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Brentwood Borough Council
Town Hall
Ingrave Road
Brentwood
Essex
CM15 8AY

Our reference: 14.202

15th December 2014

Dear Sir or Madam,

**Proposed 150 bedroom residential nursing home for the elderly
Site at Little Warley Hall Farm, Little Warley Hall Lane, Brentwood**

Spectrum Town Planning Consultants has been appointed by Drs M. & Z. Sahirad to assist in moving forward proposals for a new elderly persons residential nursing home at the above site.

The chosen site is located within the Metropolitan Green Belt. The purpose of this letter is to set out a very special circumstances case to justify the departure from established Green Belt policy. At this stage the case is presented in a summary form but would be developed in full to accompany any future planning application. This letter has been prepared taking into account the comments made by Council Officers in a letter dated 22nd July 2014. The purpose of this letter is to support our client's submission through the plan-making process. The contents of this letter could also be used to accompany a pre application request to the Council's Development Team.

Introduction to the Proposals

Responding to the pressing need for elderly persons care provision, our client wishes to bring forward a new purpose built residential nursing home with state of the art facilities, set in an attract parkland setting. The proposed nursing home would be constructed on a green field site in the south of the borough, located in the civil parish of West Horndon. The subject site, which forms part of Little Warley Hall Farm, is situated directly to the south of the Southend Arterial Road (A127) and to the west of Little Warley Hall Lane.

Our client's proposals are for a 150-bedroom nursing home, providing 24-hour care and support for the elderly, some of whom will have high dependency needs including those with dementia or other health problems including neurological conditions. In addition, it is envisaged that the facility would provide care and support for the terminally ill, partially sighted or those with a disability. The proposed facility would provide short-term health and social care, treatment and support, specialist respite care, rehabilitation and palliative care. The proposed nursing home would additionally offer a number of dementia bed spaces.

It is our client's intention to offer residents a range of onsite amenities and facilities that are not directly care related, but which add to the quality of life available, such as a restaurant, wellness suite including swimming pool, craft rooms, TV lounges, computer room, library, small residents' shop, hairdressers, Post Office, dental surgery and communal transport facilities.

The proposed development would be accessed from Little Warley Hall Lane (south of A127) via an existing private road, which would be upgraded to a suitable standard. At this stage the detailed design of the proposed building itself has not been planned, although basic plans were prepared at the request of the Council to show the possible scale and layout of the development. Should the proposal progress our client would appoint an architect to design a bespoke high quality and sustainable building, which sits appropriately within the sensitive rural landscape. It is envisaged that the development would sit at the centre of landscaped parkland, which would provide places to relax and unwind. The parkland would also create new habitats, which would serve to increase the biodiversity value of the site.

Background Information

It is our understanding that the proposals for a new nursing home on the subject site were first presented to Brentwood Borough Council five years ago. The possibility of locating a nursing home on the site was put forward to the Council by our client as part of the call for sites process associated with the Strategic Housing Land Availability Assessment (SHLAA). The Council's current document, which was adopted in October 2011 identifies Little Warley Hall Farm as site reference G149. It considered the suitability of the subject site but concluded that the site is not suitable for residential development due to its unsustainable location and its poor accessibility to services, facilities and public transport links.

Subsequent to the adoption of the above our client has been involved in the plan-making process associated with the emerging Brentwood Local Development Plan. In particular, we note that our client submitted representations to the Council's Local Plan Preferred Options Consultation in June and July 2013. The representations were that Policy DM23 (housing land allocations) should be amended to include the subject site for development of a residential nursing/care home for the elderly. To support their representations our client provided information relating to the need for additional nursing/care homes in the Borough, together with information about the subject site in an effort to demonstrate that it is both suitable and available for the proposed development.

It is our understanding that the idea of developing a residential nursing home for the elderly on the subject site was first discussed with the Council in 2008. At this time it was suggested that the proposed development should be taken forward through the plan-making process.

In undertaking discussions with the Council at different times since 2008, we understand that Officers have not dismissed the proposals offhand but have encouraged our client to prepare additional information to support their case. On the basis of this advice our client has commissioned basic drawings of the proposed building and written a business case. Our client has indicated to us that in more recent correspondence, Council Officers have suggested that it may be appropriate to take the proposals forward through the Development Team as a pre-application submission, instead of through the plan-making process.

Planning Policy Context

The subject site is located within the Metropolitan Green Belt. National planning policy contained within the National Planning Policy Framework (NPPF) advises that the Government attaches great weight to Green Belts in preventing urban sprawl by keeping land permanently open. The NPPF sets out five purposes of the Green Belt including to check the unrestricted sprawl of large built-up areas and to safeguard the countryside from encroachment (para 80).

Within the Green Belt, there is a well-established presumption that development is kept to a minimum and where it is allowed, it is for certain purposes only including agricultural and forestry, open sport and recreation and cemeteries. The construction of new buildings is regarded as inappropriate in the Green Belt unless for use in connection with those purposes specified (para 89).

If a proposal comes forward which falls outside of these specified categories it is referred to as 'inappropriate development'. In order for a planning permission to be given, a very special circumstances case must be demonstrated which outweighs the inappropriateness of the proposal together with any other harm, which may arise from it.

Our client is aware that viewed against current planning policy contained within the NPPF and adopted Local Plan the proposed development will be treated as inappropriate development within the Green Belt. It is for this reason that our client has been seeking to influence future local planning policy through the plan-making process. However, if we work on the basis that the Council is unlikely to remove the site from the Green Belt, any future planning application will need to be accompanied by a very special circumstances case. Such a case will need to put forward an exceptionally strong argument, or collection of arguments, which outline why there is an overwhelming case for approving such a scheme, contrary to the provisions of national planning policy and the development plan.

Very Special Circumstances Case

As explained at the start of this letter, its purpose is to set out a very special circumstances case to justify the departure from established Green Belt policy. Again, we wish to reiterate that at this stage the case is presented in a summary form and will need to be developed further, with the aid of specialist consultants where appropriate, to be of a suitable breadth and standard to accompany any future planning application. It is hoped however, that the summary case provided is sufficient to enable the Council to advise our client whether such a proposal is worth progressing.

Our client's very special circumstances case is primarily focused upon the issue of need. It

is possible to have regard to examples, both locally and nationally, where proposals for retirement and care accommodation have been permitted on the basis that the need for provision of such facilities, has justified their location within the Green Belt. These cases demonstrate that there has been an acceptance that the provision of care facilities that meet the needs of an ageing population constitutes the very special circumstances required to justify development in the Green Belt.

The Need Case

Our client's need case in support of the proposed nursing home, and other associated uses, comprises a number of strands, which are outlined in turn below.

National policy and guidance recognises the need to plan for meeting the needs of the elderly population

National policy and guidance provides a clear message regarding the importance that Government places upon the need to plan now in order to meet the requirements of an increasing elderly population. The NPPF continues to place particular emphasis on addressing the accommodation requirements of different groups in the community, which includes older people, as well as highlighting the regard that should be had to current and future demographic trends.

The Housing Green Paper, Homes for the Future: More Affordable, More Sustainable (July 2007) gives specific consideration to this issue. This notes, at Para. 9, the substantial anticipated growth in elderly population, and highlights that houses "need to be easily accessible and supported by the right infrastructure, so that people have access to health, housing, transport and care services." It is also noted that providing more attractive options for older people will encourage the process of downsizing, which in turn will make their lives more manageable and increase the available supply of family housing.

Further reference is made to this issue in the Housing Green Paper (2007), providing a clear indication that this is a major component of Government policy. This is reinforced by the Government's National Strategy for Housing in an Ageing Society (2008), which sets a clear requirement to ensure that sufficient appropriate housing is made available in the future to relieve the predicted pressures on homes, health and social services from the specific needs of the elderly population. This stance is echoed more recently within the report HAPPI: Housing our Ageing Population: Panel for Innovation (2009) by the Homes and Communities Agency.

Demographic circumstances and forecast growth in elderly population

There are 9.6 million people in the UK over 65. That's 15.7% of the population. In the next 25 years, this percentage will grow by 55% to 14.8 million (almost a quarter of the population). The supply of suitable care/nursing home accommodation is limited and unsophisticated. It has to increase to meet the growing demand and it has to meet the needs of its residents.

By contrast, the supply of care/nursing home beds is still contracting. More care homes have closed and far fewer have opened, resulting in an 18% reduction since 1996. Surveys

suggest that nationally, 10,000 new places in a mix of care homes and extra care units need to be created each year just to keep pace with demand. If these trends continue, there will soon be a serious lack of residential and nursing care in this country. Analysis of growth of the local retirement population suggests that without the creation of new facilities, the elderly could soon have nowhere to go, adding more burden to the overstretched NHS.

Brentwood is acknowledged as having a high proportion of elderly persons, compared to national statistics, and it is forecast that the numbers of elderly will continue to increase, both in total numbers and as a proportion of the resident population. The availability of appropriate housing for older people is an area where major changes are required over the next ten to twenty years.

Just under a fifth of Brentwood's population is over 65 and more than a quarter of households contain someone of this age. The Council's Strategic Housing Market Assessment (2013) identifies population age structure projections to the period 2021. One of the most notable features of the report is the anticipated growth of the population in the over 65 age group. According to the data sourced from POPPI (Projecting Older People Population Information System) the older population in Brentwood will increase by 12.2% between 2012 and 2020. At the time the report was published, the Office of National Statistics interim 2011 sub-national population projections showed an increase in the population of those aged 65 as around 15.3%, based on data between 2011 and 2021. The Council's Strategic Housing Market Assessment goes on to state that the changes in population will impact on demand for different house types and tenures. Furthermore, local development plan documents will need to take account of the projected growth in demand in this age group.

We understand that there are presently circa 1,495 registered bed spaces in the catchment area of the proposal site (5 miles), comprising circa 1,261 single bed spaces of which circa 1,080 have en suite facilities. Also, within the catchment area of the site are approximately 1,346 elderly people requiring residential/nursing care. This figure is set to increase to 1,662 by 2020, and to 2,124 by 2030. There has been a gain of around 240 bed spaces in care homes within the catchment area since 2002. This would suggest a current shortfall of around 260 single en suite bedrooms, increasing to 582 by 2020 and 1,044 by 2030.

In the event that our client was to take this proposal forward as a full planning application, they would commission a detailed study of care accommodation supply and demand within the Borough and catchment area of the proposal site. This would expand upon the information provided above in order to demonstrate that there is a need for the proposed development and that existing provision often fails to meet the decent homes standard or DDA/equality compliance regulations.

In light of the above Brentwood's emerging Local Development Plan must seek to address the issue of meeting the needs of an ageing population. Older people generally remain fit and active longer than they did in the past. We are also living longer primarily due to improved healthcare services. Studies have shown that there is an increasing desire among older people to remain in their own home for as long as possible. It is widely recognised that there is a need to increase the level of locally available flexible specialist accommodation for older people in order that the appropriate levels of support and care can be tailored to individual needs.

The Council's Local Plan Preferred Options Consultation identified that part of the response to an ageing population is to provide choice so that should people wish to move they can find somewhere, which suits their needs and aspirations. It is also acknowledged that particular types of specialist accommodation and support will be required in order to meet the needs of a growing number of frail elderly people. It is this requirement, which our client is seeking to address through this proposal.

Lack of alternative sites, and delivery economics

The fact that Brentwood Council are presently in the process of adopting a new Local Development Plan would suggest that alternative sites for care/nursing home development will be identified and allocated through this process. This is especially so given the emphasis that is now placed on demonstrating at least a ten year supply of deliverable and available sites, in line with the requirements of the NPPF.

The Council's Local Plan Preferred Options Consultation (Policy CP3) identified a number of strategic sites for the delivery of new development across the plan period. Policy DM23 also identified some additional sites specifically for housing development. However, no specific provision is made on these sites to accommodate care/nursing home provision.

A number of strategic sites are allocated for residential development, whilst others are specified for mixed uses, including residential. It is however highly unlikely that without a specific policy requirement for additional care/nursing accommodation to be incorporated within these sites, such uses will be included by developers. This is because the higher value use of standard residential provision will generally be preferred. The applicant's proposals include a range of supporting facilities and ancillary uses that are likely to further reduce the value of the scheme. It is also clear that reliance is placed upon the allocated sites for delivery of the housing requirement stemming from the NPPF, whereas it has been established that much of the provision for the elderly would not contribute directly in this respect. This places further pressure on the sites allocated for residential use to provide uses other than care/nursing accommodation.

Our client has obtained the results of a recent survey commissioned by Kemsley Property Consultants, which sets out a review of recent residential and commercial land sales within the urban area, confirming that sites have exchanged hands for between £1m and £7.4m per care. Such levels of site acquisition would simply not support a nursing home of the nature proposed, whereby substantial non-profit generating investment in the building and facilities would be required at the outset.

In the event that our client was to take this proposal forward as a full planning application, they would look to strengthen their very special circumstances case by commissioning a study to assess the planning and viability issues relating to each of the strategic sites identified in the emerging Local Plan. It is our client's view that such a study is likely to conclude that each of the sites suggested for housing development are not realistic options for the proposed development for a number of reasons. The primary reason is that of higher use values associated with these allocations. Furthermore, the majority of sites are brownfield in nature and as such would require substantial site clearance and demolition. These sites may also

need a program of remediation for potential ground contamination ahead of any development, adding further costs to the equation.

Highway Improvements

As part of our client's proposals and very special circumstances case, it is envisaged that a package of highway improvement measure would be put forward with any planning application. These measures will include the upgrading of the existing access road, which serves Little Warley Hall Farm and its junction onto Little Warley Hall Lane. Such an improvement would be to the benefit of St Peter's Church, the Virgin Active health club and nearby residential properties.

In the event that the Council could be convinced of the proposals merits from Green Belt policy perspective, our client is aware that the location of the site will also be an important consideration taking into account the current sustainability agenda. It is our client's intention to provide ancillary facilities and services on site in order to reduce the need for future residents to travel. Acknowledging that some residents will wish to travel into Brentwood town centre, it is our client's intention to provide a shuttle bus service to and from the site. The service would be operated by a small fleet of electric buses and would also provide a means for staff to travel to work. A green travel plan would be prepared to accompany any future planning application.

Additional community benefits

The proposed development would provide a range of additional community benefits, which we consider should also be taken into account when weighing up any very special circumstances case.

Our client's proposals offer a number of positive planning, housing, social service and health benefits. The proposals would help reduce demands on health, social services and other care facilities, partly because doctors, physiotherapists, community nurses and other practitioners would be able to visit several residents at the same time, leading to more efficient use of public resources.

The freeing-up of under-occupied family housing in the area, relieving pressure on housing stock, is a further relevant community benefit that is particularly worthy of note. As older people tend to remain in their family home after children have left home or after the loss of a partner there is a growing trend of under-occupation in the housing market. The Council's Strategic Housing Market Assessment (2013) undertook a broad assessment of under-occupation based on detailed analysis of family composition data. The report identifies that under occupation across the Brentwood Borough overall was 42.9%.

It can thus be seen that our client's proposals have the potential to release family housing onto the market through the provision of alternative purpose built accommodation for older people, assisting in the availability of much needed housing of this kind in the Borough.

Furthermore, the proposed development would lead to the direct generation of additional employment on the site. This could equate to up to 70 full time and 60 part time people being employed on the site, fulfilling a range of functions including site management and administration, nurses, care leaders and assistants, cleaners, catering, therapists, buildings and grounds maintenance, and laundry. Such jobs are considered to be particularly

attractive to residents in the local area, whilst the benefits that this would provide are likely to be considered a welcome boost given the current economic climate.

Landscape and biodiversity enhancements

The adopted Local Plan designates the application site as falling within a landscape improvement area. Within areas such as these, the Council seeks to encourage landowners to implement schemes to improve the environment planting, habitat creation, improved public access and management agreements. As part of our client's proposals and very special circumstances case, it is envisaged that a package of measures would be put forward with any planning application to improve the landscape of the site around the proposed building.

The subject site is presently open grazing land, which is of low ecological value. The site is presently entirely in private ownership. The proposed development would only occupy part of the subject site, leaving a sizeable area of land directly to the south of the building, which could be transformed to create new parkland. The primary objective of the parkland would be to optimise biodiversity interests but provision could also be for some form of access.

In the event that our client was to take this proposal forward as a full planning application, they would look to strengthen their very special circumstances case by providing more information concerning the proposed parkland, together with a full landscape and nature conservation management plan.

The subject site is located in close proximity to St Peter's Church. An opportunity exists to create a close relationship between the proposed development and the church. In bringing forward a future planning application, our client would liaise with the Diocese to explore whether opportunities exist to fund landscape improvements work within the church grounds, as well as building maintenance as this could be used by the nursing home residents and staff in addition to the general public.

Summary and Conclusion

The proposed development is commended as an ambitious scheme that would bring about substantial benefits to the local area, helping to meet specific identified housing needs for older people, with a range of additional community and environmental benefits.

Notwithstanding this, the proposal constitutes inappropriate development and would give rise to harm to both the character and openness of the Green Belt. Our client acknowledges that in order to justify this development, very special circumstances must be demonstrated to outweigh this collective harm. The summary case presented in this letter outlines a multifaceted very special circumstances case, which comprises a need case, the non-availability of alternative sites, highway improvements and the creation of a park.

Whilst it is acknowledged that the case presented requires further work to be of a suitable breadth and standard to accompany any future planning application. It is hoped, that the summary case provided is sufficient to support our client's aspirations through the plan making process.

Clearly, we are keen to avoid a situation whereby our client invests further significant time and

money on a project, which is unlikely to be supported by the Council. It is for this reason that we have recommended to our client they may wish to consider approaching the Council, separate from the plan-making process, on a pre application basis, to discuss the merits of this proposal. To this end, should our client opt to undertake pre application discussions, we hope that the summary very special circumstances case outlined in this letter, will be sufficient for the Council to advise whether merit exists in progressing this proposal to a full planning submission, or whether the summary case outlined is unlikely to reach the bar of very special circumstances.

Yours faithfully,

Matthew Letten
Planning Consultant