices, laundry, staff rooms, medication stores and nurses' stations.

Layout and Scale

3.5. Through a combination of pre-application consultation and design development, a unique and appropriate design concept has been guided by the principle of adapting the architecture to the setting.

3.6. The position and orientation of the buildings has had particular regard to limiting the loss of existing trees as far as possible and blending in with the existing landscape setting. In this regard, the new building is sited on the footprint of the vacant hotel building, with two blocks behind stepping up the slope of the site.

- 3.7. The bulk of the building is set back behind the front block and is largely concealed by the trees to the boundary of the site. The area to the front of the site that is currently hardstanding is to be landscaped with formalised car parking and a drop-off area under a projecting canopy element, providing practical shelter for those who may need assistance from vehicle to entrance.
- 3.8. The layout, scale and design look to combine the stepping forms and materials with the immediate landscape to blend harmoniously with the natural setting. The site gradually slopes upwards from south-west to north-east which informs the stepping and configuration of the building blocks.
- 3.9. There is a series of garden areas which are concealed from views outside the site by the existing trees and dense vegetation that are to be retained and enhanced where possible. A nature trail for residents and their visitors will connect the garden areas.
- 3.10. A secure external amenity space, the 'Hanging Garden', will be located over the central block and, by virtue of its location and slatted screen, the perimeter is concealed from views into the site and does not overlook other parts of the site or surrounding areas.

Appearance

- 3.11. To enhance the concept of adapting the architecture to the setting and relate to the Grade II listed Woodlands Cottage, natural timber cladding has been selected as the predominant external material.
- 3.12. The cladding construction is developed to mimic the horizontal 'layers' of shrubs and trees to the boundaries of the site. The layers comprise: shrub; under-canopy; canopy; and emergent. The effect is achieved by applying battens to joints in cladding boards to the horizontal bands of the façade where they provide functions including screening, solar shading, guarding and additional weathering to exposed areas.

Landscaping

- 3.13. The development has been progressed with a holistic approach to landscape and sustainability, in order to respond to the semi-rural location of the site. The development is landscape-led, to ensure that it responds and adapts to its setting. In

this respect a Landscape Masterplan (dwg ref. 11119-FPCR-XX-XX-DR-L-0003-P07) is submitted with the application.

- 3.14. Footpaths are arranged simplistically, with looped routes to the north, east and west of the gardens. The footpaths connect destination points such as allotments, sheds, seating, greenhouses and features for attracting wildlife. The woodland area to the rear of the site is an existing high-quality feature of the site and there will also be a footpath through this woodland.
- 3.15. An avenue of trees at the front of the building leads to the eastern garden access. These trees will have a compact, upright form which responds to the external cladding of the building and maintains views of the façade. On the western side, there is a pathway from the car park into the garden.

Access and Parking

- 3.16. The site is currently accessed via two junctions – one main access junction from Coupals Road leading to the former hotel building, and another (also from Coupals Road) leading to a former secondary car park.
- 3.17. Vehicular access to the site (for all vehicles) will be via the existing main priority junction onto Coupals Road. Some minor modifications to the geometry of this existing site access are proposed, as shown in Appendix 2 of the Transport Statement (Connect Consultants) submitted with this application. The secondary access to the site will be closed, and therefore the site will be accessed only via one priority junction.
- 3.18. In terms of parking, 35no. car parking spaces are proposed, along with 22no. cycle parking spaces.

Sustainability

- 3.19. The proposed development will incorporate multiple renewable low carbon energy sources, including air source heat pumps and photo voltaic panels. Further, mechanical ventilation with heat recovery is proposed, lighting will be high efficiency LED lighting with intelligent controls to common spaces, and smart energy metering of services will be provided to allow review and management of services.

4. PLANNING POLICY

- 4.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004, states that all planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The Development Plan

- 4.2. The Development Plan for Braintree District Council comprises the Local Plan 2033, made up of Section 1 (adopted 22 February 2021) and Section 2 (adopted 25 July 2022).
- 4.3. Section 1 is a strategic plan for North Essex. It is shared with Colchester and Tendring Councils and covers all three authorities. Section 2 contains policies, maps and sites for development, housing, employment, regeneration within Braintree District.
- 4.4. The key policies for the determination of the application are listed below and appraised in detail against the proposal in 'Planning Considerations' section of this Statement.
- **Policy SP1 (Presumption in Favour of Sustainable Development):** The Local Planning Authorities will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.
 - **Policy SP2 (Recreational Disturbance Avoidance and Mitigation Strategy) (RAMS):** Contributions will be secured from development towards mitigation measures in accordance with the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy 2018-2038.
 - **Policy SP3 (Spatial Strategy for North Essex):** Existing settlements will be the principal focus for additional growth. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area.

- **Policy SP6 (Infrastructure and Connectivity):** All development must be supported by the provision of the infrastructure, services and facilities that are identified to serve the needs arising from the development.
- **Policy SP7 (Place Shaping Principles):** All new development must meet high standards of urban and architectural design. Development must, amongst other things, respond positively to local character and context; provide buildings that exhibit individual architectural quality within well-considered public and private realms; protect and enhance assets of historical or natural value; incorporate biodiversity creation and enhancement measures; enhance the public realm through additional landscaping; include parking facilities that are well integrated; include measures to promote environmental sustainability; and protect the amenity of existing and future residents and users.
- **Policy LPP1 (Development Boundaries):** Development outside development boundaries will be confined to uses appropriate to the countryside whilst also protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils to protect the intrinsic character and beauty of the countryside.
- **Policy LPP33 (Specialist Housing):** Specialist housing is defined as accommodation which has been specifically designed and built to meet the needs of the elderly, disabled, young or vulnerable adults, and may include some elements of care and support for everyone who lives there. Proposals for specialist housing provision are allocated on the Proposals Map and will be permitted within development boundaries providing that a number of criteria are met. New specialist housing on unallocated sites in the countryside will not be supported.
- **Policy LPP42 (Sustainable Transport):** Sustainable modes of transport should be facilitated through new developments to promote accessibility and integration into the wider community and existing networks.
- **Policy LPP43 (Parking Provision):** Development will be required to provide vehicular and cycle parking in accordance with the Essex Vehicle Parking Standards.

- **Policy LPP47 (Built and Historic Environment):** The Council will promote and secure a high standard of design and layout in all new development and the protection and enhancement of the historic environment.
- **Policy LPP48 (An Inclusive Environment):** Developments shall achieve a high standard of accessible and inclusive design to ensure that they can be used safely, easily and with dignity by all; are convenient and welcoming with no disabling barriers; are flexible and responsive taking account of the needs of different users; and are maintained and managed to ensure they remain inclusive.
- **Policy LPP49 (Health and Wellbeing Impact Assessment):** To ensure new development is designed to promote good health all developments over 50 residential units all C2 development and non-residential developments over 1,000sqm will be required to undertake a Health Impact Assessment having regard to the Essex Design Guide Supplementary Guidance on Health Impact Assessments and the guidance of Public Health England.
- **Policy LPP50 (Provision of Open Space, Sport and Recreation):** All developments will be expected to provide new open spaces in line with the requirements set out in the Open Spaces Supplementary Planning Document 2009 or successor document.
- **Policy LPP52 (Layout and Design of Development):** The Council will seek a high standard of layout and design in all developments in the District and encourage innovative design where appropriate.
- **Policy LPP57 (Heritage Assets and their Settings):** The Council will seek to preserve and enhance the immediate settings of heritage assets by appropriate control over the development, design and use of adjoining land.
- **Policy LPP63 (Natural Environment and Green Infrastructure):** Development proposals must take available measures to ensure the protection and enhancement of the natural environment, habitats, biodiversity and geodiversity of the District and to be acceptable, also taking climate change and water scarcity into account in their design.

- **Policy LPP64 (Protected Sites):** Where there is a confirmed presence or reasonable likelihood of protected species or priority species being present on or immediately adjacent to a development site, the developer will be required to undertake an ecological survey and will be required to demonstrate that an adequate mitigation plan is in place to ensure no harm to protected species and no net loss of priority species.
- **Policy LPP65 (Tree Protection):** When considering the impact of development on good quality trees the Council will expect developers to reflect the best practice guidance set out in BS5837:2012 (as amended). The standard recommends that trees of higher quality are a material consideration in the development process. Where trees are to be retained on new development sites there must be a suitable distance provided between the established tree and any new development to allow for its continued wellbeing and ensure it is less vulnerable to pressures from adjacent properties for its removal.
- **Policy LPP66 (Protection, Enhancement, Management and Monitoring of Biodiversity):** Development proposals shall provide for the protection of biodiversity and the mitigation or compensation of any adverse impacts. Additionally, enhancement of biodiversity should be included in all proposals, commensurate with the scale of the development.
- **Policy LPP67 (Landscape Character and Features):** In its decision-making on applications, the Local Planning Authority will take into account the different roles and character of the various landscape areas in the District, and recognise the intrinsic character and beauty of the countryside, in order to ensure that any development permitted is suitable for the local context. Proposals which may impact on the landscape such as settlement edge, countryside or large schemes will be required to include an assessment of their impact on the landscape and should not be detrimental to the distinctive landscape features of the area such as trees, hedges, woodlands, grasslands, ponds and rivers.
- **Policy LPP70 (Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards):** Proposals for all new developments should prevent unacceptable risks from all emissions and other

forms of pollution (including light and noise pollution) and ensure no deterioration to either air or water quality.

- **Policy LPP71 (Climate Change):** Applicants will be expected to demonstrate that measures to lower carbon emissions, increase renewable energy provision and adapt to the expected impacts of climate change have been incorporated into their schemes.
- **Policy LPP72 (Resource Efficiency, Energy Generation and Energy Efficiency):** All planning applications for new residential dwellings shall include renewable and low carbon energy technology to provide at least a 19% improvement in energy performance over the requirements of the Building Regulations (2013) unless: a. Revised Building Regulations standards exceed this requirement, or b. All new non-residential buildings with a floor area in excess of 500sqm shall achieve a minimum BREEAM rating (or its successor) of 'Very Good'.
- **Policy LPP74 (Flooding Risk and Surface Water Drainage):** New development shall be located on Flood Zone 1 or areas with the lowest probability of flooding, taking climate change into account, and will not increase flood risk elsewhere.
- **Policy LPP75 (Surface Water Management Plan):** The Council will require development to have regard to and contribute positively towards delivering the aims and objectives of the Braintree and Witham Surface Water Management Plan as updated. Developments located in Critical Drainage Areas (CDAs), Local Flood Risk Zones (LFRZs) and for redevelopments of more than one property or area greater than 0.1 hectare should seek betterment to a greenfield runoff rate.
- **Policy LPP76 (Sustainable Urban Drainage Systems):** All new development of 10 dwellings or more and major commercial development, car parks and hard standings will incorporate Sustainable Drainage Systems (SuDs) appropriate to the nature of the site. Such systems shall provide optimum water runoff rates and volumes taking into account relevant local or national standards and the impact of the Water Framework Directive on flood risk issues, unless it can be clearly demonstrated that they are impracticable.

- **Policy LPP78 (Infrastructure Delivery and Impact Mitigation):** Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal.

National Planning Policy Framework (NPPF, July 2021)

- 4.5. The revised National Planning Policy Framework (NPPF) was published in July 2021 and sets out the government’s planning policies for England and how these are expected to be applied.

Achieving Sustainable Development

- 4.6. Chapter 2 of the NPPF sets out how the Government aims to achieve sustainable development. Paragraph 7 of the NPPF advises that, ‘The purpose of the planning system is to contribute to the achievement of sustainable development.’

- 4.7. Paragraph 8 continues, achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:

- an **economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a **social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- an **environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 4.8. Paragraph 11 identifies that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:
- approving development proposals that accord with an up-to-date development plan without delay; or
 - where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.’

Decision-making

- 4.9. Chapter 4 of the NPPF provides key guidance for decision making. Paragraph 38 states that Local Planning Authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.
- 4.10. The NPPF provides guidance on planning conditions and obligations. Paragraph 55 states that Local Planning Authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 4.11. Paragraph 56 continues to state that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged

before development commences should be avoided, unless there is a clear justification.

4.12. Paragraph 57 advises that planning obligations must only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Delivering a Sufficient Supply of Homes

4.13. Chapter 5 of the NPPF provides guidance on the supply of homes. Paragraph 60 states, '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.'

4.14. Paragraph 74 confirms local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

Promoting Healthy and Safe Communities

4.15. Chapter 8 of the NPPF seeks to promote healthy and safe communities. Paragraph 92 advises that, 'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a. promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

- b. are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and
- c. enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.’

Promoting Sustainable Transport

- 4.16. Chapter 9 of the NPPF provides guidance on the promotion of sustainable transport. Paragraph 105 identifies that the planning system should actively manage patterns of growth in support of the objectives of sustainable transport. As such significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 4.17. Paragraph 110 recommends that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
- a. appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b. safe and suitable access to the site can be achieved for all users; and
 - c. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.’
- 4.18. Paragraph 111 states development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Making Effective Use of Land

- 4.19. Paragraph 119 advises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while

safeguarding and improving the environment and ensuring safe and healthy living conditions.

- 4.20. Paragraph 120 identifies that planning decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs' and 'promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available site could be used more effectively'.
- 4.21. Paragraph 123 confirms local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.

Achieving Well-Designed Places

- 4.22. Paragraph 126 states 'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.'
- 4.23. Paragraph 130 states that '*Planning policies and decisions should ensure that developments:*
- a. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c. are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

- e. optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f. create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

4.24. Paragraph 134 identifies that ‘Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Conserving and enhancing the historic environment

- 4.25. Paragraph 194 states that ‘Local Planning Authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance’.
- 4.26. Paragraph 197 requires local planning authorities to ‘take account of a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 4.27. Paragraph 199 notes that ‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater weight should

be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’.

National Planning Practice Guidance

- 4.28. The National Planning Practice Guidance (PPG) is a web-based resource which was launched in 2014, and together with the NPPF sets out what the Government expects from Local Planning Authorities. The PPG specifically adds further context and more detailed practical guidance to the NPPF, and it is intended that the two are read together. The following points are of particular relevance to these proposals.
- 4.29. There is a specific section addressing housing for older and disabled people and Paragraph 001 (Reference ID: 63-001-20190626) states that: ‘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 system. 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.
- 4.30. Paragraph 003 (Reference ID: 63-003-20190626) recognises that there are a diverse range of needs which exist, advising that: ‘The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support’.
- 4.31. Paragraph 010 (Reference ID: 63-010-20190626) sets out the different types of specialist housing for older people including age restricted general market housing; retirement living or sheltered housing; extra care housing or housing with care; and residential care homes and nursing homes. It acknowledges that there is significant variation in these types of accommodation and specifically describes residential care homes and nursing homes as having: ‘individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes’.

- 4.32. Paragraph 016 (Reference ID: 63-016-20190626) 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'.

5. PLANNING CONSIDERATIONS

- 5.1. Section 38 of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Principle of Development

- 5.2. As noted previously, the site is located outside of the defined settlement boundary of Haverhill and is therefore defined as a countryside location. Nevertheless, it is a previously developed site, containing buildings and associated hardstanding associated with the former use of the site as a hotel/restaurant (Woodlands Hotel).
- 5.3. In respect of the principle of development, Local Plan Policy SP3 sets out that existing settlements will be the principal focus for additional growth. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area.
- 5.4. Policy LPP1 relates to development boundaries and confirms that development outside such boundaries will be confined to uses appropriate to the countryside whilst also protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils to protect the intrinsic character and beauty of the countryside. Further, Policy LPP33 relates specifically to specialist housing i.e. including accommodation which has been specifically designed and built to meet the needs of the elderly, and states that new specialist housing on unallocated sites in the countryside will not be supported.
- 5.5. Paragraph 11 of the NPPF outlines a presumption in favour of sustainable development which for decision taking means, (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

5.6. Footnote 8 of the NPPF confirms policies which are most important for determining an application (for applications involving the provision of housing) can be considered out-of-date in situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

5.7. In this respect, the Council's latest five year housing land supply position statement (as of April 2022) confirms that the Council has a supply of 4.86 years, meaning it is unable to demonstrate a five year housing supply. As such, the tilted balance applies, and Local Plan Policies SP3, LPP1 and LPP33 are therefore considered out of date for the purposes of this application.

5.8. To confirm, in an appeal at land adjacent to Newell Hall, Warfield, Bracknell (ref. APP/R0335/W/20/3245185), for the erection of a 45no. bedroom care home, the Inspector confirmed (at paragraph 52) that the tilted balance applies to Class C2 care home development, as it provides a form of housing, stating:

"...Accordingly, regardless of the current status of the most important policies, the tilted balance would ordinarily apply as a result of Footnote 8 to Paragraph 11 d) of the Framework, as the appeal proposal is providing a form of housing. "

5.9. In addition, the NPPG (Paragraph: 016a Reference ID: 63-016a-20190626) confirms that:

"Plan-making authorities will need to count housing provided for older people against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data."

- 5.10. As such, it is clear that the tilted balance can be applied to care home development, as a form of housing, and also that the provision of 64no. care home beds would contribute towards the Council's housing land supply position.
- 5.11. As demonstrated below, the proposed care home will meet an identified need for such development, on a previously developed site, and will also offer significant benefits. Given this, the NPPF (paragraph 11(d)) is clear that the local planning authority should take a positive approach to such development.

The 'Need' for a Care Home

- 5.12. The need for specialist housing for older person's is a pressing issue for the planning system, with Government recognising that the need for such housing is of "critical importance" (Paragraph 001 (Reference ID: 63-001-20190626) of the NPPG).
- 5.13. Further, paragraph 123 of the NPPF sets out that "*Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.*"
- 5.14. Whilst now dated, at a local level, the Strategic Housing Market Assessment (SHMA) Update (December 2015), prepared for Braintree, Chelmsford, Colchester and Tendring Councils, provides more specific evidence on the need for older person's housing. This document was prepared in respect of the now adopted Local Plan (Part 1). The SHMA advises that the older population will dramatically increase up to 2037. Paragraph 6.5 states:

"The Objectively Assessed Need projections supplied by Edge Analytics indicate that the population aged 65 or over is going to increase dramatically over the plan period from 134,682 in 2015 to 205,906 in 2037, a rise of 52.9%. Within the HMA, Colchester is projected to record the biggest growth in its older person population, (60.6%), followed by Chelmsford (57.5%), Braintree (51.0%) and Tendring (44.5%)."

- 5.15. As well as the need for specialist housing for older people, there will also be additional requirement for registered care i.e. the sector that the proposed development sits within. The SHMA advises at paragraph 6.13 that according to the Strategic Housing

for Older People (SHOP) tool there are around 5,882 spaces in nursing and residential care homes in the Housing Market Area (HMA). It makes the presumption that the current occupation rate by age across the area is continued forward and the SHOP tool indicates there will be a requirement for 12,483 spaces in the HMA in 2037, suggesting an additional 6,601 spaces will be required over the next 23 years (having regard for the date of the SHMA). What the SHMA doesn't do is break need down to individual local authority areas for registered care provision.

- 5.16. As such, Carterwood has prepared a Planning Need Assessment in order to support this application. This reviews care home demand and capacity within a localised catchment area, that being a circa 6-mile market catchment and the Braintree District Council local authority area. This catchment area has been used by Carterwood following an analysis of resident data from a number of private operators of high-quality operational care homes, and a calculation of the mean distance travelled by each resident to live in that care home.
- 5.17. It is also noted that a significant number of those who would occupy the proposed care home would be self-funded and would make their own decision (sometimes with input or by proxy by their family) as to when or where to enter a care home setting. The quality of care and accommodation, along with its location and proximity to family and friends will be the major drivers of this decision-making process, rather than the commissioning intentions of the local authority.
- 5.18. The Assessment is based on the care home being operational by 2025 (i.e. the earliest it could be available), and confirms the following:
- There is a net need for 169no. and 466no. full market standard wetroom care home beds in the market catchment and local authority, respectively.
 - There is a net need for 86no. and -269no. full market standard en-suite care home beds in the market catchment and local authority, respectively.
 - In terms of dedicated dementia beds, there is a net need for 282no. full wetroom care home beds in the local authority, with the market catchment at equilibrium on this basis. There is a net need for 158no. en-suite care home beds in the local authority, and -47no. in the market catchment.

- The full wetroom beds shortfalls are expected to increase to over 273no. and 613no. beds by 2035 (this assumes that all planned beds are developed and that existing supply and prevalence rates remain constant, reflecting the sustained and escalating nature of need).
- Based on minimum market standard bedspaces in the market catchment, there is a shortfall of 86no. care beds, with an oversupply in the local authority area. There is, however, a significant undersupply of 158no. dedicated dementia beds within the local authority area (at 2025).

5.19. Overall, based on minimum market standard bedspaces in the market catchment, there is a shortfall of 86no. care beds, with an oversupply in the local authority area. There is, however, a significant undersupply of 158no. dedicated dementia beds within the local authority area (at 2025). The proposed care home, being predominately dedicated to dementia care, would therefore assist in meeting the existing and increasing shortfall of care beds in the market catchment, and will also assist in providing dedicated dementia care provision, where there is currently a substantial under provision in the local authority area.

5.20. The details of the need assessment for the care home set out above identify a strong need case for the development, and a substantial increase in need as the population of Braintree and the market catchment area ages. This is a significant benefit and material consideration in the determination of this application.

'Size' of the Care Home

5.21. As part of pre-application discussions, the Council also requested information in respect of the required size of the care home, to ensure it is not larger than necessary, given the out of settlement location i.e. to demonstrate that the care home needs to be the size proposed in order for it to be viable.

5.22. In this respect, a Development Consultancy Report has been prepared by Knight Frank and accompanies this application. This Report assesses the required care home size of the scheme, and comprises an analysis which compares a number of trading performance indicators in the UK against 'local area' levels, by care home size band. As part of this analysis, all modern purpose-built care homes developed since

2016 have been reviewed and a review of any future schemes in the 'local area' undertaken.

5.23. For the purpose of this Report and to ensure a robust sample, 'local area' refers to combined averages for the counties of Suffolk, Essex and Cambridgeshire (i.e. the 'Eastern Counties').

5.24. The Report confirms the following:

- 58% of all modern purpose-built care home developments completed since 2016 across the UK were in the 60-79no. beds category. In the Eastern Counties specifically, this figure was higher at 68%.
- The average number of beds delivered through schemes in the Eastern Counties sits at 64no. beds.
- Earnings before interest, taxes, depreciation, amortisation, rent, and management fees (EBITDARM) margins are typically higher for care homes with 60no. beds or more. Across the UK, care homes in the 1-39no. bed and 40-59no. bed band averaged margins of 20% and 23.9% respectively. This compared to margins in excess of 28% across all larger bed bands.
- The 60-79no. bed band shows the strongest profitability both in the UK and Eastern counties in relation to EBITDARM per occupied bed.
- When comparing the 60-79no. bed band to the 40-59no. bed band, the larger schemes performed stronger on six out of the nine key performance indicators. The 60-79no. bed band averaged higher occupancy, superior average weekly fees, greater income levels, lower staff costs (as a percentage of income), lower property costs and greater EBITDARM per occupied bed.

5.25. The above highlights the strength of schemes sitting within the 60-79no. bed band, where efficiencies are gained, and economies of scale achieved. As such, it is clear that the proposed size of the care home in this case (i.e. to deliver 64no. beds) is the optimum size in order to ensure it can be viably delivered and operate successfully. This is a significant material consideration in the determination of this application.

Economic, Social and Environmental Benefits

5.26. There are significant economic, social and environmental benefits of the proposed development, as follows:

- **Economic:** The introduction of Class C2 units will ensure an optimum, viable use of this vacant previously developed land, creating temporary construction jobs and additional permanent roles once the development is complete i.e. in areas such as management, care, grounds maintenance, leisure, domestic services; and direct construction-related jobs.
- **Social:** The proposed development is a high quality and well-designed purpose care home scheme to deliver 64no. beds, and will therefore result in a strong residential sense of place and community. The proposed development will also make an important contribution towards housing need and supply in the Braintree area through the provision of a further 64no. beds, to meet an identified local housing need. Care homes can consequently encourage and free-up existing family-sized homes for younger families to meet local needs. In addition, the proposed development will support significant improvements in residents' health and well-being. Care homes are an important part of overall healthcare provision, particularly for those with advanced care needs. As such there are other significant social benefits arising from the development of a care home, including significant savings to the NHS as a result of removing bed blocking within hospitals, reduced falls at home, improved wellbeing and a reduction in loneliness.
- **Environmental:** The proposed development will make an effective and efficient use of a previously developed, and vacant site. The existing building is derelict and realistically will only be remedied by investment through development. The scheme will significantly enhance the visual appearance of the site. It will be built to the necessary sustainable standards via an energy efficient design and fabric first approach to ensure a long-term responsible approach to building management, use of natural resources, carbon emissions and waste management.

- 5.27. Overall, the proposed development has a number of benefits which should be afforded significant weight in the decision-making process. As is demonstrated below, there are no adverse impacts of the proposed development which would significantly and demonstrably outweigh the benefits. As such, the development is sustainable development for the purposes of paragraph 11 of the NPPF.

Conclusion

- 5.28. Overall, as the Council cannot demonstrate a five year supply of housing, in accordance with paragraph 11(d) of the NPPF, the tilted balance applies. The proposed development has a number of economic, social and environmental benefits, and there are no adverse impacts of the proposed development which would significantly and demonstrably outweigh these benefits.
- 5.29. Further, the site constitutes previously developed land and it is considered that the re-development of this previously developed land, for a purpose where there is a clear identified need, complies with the positive approach advocated by paragraph 123 of the NPPF.
- 5.30. Indeed, the proposed care home would assist in meeting the existing and increasing shortfall of care beds in the market catchment, and would also provide dedicated dementia care provision, where there is currently a substantial under provision in the local authority area. Further, it is clear that the proposed size of the care home in this case (i.e. to deliver 64no. beds) is an appropriate size in order to ensure it can be viably delivered and operate successfully. Although within the 'countryside', it is directly adjacent to Haverhill, a large sustainable settlement These factors should be also afforded significant weight in the decision-making process.
- 5.31. Overall, the principle of the proposed development is considered to be acceptable, and will ensure the long-term viable use of a vacant, derelict site.

Design

- 5.32. The DAS explains the approach to the design, layout and appearance of the proposed development, and the rationale for materials selection and elevation treatment.

- 5.33. Through a combination of pre-application consultation and design development, a unique and appropriate design concept has been guided by the principle of adapting the architecture to the setting.
- 5.34. The position and orientation of the buildings has had particular regard to limiting the loss of existing trees as far as possible and blending in with the existing landscape setting. In this regard, the new building is sited on the footprint of the vacant hotel building, with two blocks behind stepping up the slope of the site.
- 5.35. The bulk of the building is set back behind the front block and is largely concealed by the trees to the boundary of the site. The area to the front of the site that is currently hardstanding is to be landscaped with formalised car parking and a drop-off area under a projecting canopy element, providing practical shelter for those who may need assistance from vehicle to entrance.
- 5.36. The layout, scale and design look to combine the stepping forms and materials with the immediate landscape to blend harmoniously with the natural setting. The site gradually slopes upwards from south-west to north-east which informs the stepping and configuration of the building blocks.
- 5.37. In terms of appearance, to enhance the concept of adapting the architecture to the setting and relate to the Grade II listed Woodlands Cottage, natural timber cladding has been selected as the predominant external material.
- 5.38. The cladding construction is developed to mimic the horizontal 'layers' of shrubs and trees to the boundaries of the site. The layers comprise: shrub; under-canopy; canopy; and emergent. The effect is achieved by applying battens to joints in cladding boards to the horizontal bands of the façade where they provide functions including screening, solar shading, guarding and additional weathering to exposed areas.
- 5.39. Overall, the proposed development achieves a high quality design and layout, integrating sensitively into the site and informed by its topography and landscape characteristics. As such, the proposed development is acceptable in design terms, in accordance with Local Plan Policies SP7, LPP47, LPP48, LPP52, LPP63 and LPP67.

Amenity

- 5.40. The amenity of residents is an important element of the building's, design, operation and management to ensure that the aims of the care home can be successfully achieved. Amenity and well-being is central to delivering the social benefits of this form of development.
- 5.41. Generously proportioned and well-designed living accommodation which can promote and support a resident's independence, whilst being capable of adaption to suit the level of care and support, is provided in order to ensure quality of life and health. There will also be access to communal facilities and wider landscaped open space to support everyday living and quality of life, and allow each resident to enjoy being part of a community.
- 5.42. In terms of neighbouring amenity, the site is well enclosed by existing landscaping and is separated from existing residential dwellings to the west by the driving range/practice area. It is also separated from the Woodlands Cottage to the east by vegetation and a village green area. As such, there are no constraints in respect of neighbouring amenity.
- 5.43. On this basis, the proposed development will achieve a high level of residential amenity in compliance with Local Plan Policy SP7.

Transport Considerations

- 5.44. The application is supported by a Transport Statement (TS), prepared by Connect Consultants. The TS provides details of the site context, including its accessibility by relevant transport modes, describes the site access arrangements and parking provision and provides an assessment of the vehicular attraction and trip generation of the proposed development and its traffic effects.
- 5.45. In respect of accessibility by relevant transport modes, the TS confirms that the site is connected to the local pedestrian network, and there are a number of bus stops within walking distance of the site – the nearest is 315 metres away.

- 5.46. Vehicular access to the site for all vehicles will be via the existing priority junction onto Coupals Road. Coupals Road follows a broadly east / west orientation, providing connections to Haverhill to the west of the site and Sturmer / Kedington to the east. Some minor modifications to the geometry of the existing site access are proposed, as show in Appendix 2 of the TS. Vision splays of 2.4m x 90m to the east, and 2.4m x 72m to the west, have been shown on the site access drawing (Appendix 2 of the TS), which indicates the upper extents of available visibility. The secondary access point on Coupals Road, which led to the former hotel car park, will be closed as part of the proposals, leaving one sole access point.
- 5.47. Servicing for the proposed development will be via a private service, utilising an 11.2m refuse vehicle and a 10m rigid delivery vehicle. Appendix 3 of the TS shows a swept path analysis of the refuse and delivery vehicles manoeuvring.
- 5.48. In terms of car parking, the car parking standards relevant to the proposed development are contained in Section 4 of Essex County Council's 'Parking Standards – Design and Good Practice' document (adopted in 2009). For residential care homes, the maximum (our emphasis) standard is 1no. space per full time equivalent staff and 1no. visitor space per 3no. beds. The care home will operate with 20no. staff working at one time, and provides a total of 35no. car parking spaces.
- 5.49. The proposed development also provides a total of 20no. cycle parking spaces, comprised of 10no. 'Sheffield' style cycle parking loops for both staff and visitors, as well as 2no. accessible cycle parking spaces i.e. a total of 22 spaces which also accords with local standards.
- 5.50. In respect of trip generation from the proposed development, an assessment was undertaken based on an AM peak between 8am-9am and PM peak between 5pm-6pm. In respect of the AM peak, the proposed development is anticipated to generate 10no. trips, and in the PM peak this is anticipated to be 5no. trips. As such, the TS concludes that the traffic effect of the proposed development is negligible and requires no further assessment.
- 5.51. Overall, it is clear that the proposed development is acceptable in highway terms, in accordance with Local Plan Policies LPP42 and LPP43.

Flood Risk/Drainage

- 5.52. The application is supported by a Flood Risk Assessment and Drainage Strategy, prepared by BSP Consulting. In terms of flood risk, the Assessment confirms that the site is located in Flood Zone 1 and is at a very low risk of surface water flooding. As such, Sequential and Exception Tests are not required, and the location of the proposed development is acceptable in flood risk terms.
- 5.53. In terms of drainage, the British Geological Survey's Geology of Britain mapping indicates that the site lies upon bedrock geology consisting of Lewes Nodular Chalk Formation and Seaford Chalk Formation (Undifferentiated) – Chalk, and superficial deposits consisting of Lowestoft Formation – Diamicton.
- 5.54. Infiltration testing to BRE 365 specification was completed by Evolve Geo-Environmental in March 2023, in which 3no. infill tests were carried out at 3no. trial pit locations on-site. Ground conditions at these locations generally comprised made ground, underlain by gravelly clays and, as such, each test failed to complete. Based on the above information, permeable ground conditions are not present at the site. As such, the disposal of surface water runoff via infiltration has been discounted.
- 5.55. As such, surface water runoff from the proposed development is intended to be harvested for re-use. Rainwater recycling is the main strategy for surface water drainage. For the external ground level hard surfaced areas where rainwater harvesting will not be suitable, permeable paving will be utilised i.e. for car parking spaces and pedestrian walkways. Any impermeable surfaces will be drained to features such as bioretention areas, swales and gravel filter drains which collect and retain surface water, before allowing it to dissipate via high-level filtration and evapotranspiration.
- 5.56. The proposed surface water drainage system will be designed to accommodate the 1 in 30-year rainfall event without any surface water flooding and will be capable of retaining the 1 in 100-year plus climate change (40%) storm event on site without flooding any buildings.
- 5.57. In respect of foul water drainage, as the nearest public sewers are located approximately 100 metres to the south-west of the site, within Coupals Road, it is envisaged that a new private package treatment works or cesspit to serve the proposed development will be installed.

- 5.58. Overall, the above demonstrates that the development is acceptable in flood risk and drainage terms, in accordance with Local Plan Policies LPP63, LPP74, LPP75, and LPP76.

Arboricultural

- 5.59. An Arboricultural Impact Assessment has been prepared by Oakfield Arboricultural Services and is submitted with this application. The tree survey classifies all trees on the site depending on their value and health:
- Category A: Highly desirable for retention.
 - Category B: Desirable for retention.
 - Category C: Of no merit, could be retained.
 - Category U: Unviable beyond 10 years.
- 5.60. The proposed development has been designed to minimise the loss of trees where absolutely possible. To facilitate the proposed development, the removal of 18no. single trees and 6no. groups of trees is required. In addition, the part removal of 3no. groups of trees is also required.
- 5.61. This removal will be compensated for through the planting of 128no. new trees. As such, in arboricultural terms, there is a significant net gain of trees. The Landscaping Masterplan submitted with this application provides further details of the proposed tree planting, together with the wider proposed landscaping and planting.
- 5.62. On this basis, the proposed development is acceptable in arboricultural terms, in accordance with Local Plan Policy LPP65.

Landscape and Visual Impact

- 5.63. A Landscape and Visual Appraisal (LVA) has been prepared by FPCR and accompanies this application. The purpose of the LVA is to provide an assessment of the likely landscape and visual effects of the proposed development.
- 5.64. The LVA confirms that the site's landscape character has the ability to absorb development of the scale and type proposed. The proposed development of a care home, with associated landscaping, is not out of character, reflecting the scale and

nature of the development currently located within the site. The proposals are therefore considered to provide an appropriate design approach within this landscape context.

- 5.65. The LVA also confirms that design and mitigation measures are adopted and embedded within the scheme as identified within the application drawings, and specifically on the Landscape Masterplan (dwg ref. 11119-FPCR-XX-XX-DR-L-0003-P07). The proposed development includes the provision of new planting and considered landscaped spaces. The proposed landscaping will be multifunctional in its design and management, so that it performs a range of functions, to include benefits for residents, screening, biodiversity and climate change mitigation. These landscape strategies will minimise the level of adverse effects on landscape character and visual amenity.
- 5.66. Overall, the LVA concludes that the proposed development would not result in any unacceptable long-term landscape and visual effects and would indeed provide some landscape benefits in the longer term i.e. through the removal of the former derelict Woodlands Hotel, and the introduction of a well-designed and cohesive building with associated landscaping.
- 5.67. The proposed development is therefore acceptable in terms of landscape and visual impact, in accordance with Local Plan Policies SP7, LPP63 and LPP67.

Ecology

- 5.68. An Ecological Appraisal has been undertaken by FPCR in order to provide an ecological assessment of the site. The Assessment confirms that the dominant habitats comprise neutral semi-improved grassland and semi-natural broadleaved woodland. Other habitats present include coniferous woodland plantation, poor semi-improved grassland, a hedgerow, a treeline and areas of dense/continuous scrub, scattered scrub, and hardstanding/buildings.
- 5.69. No international statutory ecological designations are within 10km of the site. Haverhill Railway Walks Local Nature Reserve is located approximately 500 metres west of the site at its closest point. Given the nature of the proposed development, it is considered unlikely to result in a significant impact as a result of increased recreational pressure.

Overall, statutory and non-statutory ecological designations are not considered to pose a constraint to the proposed development.

5.70. A Phase 1 Habitat survey (including a bat assessment) was completed in August 2022, with follow up bat surveys undertaken. A summary of the findings is presented below:

- **Bats:** no roosts were identified across the surveys carried out, and as such, demolition of the existing buildings on site is not constrained. Suitable commuting and foraging habitats for bats included the boundary hedgerows, scrub, treelines, plantation woodland, broadleaved woodland, semi-improved grassland, whilst the areas of hardstanding habitat were considered to provide negligible and limited foraging potential.
- **Reptiles:** No evidence of reptiles was noted during the survey.
- **Great Crested Newt:** There are 5no. waterbodies within 500 metres of the site, separated from the site by a single lane road which is not considered to be a considerable barrier to GCN movement.
- **Birds:** The site offers opportunities for a range of common and widespread bird species.
- **Badger:** No badger setts or signs were identified on the site.
- **Other Protected/Notable Species:** No evidence of other protected or notable species were noted during the survey. No other protected or notable species are considered likely to be present/utilising the habitats within the site.

5.71. eDNA surveys in respect of Great Crested Newts (GCN) have been carried out by FPCR given the presence of 5no. waterbodies within 500 metres of the site. Four off-site ponds (P1, P2, P4 and P5) are located within the confines of the adjacent golf club (Haverhill Golf Club), with a further pond (P3) located in a private garden - access to this pond for surveying was not permitted.

5.72. The results returned were negative for GCN DNA and GCN are therefore considered to be absent from ponds P1, P2, P4 and P5. Pond P3 is located c.280m to the southwest of the site within an area of grassland surrounded by woodland. While some suitable habitat connectivity was present in the form of grassland and linear trees/scrub, it is considered unlikely that any GCN potentially present in this waterbody would be utilising the small area of suitable habitat on site. Overall, it is

considered unlikely that GCN are present and the species is not considered to pose a statutory constraint to the proposed development.

- 5.73. In addition, a Biodiversity Net Gain Assessment has been prepared by FPCR and accompanies this application. It confirms that the site has a baseline value of 7.98 habitat units. The results of the assessment show that the proposals will lead to a gain of 9.17 habitat units, representing a 14.95% gain. This is achieved through an increase of created habitat units which results from the incorporation of additional areas of scrub planting, biodiverse green roof and neutral grassland planting at the peripheries of the site and the planting of urban trees.
- 5.74. Overall, the proposed development is acceptable in ecological and biodiversity net gain terms, in accordance with Local Plan Policies LPP63, LPP64 and LPP66.

Heritage

- 5.75. A Settings Assessment (Heritage Assessment) has been prepared by Cotswold Archaeology in support of this application. As noted previously, the site is not located in a Conservation Area. Woodlands Cottage, a Grade II listed 18th-19th century thatched cottage, is located 70 metres south-east of the site. Pope Mill Farmhouse and Barn, Grade II listed, are located around 330 metres to the south of the site.
- 5.76. The Assessment confirms that the significance of Woodlands Cottage is derived from its aesthetic and evidential value. The setting of the Cottage, which has altered substantially over the last century, generally negatively contributes to its significance through creation of landscape which reduces the ability to perceive the building within its historic context. The proposed development would not erode this setting further and would therefore result in **No Harm** to the significance of this designated heritage asset.
- 5.77. The proposed development will cause **No Harm** to the significance of Pope Mill Farmhouse and Barn through changes to their setting. Further, the proposed development will result in **No Harm** to any other designated heritage assets within the wider landscape.
- 5.78. On the basis of the above, the proposed development is acceptable in heritage terms, in accordance with Local Plan Policy LPP47.

Sustainability

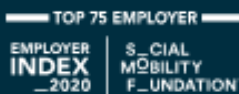
- 5.79. Policy LPP72 sets out that residential development should include renewable and low carbon energy technology to provide at least a 19% improvement in energy performance over the requirements of the Building Regulations (2013) unless: (a) revised Building Regulations standards exceed this requirement.
- 5.80. In this respect, a Low and Zero Carbon Energy Systems Feasibility Study (i.e. a Sustainability Statement) has been prepared by Hibec Ltd (on behalf of iTS) in order to support this application. In addition, a MEP Design Intent Document has been prepared by iTS.
- 5.81. The MEP Design Intent Document confirms that the proposed development will incorporate multiple renewable low carbon energy sources, including air source heat pumps and photo voltaic panels. Further, mechanical ventilation with heat recovery is proposed, lighting will be high efficiency LED lighting with intelligent controls to common spaces, and smart energy metering of services will be provided to allow review and management of services.
- 5.82. The Feasibility Study confirms that through the use of these renewable technologies, the target set out in Local Plan Policy LPP72 will be met. As such, the proposed development is acceptable in terms of sustainability, in accordance with Local Plan Policy LPP72.

6. CONCLUSION

- 6.1. This Planning Statement has been prepared on behalf of Country Court Care Homes 5 Limited in support of an application for full planning permission for the demolition of the existing buildings on site and the erection of a 64no. bed care home (Use Class C2) at the Former Woodlands Hotel, Coupals Road, Haverhill.
- 6.2. This Statement demonstrates that as the Council cannot demonstrate a five year supply of housing, in accordance with paragraph 11(d) of the NPPF, the tilted balance applies. The proposed development has a number of economic, social and environmental benefits, and there are no adverse impacts of the proposed development which would significantly and demonstrably outweigh these benefits.
- 6.3. The benefits of the proposed development can be summarised as follows:
- **Economic:** The development will have economic benefits in respect of job creation, both during construction and over the operational life time of the development.
 - **Social:** Care homes are an important part of overall healthcare provision, particularly for those with advanced care needs. As such there are significant social benefits arising from the development of a care home, including significant savings to the NHS as a result of removing bed blocking within hospitals, reduced falls at home, improved wellbeing and a reduction in loneliness. The proposed care home provides a highly attractive living environment that has been specifically designed to accommodate resident's complex needs. The proposal will make a contribution to housing supply in a context where the LPA is unable to demonstrate the required five year housing supply.
 - **Environmental:** The development will make an effective and efficient use of a previously developed, and vacant site. The site is derelict and has a negative impact on the visual appearance of the area. Realistically a proposal of this nature is what is required to trigger the required change to the appearance of this site. It will be built to the necessary sustainable standards via an energy efficient design and fabric first approach to ensure a long-term responsible approach to building management, use of natural resources, carbon emissions and waste management.

- 6.4. Further, the site constitutes previously developed land and it is considered that the re-development of this previously developed land, for a purpose where there is a clear identified need, complies with the positive approach advocated by paragraph 123 of the NPPF.
- 6.5. Indeed, the proposed care home would assist in meeting the existing and increasing shortfall of care beds in the market catchment, and would also provide dedicated dementia care provision, where there is currently a substantial under provision in the local authority area. Further, it is clear that the proposed size of the care home in this case (i.e. to deliver 64no. beds) is the appropriate size in order to ensure it can be viably delivered and operate successfully. This should be afforded significant weight in the decision-making process.
- 6.6. As such, overall, the principle of the proposed development is considered to be acceptable, and will ensure the long-term viable use of a vacant previously developed site.
- 6.7. The assessment has also demonstrated that the proposed development is acceptable in design terms and from a technical point of view. Indeed, the scheme will provide high quality, sustainable development delivering contemporary accommodation, relating harmoniously within the existing landscape setting of the site.
- 6.8. Overall, the need for the care home, along with other economic, social and environmental benefits of the proposed development are substantial. As the proposed development constitutes sustainable development for the purposes of NPPF paragraph 11, and there are no adverse impacts which significantly and demonstrably outweigh the benefits, the application should be approved.

Awards and accreditations



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