



REGULATORY SERVICES COMMITTEE

7 June 2012

REPORT

Subject Heading:

**P0989.10 - Land east of Moor Lane,
North of Moor Lane Church, Cranham
(Received 18 August 2010).**

**Outline permission for the erection of a
continuing care retirement community
comprising 36 care bedrooms, 27 close
care apartments, 68 assisted living
apartments, communal facilities, car
parking, landscaping and
infrastructure works.**

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Policy context:

Local Development Framework

Financial summary:

None

The subject matter of this report deals with the following Council Objectives

Clean, safe and green borough	[X]
Excellence in education and learning	[]
Opportunities for all through economic, social and cultural activity	[]
Value and enhance the life of every individual	[X]
High customer satisfaction and a stable council tax	[]

SUMMARY

The application is in outline form and proposes the formation of a care village or Continuing Care Retirement Community (CCRC). The scheme comprises approximately 12,000sq metres of floorspace consisting of a 36 bed care unit, 27 close care units, 17 linked assisted living units and 51 assisted living units. The site is located within the Green Belt. For the reasons set out within the report, the application is considered unacceptable and refusal is recommended.

RECOMMENDATIONS

That planning permission is refused for the following reasons:

1. The site is within the area identified in the LDF Core Strategy and Development Control Development Plan Documents as Metropolitan Green Belt. The Core Strategy and Development Control Development Plan Documents and Government Guidance as set out within the National Planning Policy Framework states that in order to achieve the purposes of the Metropolitan Green Belt it is essential to retain and protect the existing rural character of the area so allocated and that new building will only be permitted outside the existing built up area in the most exceptional circumstances. It is not considered that the circumstances submitted by the applicant amount to the very special circumstances needed to over-ride Green Belt policy and the proposal is therefore contrary to Policies CP14 and DC45 of the LDF Core Strategy and Development Control Policies Development Plan Documents and the National Planning Policy Framework.
2. The proposal would, due to its scale, size, massing, height and the considerable loss of preserved trees, result in an adverse impact upon the open character of the green belt contrary to Policies CP14 and DC45 of the LDF Core Strategy and Development Control Policies Development Plan Documents and the National Planning Policy Framework
3. The proposal would, by reason of the siting, scale and bulk of the some of Assisted Living Units, appear unduly prominent in the Moor Lane street scene, to the detriment of its visual amenity, contrary to Policies CP17, DC3 and DC61 of the LDF Core Strategy and Development Control Policies Development Plan Documents.

REPORT DETAIL

1. Site Description

- 1.1 The roughly rectangular-shaped application site has an area of 3.27 hectares. It is situated on the Eastern side of Moor Lane to the north of Fairholme Gardens. Its northern limit would run roughly east-west to the east, and slightly north, of the northern boundary of the last dwellinghouse in Moor Lane, No. 211. The proposed Eastern Boundary would, similarly run roughly north-south to the north, and slightly east, of the last dwelling in Fairholme Gardens, No.35. The applicant also owns an adjoining area to the north and east of the application site which, together with the application site, forms an area of approximately 12 hectares in size.
- 1.2 The application site currently contains no buildings or structures and comprises mainly small and medium-sized trees and shrubs with some grassland. There are larger, more mature trees located close to the southern and western boundaries of the site with Moor Lane and the public footpath/rear gardens of Fairholme Gardens.
- 1.3 The application site (and the adjoining land parcel under the applicants' ownership) forms part of the Metropolitan Green Belt and Thames Chase Community Forest and is a Site of Borough Importance for Nature Conservation. The site is located within Flood Risk Zone 1 (Low Risk).
- 1.4 The site forms part of a larger area (extending beyond the applicant's ownership) of similar flora with trees, grassland and shrubs spreading away from the site to the north and east, wrapping around the edge of the existing urban area. There are no residential properties within this area (bounded by the A127 to the north and the M25 to the east). To the south and west (on the opposite side of Moor Lane) of the site are almost exclusively residential properties: mainly one-storey detached dwellings many of which are in the form of chalet bungalows; a few being two-storey buildings. The exception being the single-storey church building, Moor Lane Church which is located directly adjacent to the south-western corner of the application site.
- 1.5 There are currently no vehicular accesses to the application site. There is a public footpath along the southern edge of the site and a number of informal footpaths crossing the application site.
- 1.6 The site is the subject of two Tree Preservation Orders (Nos 19-91 and 3-06) which form a Woodland Order in which all trees on the application site are protected.

2. Description of Proposal

- 2.1 The proposal is in outline form and is for the formation of a care village or Continuing Care Retirement Community (CCRC). The scheme will comprise approximately 12,000sq metres of floorspace comprising 131 units in the form of a 36 bed care unit, 27 close care units, 17 linked assisted living units and 51 assisted living units. The only matter to be considered at this stage is "Access". All other matters are reserved, i.e., siting, appearance, scale and landscaping. Nonetheless, the proposal would fix the siting of the proposed new vehicular access onto Moor Lane and the layout of the access road within the site.
- 2.2 A CCRC is a relatively new concept and is sometimes known as "a retirement village". Although there are a number of examples across the country, there are few examples within London or Essex. They are seen, in the Planning Officers Society/Joseph Rowntree Foundation Report "Continuing Care Retirement Communities" as being "a response to the limitations of traditional models of sheltered housing ... which are unable to provide the care and support some older people need, and which fail to satisfy the diversity of housing need in later life". The report indicates that this form of development provides for older people with a range of abilities and disabilities, enabling them to be provided with care if necessary in a socially supporting, stimulating environment. The elderly may live wholly independently but receive extensive care and support services when required. The focus is therefore not just to provide care and support but to address a range of needs, provide quality accommodation, opportunities for social interaction, can be affordable (rent or part owned) and provide continuing independence.
- 2.3 What distinguishes a CCRC from a traditional residential care home is that the residents are tenants or owners and have security of tenure and there is a separation of the care provision from the provision of accommodation, unlike a traditional care home where care and accommodation is broadly co-dependant. Care costs depend on how much care is needed by an individual. The proposal would involve a care village with accommodation limited to those over 65, frail and in need of care and support. The concept also makes provision for any spouse, cohabitee or dependent living with them for the duration of their lives, any registered disabled person and any person engaged to provide services for anyone living on the site for the duration of their lives.
- 2.4 Information submitted with the application indicates that based on experience in established operational villages, the average age of residents in Assisted Living Units is 75, though 65% are over 80. In Close Care Units, the average age is 86 with 70% being over 85. In the Nursing Care Unit, the resident profile ranges between 85 and 100 years old. All elements of domiciliary care throughout the village would be registered through the Care Quality Commission.

2.5 The concept is based on three main types of accommodation:

- Care Bedrooms - a dedicated Nursing Care Unit with 36 rooms for those in need of 24 hour care. The bedrooms will have full en-suite bathrooms. Residents pay a weekly fee which may vary according to needs. The care bedrooms are divided into groups of 12 rooms, each such unit with its own lounge, dining room and assisted bathrooms.
- Close Care Units - these units will be available to buy or rent. They offer more privacy and independence than a care bedroom. A Close Care Unit will comprise of a bedroom with en-suite bathroom / shower room, lounge and galley kitchen with a microwave and fridge. Residents benefit from core care and support services and facilities, including meals, heating, lighting, water utilities, cleaning and laundry which are paid via a uniform service charge.
- Assisted Living Units - these offer semi-independent lifestyle and in general comprise of a sitting room, 1 or 2 bedrooms, 1 or 2 bathrooms and a kitchen. Assisted Living Units are available to purchase or rent. These units are ideally suited to the more physically able or a couple where one partner may need personal or mobility assistance. All residents would have a pre-admission assessment and the level of support needed would be agreed prior to moving in. Residents benefit from core care and support services and facilities according to their needs.

2.6 The Operational Plan indicates supporting facilities on the site, i.e. a café / bar, a small convenience shop, hairdressing and beauty salon, library and IT room, consulting / treatment room (to enable the local GP to see residents), a laundry room, main restaurant and a Wellness Centre which will comprise a heated swimming pool, fully equipped gymnasium, Jacuzzi, steam room, treatment rooms and changing facilities. The Wellness Centre also provides fall prevention services, stroke rehabilitation, assessment clinics, physiotherapy and long term conditions management, amongst other services. All residents are able to use the village facilities and some of these could be opened up for community use for specified groups. In this regard, the applicant indicates that the specific groups are anticipated to be those connected via the local Age Concern branch/membership or indeed through other elderly person's organisations or societies. The site mini-bus would be available to help the co-ordinated movement of these groups to and from the CCRC. Local residents wishing to remain in their own homes are also able to become members of the 'English Village Club' and enjoy the facilities, social events and individual activities available.

2.7 Staffing wise, the village would employ between 75 to 100 full and part time staff, with three shift patterns covering each 24 hour period. The application indicates that key worker accommodation, comprising bedrooms with a shared lounge, kitchen and dining area will be provided within the scheme, rented on a needs basis at below average market rent to new staff waiting to

relocate and specifically to assist staff working shifts. The quantum and location of such provision is not specified as part of this outline submission.

- 2.8 The indicative masterplan shows a layout where the largest building (care building) is located towards the eastern side of the site with its 2.5 / 3 storey element laid out in a north-south direction. This building would have a wing towards the east which is 2 storeys in height and towards the west, would be linked to the Linked Assisted Living Units building by means of a single storey building. The Linked Assisted Living Units building is more or less in the middle of the site and is a 2 storey building. The remainder of the site consists of mainly 2 storey buildings with the Assisted Living Units arranged around the outer boundaries of the site and therefore closest to the Moor Lane boundary and properties along Fairholme Gardens. The development would also consist of a few single-storey buildings towards the north and east of the Care Building.
- 2.9 The applicant has also been required to provide parameters for the scale of the proposed buildings. Typical dimensions have been supplied with single storey buildings measuring between 4m and 6m in height, 2-storey buildings would generally be between 8.4m and 9.6m in height and the 2.5/3 storey building between 11.5m and 13m in height.
- 2.10 The access onto the highway of Moor Lane would be located directly opposite 207-209 Moor Lane with the internal estate road splitting towards the east and south of the site. Towards the east the road gives access to parking at the main Care Building and Wellness Centre and continues further towards a parking area in the north-eastern corner of the site. Towards the south the access road provides access to the Assisted Living Units located towards the western and southern boundaries as well as linking up with the proposed extended car park at the Moor Lane Church. The proposal would provide 26 carports and 59 car parking spaces on the site, providing a total number of 85 parking spaces for cars.
- 2.11 Separate pedestrian access points would be located opposite Nos. 201 Moor Lane and again at 189-191 Moor Lane (where the existing public footpath exits). The public footpath would be retained within the application site which will link up with the proposed network of paths and circular walks on the wider area surrounding the application site.
- 2.12 The application also makes provision to upgrade the existing car park for the adjacent Moor Lane Church.
- 2.13 Outside of the application site, the applicant indicates that they are willing to implement a landscape and ecological management strategy plan to mitigate the impact of the development on the other green belt land within their ownership. This area stretches some 220m to the East and 200m North of the application site; at its northernmost point it lies adjacent to the A127. The applicants indicate that this would mainly consist of the restoration of an existing pond, scrub clearance, buffer planting and the

provision of a new pond and several areas of marshy grassland and wetland habitat. The wider site will also provide access to the surrounding community and the intention is to provide footpaths, benches and picnic areas throughout the site. Details regarding the long term management of the open space are included with the application and are explored in more detail below.

2.14 Together with the Design and Access Statement and Planning Statement the applicant has submitted the following information to accompany the application:

- An Executive Summary
- Public Consultation Report
- Transport Statement
- Travel Plan
- Flood Risk Assessment and Drainage Strategy
- Landscape and Visual Impact Assessment
- General Ecological Appraisal, including Great Crested Newt & Reptile Survey and Badger and Bat Surveys
- Ecological Strategy and Outline Management Plan
- Tree Survey, Arboricultural Implication Assessment and Method Statement
- Safer Places Statement
- Sustainable Design and Construction Statement
- English Care Villages Operations Plan
- Alternative Sites Assessment and Viability Review on Alternative Sites
- Care Accommodation Supply and Demand Study

3. Relevant History and Background Information

3.1 In 2009, outline planning permission was refused for the erection of continuing care retirement community comprising 52 no. independent living units, 60 no. assisted living units and 60 no. extra care units of accommodation together with associated communal facilities, car parking, landscaping and infrastructure works (reference P0603.09). Similar to this current application, the previous application was in outline form only with all matters except for access, reserved for future consideration.

The application was refused for the following reasons:

- The very special circumstances submitted by the applicant were not considered to be sufficient to over-ride the presumption against development in the Green Belt.
- The scale, size, massing, height of the proposal and loss of preserved trees, was considered to have an adverse impact upon the open character of the Green Belt.

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- The proposal was considered to appear unduly prominent in the Moor Lane street scene by reason of the siting, scale and bulk of the Extra Care Unit.
- It was considered that due to insufficient detail, the Council was unable to determine whether the proposal to enhance the wider site would result in sufficient biodiversity gain in the longer term to overcome the loss of natural flora and fauna habitat, protected species and other wildlife on this part of the Site of Borough Importance for Nature Conservation.
- In the absence of a travel plan secured through a legal agreement, the proposal was considered likely to have an adverse impact on the functioning of the public highway and the safe passage of pedestrians and cyclists in the vicinity of the application site.

3.2 This application follows on from that submission. In headline terms, the main differences between the previous submission and this submission are:

- The number of units proposed has been reduced from 172 to 131 (41 units fewer), comprising of 36 care bedrooms, 27 close care apartments, 17 linked assisted living units and 51 assisted living units along with a range of communal facilities including a wellness centre.
- The bulky 3 storey building towards the Moor Lane frontage has been removed. The indicative layout shows 2 storey cottages towards this boundary.
- The majority of trees along the western and southern boundary will be retained although the proposal will still involve the removal of hedgerow to both boundaries and 7 trees with TPOs to the southern boundary.
- The internal road layout has been altered and a large car park area introduced to the south-western corner of the site.

3.3 In addition to the above changes, the applicant has also provided the following additional information:

- Care Accommodation Supply and Demand Study

A report by Savills Healthcare Research into the elderly care accommodation sector which demonstrates the need for additional close and extra care in Havering.

- Alternative Sites Search Report

The report demonstrates that the applicant considered alternative brownfield sites (sites in the Site Specific Allocations DPD) and why these sites are not suitable for the proposed care village development.

- English Care Villages Planning Policy Support Document, including Operations Plan

A report explaining how the proposed scheme will operate in practice and sets out a range of issues such as tenure arrangements, different formats of accommodation and additional facilities to be provided.

- Ecological Management Strategy and Outline Management Plan

The report sets out a detailed strategy for the enhancement of the wider site in ecological terms and to improve public access to the Green Belt, together with proposals for the long term management of the land.

- A Travel Plan

3.4 Greater detail has also been provided by the applicant as to the obligations which might be considered appropriate in the event that planning permission is granted. These obligations could be secured by way of a Section 106 Agreement. Details of the obligations are as follows:

- Strategy for the long term management of the adjoining land parcel together with a package of funding to enable this for a 10 year period
- A contribution of £300,000 towards the off-site provision of affordable housing
- A new car park for the use of Moor Lane church which would be shared with visitors to the care village
- A potential financial contribution towards the redevelopment/extension of Moor Lane Church
- An occupation restriction limiting occupation of the village to elderly people and/or people in need of care. It is suggested that this would require that one member of each household unit would be of retirement age
- An occupancy cascade is also offered which would ensure that residents of the London Borough of Havering have the first opportunity to acquire accommodation within the scheme, before this is opened out to people with a family connection with the Borough, before finally being made available to those currently living outside the area and with no family connection. The applicant has indicated they would be willing to discuss the exact terms of such an arrangement as part of any Section 106 Agreement negotiations and would naturally need to include the exact wording of such a mechanism and in particular the length of time

assigned to each period before consideration would be opened up to the next tier in the cascade

- A Travel Plan
- A contribution towards funding minor footway extensions to link footways within the development site

4. Consultations/Representations

4.1 433 adjoining and nearby properties have been notified of the application. A press notice was advertised in Living and a site notice was posted. There have been 171 letters; 23 letters in support of the proposal and 148 objecting on the following grounds:

- loss of green belt land, contrary to national, regional and local policy
- loss of natural habitat, flora and fauna
- Cranham Court is an established care home which can be upgraded, minimising the impact on the Green Belt.
- increased traffic congestion/parking problems
- loss of natural buffer with A127
- it would set a precedent
- existing services/infrastructure would not cope
- loss of residential amenity through noise; light pollution; overlooking/loss of privacy; loss of light/sunlight; visual intrusion
- out of character/keeping in the streetscene/locality
- concern regarding possible under-occupation and future change to C3 use
- unbalancing increase in older age-group
- concern that application is unclear about which services would be provided for community
- safety/ criminal attraction to area
- health issue as would be located closer to electricity pylons
- concern that transport assessment over-optimistic
- increase in risk of traffic accidents
- patients may be a risk to themselves
- discrimination against poor elderly
- affects public right of way
- affects Thames Chase forest
- loss of preserved trees
- increase in likelihood of flooding

A letter was received from Angela Watkinson MP, to confirm her support for residents objecting against the application.

4.2 Prior to the submission of the application, the applicants undertook their own public consultation exercise, administered by Electoral Reform Services. An exhibition was held on 26th and 27th March 2010 and in addition, 7,500 questionnaires were posted out to local residents. Additional questionnaires

were also handed out at the exhibition. By the closing date of 9th April, a total of 557 responses were received. Of these responses, the applicant advises that 56% of respondents supported the proposal, 7% supported the proposal with suggestions and 37% of respondents did not support the proposal. For those in favour of the proposal, the most commonly cited reason for this support was the need for more elderly accommodation in the area. For those against the proposal, the most commonly cited reason was its location within the Green Belt

- 4.3 The London Fire Brigade have written requesting that 3 private fire hydrants should be located within the CCRC. The London Fire and Emergency Planning Authority have written in to indicate that they are not satisfied with access within the site which does not meet Part B5 of the Building Regulations due to pinch points being less than 3.8m wide.
- 4.4 The Environment Agency have written confirming that they have no objections to the Flood Risk Assessment and have asked for conditions to be attached to any approval.
- 4.5 Natural England advise that subject to a Section 106 agreement in respect of management of the site, a 10-year management plan and a 3-year species monitoring, no objections are raised.
- 4.6 The Metropolitan Police's Crime Prevention Design Advisor has requested that conditions be attached with regard to Safer Places/Secured by Design for the buildings and car-parking areas and CCTV provision.
- 4.7 The London Green Belt Council objects against the proposal as the development would be inappropriate in the Green Belt. It is considered that the Needs Assessment is not up to date and is not taking into account the recent care homes which were granted permission by the Council. The Alternative site report only dismissed non-Green Belt sites on grounds of costs. The arguments do not amount to very special circumstances to outweigh the harm.
- 4.8 The Environment Agency raised no objections against the development, subject to an appropriate water drainage condition.
- 4.9 The Campaign to Protect Rural England (CPRE) raised objections in respect of the development being inappropriate in the Green Belt, a breach of the permanent defensible Green Belt boundary, loss of habitat and species, loss of mature trees protected by TPO, the impact of external lighting on surrounding protected wildlife and noise levels to future occupiers as a result of the M25 / A127 interchange.
- 4.10 Transport for London recommends a number of conditions requiring the applicant to provide electric vehicle charging points, additional parking, cycle storage, Pedestrian Environment Review System results, a Disability Access Assessment to be carried out, submission of a Delivery and Servicing Plan

(DSP) and a Construction Logistics Plan (CLP). TFL originally raised concerns regarding the quality of the Travel Plan. The Travel Plan was subsequently updated and TfL confirmed that they were happy with its contents.

4.11 The Greater London Authority raised the following comments:

- Green Belt: the proposed development of a residential care facility on metropolitan green belt represents inappropriate development and the evidence presented to date does not constitute very special circumstances.
- Specialist Housing: notwithstanding the above land use concern the provision of a residential care home in this area would be supported.
- Biodiversity: the proposals would be acceptable in biodiversity terms on the basis that a management plan for the remainder of the site, and sufficient resources for its implementation are secured by the Council.
- Affordable Housing: the applicant should engage with the GLA to further explore the applicability of London Plan affordable housing policy.
- Urban Design: The applicant should address the comments made in the urban design section of this report in accordance with London Plan Policy 4B.1.
- Access: The applicant should ensure that all units are fully wheelchair accessible and access should be secured via a condition.
- Sustainable Development: The applicant is required to submit an energy strategy which addresses London Plan energy policies, and a sustainability strategy which addresses climate change adaptation policies.
- Transport: The applicant should address the concerns raised by TFL regarding the number of parking spaces on the site, provision of electric vehicle charging points, the proposed conditions and the quality of the Transport Assessment.

5. Relevant Policies

5.1 Policies CP1, CP2, CP8, CP17, CP14, DC2, DC3, DC5, DC7, DC22, DC33, DC34, DC35, DC36, DC45, DC48, DC49, DC50, DC58, DC59, DC60, DC61, DC62, DC63 and DC72 of the Core Strategy and Development Control Policies Development Plan Document are considered to be relevant in the determination of this application. The Supplementary Planning Documents entitled Residential Design, Sustainable Design and

Construction, Protection of Trees during Development, Protecting and Enhancing the Borough's Biodiversity, Designing Safer place and Landscaping are also all considered material to the determination of this application.

5.2 London Plan Policies 1.1, 2.6, 2.8, 2.18, 3.1, 3.2, 3.3, 3.4, 3.5, 3.8, 3.12, 3.13, 3.16, 3.17, 5.2, 5.3, 5.12, 5.13, 5.21, 6.1, 6.3, 6.9, 6.10, 6.13, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.14, 7.15, 7.16, 7.19 and 7.21 are also consider to be relevance

5.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. Sections 4, 6, 7, 8, 9, 10 and 11 are directly applicable to the consideration of this application.

5.4 The key objective of the NPPF is achieving sustainable development through the planning process. Paragraph 7 of the NPPF outlines that there are three dimensions to sustainable development: economic, social and environmental. NPPF explains that these dimensions give rise to the need for the planning system to perform a number of roles:

- An economic role: contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure
- A social role: supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- An environmental role: contributing to protecting and enhancing our natural, built and historic environmental; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimize waste and pollution and mitigate and adapt to climate change including moving to a low carbon economy

6. Staff Comments

6.1 The main issues are the principle of the development including the appropriateness of this use in the green belt; the impact of the proposal on the open character of this part of the Green Belt; density and site layout, visual impact in the street scene; landscape impact; impact on the amenities of adjoining occupiers; impact on the SINC (Site of Importance for Nature Conservation)/ impact on protected species/other wildlife; sustainable construction and parking/highways matters. If the proposal is considered to be inappropriate development which results in significant harm, the final

issue is whether there are any very special circumstances which could be considered to over-ride the harm identified.

Principle of Development

- 6.2 Staff are of the view that the proposal would contribute to the Council's 20-year vision for the Borough, 'Living Ambition' by providing additional housing.
- 6.3 Policy CP2 indicates that sustainable, attractive, mixed and balanced communities will be created in part by ensuring that the needs of those households with special needs, including the elderly, are met. According to Policy CP2, there is still a need within the Borough to plan for sheltered and, in particular, extra care accommodation. Putting aside the Green Belt location of the site, the proposed development would clearly contribute to achieving a standard of housing as set out in Policy CP2 by increasing the independence of people in old age.
- 6.4 Policy DC2 indicates that a mix of housing types and sizes are needed to meet local and sub-regional housing needs with regard to creating mixed and balanced communities. In terms of specialist accommodation, Policy DC5 indicates that all health and non-health social service residential projects, including extra care accommodation, will only be granted if they satisfy certain criteria. These are (among others) that the proposal is located within a residential area unless the scale and nature of the facility is such that it would be inappropriate in a residential setting, that it would be within reasonable access to shops and services, well served by public transport, of a high quality of design and layout and have sufficient parking on-site for residents and visitors.
- 6.5 Whilst the scale of the scheme justifies the proposal being located outside of the built up part of Cranham, thereby satisfying part of Policy DC2, the Green Belt status of the site clearly conflicts with Policy CP1, which indicates that in meeting the Borough's identified housing need, other non-designated sites will be prioritised for housing above green belt land. This is generally the position taken in respect of housing development within the London Plan and the NPPF. The applicants have indicated that they have not found a suitable alternative site within the Borough for their proposed development. In support of this, the applicants have submitted an Alternative Sites Search Report which sets out what sites were considered and why they were deemed unsuitable. The sites identified in the Site Specific Allocations DPD were taken into consideration as part of the Alternative Sites assessment. The findings of this assessment will be discussed in more detail under the "very special circumstances" section of this report.
- 6.6 In green belt terms the proposal is clearly contrary to Policy DC45 for two reasons: new general housing development is not included in the appropriate uses for Green Belt land and, secondly, as the site is currently undeveloped, there are no buildings capable for conversion or reduction in

order to improve openness of the site. The site is open land with no structures buildings or any man-made features. The proposal is therefore considered to be inappropriate development which, by definition, would give rise to harm. The development is therefore considered to be unacceptable in principle.

- 6.7 In line with Policy DC45 however, while there is a clear presumption against inappropriate development in the Green Belt, exceptions may be allowed where very special circumstances can be robustly demonstrated. The NPPF indicates that “Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”. Therefore, in line with the NPPF, it is necessary to first consider whether any harm, other than the in principle inappropriateness, would arise from the proposed development.

Impact on the open character of green belt

- 6.8 The application site in its current form is a naturally vegetated, coped, 3.27 hectare parcel of previously undeveloped, open land. The site is clearly distinguishable from the built up character of Moor Lane and Fairholme Gardens which bound it. Indeed, the site has an important, key function in Green Belt terms as it defines the built up edge of Cranham, thereby preventing sprawl and coalescence. Public viewpoints of the site are achieved from the footpath/part bridleway (no. 176) which runs parallel to the site to the south and the track leading to the A127, which runs parallel to the west of the site. Wider views of the site are obtainable from the A127 and to a lesser degree, the M25. Given the deciduous nature of the vegetation, the visibility of the site increases and decreases according to the seasons.
- 6.9 The application site and the wider site which surrounds it are both of Borough Grade 1 Importance for Nature Conservation, forming part of Cranham Brickfields and Franks Woods (HvB102), which together comprise a land parcel of 42.5 hectares.
- 6.10 The proposed development which comprises 131 units, consisting of 51 residential properties (Assisted Living Units), a 17 unit apartment block (Linked Assisted Living Units) and a 63-bed Care Building (consisting of 36 Care Beds and 27 Close Care Units) with ancillary facilities (i.e. the Wellness Centre) are indicated as having a gross internal floorspace of approximately 12, 000 square metres. This, together with an internal access road, areas of hardstanding for the parking of 85 vehicles plus the Church car-park extension, would, since there are no existing buildings on this site, clearly urbanise this previously undeveloped green belt site.
- 6.11 The proposal indicates a revised layout in an attempt to address the earlier refusal reasons. The previous scheme included a 3-storey building fronting Moor Lane and single storey bungalows towards the western and northern

boundaries of the site, with side elevations also facing Moor Lane. The proposed development, in particular the cottages fronting on to Moor Lane, would be 2 storeys in height (indicated up to 9.6 metres). In addition, these cottages would be linked and would present continuous frontage of up to 50 metres wide. The applicant states that one of the improvements of the current scheme is the retention of the tree line towards the western boundary and the “more residential scale and character” of the 2-storey cottage-style dwellings along this boundary. In Staff’s view, apart from the removal of the 3-storey building to the western boundary, the design of the current Moor Lane frontage represents a more bulky, continuous form of development compared to the previous single storey, side-facing bungalows. In addition, the development still presents a 3-storey building towards the eastern side of the site. Staff are of the opinion that the proposed development as a whole would not be completely concealed behind existing or proposed landscaping. Staff therefore consider that the development would have a significant adverse impact on the open character of this part of the green belt, including from public viewpoints (as described above). It is further considered that there would be an impact on the character of the green belt generally from the significant increase in activity associated with the development compared to the very low intensity of activity currently on site.

Density and Site Layout

- 6.12 The proposed development is considered to be representative of a care home facility (use class C2) and not residential dwellings falling within a C3 use class. It is on this basis, that the normal density assessment is not being undertaken. In terms of general site layout however, Staff consider it appropriate to apply the same principles to determine whether the indicative layout is acceptable.
- 6.13 The site would be laid out so that the largest building (care building) is located towards the eastern side of the site with its 2.5 / 3 storey element laid out in a north-south direction. This building would have 2 wings extending in an eastern and western direction and would be linked to the Linked Assisted Living Units towards the west. The Linked Assisted Living Units building is more or less in the middle of the site. The remainder of the site consists of mainly 2 storey buildings with the Assisted Living Units arranged around the outer boundaries of the site and therefore closest to the Moor Lane boundary and properties along Fairholme Gardens. Access to the site would be via 2 points, one from the extended church car park and the other opposite Nos. 207-209 Moor Lane. The internal road would give access to all the Assisted Living Units, the main building and various car parks on the site. The indicative layout shows various Garden Courts and green open spaces between buildings.
- 6.14 While the southern and western boundaries of the application site are fixed, there is no defining outer limit for this development, i.e., no natural or man-made features which form a physical boundary. The extent of the site and

the outer proposed northern and eastern boundaries are therefore arbitrary. The applicants indicate that the proposal would form a “village” and the proposed layout suggests that properties towards the western boundary would face Moor Lane whilst the remainder of properties would be focussed around the Garden Courts and have views of the new park on the wider site. All properties would be accessible from the access road and Staff therefore consider that the indicative site layout of itself would be acceptable.

Impact in the street scene

- 6.15 The proposal is for a number of 2-storey cottages (Assisted Living Units) arranged around the southern, western and northern boundaries of the site. The prevailing character of the Moor Lane and Fairholme Gardens street scene is that of mainly single storey chalet style bungalows with a few 2 storey dwellings. Dwellings in general have moderate frontages and a good level of spacing between buildings. It is recognised that the applicant has attempted to reduce the impact of the development from a visual point of view by retaining the majority of vegetation and in particular the mature trees along the western and southern boundaries of the site. In addition, the 3 storey building has been moved towards the eastern side of the site and therefore further away from the existing neighbouring dwellings and street scene.
- 6.16 While “siting” is not to be determined at this stage, Staff consider that as “access” is to be determined, that the layout shown on the illustrative masterplan would be deliverable. On the basis of the drawings submitted, the larger buildings would be located about 100m from Moor Lane (at its closest point) and about 26m from the rear boundary of properties in Fairholme Gardens. The majority of screening would be retained along both of these boundaries and this could be supplemented. Although the highest building (Care Building) would not be visible from the street scene, Staff consider that the scale of the development fronting Moor Lane would still be visible in the street scene, due in part to the mainly deciduous nature of the existing trees.
- 6.17 In addressing the reasons for refusal of the previous application, the indicative layout now shows the introduction of 2 storey buildings towards the western boundary (as opposed to the previously proposed 3 storey building). Although the surrounding street scene presently has a mixture of single storey bungalows and 2 storey dwellings, these dwellings are mainly detached (with the exception of semi-detached bungalows) with a reasonable degree of spacing between buildings. The indicative street scene view from Moor Lane show 3 sections of linked buildings, which effectively have the appearance of terraced dwellings. Whilst the relocation of the 3 storey building is welcomed, it is considered that the design approach now proposed would still be at odds with the more spacious character and moderate sized dwellings found within the street scene. This indicative element of the scheme is therefore considered to be unacceptable.

- 6.18 The proposed two storey buildings towards the south would be located behind dwellings in Fairholme Gardens. No significant visual impact in street scene terms is therefore anticipated.

Landscape Impact

- 6.19 Aside from street scene impact within Moor Lane and Fairholme Gardens, other visual impact would arise in wider landscape terms, particularly given the open character of the site and the land surrounding it which is within the applicants' control.
- 6.20 The Landscape and Visual Impact Assessment submitted by the applicants concludes that there would be a loss of regenerating woodland and scrub following development but the proposal allows for the retention of trees of value within the site and on the site boundaries. The Assessment considers that the impact on local landscape character would be "moderate adverse". It further considers that in the longer term, the potential for enhancement of the wider site (ie. the additional 9ha surrounding the site under the applicant's control) means that overall, the development would have a "neutral" impact on local landscape character. The Assessment outlines that the proposed enhancements (which are described below in more detail) would provide an opportunity to contribute to the Thames Chase Community Forest by improving public access to the wider site, by protecting and enhancing its nature conservation value and by fulfilling the objectives of the Havering Wildlife Partnership Action Plans.
- 6.21 Staff recognise that if the development does not go ahead that the flora and fauna associated with it would change due to succession, i.e., the grassland would be replaced by more shrubs and trees and eventually the area would have a greater woodland area. This would also be the case for the wider area in the applicant's ownership. The proposal would clearly prevent this in the main. However, the applicants have offered to stabilise and improve the remainder of the Green Belt in their ownership such that this could have a positive impact on flora and fauna.
- 6.22 Notwithstanding this, comments from the Council's Environmental Programmes Regeneration Officer state that the succession to scrub and woodland may be halted at any time and with appropriate management, the habitats could be brought back into a condition in line with the site's status as a Site of Importance for Nature Conservation of Borough (Grade 1). Put another way, the enhancements described could be achieved without the development, although it is acknowledged by Staff that such measures are unlikely to come forward in complete isolation.
- 6.23 The site is the subject of two Tree Preservation Orders (Nos 19-91 and 3-03). This Woodland Order protects all trees within the application site. The applicants have partly addressed concerns raised in the previous application (reference P0603.09) regarding the loss of preserved trees on the site. On the western boundary there will be no tree removal but the removal of 15m

of mature hedgerow to facilitate the proposed site access. On the southern boundary, the mature hedgerow will be retained but 7 semi or early mature oak and ash trees would be removed, due to their current poor condition.

- 6.24 Despite the retention of trees and hedgerows on the periphery of the site, a significant amount of site clearance will still be needed to enable the development to take place. This clearance will inevitably impact upon landscape character. Subject to appropriate enhancement and management of the wider land parcel enveloping the application site together with a sound landscaping strategy for the site itself, Staff consider that this landscape impact can be mitigated. In drawing such a conclusion however, a clear distinction is drawn between landscape character and the impact upon the openness of the Green Belt which has been assessed elsewhere within this report.

Impact on Residential Amenity

- 6.25 Insofar as residential amenity, regard needs to be given to the impact arising from the development upon privacy, outlook and light and also in respect of noise and disturbance, particularly that associated with the 2 site entrances onto Moor Lane. While only access (including the internal access road and parking areas) is to be determined at this stage, Staff consider the layout shown on the Illustrative masterplan to be a reasonable indication of how the development could be set out
- 6.26 In relation to the properties in Fairholme Gardens, the closest part of the development (the Care Building and Assisted Living Units) would be located approximately 10m from the shared southern boundary and 63 metres from the rear elevations of the properties along Fairholme Gardens. Further Assisted Living Units would be located 20m from the shared boundary. Whilst it is recognised that the proposed development would be visible from the existing residential properties, given the separation distances involved, Staff consider that the proposed buildings would neither be visually intrusive nor overbearing and that there would be no undue loss of privacy to the existing occupiers. As the development would be located to the north of the existing properties Staff do not consider that there would be any loss of daylight or sunlight
- 6.27 The closest part of the development to the properties in Moor Lane would be the Assisted Living Units. Here, the buildings would be set back a minimum of 11m from the western site boundary with a minimum gap of 28m between the front elevation of properties in Moor Lane. The Care Building would be approximately 95 metres at its closest point from the edge of the Moor Lane boundary and 117m from the front building line of dwellings along Moor Lane. Given the proposed retention of the tree screen to Moor Lane and again, the separation distances illustrated, Staff consider that the proposal would neither be visually intrusive nor overbearing and that there would be no undue loss of privacy to the existing occupiers. Staff neither consider

that the proposed development would result in a significant loss of daylight or sunlight to properties on the opposite side of Moor Lane.

- 6.28 The amount of traffic entering the site will depend on a number of factors such as the final number of staff which are employed, when shifts start and finish, how many service vehicles and visitors there would be, how many residents would have their own vehicles and how many people would rely on alternative modes of transport. What is clear is that all vehicles would have to enter through either the main vehicular access or through the extended church car park area and the level of trips to and from the site will be very different to that currently experienced given that the site is undeveloped.
- 6.29 The area south and west of the application site is characterised by vehicular movements typical of a suburban residential area. The area has a good local bus service which provides a regular 15 minute service throughout the day and every 30 minutes after 8pm. There is no dispute that the development would result in an increase in traffic along Moor Lane and possibly the surrounding roads. It is however considered that the level of noise and activity generated as a result of traffic and services would not be unacceptably increased as a result of the care village development. The Travel Plan illustrates measures to reduce single vehicular trips and it would be reasonable to assume that activity levels would reduce over night. Staff are therefore of the opinion that the increase in noise and disturbance as a result of increased vehicular trips would not give rise to significant harm to residential amenity.

Impact on the SINC (Site of Importance for Nature Conservation)/Protected Species and other wildlife

- 6.30 The application site and the wider site which surrounds it are of Borough Grade 1 Importance for Nature Conservation, forming part of Cranham Brickfields and Franks Woods (HvB102). Policies DC58 and DC59 are relevant and indicate that planning permission will not be granted unless the economic or social benefits of the proposals clearly outweigh the nature conservation importance of the site, and then, only if adequate mitigation can be provided. Whilst the applicant has submitted a number of supplementary reports on flora and fauna, some of the surveys have been undertaken outside the optimal survey period, for example, the reptile surveys.
- 6.31 The various documentation submitted indicates that of the Protected Species, there are bats, common lizard and slow worms but no badgers or Greater Crested Newts (GCN) at the application site. Mitigation and compensation measures would include the provision of additional roosting and foraging opportunities for bats together with capture and translocation for the slow worms and common lizards.
- 6.32 In addition to these mitigation measures, as part of the overall package put forward, the applicant has set out a commitment to enter into a full

Landscape and Nature Conservation Management Plan to ensure the ongoing, sensitive management of the retained habitat on the wider site surrounding the application site. The primary objective is to optimise biodiversity interests but it is also intended that provision is made for enhancing public access.

- 6.33 To ensure a realistic prospect of delivery, the applicant has held preliminary discussions with Thames Chase Community Forest (TCCF) who could potentially fulfil the role of implementing the measures needed to create a new community park and take responsibility for its long term management. The initial 'heads of terms' discussed with TCCF involve the gifting of the land to TCCF together with the provision of a package of funding for the implementation of the full Landscape and Nature Conservation Management Plan and the ongoing management of the park for a period of 10 years. The indications are that TCCF are very interested in the offer being made to them.
- 6.34 In the event that TCCF became unable to take up the offer, the applicant has also provided details of another model of open space and parkland management which is provided by a company called Oasis. The Oasis concept relies on using income derived from property rental and a programme of community participation to fund and manage the open space in perpetuity.
- 6.35 In light of the currently unmanaged nature of the wider site, in some respects, there can be no dispute that the Management Plan would achieve clear benefits to biodiversity. That said, in order to fulfil the objectives of Policies DC58 and DC59, the economic or social benefits of the proposals must outweigh the current nature conservation importance of the site. In addition, a 10 year management period would not be sufficient to safeguard the future of the site following the expiry of any such agreement. Both factors need to be weighed in the balance as part of the very special circumstances case which is promoted by the applicant. Further analysis on this is offered below.

Parking and highways considerations

- 6.36 The Highway Traffic and Transport Statement concludes that the care village will have a high level of self sufficiency by providing a number of communal facilities, i.e. café, restaurant, wellness centre, swimming pool, shop, library, communal transport facilities, cycle club etc thus minimising vehicle flows associated with it. The proposal also includes the provision of additional spaces (albeit shared with the CCRC) to serve the existing Moor Lane Church and it is suggested that this will benefit both users of the church and highway users of this part of Moor Lane as it will help remove current on-street parking. The proposal will involve an improvement to existing pedestrian routes including the public footpath and permissive routes across the wider area. The report further concludes that no objections were raised against the previously proposed 172 units and in light

of the reduction in units to 131, no traffic or transport objections should be raised against the current scheme.

- 6.37 The proposal would have 85 parking spaces in total (26 car ports and 59 spaces, including those shared with the Church). In line with Annex 5, 1.5-2 parking spaces should be provided for the Assisted Living Units, i.e., between 76 and 102 parking spaces. In addition, it is anticipated that an Extra Care Unit would provide (based on the guidance for a Nursing Home) 1 space per 4 resident bed spaces such that 20 spaces would be required. In total therefore, between 96 and 122 parking spaces (a development average of between 0.7 and 0.9 spaces per unit/care bed) are needed if the requirements of Annex 5 are strictly applied. At this stage, the floorspace of other ancillary elements of the proposal are not available, thus in practice the number of spaces needed for staff parking may increase.
- 6.38 The applicant has indicated that from experience of other CCRCs, the use of parking spaces for independent units falls once a new occupier is established, in part due to the provision of most services on site and, where appropriate, because “pool” vehicles are provided. It is on this basis that 85 car parking spaces are proposed, rather than an amount within the range of 96 and 122.
- 6.39 It is clearly a matter for the marketing of this scheme if the applicant considers that parking provision would meet expectations of future occupiers. If the proposed number of parking spaces proves to be insufficient in the longer term, Staff consider that the site could accommodate more than the proposed 85 spaces identified, particularly those associated with the cottages and bungalows. As a matter of judgement, Staff consider that as the site is on an established bus route and as pool cars and cycles could be provided, that the proposed parking provision would be acceptable. Indeed, in previously refusing planning permission for the larger 172 no unit scheme, no objection was raised to the provision of 126 car parking spaces (a development average of 0.75 spaces per unit/care bed). If planning permission were forthcoming, Staff consider that a travel plan could be required through a legal agreement to secure the use of specific alternatives to private motor vehicles for residents and staff, in perpetuity. The application is accompanied a Travel Plan and its contents are considered to be sound.
- 6.40 The proposed access onto Moor Lane and within the site would meet Highways technical requirements. The London Fire and Emergency Planning Authority have written to indicate that they are not satisfied with the access within the site, which does not meet Part B5 of the Building Regulations, due to pinch points being less than 3.8m wide. As the application is in outline form, amendments could be incorporated within any Reserved Matters submission to resolve these concerns.

Other Issues

- 6.41 The application is accompanied by a Flood Risk Assessment. The Environment Agency raise no objections to the proposal subject to conditions.
- 6.42 With regards to Safer Places, the Crime Prevention Design Advisor raises no objections to the scheme in its illustrated form, subject to conditions.
- 6.43 The applicant has indicated that they would meet sustainable design and energy assessment/renewable energy minimum standards. In the absence of details as to how they would be achieved suitable conditions would need to be attached to any grant of planning permission.
- 6.44 The development would be liable for the Mayoral Community Infrastructure Levy. The application indicates that the development comprises 12,000sq.m. A payment of approximately £240,000 would therefore be necessary in the event the scheme was commenced. The liability figure would be revisited if and when a Reserved Matters submission is received.

Very Special Circumstances Case

- 6.45 As set out above, whilst there is a clear presumption against inappropriate development in the Green Belt which this development would be, exceptions may be allowed where very special circumstances can be robustly demonstrated. The NPPF indicates that “very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”.
- 6.46 Alongside the in principle harm identified, in Staff’s view, the proposal would adversely impact on the open and general character of the Green Belt and appear unduly prominent within Moor Lane to the detriment of visual amenity.
- 6.47 The applicant has outlined a number of circumstances which they consider outweigh the harm described. The headline themes of this very special circumstances case can summarised as follows:
- Government, Regional and Local Planning policies recognise a need for specially designed housing for an increasing elderly population
 - That there is insufficient appropriate housing for the elderly who can now expect to live into their early 80s, particularly 2-bedroom
 - Cranham has the highest proportion of older people in Havering and Havering has the highest proportion of older people in Greater London but few sheltered housing schemes/Extra care accommodation are available

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- A CCRC provides a fit elderly person with care when they need it, thereby preventing the loss of independence, autonomy and lifestyle which can occur with traditional care accommodation
- Providing the accommodation proposed would release under occupied, family housing within the Borough
- Care Home supply in Havering is mostly focussed around Romford and the northwest of the Borough. This does not reflect the high concentration of the elderly in Cranham.
- The CCRC (Continuing Care Retirement Community) would provide a range of services for Cranham
- There are no other alternative sites for a CCRC of this scale in the Borough. No specific provision is made in the LDF for sites to accommodate retirement provision of this scale
- CCRC's in rural areas are supported in principle by the Planning Officers Society "Continuing Care Retirement Communities: A guide to Planning" (2006).
- In a care village, care givers can provide care in a more efficient way. It can help reduce demands on health, social services and other care facilities, partly because doctors, physiotherapists, community nurses and other practitioners can visit several residents at the same time, leading to more efficient use of public resources
- Economies of scale mean that the facilities are better and more varied
- The development would safeguard other green belt land from development and provide the surrounding green belt land for future recreation/ecology
- The new car park for the church will reduce on-street parking and reduce problems for the bus and at some point the church may be supported to be redeveloped
- A substantial commuted sum for the off-site provision of affordable housing would be secured through a Section 106 Agreement
- The development would increase in employment in Cranham, which is considered to be particularly important in the current recession.
- The proposal would bring about ecological and recreational access improvements within the wider site area, through the creation of parkland area extending to some 9.2 hectares.

6.48 Combining these themes into principle strands creates a three-prong very special circumstances case which comprises a need case, the non-availability of alternative sites and the creation of a park. In addition to these prongs, it is the applicants' view that the development of the site would not unduly harm the purposes of the Green Belt and it is to this element of the case this report first turns.

The Green Belt

6.49 The applicant sets out that securing the long-term future of the substantial wider site via a legal agreement and management plan will assist in restricting sprawl and encroachment by reinforcing a newly defined defensible Green Belt boundary. The potential gifting of the land to an organisation such as the Thames Chase Community Forest, combined with funding for the implementation and management of the park area, is seen by the applicant to reinforce the long-term commitment that is proposed. At the same time, the applicant suggests that the contained nature of the site, combined with the proposed enhancements to landscaping features within the wider site mean that there will be negligible impact on the setting of Cranham when viewed from the wider landscape.

6.50 In respect of securing the long-term future of the substantial wider site by reinforcing a newly defined defensible Green Belt boundary, Staff do not share the applicants' view. At present, the Cranham envelope and the Green Belt boundary is clearly defined. Allowing a development to take place in the Green Belt equivalent to 3.27 hectares so that a newly defined defensible boundary can be formed is not a logical approach in itself, particularly as the development would result in sprawl and encroachment - which is exactly what the Green Belt is intended to prevent and the current boundary successfully achieves.

6.51 As set out above, the application site is a naturally vegetated parcel of previously undeveloped, open land, whose character is clearly distinguishable from the built up areas which bound it. It is on this basis that the creation of a newly defined defensible Green Belt boundary is considered to be unjustified.

The Need Case

6.52 The need case is essentially grounded in the demographics of Cranham and the shortcoming of existing Extra Care provision within the Borough. The application is accompanied by a Care Accommodation Supply and Demand Study dated (October 2009), plus an Addendum (dated November 2009) which has been produced by Savills. The key findings of this Study can be summarised as follows:

Demographic Demand

- There is a forecast increase in the population of people aged over 65 years from 41,300 to 55,700 in Havering in the next 20 years. This means there will potentially be an additional 14,400 elderly people in the borough that will need to find suitable retirement accommodation
- The population of people over 80 years in the catchment will also see a notable increase in numbers over the same period, with an additional 37% predicted in Havering by 2028. This percentage growth will result in an increase from approximately 10,100 to 13,800 people over 80 years in the borough
- An analysis of demographic and lifestyle data shows a general trend for affluence within the more elderly age groups in Havering
- The proportion of homes owned in the borough is above the national average by 11% and represents 73,000 homes (79%). Conversely, social rented accommodation has a below average representation, with around 5% fewer people requiring social housing than the national average
- Collectively, these statistics indicate a need for elderly care accommodation to serve people across several demographic groups, with particular reference to the above national average affluent groups and for least affluent groups

Supply Requirement

- The care home supply in the borough is significantly below average, with a current shortfall of approximately 440 residential beds, which could make it difficult to meet the demands of the current elderly population. Nursing care beds are however broadly in line with national levels
- Two thirds of care homes for the elderly are graded as 2 or 3 star (good or excellent)
- Given the quality of existing provision and the future projected elderly population growth, some of these schemes will need to be upgraded or shifted to fit the extra care model to meet the needs of the elderly population
- There is a lack of extra care provision in the borough with just 2 extra care schemes in the whole of Havering, providing 95 units in total, of which all are operated by a Registered Social Landlord (Staff note: since the submission of this report, a third scheme has been approved and is currently under construction provided bringing the total number up to 186 units). In an area that has been proven statistically to have a demographic profile skewed towards more affluent residents with access

to equity it seems important that an improved variety of extra care facilities is considered

- Savills estimate that there is a current need for approximately 700 extra care units in the catchment. This will increase by a further 100 units in the next 10 years
- A CCRC development such as that proposed at Cranham would help increase the variety of care in the local area, provide enhanced levels of service and reduce the increasing gap between supply and demand

6.53 At paragraph 50, the NPPF sets out that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, including older people. For the purposes of the NPPF, older people are defined as those over retirement age, including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.

6.54 One of the Council's core priorities is to improve quality of life for residents aged 65 and over and enable as many older people as possible to live independently in their own home, for as long as possible. In 2011, the Council published its Extra Care Housing Strategy for the period 2011 to 2021. The objective of the strategy is to accommodate more people within extra care housing. To underpin the strategy, an evidence base for determining the level of current and likely future demand for extra care housing amongst older people in Havering is included

6.55 Similarly to the Savills Report, the Strategy includes a demographic analysis of the Borough. The Strategy sets out that:

“Many studies and organisations have projected the likely growth in the number of older people over the next 10-15 years, with widely varying results from 40,000 to over 70,000 people aged 65 or over. It is difficult to draw an average estimate of the population of older people from these projections because they do not all classify ‘older people’ as 65 or over - some take it as 50 and over, 60 and over or of ‘pensionable age’. Also, they do not all make projections over the same, long term time periods - some project to 2020, 2021 and so on, up to 2030.

However, if we were to assume that change in the numbers of older people over time is constant over the project period of time, and that the projections refers to the same age category and are equally robust, the average figure for 2010 would be 51,821 older people. This represents a growth of 3,830 people, or 8%, on 2010 figures.”

6.56 In addition to the demographic analysis, information is set out regarding health outcomes and health projections for older people within Havering and the current tenures and uptake of extra care and supported housing together with details of adaptations and support required by older people. Some of the key findings set out by the Strategy are as follows:

- At the time of publication, there were two extra care housing schemes within the Borough (Paines Brook, Harold Hill and Ethelburga Court, Harold Wood) providing 88 units. The former Snowdon Court site in Squirrels Heath Lane is currently being redeveloped to provide a further 98 units of extra care housing.
- There are 894 units of sheltered housing owned by the Council, which are located within 20 complexes. At the time of publication of the Strategy, 103 of these units were empty. A Housing Needs Study carried out for the Council in 2006 by Peter Fletcher Associates found that sheltered housing provided by the Council and Registered Social Landlords accounts for 40% of the places available for older people within the borough. Leasehold sheltered housing in the private sector accounts for the majority of the remainder.
- There are 1,500 residential care places in the borough, within both nursing homes and residential care homes. These are provided entirely by the private and third sectors. Some of these places are taken by people with mental health, physical and learning disabilities, but the majority are filled by older people aged 65 and over. The Council's Associate Director for Commissioning confirms that there is an over supply of residential care homes in the Borough, citing an example where one 100 bed home has never been more than 50% full, despite being open for about 3 years. As of March this year, there were 172 empty care beds within the Borough. The Associate Director also confirms that due to advances in options in the community, the Council is placing 30% less people in to residential care than it did two years ago.
- In addition to extra care, sheltered and care home placements, there are 5,023 older people in Havering who received care whilst living at home, 45% of whom are aged 85 and over. It is on this basis that the Strategy concludes there is considerable scope for developing provision of extra care housing as Home Care customers may increase future demand for extra care housing should their circumstances change and a greater level of support be needed.
- Alongside the home care of the Borough's residents, support is also offered by the Council through home adaptations (by way of relocation of a bath or shower or installation of extra handrails for example) and the running of a Telecare service which provides a range of electronic devices, including alarm call systems, sensors to detect falls and detectors on doors and appliances to check if the gas has been left on.

- 6.57 Through an analysis of current demand from the Housing Register, potential future demand according to aspirations of older people (identified through the 2006 Housing Needs Study), identifying where older people live and through mapping deprivation, by looking at which wards have higher proportions of older people and which have higher rates of deprivation amongst older people, the Council can identify its priority wards, ie, those wards where future extra care schemes should be located because there is a demonstrable need
- 6.58 In relation to geography, the analysis concludes:
- The wards with higher proportions of older people and with higher rates of deprivation amongst older people, ie. those with higher numbers of older people living in deprivation, are Gooshays, Heaton and St Andrews
 - The wards with the greatest number of older people receiving social care are Gooshays and Heaton wards, followed by St Andrews
 - The greatest concentrations of older people applying for social housing are found within Gooshays and Heaton wards, with other isolated but dense concentrations in Havering Park, Brooklands, Rainham and Wennington and Cranham
 - The most popular areas that older applicants for social housing wish to move to are Romford and Hornchurch, followed by Gidea Park and Harold Wood.
- 6.59 In relation to need, the analysis concludes that there is a net annual need for extra care housing of 63 spaces, giving a 10 year need of 630 spaces. To deliver these spaces, the Strategy sets out several different approaches to increase provision of extra care throughout the Borough, but also improving the quality and therefore reducing the void rate of the Council's sheltered housing stock.
- 6.60 Havering has an ageing demographic profile and Staff are very mindful of the increasing need to provide accommodation for older people, a need which is endorsed by the Extra Care Strategy. However, this need is concentrated within certain wards within the Borough. Although Cranham is identified as having an isolated but dense concentration of older people applying for social housing, other wards within the Borough have an evidenced greater need.
- 6.61 It is acknowledged that the proposed CCRC is for the self-pay market rather than being a social housing scheme and given that Cranham has a) a notably high percentage of people over 65 years old within the Borough and b) the second least income deprivation amongst older people, that its demographic profile seemingly supports the provision of a CCRC. Nonetheless, demographic compatibility is markedly different from evidenced need. On this basis, it is not considered that the need case

presented by the applicant represents a very special circumstance for justifying the proposal.

Non-Availability of Alternative Sites

- 6.62 The second strand of the very special circumstances case relates to the non-availability of alternative sites with the Borough to accommodate a CCRC. The applicant has produced a report which looks at the site's specifically identified by the Site Specific Allocation DPD and outlines why these sites are unacceptable. Through the passage of time since the adoption of the DPD and the submission of this planning application, the Harold Wood Hospital (SSA1) and Whitworth Centre (SSA2) sites are no longer available (permission has been granted for their residential redevelopment). The remaining allocations for residential development are within London Riverside (SSA11, SSA12, SSA13) which seek to achieve medium to high density development, which a CCRC does not deliver. The applicant also comments within the report that the nature of the existing land uses and site constraints within London Riverside would require clearance of substantial buildings and potential remediation works which would not assist financial viability of a lower density CCRC development. Aside from the sites detailed by the SSA DPD, the applicant has not included any other detail or information about other sites which have been considered and discounted either within Havering or nearby adjoining boroughs.
- 6.63 In addition to the looking at the Site Specific Allocations, an analysis has been carried out of the demography of the wards the sites are located within (Heaton, Harold Wood, Gooshays, South Hornchurch, Rainham and Wennington) together with the application site itself (Cranham and Upminster). Using 2001 Census data, it is suggested that Cranham and Upminster wards have a substantially higher proportion of elderly residents in comparison with the areas in which the alternative sites are located, thereby supporting the applicants' case that the Cranham site is demographically preferable to others within the borough. Other data submitted by the applicant demonstrates that statistically Cranham and Upminster has a higher degree of under occupied houses and the older and elderly living in Cranham are statistically more affluent. However, as set out above, demographic compatibility is markedly different from evidenced need.
- 6.64 To supplement this justification, the applicant has also submitted a viability report which outlines why this type of site (ie. an undeveloped, Green Belt site) is the only one which is available to bring forward a CCRC. The viability report has been independently scrutinised. The conclusion of that review is that the residual land value of the site following development would be sufficient to compete with other developers for sites allocated for residential development within the Borough, ie. those outside of the Green Belt. On this basis, it is not considered that the suggested lack of alternative sites presented by the applicant represents a very special circumstance for justifying the proposal.

The Creation of a Park

- 6.65 The third strand of the very special circumstances case relates to the applicant's commitment to enter into a full Landscape and Nature Conservation Management Plan to ensure the ongoing, sensitive management of the retained habitat on the wider 9 hectare site surrounding the application site. As described above, the primary objective is to optimise biodiversity interests but it is also intended that provision is made for enhancing public access by creating a park.
- 6.66 To ensure a realistic prospect of delivery, the applicant has held preliminary discussions with Thames Chase Community Forest (TCCF) who could potentially fulfil the role of implementing the measures needed to create a new community park and take responsibility for its long term management. In the event that TCCF became unable to take up the offer, the applicant has also provided details of another model of open space and parkland management which is provided by a company called Oasis.
- 6.67 In light of the currently unmanaged nature of the wider site, in some respects, there can be no dispute that the Management Plan would achieve clear benefits to biodiversity. That said, in order to fulfil the objectives of Policies DC58 and DC59 but also to mitigate the harm arising to the character and openness of the Green Belt, this parkland must be retained in perpetuity. Currently, the applicant is offering to provide funding to the TCCF to create and manage the park for a 10 year period. However, this provides no certainty in the longer term, once the 10 year period has expired This is of great concern to staff given the SINC designation and wider role this park has in mitigating the impact of the proposal and therefore, it is considered that the offer in its current form does not constitute a very special circumstance to allow the development.

Planning Obligations

- 6.68 As part of the very special circumstances case, various planning obligations are offered by the applicant. In order to fulfil the requirements of the Community Infrastructure Levy Regulations 2010, any obligation secured must be a) necessary to make the development acceptable in planning terms, b) directly related to the development and c) fairly and reasonably related in scale and kind to the development. For completeness, each of the obligations offered are commented on below:
- A strategy for the long term management of the adjoining land parcel together with a package of funding to enable this for a 10 year period: The merits of this offer are commented on above within paragraphs 6.66 to 6.68.
 - A contribution of £300,000 towards the off-site provision of affordable housing: the development does not require an affordable housing

contribution under the terms of Policy DC6. Whilst it would be welcomed, it is not necessary to make the proposal acceptable in planning terms and could be open to challenge.

- A new car park for the use of Moor Lane church which would be shared with visitors to the care village: an analysis of the highways and parking implications of the proposal are set out within paragraphs 6.36 to 6.39
- A potential financial contribution towards the redevelopment/extension of Moor Lane Church: this obligation is also unnecessary to make the proposal accept in planning terms. The offer is unrelated to the development being proposed and could be open to challenge.
- An occupation restriction limiting occupation of the village to elderly people and/or people in need of care. It is suggested that this would require that one member of each household unit would be of retirement age: in the context of the nature of the development, such an obligation would be support in the event of planning permission being granted.
- An occupancy cascade is also offered which would ensure that residents of the London Borough of Havering have the first opportunity to acquire accommodation within the scheme, before this is opened out to people with a family connection with the Borough, before finally being made available to those currently living outside the area and with no family connection. The applicant has indicated they would be willing to discuss the exact terms of such an arrangement as part of any Section 106 Agreement negotiations and would naturally need to include the exact wording of such a mechanism and in particular the length of time assigned to each period before consideration would be opened up to the next tier in the cascade. In the context of the nature of the development and the very special circumstances put forward in this case around need, in the event that planning permission was granted, such an obligation would be supported, subject to appropriate wording being agreed.
- A Travel Plan: in the context of the nature of the development, such an obligation would be supported in the event of planning permission being granted.
- An unspecified contribution towards funding minor footway extensions to link footways within the development site. Two pedestrian points of access to the CCRC would be provided from Moor Lane, one towards the quieter northern end of the site which will enable pedestrians to cross to the western side of Moor Lane and proceed towards the Avon Road local centre, or to catch the bus at the junction with Queens Gardens. The other is towards the southern end of the Moor Lane frontage at the point where an existing wooden bridge provides access to the Public Right of Way that is contained within the site and passes

close to its southern boundary. The submitted Transport Statement acknowledges that the footway on the eastern side of Moor Lane stops marginally short of this access point, hence the offered contribution to fund minor footway extensions. Again, such an obligation would be supported in the vent of planning permission being granted.

- 6.69 In addition to the obligations offered by the applicant, the Highways Authority have requested a financial contribution of £75,000 towards the review and upgrade works necessary to provide a pedestrian friendly route from the development to the Avon Road shops and improvements to upgrade the local Bus Stops. The applicant has confirmed that they are happy to consider the need for the contribution, subject to the meeting the tests of soundness set out by the CIL Regulations and resolving the degree of overlap with the financial contribution being sought by Transport for London. TfL are seeking a contribution of up to £40,000 (£20,000 per bus stop) if either of the two bus stops nearby to the site do not adhere to current guidance. In the event of planning permission being granted, further negotiations would be necessary to establish to extent of contribution required in this respect.
- 6.70 Were members minded not to resolve to refuse or defer the application such resolution would be subject to notification of the application to the First Secretary of State pursuant to the advice in the Annex to Circular 11/2005.

7.0 Conclusions

- 7.1 The site is located within the Green Belt. In its current form, the site is a naturally vegetated, 3.27 hectare parcel of previously undeveloped, open land. The site is clearly distinguishable from the built up character of Moor Lane and Fairholme Gardens, both of which bound it. The site has an important, key function in Green Belt terms as it defines the built up edge of Cranham, thereby preventing sprawl and coalescence. Public viewpoints of the site are achieved from the south and west, with longer distance views obtainable from the A127 and to a lesser degree, the M25.
- 7.2 The proposal constitutes inappropriate development and would give rise to harm to both the character and openness of the Green Belt and visual amenity in the streetscene within Moor Lane. In order to justify this development, very special circumstances must be demonstrated to outweigh this collective harm.
- 7.3 The applicant has presented a three-prong very special circumstances case which comprises a need case, the non-availability of alternative sites and the creation of a park. In addition to these prongs, it is the applicants' view that the development of the site would not unduly harm the purposes of the Green Belt.
- 7.4 Balancing the harm arising from the proposal against the very special circumstances case promoted and reviewed fully above, Staff consider that

the harm would be so significant to the nationally important Green Belt in this case that the circumstances offered are insufficient to outweigh it. The application is therefore refused. It is therefore recommended that the application is refused.

IMPLICATIONS AND RISKS

Financial implications and risks:

None

Legal implications and risks:

None

Human Resources implications and risks:

None.

Equalities implications and risks:

The proposal would provide accommodation for older people, which in isolation, is welcomed given the Borough's ageing demographic profile. However, for the reasons set out within the report, the site is considered to be inappropriate for the development proposed and in this case, this inappropriateness outweighs the benefit of providing additional accommodation for older people.

BACKGROUND PAPERS

Application forms and plans received on 18th August 2010.