



For and on behalf of
Endurance Estates

**Representations to the Greater Cambridge Local Plan – First Proposals
Consultation 2021**

Land off Branch Road and Long Road, Comberton, CB72 7DF

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APPENDICES

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1.0 INTRODUCTION

- 1.1 These representations have been prepared by DLP Planning Ltd (DLP) on behalf of Endurance Estates Ltd (EE) to the Greater Cambridge Local Plan – ‘First Proposals’ Regulation 18 Consultation. These representations seek to provide feedback on the emerging development strategy and preferred approach to development management policies to help shape the new local plan as it proceeds through the plan making process.
- 1.2 This response is made in the context of the client’s interest in land off Branch Road, Comberton which was submitted for consideration through the Call for Sites (ref. 40316) and builds on the representations submitted to the Greater Cambridge Local Plan ‘First Conversation’ Consultation 2020.
- 1.3 The site represents an opportunity to deliver a high-quality development containing (i) specialist housing for older people as part of a C2 Integrated Retirement Community, which provides Extra Care housing in a sustainable location in reflection of local need, as well as (ii) C3 general housing on adjoining land. The site is in a highly sustainable location, and this report sets out how the proposals will contribute to meeting the broader aims of the Greater Cambridge Local Plan.
- 1.4 The development is supported by the landowner and an established and leading retirement community operator, who is able to both demonstrate the need for the development and the deliverability of the site.

2.0 REPRESENTATIONS

Vision and Development Strategy policy approach:

Policy S/JH: New jobs and homes

- 2.1 In terms of residential and employment commitments, the new Local Plan should seek to meet the full, unconstrained objectively assessed needs for market and affordable housing, as well as the assessed needs for jobs.
- 2.2 Paragraph's 60 – 62 of the National Planning Policy Framework (NPPF) outline that Local Plans should support the Government's objective to significantly boost the supply of homes and at a minimum should be informed by a local housing need assessment using the standard method included in National Policy Guidance. The NPPF also notes that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed.
- 2.3 The Plan has identified an objectively assessed need for 58,500 jobs and 44,400 homes across the Plan period from 2020-2041.
- 2.4 The total number of homes to be provided through the plan is 48,840 which includes a 10% buffer for flexibility and results in a requirement of 11,640 homes to be identified in this Plan.
- 2.5 Whilst an uplift has been applied to the Standard Method, in response to the Council's evidence which considers the preferred forecasted employment levels, it is noted that planning for the standard method housing figure set by government would not support the number of jobs expected to arise between 2020 and 2041.
- 2.6 The Councils have instead opted to pursue a 'Medium' growth option (2,111 dwellings per annum), but this falls short of maximising the economic potential of the 'Plan Area' and the provision of housing in accordance with higher forecasts for jobs growth (2,549 to 2,690 dwellings per annum). This is projected to continue existing trends, where levels of housing delivery have been out-paced by jobs growth, resulting in sustained affordability pressure, and increased in-commuting. This has addressed in more detail by the representations submitted by Barton Willmore in respect of our client's wider interests in Greater Cambridgeshire.
- 2.7 The Council's Housing Needs for Specific Groups Addendum (2021) models the demographic implications of various growth scenarios. This recognises that whilst needs

increase as the housing numbers go up, the proportionate increases are fairly small due to uplifts primarily affecting younger working populations (Paragraphs 6.7-6.8). The material point, however, is that the higher growth scenarios provide a true reflection of the actual demand for housing. Even using the Council's 'medium' scenario, without prejudice to the reservations in these representations, the Council's Preferred Approach represents a significant increase in the requirements for development.

- 2.8 To address this, the Council is only proposing a limited number of new allocations at urban extensions and new settlements and is seeking to realise additional capacity from existing allocated and committed sites as provided for in the existing strategy. In practice, the risks to delivery mean that the Council's stated provision for the 'medium' scenario plus a 10% buffer is unlikely to be achieved within the plan period utilising very limited additional sources of flexibility.
- 2.9 Whilst this policy recognises the overall number of homes to be provided for within the plan period, the First Proposals as a whole fail to set a figure or a range for the number of specialist housing for older people needed across the plan area. The issues identified mean that, together with considering full housing needs, and the requirement for an increased supply buffer, consideration **must** therefore be given to specifying the amount of homes to be provided for to meet the demand for Extra Care and other types of specialist accommodation, and then how these will be delivered.
- 2.10 While an increase to the overall buffer may be appropriate (to say 20%) the practical implications are that any risks to delivery of the strategy mean operators within the specialist older persons housing sector will face the most extreme pressures of competition in securing development opportunities.
- 2.11 This is an issue exacerbated in circumstances where the limited provision that exists (in some cases) as part of committed developments fails to meet the operational requirements of the sector in terms of scale and scope to deliver a full and comprehensive range of services to residents as part of the Extra Care model.
- 2.12 In these circumstances, greater certainty and flexibility would be achieved through the allocation of specific sites to meet the needs for specialist housing for older people alongside provisions for the overall buffer, including that relating to general housing needs. Addressing this issue is central to satisfying NPPF Paragraph 60 in terms of providing an appropriate

strategy that will enable the needs of specific groups to be addressed without being entirely dependent on the wider identified risks.

Policy S/DS: Development Strategy

- 2.13 The consultation document outlines the 'preferred development strategy' for Greater Cambridge and defines the intention to direct development where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way.
- 2.14 The strategy notes that development will therefore make use of brownfield opportunities within the Cambridge Urban Area, urban extensions and new settlements, but only proposes a very limited amount of development in rural areas.
- 2.15 At this early stage in the Local Plan preparation process (Regulation 18), further consideration of sites suitable for, amongst other development typologies, specialist housing for older people (including Extra Care development) in sustainable locations should be undertaken. There are opportunities, such as the sub mission site, to deliver Integrated Retirement Communities which provides Extra Care housing in sustainable locations which will also serve to support rural services, improve the vitality and viability of villages, and their shops and facilities whilst also enhancing local amenities including healthcare.
- 2.16 The proposed development strategy focuses on a number of larger, strategic developments which will not support the existing villages and will not deliver the type of housing required to meet the housing needs of different groups (including older people) and needs of local communities in these locations.
- 2.17 The Plan needs to support conscious efforts to ensure the delivery of housing to meet the need for specialist housing for older people, which is described in government policy guidance (PPG) as *critical*. (Paragraph: 001 Reference ID: 63-001-20190626)
- 2.18 There is a significant amount of variability within the sector (as acknowledged within the PPG), which also recognised that the location of housing is a key consideration for older people who may be considering whether to move. It is not considered that the proposed development strategy takes into consideration the needs of the sector, including the

allowance of choice, and the approach currently advocated will not support the varying models available to provide Extra Care housing and retirement communities.

- 2.19 The PPG identifies the different typologies of specialist housing, each designed to meet the diverse needs of older people and identifies that specialist housing needs differ dependant on the level of care needed. The PPG makes it clear that diverse housing models will need to be considered and the provision of one type of specialist housing will not meet the care requirements of older people whose range of needs will differ greatly.
- 2.20 The characteristics of Extra Care accommodation, including the level of services provided and support available, materially affects the requirements of operators and the conclusions on those locations that are potentially suitable for development. The characteristics of Integrated Retirement Communities which provide Extra Care housing also enable consideration of where this can contribute towards mixed and balanced communities and sustainable growth in rural areas (in accordance with NPPF 2021 paragraph 79). There may be cases, such as the at Comberton, where delivery alongside general needs housing would promote social interaction and the delivery of mixed and balanced communities.
- 2.21 This necessitates an objective assessment of alternatives to the Council's proposed strategy to meet general housing needs where this would ensure a reasonable prospect of meeting needs for specialist housing in full.

Policy H/AH: Affordable housing

- 2.22 Paragraph 65 b) of the Framework makes clear that proposals for specialist accommodation should be exempt from providing at least 10% of properties for affordable home ownership, stating: *"Exemptions to this 10% requirement should also be made where the site or proposed development: b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students)";* Government policy is therefore clear that specialist accommodation should be exempt from this affordable housing policy requirement.
- 2.23 The proposed development at Branch Lane and Long Lane, Comberton would include a mix of C3 general needs dwellings and Use Class C2 Extra Care accommodation. The provision of affordable housing contributions will need to be assessed with this consideration in mind and as such the policy approach must support the separate assessment of affordable housing contributions on these types of mixed-use sites. For example, the Council's

proposals under Policy H/AH for mixed-tenure schemes including Build-to-Rent elements may be subject to making up any shortfall in affordable homes across the remainder of the development. Without prejudice to the justification for that position, Policy H/AH must be clarified to ensure that similar arrangements will not be applied to mixed-use sites incorporating specialist housing for older people.

- 2.24 Proposed Policy H/AH also sets out that on sites of 10 or more dwellings 40% of new homes will be required to be affordable, except where: there can be a proportionate reduction as a result of vacant buildings being re-used or re-developed (as set out in national planning policy), the development is solely for Build to Rent, the development is for some types of specialist accommodation that fall within Use Class C2, or the development is solely for residential caravans. Further clarification is required as to which types of specialist accommodation that fall within Use Class C2 would be exempt in light of the Framework and Planning Practice Guidance.
- 2.25 Retirement Communities providing for Extra Care take the form of a “core building” and containing a mix of service and residential uses and surrounding purpose designed specialist accommodation.
- 2.26 The village core will provide a number of communal facilities focussed on facilitating wellness and typically comprise up to 25% of its floorspace as non-saleable space. This includes the communal and care facilities available to its residents. These facilities may vary from village to village but will always include a minimum level of communal provision.
- 2.27 The specialist accommodation will be carefully designed to incorporate features that allow for practical living for older people and the delivery of care and assistance safely within that setting, which can be increased over time as necessary.
- 2.28 The proposed site would provide a mixed-use development with part of the site including the following features which suggest that some of the site falls within Use Class C2:
- The development provides for specialist housing that caters for the specific needs of older persons
 - The care village provides a wide range of communal facilities to promote physical and mental health and wellbeing, including a wellness spa, restaurant, meeting spaces/library, transport services, landscaped grounds, back offices and staff facilities
 - The accommodation would provide for specialist features including level access,

- maximised natural daylight, internal room layout, connectivity to staff
- The development would provide specialist management services including a village manager, wellbeing navigator and reassurance response co-ordinated through the central reception;
- An extensive review process to identify Registered Domiciliary Care Providers to provide Personal Care to residents
- Restriction of use through a legal agreement so that units are only used for Class C2 purposes in perpetuity

2.29 In this regard, Integrated Retirement Communities which provide Extra Care housing fall within use Class C2 of the Use Classes Order.

2.30 For the reasons outlined above, the delivery of Affordable Housing on Extra Care sites is typically challenging, which is why paragraph 10-007-20190509 of the PPG states that viability may need to be considered on schemes where particular types of development are proposed which may significantly vary from standard models of development for sale (for example housing for older people). Whilst an initial purchase may be discounted, the ongoing service charge for access to the village's services and facilities cannot be discounted. It would also not be possible to discount the cost of care for residents within units provided as affordable tenures. It is considered that these practical issues should be addressed within policy as otherwise it could be difficult to implement and be ineffective.

2.31 The integrated retirement community/Extra Care model predominantly operates on the sale of individual units as part of a managed development. Care packages are purchased either from the operator or by a third-party care provider. This differs from care homes which are sold or let to an operator with individual residents paying for their room, board, and care.

2.32 The integrated retirement community/Extra Care model also differs from more general development in that they incorporate a significant level of facilities which results in the net to the total gross floorspace being significantly poorer than in traditional/general housing needs. This means that such schemes have a substantially lower amount of saleable floorspace compared with traditional developments and such schemes will also require the additional costs of lifts and specially adapted bathrooms and other such facilities appropriate to the target age group and level of care.

2.33 At paragraph 10-007-20190509 of the PPG, it states that:

“Where up to date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. It is

up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Policy compliant in decision making means that the development fully complies with up-to-date plan policies”.

2.34 The PPG continues to outline that:

“Such circumstances could include, for example, where development is proposed on unallocated sites of a wholly different type to those used in the viability assessment that informed the plan; where particular types of development are proposed which may significantly vary from standard models of development for sale (for example built to rent or housing for older people), or where a recession or similar significant economic changes have occurred since the plan was brought into force”.

2.35 The First Proposals set out that the Plan will be subject to a viability assessment at each stage of plan making, including a whole plan viability assessment that will accompany the draft plan and be updated at subsequent stages of plan making. It adds that current evidence indicated that securing 40% affordable homes is deliverable across Greater Cambridge taking account of other development costs assumed so far but will be kept under review as the plan progresses.

2.36 The Viability Assessment that supports this consultation, paragraph 2.45 sets out that the Council have appraised generic retirement living or sheltered housing schemes typically delivered by developers such as McCarthy and Stone or Churchill retirement living, and these have been included within the residential typology rather than a separate element which therefore means it becomes tied up with Class C3 for viability purposes.

2.37 It is considered that the evidence base has failed to assess the different typologies available for the provision of specialist housing for older people by only appraising generic retirement living or sheltered housing schemes. The evidence is not reflective of the viability of schemes which seek to deliver Extra Care provision. The Councils evidence should therefore assess a range of typologies including Extra Care schemes up to 200 units to considered the viability of these developments to come forward.

2.38 The Viability Assessment should also consider the provision of affordable housing on such type of schemes as it is often the case that Affordable Housing is unlikely to be viable for Extra Care schemes.

2.39 It is imperative that careful consideration is given to the forms of specialist accommodation which relate to older persons’ housing and the different types of accommodation that can be

provided as these can vary significantly.

Policy H/HM: Housing mix

- 2.40 Paragraph 62 of the NPPF requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflected in planning policies. The NPPF also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.
- 2.41 The proposed policy direction notes that new housing development of 10 or more dwellings will be required to provide an appropriate mix of housing sizes with the proportions of dwellings of each size to be guided by the housing mix for each tenure and for Cambridge and South Cambridgeshire as set out in the recommendations from the '*Housing Needs of Specific Groups – Addendum for Greater Cambridge (2021)*' or any future update to the Greater Cambridge Housing Strategy or housing mix evidence published by the Councils.
- 2.42 Whilst this policy is applicable to traditional Class C3 residential schemes, consideration should be given on a site-by-site basis in respect of C2 residential institutional schemes as it is not always appropriate or viable to provide larger 4- and 5-bed properties on such type of schemes.
- 2.43 As set out at paragraph 3.3 in the accompanying '*Representation by Inspired Villages – to support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population*' (Appendix 1), a standard model for an Inspired Villages site is for approximately 150 units of accommodation comprising a mix of cottages, bungalows and apartments ranging from 1, 2 and 3-beds with some 210,000sqft of floorspace, of which, approximately 20-25% would be communal facilities.
- 2.44 The policy approach should therefore be sufficiently flexible to take account of current identified and projected need for specialist housing for older people and recognise that such type of schemes may not necessarily meet the housing mix specified for C3 residential schemes, acknowledging that they serve different requirements for different markets.

Policy H/SS: Residential Space Standards and Accessible Homes

- 2.45 A separate policy H/SS: Residential Space Standards and Accessible Homes is included which is intended to set the required space standards and provide a policy direction on the proportion of accessible and adaptable dwellings to be provided as part of the dwelling mix

on sites. This notes that the policy will require that all new homes will be required to meet Building Regulation M4(2) 'accessible and adaptable' dwelling standards and that 5% of affordable homes on development which include 20 or more affordable homes will be M4(3).

- 2.46 Unlike traditional residential development (Class C3), there are no prescribed National Space Standards for Class C2 schemes. However, the future developer/operator will provide a range of C2 units to meet the intended housing mix.
- 2.47 In the context of our client's land at Comberton the proposed C3 residential element of the proposal would adhere to Building Regulation M4(2) 'accessible and adaptable' dwelling standards as well as the M4(3) requirements, resulting in provision towards the Council's overall objectives to deliver accessible and adaptable general needs dwellings in addition to specialist housing for older people.

Policy H/SH: Specialist housing and homes for older people

- 2.48 It is essential that the policies of the Greater Cambridge Local Plan set out a clear approach to support the provision of specialist housing for older people. It is a requirement of national policy and guidance that these policies are based on an up-to-date assessment of needs for specialist housing, as a central component of the housing needs of different groups.
- 2.49 The Government has recently published the Social Care White Paper "*People at the Heart of Care*" (December 2021). The White Paper emphasises the need to expand the choice of housing options available, stating that "*today, too many people with care and support needs live in homes that do not provide a safe or stable environment within which care and support can be effective*" and notes that specialised housing is likely to offer the best option for support.
- 2.50 The White Paper highlights that the projected demand for supported housing in England is estimated to increase by 125,000 by 2030 and therefore the provision of increased housing options, including specialised housing and the ability to adapt existing homes, is considered to be a key action to help deliver the visions of the Government. Part of achieving this vision includes the provision housing in the "*Right Place, at the Right Time*", and there is an emphasis on the intrinsic link between social care and housing and how the care needs of communities need to be effectively planned to sustainably support the changing needs of local populations. To assist with this, over the next 3 years the Government intends to increase the supply of supported housing by supporting providers across the housing sector

to develop more options for people in the private housing market¹.

(i) *National Policy Context*

- 2.51 National policy and guidance are clear in requiring local authorities to plan to meet the needs of older people and importantly, the PPG confirms that *“where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that proposed to address this need”* (Paragraph: 016 Reference ID: 63-016-20190626). The PPG also confirms that plan makers should evaluate the tenure, types and size of supply and current stock to assess whether future needs will be met, recognising that, *“The need to provide housing for older people is critical as the proportion of older people in the population is increasing”* (ID: 63-001-20190626).
- 2.52 The policies in both the current Local Plans which plan for the period from 2018 – 2031 are not sufficient to meet the rising need.
- 2.53 The NPPF updates the definition of Older People contained in the 2012 Framework to state:
- “People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.”*
- 2.54 Paragraph 14 contains the following requirement for Planning Authorities: *“as a minimum, provide for objectively assessed needs for housing and other uses”*.
- 2.55 A fundamental objective of the Framework is the delivery of a wide choice of high-quality homes. The NPPF states at Paragraph 60 that in order to:
- “support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”*
- 2.56 Paragraph 62 sets out that:
- “The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people*

¹ Page 39, People at the Heart of Care: Adult Social Care Reform White Paper

wishing to commission or build their own homes).”

2.57 Planning Practice Guidance relating to the Housing Needs of Older People was updated in July 2019 and applies to preparation of the Greater Cambridge Local Plan.

2.58 The PPG outlines that Local Authorities will need to count homes for older people as part of their housing land supply (Paragraph: 035 Reference ID: 68-035-20190722).

2.59 In the PPG Housing for Older and Disabled People (Paragraph 001) it states:

“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking (our emphasis).”

2.60 In the PPG Housing for Older and Disabled People (Paragraph 001) it states:

“For plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people”.

2.61 The PPG ‘Housing for older and disabled people’ highlights the advantages as:

“Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.” (Paragraph: 001 Reference ID: 63-001-20190626).

2.62 In respect of the evidence to be considered when identifying the housing needs of older people, the PPG states:

“The age profile of the population can be drawn from Census data. Projections of population and households by age group can also be used. The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ (Strategic Housing for Older People Analysis Tool), which is a tool for forecasting the housing and care needs of older people. Evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can also be useful. The assessment of need can also set out the level of need for residential care homes.” (Paragraph: 004 Reference ID: 63-004-20190626)

- 2.63 The PPG sets out that a range of specialised provision is available but notes that any single development may contain a range of different types of specialist housing (Paragraph: 010 Reference ID: 63-010-20190626):

“There is a significant amount of variability in the types of specialist housing for older people. The list above provides an indication of the different types of housing available but is not definitive. Any single development may contain a range of different types of specialist housing.”

- 2.64 The guidance makes it clear that Local Plans need to appropriately provide for specialist housing where a need exists (Paragraph: 012 Reference ID: 63-012-20190626):

*“Plans need to provide for specialist housing for older people where a need exists. **Innovative and diverse housing models** will need to be considered where appropriate.”*

- 2.65 The guidance then goes on to state how plan makers will need to account for older people who wish to stay or move to general housing that is already suitable, therefore ensuring that general housing is also sensitive to the needs of an ageing population (Paragraph: 012 Reference ID: 63-012-20190626):

“Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.”

- 2.66 The guidance clearly demonstrates how older people should have a wide choice of options when moving to specialised housing. This will be done through plan-makers considering the size, quality and location of dwellings for older people in the future or for them to move to more suitable accommodation (Paragraph: 012 Reference ID: 63-012-20190626):

“Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish”.

- 2.67 The guidance sets out possible criteria for site selection. Despite this, some larger facilities may still be viable and attractive for older persons despite not being close to nearby facilities and amenities (Paragraph: 013 Reference ID: 63-013-20190626):

“It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where

there is an identified unmet need for specialist housing. The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation). Factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres.”

- 2.68 There is little guidance on the matter of Use Class and makes no mention of the application or otherwise of affordable housing requirements to developments of specialised accommodation for older people (Paragraph: 014 Reference ID: 63-014-20190626):

“It is for a local planning authority to consider into which use class a particular development may fall. When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwelling house) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”

- 2.69 The guidance states that the need for older persons housing should be met (Paragraph: 016 Reference ID: 63-016-20190626):

“Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.”

(ii) Evidence Base for the Councils’ Proposed Approach

- 2.70 Whilst policy H/SH: ‘Specialist Housing and Homes for Older People’ includes guidance for specialist housing designed to support a variety of groups such as older people, disabled people, people with alcohol or drug dependency, those requiring refuge from harassment and violence, and others who may, for a variety of reasons, be excluded from the local community, this is primarily in the context of provision as part of the general housing mix of new developments to be provided at new settlements and within urban extensions.
- 2.71 The Plan at this stage does also refer to a criteria-based policy similar to that in the adopted Cambridge Local Plan 2018, and the need to ensure that new specialist housing is provided where there is a need, in suitably accessible locations and without resulting in an excessive concentration of such housing. However, this only goes a limited way towards meeting need and there appears to be no current allocations or sites proposed that are specifically defined/safeguarded for older persons housing needs.
- 2.72 Paragraph 8.61 of the ‘Housing Needs for Specific Groups report 2021’ identifies that over all areas assessed within the study there is a significant shortfall of leaseholder housing with support (retirement housing) and also shortfalls of housing with care (i.e., Extra Care and

Enhanced Sheltered) for both leasehold and rental tenures.

- 2.73 It is noted that the evidence provided by GL Hearn in the '*Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (August 2021)*' has been produced to examine the need for specific housing for the 2020 – 2040 period. Section 8 of this evidence provides information on Older and Disabled Persons.
- 2.74 It is noted that the assessment began with the Housing Learning and Improvement Network (LIN) SHOP@ baseline online toolkit for Housing with Care (to include both enhanced sheltered and extra-care housing) of 45 units per 1,000 population aged 75 (comprising 22.5 units per 1,000 as leasehold and rental respectively). The version of the toolkit adopted for comparison purposes in the GL Hearn Evidence comprises the projected "base case" demand at 2030 scenario from the 2013-based 'Delivering the Detail' version of toolkit assumptions.
- 2.75 No reference is made to the 2011 version of the SHOP@ Resource Pack which forecast greater representation within the 'Housing with Care' component of the sector. More detailed justification for the same assumptions was incorporated with the publication *Housing in Later Life: planning ahead for specialist housing for older people*, Housing LIN, NHF et al, December 2012. Both sources reflect strong growth in the demand for leasehold retirement housing and the emergence of the Extra Care sector specifically as informing measures to deliberately invert current levels of provision by tenure and to accelerate a shift from policies heavily reliant on traditional care home provision. The equivalent prevalence rate for 'Housing with Care' under these sources comprises 65 units per 1000 persons aged 75+, distributed as follows:
- Extra Care Housing: 45 units per 1,000 (30 leasehold; 15 rented)
 - Enhanced Sheltered: 20 units per 1,000 (10 leasehold; 10 rented)
- 2.76 However, it is then noted that adjustments were made to this baseline based on evidence concerning the reflective health of the local older population in comparison to the national average which has decreased the prevalence rate by an average of 8% across the Housing Market Area and an estimate of tenure split for housing with support and housing with care (with more affluent areas expecting a higher proportion of specialist housing to be market sector).
- 2.77 The GL Hearn Evidence for Greater Cambridge results in an equivalent prevalence rate for

'Housing with Care' of 40 units per 1,000 persons aged 75+ (a reduction of 5 units per 1,000 compared to the 2013 SHOP@ baseline or 25 units if the 'Housing in Later Life'/SHOP Resource Pack benchmarks are applied).

- 2.78 The rationale for making adjustments to any of the toolkit benchmarks referred to above are summarised in Paragraphs 8.45 and 8.50 – 8.52 of the *2021 Housing Needs of Different Groups Study* but these are not justified in isolation.
- 2.79 Paragraph 8.46 identifies the '*Assessment of Need for Specialist Housing for Older People in Greater Cambridge (Centre for Regional Economic and Social Research (CRESR), November 2017)*'. The methodology adopted in the CRESR analysis was not driven by specific outputs for requirements for specialist older persons housing by tenure but did apply assumptions regarding the preferences of older homeowners. The foundation of the methodology adopted in that analysis was to take the median level of current provision of Specialised Accommodation for older people across the one hundred English housing authorities with the highest levels of provision of such accommodation and establish that as the "norm". Its application to the population of Greater Cambridge was then moderated by considering a number of demographic, social and economic factors that might indicate a variance from the norm.
- 2.80 The model sought to increase the supply of care beds while barely increasing provision for Extra Care and Enhanced Sheltered units. The model also favoured increasing the supply of sheltered housing, which comprises a component of provision of specialist housing for older people less well-suited to meeting needs of an increasing ageing population experiencing greater frailty in later years following retirement. This assumption on the preferences for specialist housing within leasehold tenure is also incorporated within the GL Hearn evidence base.
- 2.81 Care must therefore be taken when comparing the total provision anticipated in the CRESR and subsequent GL Hearn Evidence Base per head of population against other benchmarks per head of population aged 75+. While overall levels may be similar (162 per 1,000 CRESR and 153 per 1,000 in GL Hearn versus 170 per 1,000 in the SHOP@ 2013 baseline) assumptions about the forms of accommodation and care and the tenure profile of that accommodation that will constitute an appropriate strategic response differ markedly.
- 2.82 The CRESR model itself recognises the need for further consideration of the proportion of

needs that could more appropriately be met through provision for Extra Care:

*“Comparing our model’s estimates against those from SHOP@ reveals a very similar estimate of current ‘demand’ for specialist housing (3,422 in our model versus SHOP@’s 3,554) and care beds (2,152 beds in our model versus SHOP@’s 2,299). However, there is a distinct difference between the two models in term of the forms of specialist housing supply required. **SHOP@ suggests enhanced sheltered and extra care units should make up approximately one in five specialist units [rising to approximately 1 in 4 within the SHOP@ 2011 and ‘Housing in Later Life’ benchmarks]. Hence it identifies significant deficits in the current supply of extra care and enhanced sheltered accommodation in Greater Cambridge. On the other hand, our model suggests only one in 10 of the recommended supply of specialist units in Greater Cambridge are either enhanced sheltered or extra care. This reflects the fact that our modelling is premised on existing provision in authorities with a high level of overall supply, and where extra care provision may vary in scale. As discussed in Chapter 5, if it is decided that extra care can meet a greater proportion of needs that are currently met in other areas of the system (e.g., in residential care), then this could dramatically change how many units of extra care are required. In addition, future changes in the health of the local population may affect projections for extra care in significant ways.**”*

- 2.83 The ‘Housing Needs of Specific Groups – Greater Cambridge Addendum’ published in September 2021 considers the up-to-date evidence of housing need in Cambridge and South Cambridge specifically. The addendum notes that the population aged 65+ is projected to see the highest proportionate increase in population.
- 2.84 The current development plan provision for specialist housing for older people falls well below that needed to address the requirements of national policy and guidance despite evidence of the rising need with the projected growth of approximately 55% between 2020-2040 across the HMA².
- 2.85 This work identified the shortfall in housing with care needed in Greater Cambridge when considering housing growth in line with the Council’s ‘medium’ objectively assessed housing need scenario (without prejudice to these representations on housing need). In the Council’s Topic Paper 7 (Housing) this scenario is summarises that the shortfall would be 802 units (leaseholder) considering a demand per 1,000 population of 23 units and 337 (rented) considering a demand per 1,000 population of 17 units as shown in Table 34 of the Final Addendum. A previous draft version of the addendum transposed these figures and incorrectly showed a lower leaseholder shortfall.
- 2.86 Critically, given the departure from established benchmarks and despite the comparisons

² Cambridgeshire and West Suffolk Housing Needs of Specific Groups Study (2021)

with the SHOP@ toolkit produced in the CRESR Report, the most recent evidence does not continue to provide up-to-date assessments against relevant alternatives including the 'Housing in Later Life' benchmarks for Extra Care or all 'Housing with Care' categories.

2.87 The Council acknowledges a forecast shortfall in leasehold Housing with Care of at least 802 units at 2041. Table 1 below summarises these comparisons, indicating that under the Councils' own scenario for housing need the forecast shortfall in leasehold 'Housing with Care' is substantially greater – between 780 to 1460 units. This specifically includes a shortfall of at least 1,072 units against the standalone benchmark for Extra Care provision within the SHOP@2011 and 'Housing in Later Life' benchmarks.

Table 1: Comparison of Extra Care/Housing with Care benchmarks

Source		Units @2041	Demand @2041	Prevalence @2041	Shortfall
Topic Paper 7 ³	Extra Care / Enhanced Sheltered (Housing with Care) – Rented	336	661	17	325
	Extra Care / Enhanced Sheltered (Housing with Care) – Leasehold	94	894	23	800
Shop @2013 Projected Base Case	Extra Care / Enhanced Sheltered (Housing with Care) – Rented	336	874	23	538
	Extra Care / Enhanced Sheltered (Housing with Care) – Leasehold	94	874	23	780
Housing in Later Life' / @SHOP2011	Extra Care / Enhanced Sheltered (Housing with Care) – Rented	336	972	25	636
	Extra Care / Enhanced Sheltered (Housing with Care) – Leasehold	94	1554	40	1460
Housing in Later Life' / @SHOP2011	Extra Care only Rented	336	583	15	247
	Extra Care only Leasehold	94	1166	30	1072

³ Figures may not sum to Topic Paper totals due to rounding of prevalence rates from the 2021 Housing Needs of Specific Groups Addendum.

(iii) Soundness of the Councils' Proposed Approach

- 2.88 The Council's Preferred Approach cannot be considered sound. It is clear that further work needs to be undertaken to assess the full scale of need within Greater Cambridgeshire. The following sub-section demonstrates that the approach is not justified; not positively prepared; not consistent with national policy and guidance and not effective. Without prejudice to any future detailed assessment to be prepared on behalf of our client these representations provide a critique of the Council's approach to demonstrate that the need is greater than the Council's current evidence supporting the Local Plan proposals suggests.
- 2.89 The Council's own Topic Paper presents no statement that the First Options proposals intend to provide policies that will meet in full needs for the type and tenure of specialist housing for older people, including against the Council's own assessment of need. The scope for further work identified is extensive, indicating ongoing activity to amend forecasts of future provision and approaches to the delivery of care. The Councils accept that this may further inform their preparation of planning policies. These representations strongly assert that the provision of increased levels of Extra Care accommodation must form an important component of emerging objectives identified in the work, including supporting independent living and care tailored to individuals' needs over their lifetime.
- 2.90 It is clear that the estimate of needs for Extra Care in the Housing Strategy are lower than those used in other relevant sources including the @SHOP Analysis Tool which is referred to in Planning Practice Guidance.
- 2.91 The figure of 45 units per 1000 persons comprising specific provision for Extra Care set out in Housing for Later Life has been considered to be a 'very modest' assumption in recent Appeal Decisions (PINS Ref: 3265861⁴ – paragraphs 39 and 108) as it reflects just 4.5% of the population of people 75 years of age and over and primarily resulting from the lack of this type of accommodation available. It should be noted that when considering 'Housing in Later Life Toolkit' the total ratio for provision for enhanced and extra care housing (which has been grouped in the Greater Cambridgeshire evidence) is a provision of 65 units per 1,000 population.
- 2.92 The Addendum acknowledges that in every demographic growth level option considered, it

⁴ Little Sparrows, Sonning Common, Oxfordshire RG4 9NY

is estimated that by 2041 there will be a shortfall of both rented and leaseholder housing with care (both extra care and enhanced sheltered accommodation).

- 2.93 It is noted that some of the strategic sites included in the Councils' adopted Local Plans (2018) do include some provision for specialist accommodation however, delivery of these homes is not definitive as in the majority of the examples provided no information on the actual number of C2 units to be provided is evidenced and in some cases the strategic sites are not delivering any provision.
- 2.94 As a result, there is no attempt within the Councils' Topic Paper 7 to quantify the identified provision in terms of its potential contribution to reducing forecast shortfall to 2041 as set out in Table 1 above. The Council has provided no other details of any development pipeline available to address the current identified shortfall in 2020.
- 2.95 As set out above it is critical that the Local Plan Review provides a clear approach to meet the needs for specialist older persons housing and recognises the wider benefits of this form of provision. The recent Appeal Decision on land at Little Sparrows, Sonning Common, Oxfordshire (PINS Ref: 3265861) provides a clear example of reasons to ensure that the development plan is not 'left wanting' in terms of addressing the need for Extra Care (see paragraph 31). In the Appeal case this reflected a failure to prescribe particular levels of provision by type of accommodation, nor policies to address the need for each notwithstanding the critical need for Extra Care.
- 2.96 This was a situation compounded in South Oxfordshire as a result of the 'generic approach' to provision by accommodation type and also that the characteristics and prospects for delivery of specific types of provision within the District's strategic sites expected to comprise the main source of potential supply. The First Proposals for Greater Cambridge are exposed to the same risks as a result of the reliance on urban extensions and new settlements to meet needs for specialist older persons housing.
- 2.97 It is also relevant to note that in considering the delivery of Extra Care schemes the Inspector (paragraph 117) stated that undoubtedly Extra Care housing operated in a very different market and Extra Care housing providers cannot compete with house builders or with other providers of specialist housing for older people because of the build costs, the level of the communal facilities and the additional sale costs including vacant property costs. The inspector goes on to state:

“It seems to me that these factors, all mean that age restricted developments and in particular extra care communities are less viable than traditional housing schemes. Ultimately, age restricted developers are less able to pay the same price for land as residential developers and it is much harder for age restricted developers, and in particular those seeking to deliver extra care, to secure sites for development and meet the housing needs they aim to supply.” (Paragraph 118)

2.98 In Paragraphs 121 and 122 the inspector highlights other benefits the scheme would deliver, each of which form relevant considerations for the policies of the Local Plan Review and objectives for sustainable development. These included:

- a) **Contributing to the overall supply of housing**
- b) **Savings in public expenditure (NHS and adult care);**
- c) **Creating new employment and other economic investment (construction and operation);**
- d) **Providing new facilities and services further reinforcing the role and function of settlements; and**
- e) **Additional net revenues from Council tax and new homes bonus receipt.**

2.99 The benefits to individuals and to the Public Good of facilitating a pattern of provision in which ever increasing dependence on Registered Care Home beds is mitigated by an expansion of housing-based care units, such as Extra Care, are well documented.

2.100 Gains are principally found in benefits to the Health and Social Care economy and the more effective and efficient use of the stock of general housing. Whilst the majority of older people will continue to live in general housing for the minority identified in our model specialised accommodation will provide a better quality of life and a better match to their needs.

2.101 The provision of a more adequate supply of Extra Care for homeowners will provide an environment of choice in which independence can be sustained and transfer to scarce Registered Personal Care Home beds and expensive Registered Nursing Care Home beds postponed or avoided. The development proposed for our client’s land at Comberton will help create a more adequate level of provision for older homeowners and contribute to a more equitable pattern of provision overall.

2.102 As identified at paragraphs 5.3 of the *‘Representation by Inspired Villages – to support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population’* (Appendix 1), the Housing Learning and Improvement Network (LIN) considers that the later living market needs to be made both acceptable and financially viable to enable

older people to move from unsuitable accommodation (too large to manage, costly to maintain, poorly located or ill-equipped to deal with changing needs), to better, thoughtfully designed homes in sought-after places.

- 2.103 Frequently local planning authorities overlook the Extra Care model, particularly the scale of an Integrated Retirement Communities (IRC) and instead focus on retirement housing or care homes.
- 2.104 The *'People at the Heart of Care: Adult Social Care Reform' White Paper* (December 2021) also talks about making every decision about care a decision about housing with the importance of housing and delivering the right housing in the right places being a key theme.
- 2.105 Many retirement living operators find it difficult to compete against the major house builders and smaller operators e.g., McCarthy and Stone when it comes to those sites identified for an element of retirement living as part of wider allocations, and more than often, the size of the site isn't of sufficient scale for such type of proposals.
- 2.106 It is therefore essential that authorities recognise the different models which exist and plan to meet each of their respective needs.
- 2.107 The site at Branch Lane and Long Lane, Comberton is available to provide high-quality Integrated Retirement Community which provides Extra Care housing to address the need for specialist Extra Care housing for older people whilst also providing open green spaces and community facilities to support the development. The site is sustainably located with good links to existing services and facilities in Comberton as well as links to local bus services and the proposed Greenway to Cambridge, which will provide further sustainable transport options.
- 2.108 The PPG endorses the certainty that can be provided through the allocation of sites to deliver specialist housing for older people including in circumstances where there is an identified unmet need. Relevant considerations including access to health services, public transport and local amenities (ID: 63-013-20190626) together with the proximity of town centres. Age-friendly design can also enhance the accessibility of housing for older people and improve the quality of place (ID: 63-018-20190626).
- 2.109 The Extra Care proposals for our client's site at Comberton perform well against these

considerations, which are not accurately considered in the Council's assessment proforma in terms of recognising the opportunity to deliver specialist housing for older people at this location. Given the substantial uncertainty regarding the scale and nature of provision for these uses at the Councils' existing and proposed new settlements and urban extensions the HELAA should reflect that other locations sustainably related in relation to the main settlement of Cambridge (in terms of proximity and connections) are likely to perform similarly or better in terms of their potential suitability to meet identified needs.

2.110 The policy approach being pursued by the Greater Cambridgeshire Local Plan should therefore reflect the need for site specific allocations for older-persons housing need rather than relying on the larger sites to make provision for such types of housing.

Policy S/SB: Settlement Boundaries

2.111 This policy defines that settlement boundaries will be identified around existing settlements and planned new development outlined in the Plan. It is proposed that boundaries would take into account the existing built-up areas but will not normally include buildings associated with countryside uses, such as farm buildings nor development which is detached from the main concentration of buildings in an existing area.

2.112 It is also proposed that outside defined settlement boundaries that no development would be permitted except for:

- allocations within Neighbourhood Plans that have come into force;
- Rural Exception Sites which help meet local needs for affordable housing;
- development for agriculture, horticulture, forestry, outdoor recreation and other uses that need to locate in the countryside; or
- development supported by other policies in the plan.

2.113 This policy limits the opportunity for suitable sites on the edge of settlements to come forward that can meet the needs of Extra Care development where it is required, and which can effectively tackle the known affordability crisis in the district. This policy needs to ensure that affordable housing is delivered quickly and in areas in which it will support the local community. PPG notes that 'A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness.' (Paragraph: 009 Reference ID: 67-009-2019072)

2.114 As outlined above, there is a defined current and future substantial unmet need for specialist housing. The current need of specialist housing is rising, and it is unlikely that this need will be met at urban extension or within new settlements, which are likely to come forward in the later parts of the plan period. Given the overall demand for housing in Greater Cambridge and the inflexibility of the Councils' overall strategy the nature and extent of supply in these locations is such that operators within the specialist older persons housing sector face extreme pressures of competition in securing development opportunities. This is an issue exacerbated in circumstances where the limited provision that exists (in some cases) as part of committed developments fails to meet the operational requirements of the sector in terms of scale and scope to deliver a full and comprehensive range of services to residents as part of the Extra Care model.

2.115 Consideration should therefore be given to the release of such sites for development beyond sustainable settlement envelopes such as land at Branch Road and Long Lane, Comberton.

Policy BG/BG: Biodiversity and geodiversity

2.116 NPPF paragraphs 174 - 188 outline how planning policy and decisions should contribute to and enhance the natural environment where possible.

2.117 The Environment Act 2021 introduced new mandatory requirements for provision of biodiversity net gain and outlines the requirement for developments to provide a minimum of 10% net gain, it is expected that this will apply to all developments from 2023 pending secondary regulations coming into force.

2.118 This policy outlines the approach to be taken to biodiversity and geodiversity impacts from development. It is proposed the development will be required to achieve a minimum of 20% biodiversity net gain and notes that net gain calculations should be submitted using Defra Biodiversity Metric 3.0 or its successor. The policy notes that onsite provision of biodiversity net gain will be sought where possible but that off-site habitat measures will also be considered where appropriate and where consistent with strategic aims of the Plan as set out in Policy BG/GI. In these circumstances the Council's proposed policy approach should be amended to reflect that the LPA will work proactively, positively, and collaboratively with landowners and relevant bodies to bring off-site enhancement measures forward in line with the delivery of development to ensure that the benefit to the community is clearly delivered.

2.119 The site proposal at Comberton includes measures to provide net biodiversity gain on site

through the enhancement of existing landscape features on site and the provision of green open spaces throughout the site. The majority of the site is currently characterised as open farmland which are defined by hedgerow boundaries. Located to the west of the site is an area of woodland and a ditch runs along the south-west boundary. To the north of the site lies open countryside. There are therefore a number of opportunities available to provide biodiversity net gain measures on this site. Existing hedgerows which border the site would be retained and enhanced to strengthen the green edges of the site, new tree planting will be incorporated into a green corridor and will form part of the boundary treatment to screen the development from the wider countryside. It is also proposed that the swales and drainage basin which would be provided as part of the Sustainable Drainage System (SuDS) within the site would enhance the existing watercourse within the site and provide functional landscape features to improve the ecological and environmental benefits for local wildlife.

- 2.120 The allocation of the site at Comberton would allow for both the creation and connection of green spaces. The creation of both new green and blue corridors, green open spaces within the site and enhancement of the boundary features will improve the biodiversity value of the site.

Policy BG/GI: Green Infrastructure

- 2.121 This policy identified the existing green infrastructure network through Greater Cambridgeshire and the strategic initiatives which are planned to enhance it. The policy outlines how development proposals should relate to green infrastructure through the: reinforcement and enhancement of landscaping, delivery of biodiversity net gain, promotion of healthy living, protection, and enhancement of water environments, enhancing access and connectivity and supporting climate mitigation and adaptation.
- 2.122 The enhancement of the existing landscape features in and around the site including hedgerows, trees and blue features is a central element to the development proposal at Comberton. The development would respond the existing context and surrounding landscape character and provide pedestrian and cycle routes along green links and corridors to connect the site to the villages surrounding amenities.

Policy BG/TC: Improving Tree Canopy Cover and the Tree Population

- 2.123 This policy seeks to ensure that development proposals increase tree canopy cover, enhance treescape and protect existing trees of value. The proposals outlined in this policy

are supported and provision of new tree planting, as detailed above, form a central aspect to the development proposed at Comberton to support biodiversity net gain and the enhancement of existing landscape features on the site.

Policy BG/EO: Providing and enhancing open spaces

- 2.124 This policy seeks to provide guidance on the provision of open space required by new development. It is noted that both Councils have existing open space standards as set out in their current Local Plans which establish the quantity and accessibility of open space, on site provision and a guide to contributions required for off-site provision. It is proposed that a review of the standards will be undertaken to inform the draft plan to ensure that the standards are up to date.
- 2.125 The inclusion of a policy to support the delivery of new open spaces is supported however further clarity is required in due course as to how this will be calculated and what will be expected to be delivered on-site. The proposed development at the Comberton site would provide an opportunity to increase open space provision in the village with the creation of a central open space, which would be connected to the surrounding area through the enhancement of existing footpaths, to be a focal point of the new community and would be accessible to the existing community to improve social inclusion and cohesion.

Policy WS/HD: Creating healthy new developments

- 2.126 The promotion of healthy living and the incorporation of health considerations into new developments is supported. If the site at Comberton were to be allocated this would provide a key opportunity to provide much needed specialist housing for older people in a sustainable location which would benefit the wider community and provide an integrated development with a mixed community to support social cohesion.
- 2.127 The provision of specialist housing is the central element to this proposal and provides an opportunity to support integrated living with the community rather than providing housing older people at the edge of settlements in urban extensions. The provision of community facilities within the site as well as the promotion of healthy lifestyles with enhanced pedestrian and cycle connectivity will improve the wellbeing of all residents in this location. A range of on-site services and facilities (e.g. café/bar, restaurant, small shop, hair salon, wellbeing centre, etc) which meet many of the day to day needs of existing and future residents would be delivered alongside the residential development proposed and would significantly

increase the sustainability of the development and existing settlement.

- 2.128 The characteristics of Extra Care development (such as the provision of on-site services and facilities) should enable consideration of where this can contribute towards mixed and balanced communities and sustainable growth in rural areas (in accordance with NPPF2021 paragraph 79 and paragraph 92(a)).

Climate Change

- 2.129 One of the primary objectives of the Greater Cambridge Plan is to transition to net zero carbon by 2050 in line with the nation target for net zero in the UK. The policies included under this objective focus on achieving high standards of energy and water use, the promotion of sustainable transport measures and planning sequentially to avoid development in areas of flood risk.
- 2.130 The site at Comberton would be in line with the objectives to deliver development which works to target climate change. As previously noted, the site is in a sustainable location in close proximity to Cambridge which could utilise the existing bus serves and existing cycle and pedestrian routes. This development would therefore provide an opportunity to promote modal shift away from the private car. Comberton is a 'Minor Rural Village' which is defined as having a greater level of services, facilities and employment than most of the other villages in South Cambridgeshire and could therefore support larger scale windfall development. Whilst the South Cambridgeshire Local Plan (2018) considers that schemes of around 30 dwellings would be appropriate in minor rural villages, the site at Comberton would be delivering much needed specialist housing for older people alongside community facilities and open spaces to support the development and wider community.

Great Places

- 2.131 The overarching aim of the Great Places policies is to ensure that the natural and built environment in the Greater Cambridge area is well-designed, high-quality and protects the local character and heritage.

Policy GP/GB: Protection and enhancement of the Cambridge Green Belt

- 2.132 This policy specifies the approach to the maintenance of the Green Belt surrounding Cambridge and includes local purposes for consideration:

- Preserve the unique character of Cambridge as a compact, dynamic city with a

thriving historic centre

- Maintain and enhance the quality of its setting
- Prevent communities in the environs of Cambridge from merging into one another and with the city.

2.133 The Greater Cambridge Green Belt Assessment (GCGBA) (LUC, August 2021) assessed the contribution of parcels of the Green Belt against the national Green Belt purposes as well as the local Cambridge purposes.

2.134 The site at Comberton is included in two assessment parcels. The main extent of the site falls within parcel CO3, which is bounded to the east and west by development; to the south by Comberton Recreation ground; and to the north by the tree belt separating the northern and southern parts of the site. The northern extent of the site lies within parcel CO1.

2.135 Both parcels are assessed as making no contribution to Cambridge purpose 1 as the land is not close enough to the urban area of Cambridge.

2.136 Parcel CO1 is assessed as making a 'relatively significant' contribution to both Cambridge purposes 2 and 3. The assessment notes that the rural character of the parcel contributes to Cambridge's setting and that development on this land would be perceived as narrowing the gap between Comberton and Hardwick. It is considered that there is little visual inter-relationship between the parcel and Cambridge. It should be noted that the site is bound by clear physical features that separate it from the wider countryside, namely the mature hedgerows with hedgerow trees to both sides of Branch Road and Long Lane, the mature hedgerow along Long Road and the roads themselves. The Site's western boundary within CO1 is also defined by a mature tree-lined hedgerow.

2.137 Part of the Site's southern boundary within parcel CO1 abuts allotments and gardens of properties off Fox's Way, and the break in the tree belt between parcel CO1 and CO3 allows views from the Site into the village. In combination, the Site has a clearer relationship with the village, resulting in a moderate distinction from the settlement edge and this should be reflected in the assessment of the site's contribution to this purpose.

2.138 Parcel CO3 is assessed as making 'relatively limited' contribution to both Cambridge purposes 2 and 3. The assessment notes that despite the land's rural character it does not contribute to the quality of Cambridge's setting and is considered peripheral to the gap between Comberton and Hardwick.

2.139 In considering the harm that would result from a Green Belt release for development, the GCGBA assesses that the release of parcel CO3 would result in a **Moderate** level of harm. However, where the highest contribution to a Green Belt purpose is Relatively Limited and the impact on adjacent land is Minor, the criteria in Table 3.6 of the GCGBA indicate that the harm should be rated as **Low**. Similarly, the harm arising from a release within parcel CO1 would also need to be corrected to **Moderate-High** to reflect the site's relationship with the village as explained above.

2.140 Previous Appeal decisions concerning Extra Care development in the Green Belt (PINS Ref: 3202040⁵, 3203413⁶ and 3271595⁷) demonstrate that the provision of specialist care housing, where a current or emerging development plan does not make adequate provision, does constitute very special circumstances, and would outweigh the harm to the Green Belt which may arise from development.

2.141 It is considered that Comberton represents one of the most sustainable village locations within the Green Belt and the opportunity of this site to deliver specialist housing, community facilities and landscape improvements means that the site is suitable for removal from the Green Belt. It is considered that Exceptional Circumstances exist to release this site for development to meet the unmet need for specialist housing. Further information can be found within the supporting Green Belt note prepared by LDA Design at Appendix 2.

Greater Cambridge Housing and Economic Land Availability Assessment (HELAA)

2.142 The site 'Land off Branch Road and Long Road', Comberton, CB23 7DF (Site Reference: 40316) was assessed at pages 867 – 872 and found unsuitable in the HELAA (Appendix 4 Part A). The site was, however, found to be available and achievable.

2.143 This site assessed within the HELAA considered a proposal for 250 C3 dwellings, the site is now proposed to include a 200-unit (C2 Integrated Retirement Community which provides Extra Care Housing and 200 C3 dwellings to create an integrated community which places care at its centre.

2.144 A 'Red, Amber, Green' (RAG) scoring system was used to carry out the assessment. The site was assessed as 'Red' in the issues of Landscape and Townscape and Strategic

⁵ Land to the rear of 237-259 London Road, West Malling, Kent ME19 5AD

⁶ Beechmoor Garden Centre, Whitchurch Road, Great Boughton, Chester CH3 5QD

⁷ Kent and Surrey Golf and Country Club, Crouch House Road, Edenbridge, TN8 5LQ

Highways Impact.

Landscape and townscape

2.145 The comments provided in the HELAA pro-forma for Landscape and Townscape note that there is a TPO on-site. Having conducted a desk top survey using the South Cambridgeshire District Council online map this has been identified as TPO 0007 (1961) which is a group of trees located to the south of the site and just bordering the most southern edge of the site. Development would not have a negative impact on this TPO as it is located outside of the site boundary, and it is proposed that the development would incorporate existing green features surrounding the site to connect the site to the wider landscape.

2.146 The assessment goes on to conclude:

“The site is part of the panoramic views because of the open nature of the landscape and also because of its location on higher and sloping land. There are no PROWs on the land or nearby. The site is land locked apart from access onto Branch Road to the north and currently isolated from the main area of the village. Development of the site would push the village envelope further northward having negative impact of the surrounding open and rolling landscape character.”

2.147 The site is currently bordered by open countryside to the north and residential development to the east. Along the eastern boundary is a run of homes which extends beyond the adjoining residential area. To the south of the site lies residential development and community sport pitches and local amenities, including Meridian Primary School. The western boundary of the site is currently formed of woodland. The site boundaries are, for the majority, formed of hedgerows which do allow some broken views into the site. The proposals would seek to reinforce the transition between the village and countryside by retaining and buffering woodland within the Site and by locating proposed open space adjacent to the existing recreation ground, reflecting the transitional character of the recreational landscape. It is therefore considered that the site does not form part of the panoramic views referred to in the HELAA pro-forma.

2.148 Whilst there are views from higher ground down to the village, more broadly the site is contained by vegetation on the western boundary and by the village to the east, west and south which restricts views in and out. The northern parcels of the site are more exposed but only locally as the site forms part of the valley sides of the Bourn Brook and sits below the peak of the ridge which contains Comberton as a whole. The landscape to the north is more open but proposals could be mitigated by tree planting and replicating the existing village

edge (which would be characteristic of village edges within the character.

2.149 Development of the Site could be integrated with its surroundings and adhere to the landscape guidelines for the Lowland Farmlands LCT and Bourn Tributaries Lowland Farmlands LCA by:

- Conserving existing woodland and hedgerows within and at the Site edges and reinforcing the settlement edge of Comberton through tree planting and hedgerow management.
- Reflecting the existing settlement pattern, contained within a network of roads that define the northern and eastern edges of the village.
- Enhancing and improving access through the Site to the recreation ground, connecting eastern and western parts of the village.
- Retaining the approach to the village along Long Road through the provision of appropriate planting.
- Providing a new green within the development, adjacent to the existing recreation ground, enhancing the community asset.

2.150 Development could thus meet the requirements of Proposed Policy GP/LC to:

- Respect, retain or enhance local landscape character
- Retain and enhance landscape features within new developments.
- Protect and enhance the setting of the villages in South Cambridgeshire and continue to protect identified Important Countryside Frontages.

Highways

2.151 The comments provided for the assessment of the Strategic Highways Impact notes that the site is within Highways England Zone 8 – M11 North. It concludes that there is no capacity for growth and that the site would need to ensure no net increase in vehicles trips on the Strategic Road Network.

2.152 It is also noted in the assessment that site **is in a location where sustainable travel into Cambridge and local services can be proposed**. It is considered that the allocation of this site would encourage the modal shift towards more sustainable modes of transport. The site would deliver a number of community benefits and local facilities which would also reduce the need to travel by car for residents of the site and in the surrounding area.

2.153 Access (in reference to isolation) is also queried as the site currently has permission routes that appear to be well used along the southern boundary of the site, connecting houses to

the east with the recreation ground and core of the village. This could be formalised, providing greater permeability between different parts of the village.

Sustainability Appraisal (SA)

- 2.154 The SA highlights that a number of different spatial options for growth have been consulted upon at the 'First conversation' Consultation in January and February 2020 and that these were subject to SA and presented in the Sustainability Appraisal of Issues and Options (December 2019).
- 2.155 It is noted in paragraph 2.19 that a medium level of growth has been selected as the preferred option which sits between the use of the government's standard method local housing need figure (minimum growth option) and the option to plan for the higher jobs forecast and level of homes associated with it (maximum growth option). Both alternatives were rejected as the Councils do not consider that they represent Greater Cambridge's objectively assessed need.
- 2.156 The SA has considered the three policy options for the delivery of Specialist Housing and homes for older people. The three options were as follows:
- Preferred option: Policy H/SH which is considered to be enable the delivery of sufficient specialist housing to meet the identified need;
 - Alternative option: No policy: this has not been appraised as it was not considered to be a reasonable alternative due to the need to provide a criteria-based policy to ensure the delivery of specialist housing; and
 - Alternative Option: Not to allocate sites for new specialist housing at new settlements and within urban extensions. This has not been appraised as it was not considered a reasonable alternative as Councils need to set out how they deliver sufficient specialist housing and as developments should seek to delivery balanced and mixed communities. It is also noted national planning policy requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
- 2.157 For the reasons set out below the Council's approach to the SA and undertaking a detailed assessment of only its Preferred Option is unsound (not justified) and not legally compliant in terms of the requirements for SA. The SA assessment findings on the Council's Preferred Option are also not supported by the assumptions underlying the Preferred Option.
- 2.158 The findings of the sustainability assessment of the preferred option as shown in *Table 5.66: Policy H/SH: Specialist housing and homes for older people* of the SA is included below:

SA Objective	A
1. Housing	++
2. Access to services and facilities	+?
3. Social inclusion and equalities	++
4. Health	0
5. Biodiversity and geodiversity	0
6. Landscape and townscape	0
7. Historic Environment	0
8. Efficient use of land	+
9. Minerals	0
10. Water	0
11. Adaptation to climate change	0
12. Climate Change mitigation	0
13. Air quality	0
14. Economy	0
15. Employment	0

2.159 The SA notes a significant positive contribution that the preferred policy will make to the delivery of housing to meet the identified needs. There is however no discussion on an alternative option to allocate specific sites to deliver specialist housing to meet the identified issues of potential under delivery of housing on strategic sites and urban extensions.

2.160 The SA is a critical tool to enable the Councils to demonstrate that they have identified an appropriate strategy that is justified with support from the Plan's evidence base (NPPF, 2021 Paragraph 35). In the context of specialist housing for older people, the baseline characteristics that it is required to consider as part of the SA process include a current and forecast future shortfall in the supply of housing towards the needs of this group. The likely evolution of this baseline without implementation of new policies, assessed in accordance with the PPG (ID: 11-016-20190722), will result in significant adverse effects for social and economic sustainability, across a number of the Council's own SA objectives (including

Health, Housing, Employment, Social Inclusion and Access to Services and Facilities.

- 2.161 The Planning Practice Guidance specifies that reasonable alternatives should be identified on the basis of being realistic and fully assessed against relevant baseline characteristics to enable likely significant effects to be evaluated. The assumptions used in assessing the significance of the effects of the plan will need to be documented, with the SA forming part of an iterative exercise during the plan-making process. Testing of reasonable alternatives should enable the different sustainability implications of sufficiently distinct options to be assessed (ID: 11-018-20140306).
- 2.162 Within the context of the PPG there is no justification for the following assessment findings of the Council's Preferred Option under the following objectives:
- Housing – Significant Positive Effects (amend to Uncertain Minor Positive Effects)
 - Social Inclusion – Significant Positive Effects (amend to Uncertain Minor Positive Effects)
- 2.163 The Council's own evidence does not propose to set out requirements in policy and the identification of allocated sites at new settlements and urban extensions that will meet the needs for specialist older persons housing in full to 2041. The Council's Topic Paper 7 acknowledges a high degree of uncertainty in likely provision from existing committed and potential future supply. Failure to meet needs in full would clearly equate to potential adverse effects to health, employment and social inclusion given the projected increase in demand.
- 2.164 The Council's approach to achieving social inclusion objectives through the delivery of specialist older persons housing at urban extensions and new settlements is entirely dependent on sites coming forward at these locations. Similar or enhanced positive effects could be secured through the result of meeting the housing needs of older people through dedicated allocations at other sustainable locations within the settlement hierarchy, including our client's site at Comberton.
- 2.165 There is no justification for the Council's failure to test a reasonable alternative that would provide greater certainty in meeting a full assessment of the needs for specialist housing for older people through the allocation of sites at locations within Greater Cambridge including outside of urban extensions and new settlements. Such an approach would satisfy the requirements of national policy in terms of setting out the size, type and tenure of housing needed and how this will be provided. Specific allocations to meet identified needs would

provide a robust basis for the effective monitoring of future supply.

- 2.166 The likely significant effects of the Alternative Option as described above would be distinct from the Council's Preferred Option (as a result of setting out measures to meet needs in full and maximise the locations benefiting from development). The assessment findings for an Alternative Option incorporating our client's site at Comberton would justify significant positive effects in relation to Housing and Social Inclusion and other positive effects in terms of objectives including Health, Employment and Services and Facilities due to the characteristics of the proposals for an Integrated Retirement Community under the Extra Care model.
- 2.167 It is therefore unclear why the preferred option, which brings with it a level of uncertainty of achieving the required delivery of specialist housing has been chosen.
- 2.168 As set out within the accompanying *'Representation by Inspired Villages – to support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population'* (paragraph 4.7), it is important the evidence base properly assesses supply and demand, given the substantial increase in the elderly demographics, the high proportion of home ownership for those ages 65+ and the rapidly increasing cost of caring for the elderly population. Continuing past trends in supply against projected growth in elderly demographics is not considered the best way of predicting demand for particular types of elderly care and accommodation, as traditional residential care homes make way for new forms of accommodation and care.
- 2.169 It is therefore essential that the local authority has a full understanding of the various forms of care and accommodation, knowledge of schemes and their availability and input from a range of sources to determine appropriate sites and levels of need over the plan period. The government's response to the 'Inquiry into Housing for Older People' (2019), identified that offering older people a better choice of accommodation can help them to live independently for longer, improve their quality of life and free up more family homes for other buyers.
- 2.170 As has been demonstrated throughout these representations, sites such as our client's site at Branch Lane and Long Lane, Comberton, offer a sustainable site in a location which is in close proximity to a number of services and facilities. The Council should therefore consider allocating specific sites such as this which are designed to support integrated living and extra-care accommodation within existing communities.



Appendix 1

Representation by Inspired Villages – to support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population

Representation by Inspired Villages

To support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population (version 3)

Inspired
Villages
The *best* years of your life?


Legal &
General



Representation by Inspired Villages

To support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population (version 3)

Foreword

We are not just getting older, we are living longer with rising health and care needs and by 2035, one in four of the population will be over 65 years old. With the unprecedented increase in the number of older people, a new approach is required to respond to the challenges of loneliness, isolation, unsuitable housing, unresponsive and rigid services.

We need to create environments where the chances of living well for longer, independently and actively are maximised, recognising the importance of social engagement and meaningful relationships to mitigate pressures on the health and social care system.

The planning system has struggled to keep up with the emerging models in the later living sector in recent years. This report is intended to assist local planning authorities with their development plan preparation to produce positive policies that will enable the housing needs for older people to be met, in full, particularly as such needs have been identified by the government's national planning guidance to be critical.

Legal & General entered the later living sector in the UK in August 2017, marking the first major institutional investment into this critically under supplied segment of the residential market. In August 2021, Inspired Villages entered into a new Joint Venture with Legal & General and NatWest Group Pension Fund providing the equity and the expertise to deliver at scale, an Integrated Retirement Community operator with at least 34 sites by 2026. This will provide in excess of 5,000 extra care units for nearly 7,000 older persons, making an important contribution to the specialist housing sector.

Phil Bayliss, Chairman, Inspired Villages

Inspired Villages recommendations

Inspired Villages makes the following eight recommendations which should be incorporated into the emerging local plan to support the practical delivery of specialist housing for older people and meet the ever-growing need.

The local plan and its evidence base should:

- 1. Be based on a clear understanding of specialist housing for older people** drawing upon national guidance and other sources, particularly regarding the use class and recognise the different types of specialist housing which exist.
- 2. Be based on a robust evidence base that identifies the housing requirements of specialist housing for older people** drawing upon appropriate sources recognised within the sector.
- 3. Set out clear and specific policy / policies to address housing needs for older people** (e.g. integrated retirement communities and extra care), on land in, or adjacent to settlement boundaries where those settlements that provide a certain level of services and facilities, where the proposed development provides sustainable transport measures and communal facilities and where there is an identified need.
- 4. Set indicative figures or a range for the number of specialist housing for older people needed** across the plan area throughout the plan period and this must recognise the diverse models that exist.
- 5. Monitor the delivery of housing for older people and deliver action plans to address under provision.**
- 6. Consider the inclusion of specialist housing for older people within appropriate strategic or other site allocations** subject to consideration of need, site and locational factors and deliverability.
- 7. Recognise the significant benefits associated with specialist housing for older people** and this can inform planning decision making.
- 8. Set out different policy requirements**, for example, affordable housing, for an integrated retirement community (C2 use) compared to residential development (C3 use) and the evidence base and viability should take into account the different circumstances between the uses (e.g. integrated retirement communities provide significant levels of communal facilities/non-saleable floorspace and their ongoing maintenance and management, staffing, funding, etc). Where there is doubt, policies should provide sufficient flexibility for specific circumstances, which may include viability, to be assessed through a planning application.

1. Introduction

- 1.1. **There is a significant existing shortage of suitable accommodation to meet the needs of the ageing population in the UK and the planning system must take positive measures to address this.** The National Planning Policy Guidance (NPPG) identified in mid-2016 there were 1.6m over-85s and this will double to 3.2m by 2041.¹ The majority of the ageing population are able to, and want to, live independently for as long as possible, and will not require intensive care home accommodation until much later in life, if at all. In this period older people will reconsider whether their home is most suitable for their current needs and are more likely to require increasing assistance with day-to-day tasks and managing their health. There is a need for a variety of types of specialist accommodation for older people, to meet the varying needs of individuals.
- 1.2. The coronavirus pandemic has brought into focus that the current system of older people remaining in unsuitable housing to meet their needs or care homes is not appropriate. An Integrated Retirement Community (IRC) model addresses the deficiencies of the existing options, and this is an opportunity to provide appropriate homes for older people to allow them to age in place with access to care and facilities on-site to meet their day-to-day needs.
- 1.3. What is not clear is how these different types of development should be classified, and delivered, by the planning system. **There is no consistent approach to local plan policies looking to tackle this issue.** Some local plans might support the principle of the delivery of specialist accommodation for older people, but do not necessarily deal with delivery in a practical sense.
- 1.4. A joint Irwin Mitchell and Knight Frank report '*Unlocking potential for senior living*' (July 2020)² identified **50% of Councils do not have any specific planning policies nor site allocations to make provision for housing for older persons.**
- 1.5. There has been an inconsistent approach to plan-making and decision taking at a local level across the country, which inevitably causes uncertainty for developers and operators within the sector, which results in delay to delivery and reduces investor confidence. **The lack of specific local plan policies and misinterpretation of the Use Classes Order are particular issues.**
- 1.6. This Local Plan representation provides an operator's perspective, to provide industry insight to inform your plan-making process, which can be used to develop planning policies that are better placed to support delivery and in compliance with the objectives of the National Planning Policy Framework (NPPF) and the NPPG.
- 1.7. This representation makes 8 recommendations (see page 3) for the local planning authority to incorporate within your emerging local plan to ensure the delivery of much-needed older people's housing.

¹ NPPG Paragraph: 001 Reference ID: 63-001-20190626

² [Unlocking Potential for Senior Living Development 2020](#)

2. Definitions of older **people's housing and care**

- 2.1. Since the late 1970s, accommodation for older people was generally limited to three options: remaining in the family home; moving into sheltered housing; or moving into a care home.³ A large volume of sheltered housing was developed in the 1980s to 2000s, predominantly by McCarthy & Stone and registered providers of social housing. This stock forms the bulk of existing provision in the UK.
- 2.2. In recent years there has been a considerable reduction in the availability of funding with spending falling in real terms,⁴ and local authorities seek alternative, more cost-effective means of providing care and accommodation for those who would otherwise be funded to move into residential care.
- 2.3. Furthermore, those who would otherwise fund their own care in a care home seek alternative options to retain their independence for as long as possible. The opportunity to retain a level of equity from an existing home by moving at an earlier stage to specifically designed housing for older people from properties that are often larger and difficult to maintain, and where increasing levels of care can be bought in as required, can serve to delay or prevent a move into a care home.⁵
- 2.4. The government's *'Housing for Older and Disabled Guidance (2019)'*⁶ set out four types of specialist housing to meet the diverse needs of older people and we also provide additional points from the Associated Retirement Community Operators (ARCO),⁷ who are the main body representing the retirement community sector in the UK, (*in underlined italics, below*), with regards the size of schemes:
 1. **Age-restricted general market housing:** Usually for people aged 55 and over. May include some shared amenities such as communal gardens but does not include support or care services.
 2. **Retirement living or sheltered housing:** Usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. Does not generally provide care services but provides some support to enable residents to live independently (may include 24-hour on-site assistance and a warden or house manager). The housing provided is available on a variety of tenures: shared ownership, long leasehold and rent (social and private). *Typically, 40–60 units.*

³ NPPG Paragraph: 001 Reference ID: 63-001-20190626

⁴ Bottery S, Ward D and Fenney D (2019) Social Care 360. The King's Fund

⁵ The University of Sheffield and Dwell (2015). Extra-care Housing: Brief development

⁶ Gov.UK (2019) Housing for Older and Disabled People

⁷ Associated Retirement Community Operators (ARCO) website: www.arcouk.org

3. **Extra care housing or housing-with-care (assisted living or independent living):** Usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available, if required, through a registered on-site care agency. Residents can live independently with 24-hour access to support services and staff, and meals are also available. Often there are extensive communal areas, spaces to socialise or a well-being centre. In some cases, these developments are known as retirement villages or retirement communities – with the intention for residents to benefit from varying levels of care as time progresses. *Typically, 60–250 units.*

For the avoidance of doubt, an Inspired Villages Integrated Retirement Community falls within extra-care housing.

4. **Residential care homes and nursing homes:** Provide individual rooms (usually with en-suite) within a residential building, together with a high level of care (24-hour), meeting all activities of daily living. Also includes dementia care homes. Range of facilities and activities including gardens, lounges and dining rooms. *Sizes of homes vary considerably. Registered and regulated by the Care Quality Commission (CQC) in England, (by the Regulation and Quality Improvement Authority (RQIA) in Northern Ireland and the Care Inspectorate in Scotland and the Care Inspectorate in Wales (CIW)).*

Figure 1. What is an Integrated Retirement Community (www.arcouk.org/what-retirement-community)



- 2.4 Until more recently, extra care or 'housing-with-care' was not widely recognised as providing an alternative to residential care. However, such accommodation maintains an individual's independence within their own specifically designed property with a range of on-site services and, importantly, where increasing levels of care can be bought in as needs change. Having evolved in recent years to respond to the growing demand from older people for greater choice, quality and independence, the number of models and designs have made it difficult to define this form of accommodation, however, the Care Services Improvement Partnership (2011)⁸ identified three common features:

- i. A type of residential accommodation, a person's own home. It is not a care home or a hospital and this is reflected in its occupancy through ownership, whether it be lease or tenancy;
- ii. It is accommodation that has been specifically designed, built or adapted to facilitate the care and support requirements of its owners or tenants; and
- iii. Access to care and support is available 24 hours per day.

2.5 **Frequently local planning authorities overlook the extra care model**, particularly the scale of an IRC and instead focus on retirement housing or care homes. **It is essential authorities recognise the different models which exist and plan to meet each of their respective needs. It is not appropriate to adopt a generic approach to provision as this is contrary to the NPPG which advocates providing a better choice of housing for older people.**

2.6 Private extra care development in the UK broadly reflects the economic boom of the middle part of the 2000s (see Table 1 below). Between 2005 and 2009 there was an acceleration of development, particularly IRC's. However, following the downturn in the residential housing market, the number of new, private extra care developments reduced significantly from 2009. Such developments have increased again from the mid-2010s resulting from the ever-increasing ageing population but provision tends to be well behind other types of specialist housing.

Recommendation One:

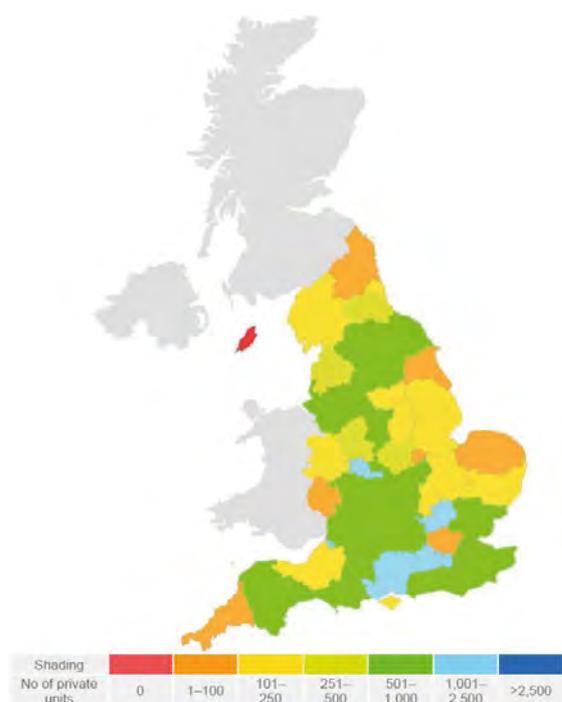
Local plans **must be based on a clear understanding of specialist housing for older people** and the Use Classes Order drawing upon the PPG and other relevant guidance.

Table 1.

Older people's housing by age of construction					
Decade	Schemes	Total units	Private units	% of private units	Average scheme size
Unknown	487	11,701	9,384	5.4	24
Prior to 1970	130	2,895	2,171	1.3	22
1970s	50	1,405	948	0.6	28
1980s	1,886	66,086	59,987	34.8	35
1990s	864	30,018	26,418	15.3	35
2000s	932	40,054	34,963	20.3	43
2010s	1,079	52,632	37,107	21.6	49
Forthcoming	46	2,184	1,141	0.7	47
Total	5,474	206,975	172,119	100.0	37.8

Source: Carterwood, EAC database May 2019. (Note. EAC database includes all schemes, including private rental and 'other' tenure types, the latter making up a small proportion of total units. 'Unknown' schemes are likely to be older developments where no date of construction has been provided.)

Figure 2. Private older people's housing per county with on-site care and facilities



Source: Carterwood, EAC database May 2019

- 2.7 The average size of specialist housing for older persons' developments has increased year on year, driven by larger IRC / retirement village style developments and to achieve economies of scale when providing on-site care and facilities.
- 2.8 It is important that a range of tenure types are provided for, to meet the housing needs of older people. For the private sector, the decision to acquire (usually leasehold) or rent an extra care unit is choice driven, whereas in the affordable sector it is more likely to be based on need.
- 2.9 For those choosing to acquire or rent a private extra care unit they should be able to choose the type of accommodation that best suits their circumstances and consequently planning policy needs to support the delivery of housing types that meet the relevant local demand. **In areas where there is high provision of home ownership, the policy should encourage higher rates of private extra care delivery to match tenure.** Put simply, a home owner is unlikely to be eligible for affordable extra care meaning that private extra care provision is going to be required to provide a choice for that older person.
- 2.10 Figure 2 above shows the geographic distribution by county in England of private older people's housing units where on-site care and facilities are provided. Overall, it shows an historic low level of provision across England resulting in under supply and increasing needs.
- 2.11 There are a variety of site size requirements dependent upon the operator, the proposed scheme and its location. They tend to range between 0.5 to 1.5 acres for traditional retirement housing schemes and care home schemes where a lower level of amenities is provided on site and fewer units, up to approximately 10-12 acres for the comprehensive IRC/extra care schemes.

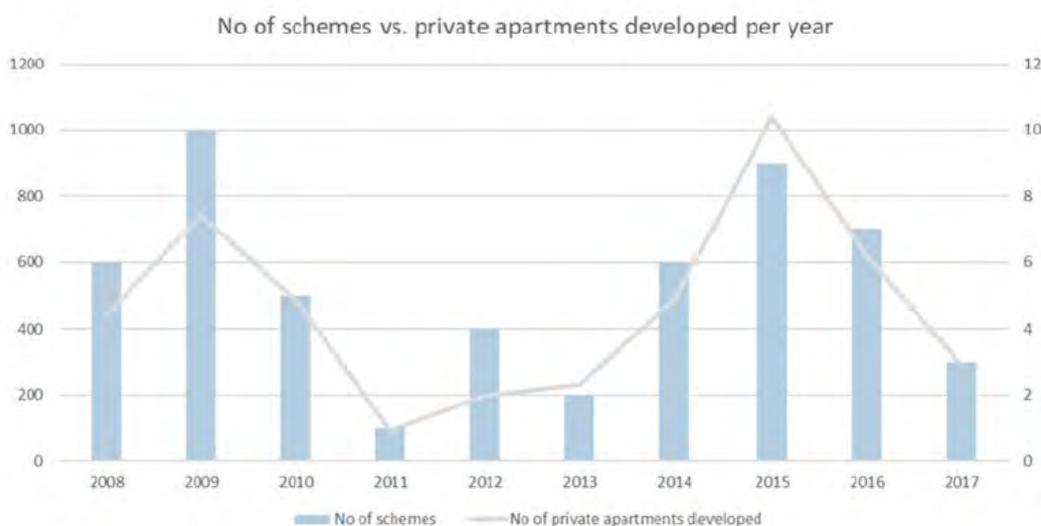
2.12 Despite rising sales rates and a demand that is tending to outstrip supply, the UK has only 4,535 private older people's housing schemes, including 124 'care villages' at 2018 (based on the EAC definition of care village).⁹ *Note: Care village is the same as an IRC.*

2.13 There have been fluctuations in new developments during the ten years to 2017 (see Table 2 below), which compares the number of schemes developed against the number of private apartments (or units) per year. These developments are operated by, amongst others: Audley Group, Inspired Villages, Retirement Villages, Richmond Villages, LifeCare Residences, The ExtraCare Charitable Trust, Joseph Rowntree Housing Trust, MHA and St Monica Trust.

Recommendation Two:

The local plan must be based on a robust evidence base that identifies the housing requirements of specialist housing for older people drawing upon appropriate sources recognised within the sector.

Table 2



Source: *Carterwood*.

⁹ Hartley, B (2018) Care Village Editorial. Healthinvestor

3. Deliverability & Use Class

- 3.1. Planning policies typically require there to be an identified need and for development to be proportionate to its surroundings. However, in terms of deliverability for extra care, for the communal facilities, funding and infrastructure, there is a minimum scale required for a development to work, both financially and operationally.
- 3.2. **A development requires a minimum scale of development to be viable whilst meeting the identified need. This means it is not realistic to disaggregate an IRC into smaller amounts as it would not be viable for an operator to deliver the units and the associated facilities and care.**
- 3.3. A 'standard' model for Inspired Villages is for approximately 150 units of accommodation (mix of cottages, bungalows and apartments ranging from 1, 2 and 3-beds) with some 210,000 sq.ft of floorspace, of which, approximately 20-25% would be communal facilities.
- 3.4. Communal facilities typically include: a café/bar; restaurant; activity/craft room; meeting room; hairdressers; and a wellbeing centre comprising treatment rooms, fitness studio and pool. These facilities are referred to as 'non-saleable space'. The extent of communal facilities provided within an Inspired village is significant and are accessible to residents, their visitors and also non-residents (wellbeing centre on a membership basis) – this is not a gated community but designed to be an important part of the local community.
- 3.5. Planning policies must be sufficiently flexible to take account of current identified and projected need for older people's housing. The introduction of an exceptions-based policy will assist the delivery of extra care to meet the *critical* need identified by the Government and must reflect the different typologies of specialist housing for older people. A generic approach is inappropriate as this does not serve to meet the identified needs nor provide the choice required for older people.

Recommendation Three:

The local plan should **set out clear and specific policy/policies to address housing needs for older people (e.g. integrated retirement communities / extra care):**

1. On land in, or adjacent to settlement boundaries where those settlements provide a certain level of services and facilities.
2. Where the proposed development provides sustainable transport measures and communal facilities.
3. Where there is an identified need.

Use Class

- 3.6. When determining the use class for specialist older people's housing, **the key considerations are the level of care and scale of communal facilities provided.**¹⁰ Indeed these are the key reasons why an elderly person chooses to move. Extra care is not accommodation alone. It provides both 24-hour care and communal facilities, which enables individuals to live independently in their own home, with the security and amenities that allow for peace of mind.
- 3.7. Such developments are C2 rather than C3 use class, even when there is no registered care home as part of the development. This has been identified in planning appeals such as West Malling in 2018, amongst others.^{11 12 13} LPAs seeking to wrap older persons housing into a general residential C3 use or applying affordable housing policy based upon a deficient evidence base acts as a barrier to delivery.
- 3.8. In July 2018, ARCO stated *'More work needs to be done, including clear guidance for councils to make provision for the different needs of older people. Without this there is a risk of the NPPF becoming a blunt instrument which fails to make a difference to planning decisions'* and supported a *'more explicit statement that C2 use classes include genuine housing with care developments.'* Inspired Villages is an ARCO Approved Operator and adheres to their Consumer Code which provides a benchmark for good practice in the sector.
- 3.9. The reason for the lack of clarity is because the Use Classes Order pre-dates the introduction of the variety of options for accommodation (with or without care) that now exist. The Use Classes Order is in need of updating.
- 3.10. The 2019 report *'Shining a spotlight on the hidden housing market'*¹⁴ considered that a new use class should be created specifically for specialist housing for older people as they have previously fallen under C2, C3 or sui generis. This has led to inconsistencies in terms of delivery, location and affordable housing provision between local authorities. The term specialist housing for older people covers a range of types of development. Some of those types of development do not involve the delivery of care, nor the inclusion of facilities that support the delivery of care and on-going 'wellbeing' and it is generally agreed that those developments fall within use class C3, whereas an IRC or extra care falls fully within C2.
- 3.11. **It is essential that the Local Plan's evidence base and viability assessment properly understands the IRC model and its associated extra significant costs.** It is not appropriate for a C2 development to attract the same affordable housing requirement as C3 residential which does not have such costs to development. For example, C2 extra care construction costs are significantly higher than C3 residential and phasing is longer; sales rates are slower; and the extensive communal facilities are delivered upon first occupation – a significant capital cost (including cost of staffing).
- 3.12. Specialist housing for older people differs in a number of ways, which affects its viability. This all feeds into the consideration of whether or not it can fund additional obligations such as affordable housing, including:

- Funding;
- The long-term operation, management and ownership of the site;
- The provision, maintenance, upkeep and management of the significant communal facilities, including its delivery before the first unit is occupied; and
- Staffing

3.13. These factors are intrinsic in recognising the extra care model is very different from C3 residential, which directly affects deliverability, and in turn, the inappropriateness of applying policy intended to be applied to C3 residential. **Local Plan Viability Assessments must assess the different typologies of specialist housing for older people in recognition of the different costs associated with them and in distinction from C3 residential.**

3.14. The following principles are drawn from recent appeal decisions, for example, Retirement Village Group's appeal at Lower Shiplake¹⁵ grapples with use class and the application of affordable housing policies:

- Though it may be reasonable to consider individual self-contained units of accommodation as dwellings, where the proposed development forms a collection of units of accommodation with extensive communal facilities, beyond that reasonably likely to be provided in C3 residential accommodation, and which clearly exists to serve the residents, both the units and the communal facilities are intrinsic to each other forming part of the same planning unit.
- The planning unit as a whole exists to provide accommodation with care, to people in need of care, falling wholly within use class C2.
- Where the units are occupied only by residents in need of, and receiving, a minimum level of care, their existence is founded on the need for, and delivery of accommodation with care, for those in need of care, in direct correlation with use class C2. Where this is secured through occupation restrictions set down within a legal agreement, the terms of the grant of permission mean it can only be used for use class C2.
- Where care and assistance are provided at additional cost to an occupant, the occupant is only likely to choose to live there if they are in need of that care and assistance.
- Care can cover a very broad range of activities that assist people in carrying out everyday tasks, which may become increasingly difficult with age. What is important is that the planning unit is designed and exists to provide care, and which can increase over time. The physical attributes of the building, the interconnectivity between accommodation and facilities and the extent of communal facilities are all relevant to assessing the nature of the development.

¹⁵ Paragraph 43 - Appeal Decision APP/Q3115/W/19/3220425 Land to the east of Reading Road, Lower Shiplake, 14 October 2019

- 3.15. The fundamental point arising from this is that these developments exist to provide accommodation with the availability of care and the provision of extensive communal facilities. With regard to these points and the guidance provided in the PPG: *'when determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwellinghouse) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.'*
- 3.16. **An Inspired village has a high level of care available and significant amount of communal facilities on-site meaning it is clearly a C2 use.** This has been established in a number of planning decisions in various local authorities including Reigate & Banstead; Wealden District; Maidstone Borough; Bedford Borough; Central Bedfordshire; South Oxfordshire; Horsham District Council; and others.

Definitions of care

- 3.17. A definition of 'care' is provided in the interpretation section (Section 2) of the Use Classes Order, as follows:

"care" means personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care of children and medical care and treatment."

- 3.18. The 1987 Use Classes Order pre-dates the formal definition of the term 'personal care' in the health legislation. For the avoidance of doubt, the term 'personal Care' is now defined in the health and social care legislation, regulations and guidance, having been introduced in 2008; however, the reference to 'personal care' in the definition of care provided in the Use Classes Order is not synonymous with the health legislation definition, which did not exist at the time it was written. The definition in the Use Classes Order can only be taken in its practical sense, as described, i.e. 'individual' care to a person in need of care.
- 3.19. The different approach by different local authorities has led to different operational restrictions/obligations being secured at different sites that essentially constitute very similar development, not helped by a Use Classes Order which is now of some considerable age. This is understandably difficult to manage and unpredictable for developers of this type of development.
- 3.20. To support delivery, we strongly encourage the LPA adopts policies which allow for the specific circumstances of the proposal to be assessed in each case, rather than seeking to pre-determine use class based on a particular characteristic; and to be clear that affordable housing policies designed to apply to unrestricted C3 residential does not apply to C2 extra care. Where there is doubt, policies should provide sufficient flexibility for specific circumstances (e.g. viability) to be assessed through a planning application, unless specialist housing for older people had been fully considered at the plan-making stage (infrastructure, relevant policies and local and national standards, cost implications of Community Infrastructure Levy (CIL) and Section 106.¹⁶

4. Evidence base and approach for local plan-making

National planning policy context

- 4.1. The NPPF stresses the importance that the needs of groups with specific housing requirements are addressed, with paragraph 62 stating *‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies’*, including for older people.
- 4.2. The PPG (Housing for older and disabled people) (2019) identifies the evidence that plan-makers should consider when assessing the housing needs of older people; in terms of census data, projections of population and households by age group, together with the future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care)¹⁷. This can be assessed from online tool kits provided by the sector, and evidence prepared by health and well-being boards together with comparisons with other local authorities.

“The need to provide housing for older people is critical¹⁸”

- 4.3. With specific regard to planning and the supply of specialist housing for older people, the PPG sets out the following guidance for local planning authorities:
 - a. Set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the LPA will consider proposals for the different types of housing that these groups are likely to require.
 - b. Can provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.¹⁹
 - c. Include the provision of housing for older people for monitoring progress when preparing the Authority Monitoring Report.²⁰
 - d. Plans need to provide for specialist housing for older people where a need exists. Innovative and diverse housing models will need to be considered where appropriate. Plan-makers need to consider the size, location and quality of dwellings needed to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.²¹
 - e. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations, which may be appropriate where there is an identified unmet need. Location is a key consideration with factors including proximity to good public transport, local amenities, health services and town centres.²²

¹⁷ NPPG Paragraph: 004 Reference ID: 63-004-20190626

¹⁸ NPPG Paragraph 001 Reference ID: 63-001-20190626

¹⁹ NPPG Paragraph: 006 Reference ID: 63-006-20190626

²⁰ NPPG Paragraph: 007 Reference ID: 63-007-20190626

²¹ NPPG Paragraph: 012 Reference ID: 63-012-20190626

²² NPPG Paragraph: 013 Reference ID: 63-013-20190626

Recommendation Four:

The local plan should **set indicative figures or a range** for the number of specialist housing for older people needed across the plan area and throughout the plan period and this **must recognise the diverse models that exist**.

Recommendation Five:

The local planning authority must **monitor the delivery of specialist housing for older people and deliver action plans to address under provision**.

Recommendation Six:

The local plan should consider the **inclusion of specialist housing for older people within appropriate strategic or other site allocations** subject to consideration of need, site and locational factors and deliverability.

Evidence base and methods

- 4.4. The typical average age of entry to private extra care is 80 to 82 years, with an age range of 70 to 90 years forming the bulk of residents. Typically, single females occupy 65–70% of units, couples 20–25%, and single males 10%.²³ As such, it is important to assess the relative age profile of a catchment market to establish the size of the population matching this demographic, both in relative and absolute terms.
- 4.5. Older people will make a choice whether to move into extra care and to own or rent their property. This means the choice can be a large financial decision, often coinciding with a need to leave the larger family home, as well as an emotional decision, perhaps following the death of a spouse/partner or health related issues.
- 4.6. The key demographic profile is where the decision maker of any property buying decision, meets the following criteria:
- 65+ years – we know from empirical evidence that the average age of those entering private extra care is 80+ years of age, and typically those entering retirement housing is 70+ years. The key demographic is the 65+ year age group.

²³ Carterwood Focus, Issue 13 (2014) Extra care housing – where do residents come from?

- Owns their property outright – therefore, has the required equity in their own property to form the means of being able to make a private property purchase or rental decision.
- 4.7. **It is important the evidence base properly assesses supply and demand, given the substantial increase in the elderly demographic, the high proportion of home ownership for those aged 65+ and the rapidly increasing cost of caring for the elderly population.** The growth in the elderly demographic is not considered the best way of predicting demand for particular types of elderly care and accommodation, as traditional residential care homes make way for new forms of accommodation and care.
- 4.8. By considering older people’s preferences should they need care, the Housing LIN advises that although over 60% of people wish to remain in their home, this decision may be limited by a lack of choice of alternative housing, rather than preference. Often a choice is made based on what is available with a decision being made following a crisis event, when need is greatest.
- 4.9. Kerslake and Stilwell²⁴ estimated about one-third of the population entering a care home *‘could have moved to a form of housing with care as a viable alternative, with a further third who could have managed in such housing had they moved at some time earlier in their care history’*. Other models for estimating demand for supported housing and housing markets and independence in old age include Ball and which endorses the approach that Councils should shift away from care home provision in favour of specialist housing for older people.²⁵
- 4.10. LaingBuisson’s *‘Extra Care Housing UK Market Report’*²⁶ does not provide a tool for assessing demand, but instead refers to the demographic factors that are likely to influence demand, as follows:
- An expansion of the older population;
 - A reduction in the pool of young adults available for training as nurses or care assistants to work in the community or care homes;
 - An increase in the number of middle-aged people looking after children and a parent;
 - An increase in the proportion of older people with a living child;
 - Changes in the health and dependency levels of older people; and
 - Changes in the patterns of immigration by potential care workers and emigration by trained care staff.
- 4.11. LaingBuisson’s Age Standardised Demand (ASD) rates for care home beds shows a trend whereby demand for residential care beds has reduced as alternatives to residential care are developed. This provides benefits to stretched adult social care service budgets.
- 4.12. The use of comparative evidence and indicators from a variety of sources is a useful method to ascertain the indicative level of need for extra care in a particular local authority area. Other accommodation options in addition to IRC’s will continue to remain open, including remaining

²⁴ Kerslake, A and Stilwell, P (2004) What makes older people choose residential care, and are there alternatives? Housing Care and Support

²⁵ Ball, M (2011). Housing Markets and independence in old age: expanding the opportunities. Henley, University of Reading

²⁶ LaingBuisson (2015) Extra Care Housing UK Market Report, Thirteenth Edition

in their own homes, moving to retirement housing, a care home or to another informal care setting. **It is essential the local authority has a full understanding of the various forms of care and accommodation, knowledge of schemes and their availability, and input from a range of sources to determine appropriate indicative levels of need over the plan period (including existing shortfalls).**

4.13. The methods of determining demand in a given area reveal a clear message; that there is a strong and increasing demand for new forms of care and accommodation as an alternative to traditional residential care, alongside an increased requirement for nursing and dementia care homes for those with the highest care needs. The difficulty in trying to accurately assess demand for extra care housing is that, due to the relatively new nature of the product, there is no position of over-supply upon which to assess a position of balance. Essentially, the additional supply creates 'demand' when it is developed.

4.14. The government's response to the '*Inquiry into Housing for Older People*' (2019),²⁷ included the following points and which the local authority should consider in their plan preparation:

- *'We have a rapidly ageing population. The needs of older people are now different from previous generations and their aspirations around housing and lifestyles have changed dramatically.'*
- ***Offering older people a better choice of accommodation can help them to live independently for longer, improve their quality of life and free up more family homes for other buyers.***
- ***We recognise that the integration of housing with health and social care services is a vital part of ensuring that people are able to live healthier, more independent lives for longer.***
- ***We agree that more older owner-occupiers, living in low value housing, should have the opportunity to move to more appropriate housing as they age. At present, new commercial specialist older people's housing tends not to cater for this market while new supported housing is largely targeted at the most vulnerable. We are keen to encourage innovative approaches, especially from local authorities and housing associations.***
- ***More of all types of housing for older people – extra care, sheltered and accessible housing – need to be built across the social and private sectors.***
- *Older people moving home in later life could be part of the solution to tackling the housing shortage but there is little evidence to support this. We agree that further research into the impact of older people moving home on the housing market could contribute to a stronger evidence base to inform policy making.*
- *It is important that providers use clear terminology (with regard to the different types of specialist housing), so that people can make informed choices.'*

“There is a strong and increasing demand for new forms of care and accommodation as an alternative to traditional residential care.”

²⁷ Government response to the second report of 2017-2019 of the Housing, Communities and Local Government Select Committee Inquiry into housing for older people. (September 2018)

4.15. The government's Social Care White Paper *'Caring for our Future'*,²⁸ committed to provide support to help local authorities develop their market capacity to provide greater choice for users and drive up quality in care services. The Developing Care Markets for Quality and Choice programme, launched by the Department of Health in 2012, was intended to support local authorities to improve capacity through preparing or improving their Market Position Statements.

4.16. The *'Top of the Ladder'* report by Demos,²⁹ the leading cross-party think tank, provided some key findings:

- *'Retirement properties make up just 2% of the UK housing stock, or 533,000 homes, with just over 100,000 to buy. One in four (25%) over-60s would be interested in buying a retirement property – equating to 3.5 million people nationally.'*
- *'More than half (58%) of people over 60 were interested in moving. More than half (57%) of those interested in moving wanted to downsize by at least one bedroom, rising to 76% among older people currently occupying three, four and five-bedroom homes.'*
- *'If just half of the 58% of over-60s interested in moving (downsizing and otherwise) were able to move, this would release around £356 billion worth of (mainly family-sized) property – with nearly half being three-bedroom and 20% being four-bedroom homes.'*

4.17. The report suggested a number of national policy recommendations to assist in overcoming these problems:

- *'Giving retirement housing special planning status akin to affordable housing, given its clear and demonstrable social value.'*
- *'Tackling S106 and community infrastructure levy (CIL) planning charges, which make many developments untenable and affect them disproportionately compared with general needs housing developments'.*
- *'Quotas and incentives for reserving land for retirement housing, and linking this to joint strategic needs assessment and health and well-being strategies for local areas.'*

4.18. **Inspired Villages recommends clear policies in development plans to support new IRC's / extra care schemes.** The evidence is clear, as are the benefits to support the approach and deliver much-needed specialist accommodation for older people.

“One in four (25%) over-60s would be interested in buying a retirement property.”

²⁸ HM Government (2012) *Caring for our future: reforming care and support*

²⁹ Wood, C (2013). *The Top of the Ladder*. Demos

5. Local Authority Plan Making

- 5.1 Many local authorities are increasingly aware of the variety of accommodation and care options available to enable older people to receive care in their own homes, and as a more cost-effective alternative to residential care. In certain areas, they are considering the potential for the reconfiguration of dated and under-used sheltered housing stock to provide additional, affordable extra care housing.
- 5.2 In reality, upgrading sheltered housing to extra care suitable for those with increasing care needs is rarely the most efficient solution, as existing developments are often too small to enable the required economies of scale to deliver 24-hour on-site care, nor are they able to provide the layout and additional communal facilities necessary to form a genuine extra care community.
- 5.3 The Housing LIN considers that the later living market needs to be made both acceptable and financially viable to enable older people to move from unsuitable accommodation (too large to manage, costly to maintain, poorly located or ill-equipped to deal with changing needs) to better, thoughtfully designed homes in sought-after places. Right-sizing does not mean a compromise on design and new homes that are accessible and adaptable and can meet with the current and future lifestyle goals of potential residents.
- 5.4 **There is a strong preference for older people to remain independent for as long as possible, and extra care housing appeals to this desire – it provides their own home, their own front door but within a communal setting with the flexible provision of care on site to adapt to their changing needs.** The key issues leading people to move into extra care are health and care requirements, frequently prompted by the death of a spouse or partner. The decision to move is often strongly influenced by immediate relatives, and the more frail or vulnerable the elderly person, the more this applies. Aspects such as accessibility and convenience for visiting play a major role in decision-making.
- 5.5 An estimated six million people provide significant support to elderly relatives, neighbours and friends across the UK. This factor contributes additional demand, as carers understand the benefits associated with their charges moving to an environment where some of the care burden can be shared, allowing them to remain, sometimes indefinitely, outside of the care home environment. Additionally, the family is often involved in a decision to move a loved one into extra care, located more conveniently, so that regular visits are more easily made and concerns over ‘welfare at a distance’ can be eliminated.
- 5.6 In 2019, ARCO partnered with ProMatura to conduct the biggest ever study of retirement communities, 30 with surveys of residents representing 81 communities³⁰ and 15 different care operators, which provided evidence of the huge health, wellbeing and security benefits for residents.

³⁰ ARCO with research by ProMatura International (2019) Housing, Health and Care. The health and wellbeing benefits of Retirement Communities

- 5.7 The main reasons given for moving to an IRC were cited as: less need for property maintenance, access to communal facilities, and the availability of 24-hour support and domiciliary care on site. The benefits of living in extra care included: being more active and healthier for longer, the ability to enjoy life, having greater control, and feeling safe and secure with a consequent reduction in loneliness.
- 5.8 The resultant recommendations for action set out, amongst others, that the government and local authorities should:
- *‘Develop a legal and regulatory framework for Retirement Communities to bring the UK into line with leading countries around the world*
 - *Develop a clear definition and terminology for Retirement Communities and recognise the significant contribution they are making to our health and social care systems*
 - *Provide more funding and land for affordable housing in Retirement Communities*
 - *Undertake further research on the level of Retirement Community supply and demand in their areas*
 - *Ensure they have provisions in their local plans for Retirement Community housing*
 - *Partner with specialist Housing Associations with expertise in extra care Retirement Communities to increase provision.’*
- 5.9 Tailored housing that is accessible, well designed and well located to facilities (particularly those on-site) may reinvigorate a person’s social life through their offer of a wide range of activities and communal areas that provide opportunities for making new friends. There is evidence that residents have better health outcomes than older people living elsewhere; designs that minimise the risk of falling, for example, and social activities that reduces loneliness and isolation.
- 5.10 By providing an attractive alternative type of accommodation in the form of extra care housing, older homeowners may benefit from releasing equity from their existing properties, which they can use to fund their retirement years. Extra care can also contribute to addressing wider housing market concern, by releasing their homes onto the market for families.
- 5.11 There are other benefits in promoting extra care as they can reduce the demand upon health and social care. Research from Aston Research Centre³¹ in 2015 set out that the NHS saved more than £1,000 per year on each resident living in Extra Care Charitable Trust’s schemes between 2012 and 2015. The Homes for Later Living *‘Healthier and Happier’* report³² suggests that each person living in older people’s housing contributes to a fiscal saving to the NHS and social care of approximately £3,500 per annum. Inspired Villages typical model providing 150 units would generate a population of approximately 195 residents (average occupancy 1.3 persons per unit) **resulting in savings of £680,000 to the NHS and social care every year**. This is a significant benefit and widely acknowledged as such in Section 73 planning appeals.

³¹ Holland, C (2015) Collaborative Research between Aston Research Centre for Healthy Ageing (ARCHA) and the ExtraCare Charitable Trust

³² WPI Strategy for Homes for Later Living (2019) *Healthier and Happier*; An analysis of the fiscal and wellbeing benefits of building more homes for later living

Recommendation Seven:

The local plan and its evidence base **must recognise the significant benefits associated with specialist housing for older people** and this can inform planning decision making.

- 5.12 As an operator, unlike C3 residential developers, Inspired Villages considers the long-term ownership and management of the site. Therefore, it is vital that we secure suitable sites and planning permissions which enables the implementation of a viable development. It is often very difficult for an operator, such as Inspired Villages to secure sites on the open market due to competition from residential developers who do not provide the level of facilities or care that an IRC does.
- 5.13 The inclusion of positive policies to support extra care could give landowners an incentive to proceed with this type of development over a C3 residential developer and can be justified on the basis that extra care developments are relatively self-contained because of the extensive communal facilities on-site (which are also publicly accessible); lower traffic generation as trips are predominantly off-peak; are employment generators; and can result in savings to the NHS and adult social care. All of which are significant benefits.
- 5.14 We recommend the LPA properly engages with the extra care sector regarding the potential for including this form of development in site allocations to ensure this would be deliverable and an appropriate site location. The sector is an emerging market and operators do not tend to have strategic land, meaning they may not be able to promote potential sites at the time the local plan is being prepared.
- 5.15 To avoid being prejudiced, LPAs should consider whether policies allow for a greater degree of flexibility for proposals for specialist housing for older people on land that may otherwise be inappropriate for standard residential development, for example, adjacent to settlement boundaries where those settlements provide a certain level of services and facilities. Such a policy approach has been applied in authorities, such as Hart District, South Northamptonshire and Horsham District (see examples at back of document.)

Recommendation Eight:

The local plan should **set out different policy requirements**, for example, affordable housing, **for specialist housing for older people (C2 use) compared to residential development** within the C3 use class and the evidence base, viability must be taken into account the different circumstances between the uses (e.g. integrated retirement communities/extra care provide significant levels of communal facilities - non saleable floorspace - and their ongoing maintenance and management, staffing, funding, etc). Where there is doubt, policies should provide sufficient flexibility for specific circumstances, which may include viability, to be assessed through a planning application.

- 5.16 Inspired Villages recognises that some LPA's have specifically considered the need for policies to be adopted to support the delivery of affordable extra care type housing, principally derived by County Council's Market Position Statements endorsing this tenure because this is the tenure which they are responsible for commissioning. Inspired Villages is concerned to ensure planning policy also gives sufficient policy support for the full range of specialist housing provision to serve older people, including private extra care/IRC's, as set out in the definitions of specialist housing in the PPG.
- 5.17 **The need identified for both affordable and private tenures must be recognised, and LPAs have a duty to plan for the delivery of development to meet all housing needs.** The 'critical need' has been identified in the PPG and the requirement to ensure sufficient land is available to address housing requirements of groups with specific needs and incorporate policies that deliver housing for all is identified at paragraphs 59 and 61 of the NPPF. Private extra care is one of the options, along with care homes, affordable extra care, and private and affordable sheltered housing, that will cumulatively contribute towards addressing the need and having provided choice.
- 5.18 In addition to responding to this duty, planning policies that support the delivery of specialist housing for all older people, regardless of financial means, is of significant benefit to social care and NHS funding. This is because individuals who plan for their future by using their own private financial means to secure accommodation in a setting that supports their health and wellbeing, without or before the need to call on the NHS and social care, will significantly reduce their need to draw on these socially funded services. Prevention of health issues is vital to the resilience of the NHS and social care services. LPAs should not underestimate the beneficial effect that supporting development proposals that facilitate people to fund and plan for their own health and wellbeing.
- 5.19 **We therefore strongly encourage the LPA to produce policy, which supports the delivery of specialist housing to meet the needs of older people in line with the requirements of the NPPF**

and the PPG which states *“where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.”*³³

Rectory Homes Judgement

Rectory Homes Ltd sought permission for ‘the erection of a ‘Housing with Care’ development (use class C2) for 78 open market extra care dwellings and a communal residents centre’ in Thame, South Oxfordshire. Both the applicant and the local planning authority agreed that the proposed use fell within use class C2, but there were differing opinions as to whether an affordable housing contribution was required.

The question to be determined by the Court was whether the proposed C2 units were ‘dwellings’ for the purpose of the development plan policy. The Court concluded that units of accommodation that allow for independent living comprise dwellings despite falling within use class C2 meaning that an extra care development may be caught by a widely drafted policy requirement to provide affordable housing.

Consequently, the decision has the potential to cause significant difficulties for the sector, resulting in an increased reliance on viability assessments, resulting in further cost and uncertainty in the planning process. This has the potential to disincentivise delivery of a much-needed form of specialist accommodation in circumstances where providers are already at a disadvantage against traditional residential developers due to the inherent costs within a retirement community development.

It is important that the drafting of affordable housing is precisely worded to reflect its applicability to C3 residential dwellings, particularly where the Council’s evidence base viability work has not assessed retirement communities.

³³ NPPG Paragraph: 016 Reference ID: 63-016-20190626

Examples of other local authorities taking a positive policy approach

Hart Local (Plan Strategy and Sites) 2032 (adopted 30 April 2020):

Policy H4 - Specialist and supported accommodation (as per main modifications)

Proposals for specialist and supported accommodation that meets the needs of older persons or others requiring specialist care will be permitted:

- a) on sites within settlement boundaries; and
- b) on sites in the countryside provided:
 - i. there is a demonstrated need for the development; and
 - ii. there are no available and viable alternatives within settlement boundaries; and
 - iii. the site is well related to an existing settlement with appropriate access to services and facilities either on or off site.

South Northamptonshire Part 2 local plan (adopted 22 July 2020):

Policy LH6 - Specialist housing and accommodation needs

1. Proposals to meet older persons / specialist housing needs for two or more dwellings will be supported on suitable sites that are within the settlement confines subject to the following criteria:
 - a) The location is well served by public transport or within walking distance of community facilities (within 400m) such as shops, medical services, public open space, and social networks appropriate to the needs of the intended occupiers, or where this is not the case, such facilities are provided on site; and
 - b) The scale, form and design of the development is appropriate to the client group and in relation to the settlement where it is located; and
 - c) Highway, parking and servicing arrangements are satisfactorily addressed; and
 - d) Gardens and amenity space are provided and are of an appropriate size and quality.

Proposals for older persons / specialist housing on suitable sites immediately adjacent to the settlement confines of Rural Service Centres and Primary Service and Secondary Villages (A) should meet all of criteria (a) to (d) above and:

- e) The scale of development should be clearly justified by evidence of need in the district; and
 - f) Evidence is provided which demonstrates that there are no alternative suitable available sites within the adjacent confines.
2. Proposals for specialist housing and accommodation to meet clearly evidenced needs arising from outside the district will be considered where they relate to suitable sites that are within or immediately adjacent to the confines of the Rural Services Centres.

Horsham District Planning Framework (November 2015)

Policy 18 Retirement Housing and Specialist Care

3. Proposals for development which provide retirement housing and specialist care housing will be encouraged and supported where it is accessible by foot or public transport to local shops, services, community facilities and the wider public transport network. The Council will particularly encourage schemes that meet identified local needs for those on lower incomes and provide affordable accommodation for rent or shared ownership / equity.
4. Large scale 'continuing care retirement communities' will be supported in appropriate locations, normally within defined built-up areas, where they can be justified in terms of meeting identified need, and:
 - a) Provide accommodation for a full range of needs, including care provision separate from the self-contained accommodation;
 - b) Include 'affordable' provision to meet identified local needs, or where this is not possible, provide an appropriate commuted sum in lieu of on-site units; and
 - c) Include appropriate services and facilities, including transport, to meet the needs of residents / staff and which contribute to the wider economy.

Vale of Aylesbury District Council Local Plan 2013-2033 (adopted 15 September 2021)

Policy H6b Housing for older people – in addition to identifying eight site allocations and four broad locations for the provision of C2 accommodation, also proposes:

3. Proposals for C2 older people accommodation will be granted permission provided the following criteria are met:
 - a) The proposal is in a sustainable location for amenities and services
 - b) There is an identified package of care provision on site
 - c) Minimum Clinical Commissioning Group inspected space standards are met or exceeded
 - d) Facilitates social and recreational activity are provided
 - e) Guest accommodation is provided (unless the proposal is for Extra Care Sheltered Accommodation)

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Appendix 2

Green Belt note prepared by LDA Design

Land South of Branch Road, Comberton

Note on Green Belt and Landscape issues

2 December 2021

This note summarises LDA Design's preliminary analysis of Green Belt and landscape issues relating to land located to the South of Branch Road, Comberton (the Site). The note provides background information in support of written representations to the Greater Cambridge Local Plan regarding two policies in particular: **Policy GP/LC: Protection and enhancement of landscape character** and **Policy GP/GB: Protection and enhancement of the Cambridge Green Belt**.

Location and Context

The village of Comberton lies approximately 6 km west of Cambridge. The historic village is located on the northern edge of the valley floor of the Bourn Brook at an elevation of 25-30 metres AOD, and modern development on the north side of the village extends onto the lower valley side up to 35-40 metres AOD. The valley side rises to a ridge approximately 1 km north of the village at an elevation of 55-60 metres AOD.

The Site, comprising arable land, is contained by a road network surrounding the village: Green End to the west, Branch Road to the north and Long Road to the east. The Site adjoins modern development on the north side of the village and rises from its southern boundary at around 30 metres AOD to its northern boundary on Branch Road at around 45 metres AOD.

Landscape Character

Proposed Policy GP/LC: Protection and enhancement of landscape character sets out how development should address landscape character and features in Greater Cambridge. The proposed policy will require developments to:

- Respect, retain or enhance local landscape character (as set out in the Greater Cambridge Landscape Character Assessment).
- Fully consider cumulative effects of development and incremental change on landscape character.
- Retain and enhance landscape features within new developments.
- Protect and enhance the setting of Cambridge, including the green corridors extending into the city and along the River Cam corridor, and strengthen or recreate the well-defined and vegetated edge of Cambridge, improve visual amenity and enhance biodiversity.
- Protect and enhance the setting of the villages in South Cambridgeshire and continue to protect identified Important Countryside Frontages.
- Protect important green gaps such as between Longstanton and Northstowe.

The proposed policy also notes that *"in many South Cambridgeshire villages, there are locations where a strong countryside character penetrates into the village, or separates two parts of a village. These Important*

Countryside Frontages, identified in the South Cambridgeshire Local Plan 2018, are part of village character, and warrant continued protection."

Greater Cambridge Landscape Character Assessment (February 2021)

The Greater Cambridge Landscape Character Assessment identifies 33 different Landscape Character Areas with a distinct local identity and sense of place. Detailed information is provided about each, including the condition of the landscape, key sensitivities and guidance on landscape management and integrating development into the landscape.

Comberton and the Site is located within the Lowland Farmlands Landscape Character Type (LCT 3), and within the Bourn Tributaries Lowland Farmlands Landscape Character Area (LCA 3B). Branch Road, Green End and Long Road form the boundary between the Lowland Farmlands LCT to the south and the Wooded Claylands LCT to the north.

The Bourn Tributaries Lowland Farmlands Landscape Character Area (LCA 3B) is described as *"a well settled rural landscape, with distinctive radio telescopes on the skyline that is strongly influenced by the wide, shallow valley of the Bourn Brook"*. Key characteristics of relevance to the Site are:

- *Wide valley of the River Bourn and its tributaries as it nears its confluence with the River Cam*
- *Generally strong, regular rectilinear field pattern with smaller scale pastoral fields near villages*
- *Well defined settlement edges defined by mature trees, copses and thick hedgerows enclosing small scale fields and paddocks*
- *Network of major roads locally detracts from the otherwise tranquil, rural character*

Supporting text notes that *"settlement edges are largely well defined by mature trees, copses and thick hedgerows, adding intimacy and visual enclosure to village edges. Small fields and paddocks contribute to their landscape setting, providing localised intimacy, visual enclosure and a transition to the surrounding countryside"*.

Specific Landscape Sensitivities for the LCA of relevance to the Site are *"well defined settlement edges defined by mature trees, copses and thick hedgerows enclosing small scale fields and paddocks"*.

Specific Landscape Guidelines for the LCA are to *"ensure land developed for recreation enhances existing landscape features, creates links between villages and recreational assets and is in keeping with the open, rural character"* and *"Conserve and enhance the regular small-scale pastoral fields, shelter belts and hedgerows at village edges"*.

General guidance for integrating development into the Landscape is as follows:

- *Conserve the historic villages through avoidance of ribbon development and coalescence with nearby settlement*
- *Manage the scale, siting and design of settlement expansion to avoid incongruous development in the rural landscape*
- *Maintain the distinctive settlement pattern of the area and its local context*
- *Ensure density and pattern of new developments reflect that of existing villages and hamlets*
- *Avoid backland and cul-de-sac developments where possible*
- *Ensure buildings are arranged in continuous frontages within village cores and are arranged in loose knit patterns facing the street on more peripheral sites*

- *Ensure new developments are integrated with sufficient space for garden and street tree planting where applicable*
- *Enhance village gateways and, where appropriate, consider provision of appropriate planting on village approaches*
- *Take opportunities to create new village greens and/or wildlife areas within new developments.*
- *Ensure new developments integrate/connect with existing Public Rights of Way (PROW) within development layout*
- *Ensure new developments reflect the form, scale and proportions of the existing vernacular buildings of the area and pick up on traditional local building styles, height, materials, colours and textures*
- *Retain hedges along roads*
- *Enclose boundaries facing the street on village peripheries with hedge and tree planting*
- *Avoid the use of standardised and intrusive urban materials, street furniture, lighting and signage as part of traffic calming measures wherever appropriate*
- *Ensure new agricultural buildings, such as large storage sheds, are sited and designed to reduce their apparent mass, minimising their impact on the wider landscape by the appropriate use of texture, colour and planting*

The overall condition of the landscape character type is perceived to be **moderate**, and is judged to be of **moderate** strength of character with few distinguishing features.

Analysis of the Site in reference to Policy GP/LC

Comberton is typical of the LCA. The village is a lowland, relatively well-treed valley settlement set within an agricultural landscape. Mature blocks of woodland and tree belts, particularly associated with valley floor or watercourses to the south and west of the village, contribute to the village's containment and well-treed character. Newer planting, including that within the Site and residential properties off Long Road, is increasing the vegetated edge of the village to the north-east. Where open spaces are located on more level terrain of the village, these have become valuable community assets, such as the recreation ground and playing fields associated with the primary school.

The character of the southern portion of the Site is more heavily influenced by the recreation ground and surrounding houses, whereas the rising ground of the Site further north, particularly where it is bound by mature hedgerows and trees, retains more arable characteristics. Despite the more rural character of the Site's northern reaches, it is nevertheless influenced by Branch Road, the presence of individual dwellings off Branch Road, Long Road and the existing edge of the village, such that it is distinct from the more rural, uninterrupted countryside between the Site and the villages of Hardwick and Coton to the north. It is notable that the LCA boundary is drawn along Branch Road, confirming that the Site is more strongly associated with the village and valley floor in terms of its landscape character than with the higher valley side to the north, which falls into the Wooded Claylands LCT.

The nearest "Important Countryside Frontage" to the Site is to the south along Barton Road. The Site is not visible from Barton Road due to intervening roadside hedgerows and vegetation bounding fields. However, the Site in combination with neighbouring fields to the west, the recreation ground and fields to the south, contributes to the sense of countryside extending into the core of the village. The woodland belt at the Site's western edge, in combination with fields between the Site and Green End, would maintain the connection between the village and its rural setting. The proposals would seek to reinforce the transition between the village and countryside

by retaining and buffering woodland within the Site and by locating proposed open space adjacent to the existing recreation ground, reflecting the transitional character of the recreational landscape.

Development of the Site could be integrated with its surroundings and adhere to the landscape guidelines for the Lowland Farmlands LCT and Bourn Tributaries Lowland Farmlands LCA by:

- Conserving existing woodland and hedgerows within and at the Site edges and reinforcing the settlement edge of Comberton through tree planting and hedgerow management.
- Reflecting the existing settlement pattern, contained within a network of roads that define the northern and eastern edges of the village.
- Enhancing and improving access through the Site to the recreation ground, connecting eastern and western parts of the village.
- Retaining the approach to the village along Long Road through the provision of appropriate planting.
- Providing a new green within the development, adjacent to the existing recreation ground, enhancing the community asset.

Development could thus meet the requirements of Proposed Policy GP/LC to:

- Respect, retain or enhance local landscape character
- Retain and enhance landscape features within new developments.
- Protect and enhance the setting of the villages in South Cambridgeshire and continue to protect identified Important Countryside Frontages.

Green Belt:

Proposed Policy GP/GB: Protection and enhancement of the Cambridge Green Belt will set the framework for consideration of development proposals in the Green Belt. It will state that new development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework.

The Greater Cambridge Local Plan will include the established local purposes of the Cambridge Green Belt, which are to:

- Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre
- Maintain and enhance the quality of its setting; and
- Prevent communities in the environs of Cambridge from merging into one another and with the city.

Greater Cambridge Green Belt Assessment (August 2021)

The Greater Cambridge Green Belt Assessment (GCGBA) is an assessment of the full extents of the Green Belt within South Cambridgeshire District and Cambridge City.

The methodology used in the GCGBA divides the Green Belt into parcels and assesses each parcel in terms of its contribution to each of the three Cambridge Green Belt purposes. It then assesses the harm that would arise from development within each parcel in terms of loss of contribution to Green Belt purposes and impact on adjacent Green Belt.

In considering Comberton, the GCGBA identifies 16 parcels of Green Belt land surrounding the village. The main part of the Site occupies the majority of parcel CO3, which is bounded to the east

and west by existing development; to the south by Comberton recreation ground; and to the north by the tree belt separating the Site's southern and northern parcels. Parcel CO3 also contains gardens and allotments to the north of houses off Fox's Way, defining the boundary between CO1 and CO3. The Site's northern parcel lies within CO1, which is bounded to the north by Branch Road and extends up to Long Road to the east and beyond Green End to the west.

Analysis of the Site in reference to Parcel C01

The GCCGBA describes parcel CO1 as having a strong distinction from the village due to the elevated landform, despite the relatively weak boundary features to the south. It is agreed that for the westernmost part of CO1 there is a strong distinction from the edge of Comberton, where the parcel extends beyond tree belts, woodland and Green End. However, the easternmost part of the parcel has a stronger relationship with the village, more overtly belonging to the developed valley side extending off Long Road. The Site's southern boundary within parcel CO1 abuts allotments and gardens of properties off Fox's way, and the break in the tree belt between parcel CO1 and CO3 allows views from the Site into the village. Furthermore, the Site is bounded by clear physical features that separate it from the wider countryside, namely the mature hedgerows with hedgerow trees to both sides of Branch Road, the mature hedgerow along Long Road and the roads themselves. The Site's western boundary within CO1 is also defined by a mature tree-lined hedgerow. In combination, the Site within parcel CO1 has a clearer relationship with the village than the parcel as a whole.

Green Belt purpose 1: Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre

The GCCGBA assesses parcel CO1 as making **no contribution** to this purpose as the land is not close enough to the main urban area of Cambridge to be associated with it.

Green Belt purpose 2: Maintain and enhance the quality of its setting

The GCCGBA assesses parcel CO1 as making a **Relatively Significant** contribution to this purpose, as it is open farmland and woodland that has a strong distinction from the edge of Comberton, and therefore its rural character contributes to the quality of Cambridge's setting. The assessment also notes that the elevated topography means there is "some visual inter-relationship with Cambridge, with land forming part of a rural backdrop in views out of the city to the west and in views across the city from the south-east". It is agreed that the rural character of the parcel contributes to Cambridge's wider setting, although visually there is little inter-relationship with Cambridge given the ridge to the north and east of the Site contains the village, and vegetation within the wider landscape between Cambridge and Comberton prevents longer distance views. In our opinion, given these factors and the fact that the Site has a stronger relationship with the village than the does the parcel as a whole, the Site should be regarded as making a **Moderate** contribution to this purpose

Green Belt purpose 3: Prevent communities in the environs of Cambridge from merging into one another and with the city

The GCCGBA assesses parcel CO1 as making a **Relatively Significant** contribution to this purpose, as it lies in a moderate gap between Comberton and Hardwick, and development would be perceived as narrowing the gap.

We agree that for the westernmost part of CO1 there is a strong distinction from the edge of Comberton, where the parcel extends beyond tree belts, woodland and Green End. However, the Site is bound by clear physical features that separate it from the wider countryside, namely the mature hedgerows with hedgerow trees to both sides of Branch Road, the mature hedgerow along

Long Road and the roads themselves. The Site's western boundary within CO1 is also defined by a mature tree-lined hedgerow. Part of the Site's southern boundary within parcel CO1 abuts allotments and gardens of properties off Fox's Way, and the break in the tree belt between parcel CO1 and CO3 allows views from the Site into the village. In combination, the Site has a clearer relationship with the village, resulting in a moderate distinction from the settlement edge.

In relation to the nature of the gap between Comberton and Hardwick, the GCGBA describes it as a moderate gap. There is no urbanising development within the gap, and the ridge lying between the two villages is a strong separating feature. Given this, and the Site's moderate distinction from the settlement edge, Table 3.4 in the GCGBA indicates that it should be assessed as making a **Relatively Limited** contribution to this purpose.

Impact on contribution of adjacent Green Belt

The GCGBA notes that the release of land as an expansion to Comberton would weaken the strong boundary distinction of land to the north and would remove some of the elevated land between Comberton and Hardwick, resulting in **minor** additional impact on the relevance of this land to Green Belt purposes. On all other adjacent Green Belt land the GCGBA states the release of the parcel would have no impact. We agree with this, although the proposals could strengthen the boundary between the Site and the wider Green Belt through the provision of a well-designed and definitive settlement edge. Overall the rating is stated as **Minor-Moderate**.

Overall Assessment of harm

In considering the harm that would result from a Green Belt release for development, the GCGBA assesses that the release of parcel CO1 from Green Belt would result in a **Very High** level of harm, the highest level. This appears to result from the GCGBA assessment of a relatively significant contribution to purposes 2 and 3, coupled with a minor-moderate impact on the contribution of adjacent land. Given our assessment of a moderate contribution to purpose 2 and a relatively limited contribution to purpose 3, the assessment of harm based on Table 3.6 should be **Moderate-High**, although the criteria set out in the table are not entirely clear.

Analysis of the Site in reference to Parcel C03

The GCGBA describes parcel CO3 as having a moderate distinction from the village due to a degree of containment by existing development and little separation from Comberton provided by hedgerows to the east and south-east.

Green Belt purpose 1: Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre

The GCGBA assesses parcel CO3 as making **no contribution** to this purpose as the land is not close enough to the main urban area of Cambridge to be associated with it.

Green Belt purpose 2: Maintain and enhance the quality of its setting

The GCGBA assesses parcel CO3 as making a **Relatively Limited** contribution to this purpose, despite having some rural character, being open farmland and woodland. The assessment notes that the land does not form or contain any specific features/aspects that contribute to the quality of Cambridge's setting.

Green Belt purpose 3: Prevent communities in the environs of Cambridge from merging into one another and with the city

The GCGBA assesses parcel CO3 as making a **Relatively Limited** contribution to this purpose, describing it as peripheral to a moderate gap between Comberton and Hardwick.

Impact on contribution of adjacent Green Belt

The GCGBA notes that the release of land as an expansion to Comberton would weaken the boundary distinction and increase urbanising visual impact on land to the northeast. However, the additional impact is limited due to a small frontage. On all other adjacent Green Belt land the GCGBA would have no impact. Overall, the rating is stated as **Minor**.

Overall Assessment of harm

In considering the harm that would result from a Green Belt release for development, the GCGBA assesses that the release of parcel CO3 would result in a **Moderate** level of harm. However, where the highest contribution to a Green Belt purpose is Relatively Limited and the impact on adjacent land is Minor, the criteria in Table 3.6 of the GCGBA indicate that the harm should be rated as **Low**.

Green Belt Conclusions

We have identified a number of errors and anomalies in the GCGBA assessment of parcels CO1 and CO3, resulting in an exaggerated harm rating for both parcels. With the ratings corrected, the release of parcel CO3 from Green Belt would result in **Low** harm. The harm arising from a release within parcel CO1 would be **Moderate-High**.



Appendix 3

Land South of Branch Road, Comberton - Vision Document

Land South of Branch Road

COMBERTON

Greater Cambridgeshire
Issues & Options Consultation

VISION DOCUMENT

December 2021





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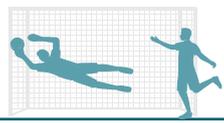
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EXECUTIVE SUMMARY

This document sets out Endurance Estates' vision for a new intergenerational, sustainable neighbourhood at Land South of Branch Road in Comberton, in response to the Greater Cambridge Local Plan Issues and Options Consultation.



 <p>150 to 200 home Retirement Village within a high quality landscape setting</p>	 <p>Local Benefits Potential for new development to promote enhancements to public transport and community facilities</p>	<p>Intergenerational Community</p>  <p>A masterplan designed for all generations to live together</p>	 <p>Community Integration</p> <p>Opportunities for new community spaces and amenities</p>
<p>Green Corridors</p>  <p>Enhancement of hedgerows and ditches. Creation of new habitats providing</p> <p>Biodiversity Net Gain</p>	 <p>Enhanced permeability</p> <p>Enhancing connectivity with existing homes and facilities</p>	<p>Connectivity to the Comberton Greenway</p>  <p>A sustainable location in proximity to Cambridge</p>	 <p>150 to 200 new homes including opportunities for</p> <p>Starter homes and Self-build</p>

A VISION FOR COMBERTON

Response to the Greater Cambridge Local Plan Issues and Options Key Themes.





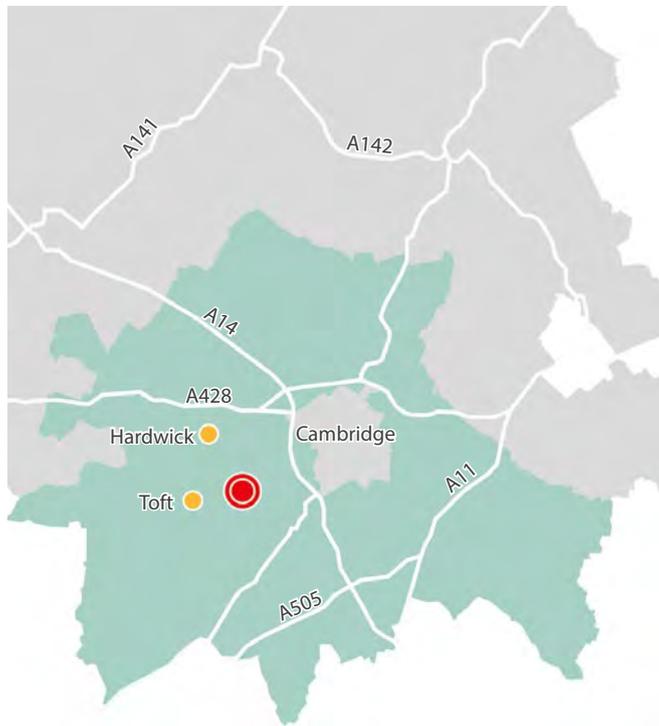


SECTION 01
SITE APPRAISAL

NATIONAL & REGIONAL CONTEXT

Greater Cambridge Location

Comberton is a village and civil parish in South Cambridgeshire England. It is situated 4.5 miles to the south west of Cambridge. Neighbouring villages east include Toft, Hardwick, Coton and Barton. The population of Comberton is 2,400 according to the 2011 Census.

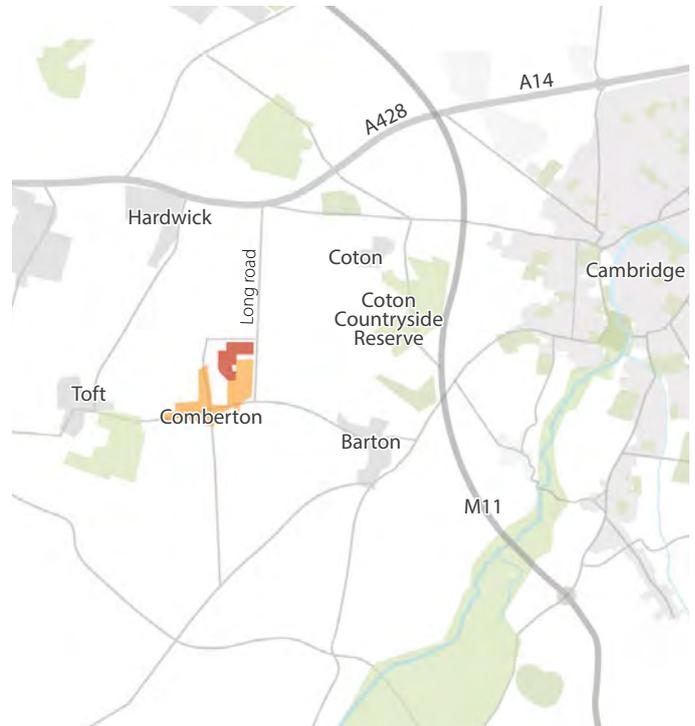


-  Comberton Village
-  Greater Cambridge
-  South Cambridgeshire



Comberton location

The primary road running east-west through the village is the B1046, providing links to Cambridge. Long Road runs north south and connects to the A428 and A1303 in turn linking through to the M11 and A14 and the wider transport network.



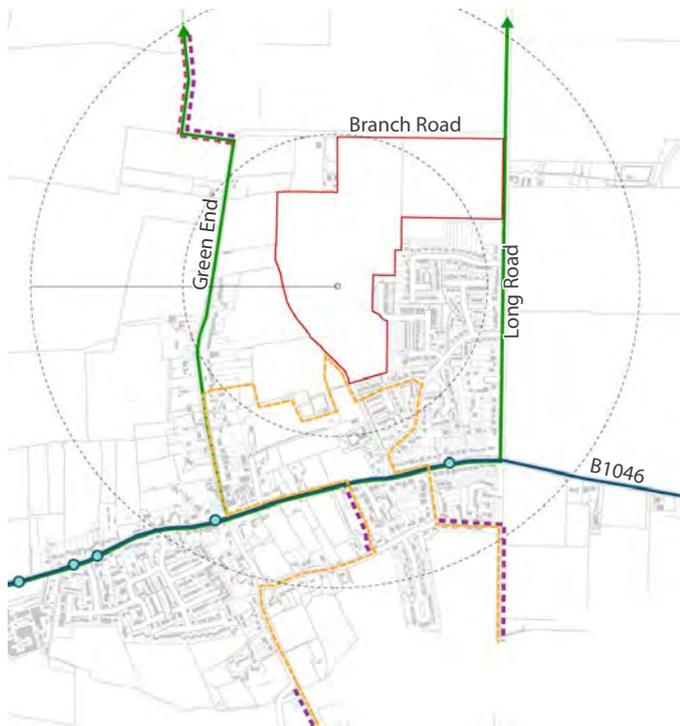
-  Site Location
-  Comberton village
-  Development
-  Woodland
-  Road network



CONTEXT ANALYSIS

Local Transport Analysis

The number 18 bus runs between Comberton and Cambridge City Centre providing an hourly service but is more frequent in the peak hours. A real time electronic timetable is shown at each bus stop. There are a number of Public Rights of Way around the village including the Circular Diamond Jubilee walk linking key features of the village.

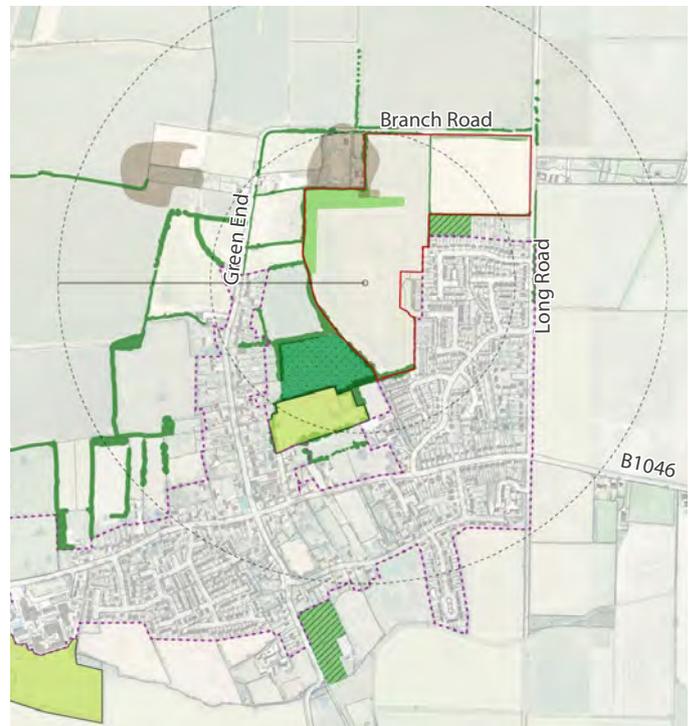


- Site Location
- Bus route (number 18)
- Bus stop
- Proposed Comberton Greenway
- Diamond Jubilee walk
- Public Right of Way (PROW)



Open space, Landscape and Ecological designations

The site is well located next to high quality public open space. To the south there are playing fields, an outdoor gym, tennis courts, skateboard ramp and a large play space. Two allotment sites are located in the village, one just off South Street and the second is located immediately south east of the site.



- Site Location
- Playing fields
- Existing tree planting
- Woodland Priority Habitat
- Allotments
- Lower quality playing fields
- Hedgerows
- Public Rights of Way (PROW)



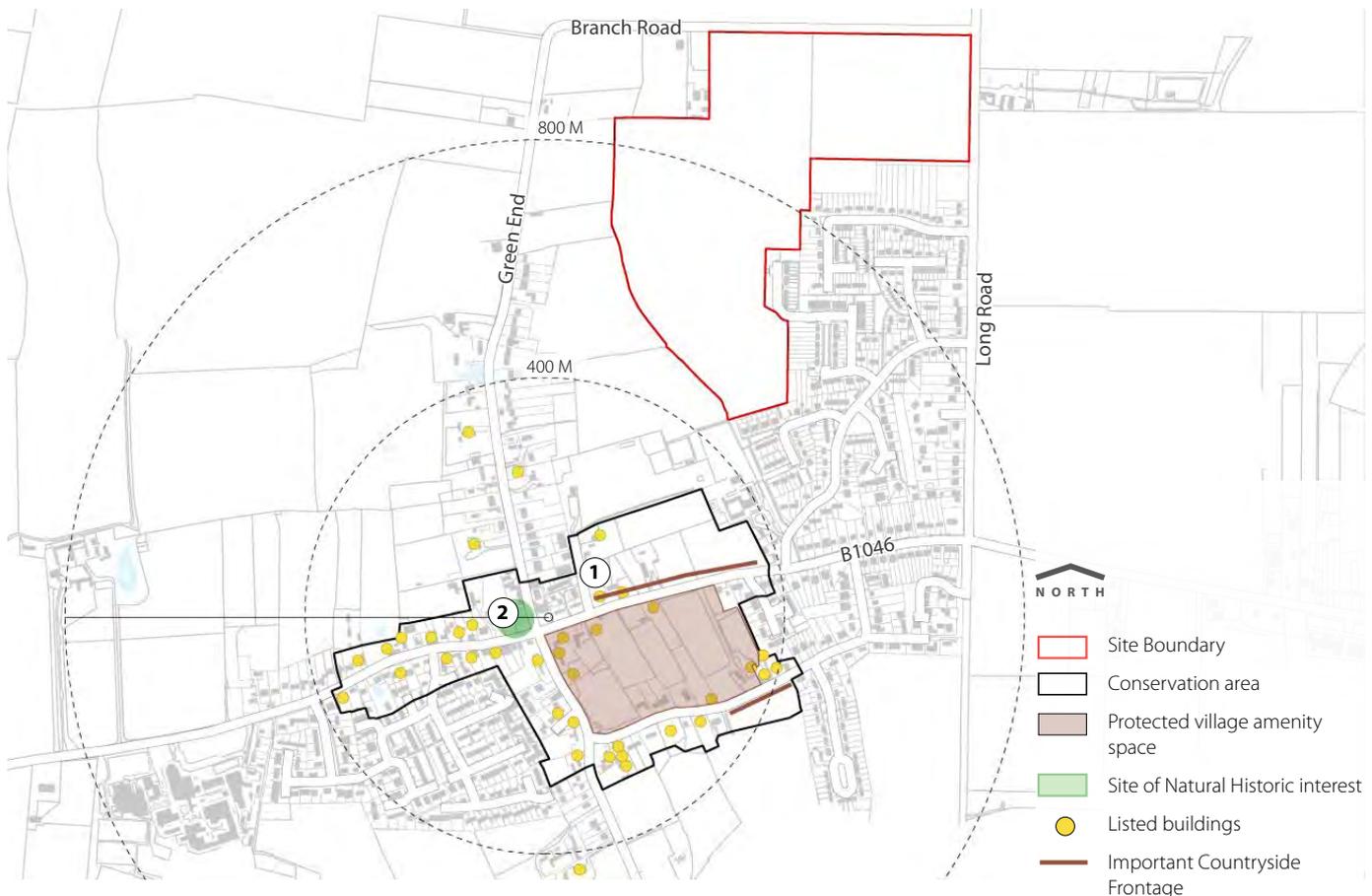
CONTEXT ANALYSIS

Heritage and local character

Comberton is an historic Roman settlement which is designated as a conservation area around the crossroads of the B1046 and Green End, as illustrated below. The conservation area includes an area to the south of the village, at the location of the Grade I listed Church, originally built in the 13th century. Buildings within the historic core use traditional building materials of timber, plaster, plain tile and thatched roofs.

Two Important Countryside frontages are defined for the village within the South Cambridgeshire District Council Local Plan. The policy stresses the importance to the village street scene of the open countryside that penetrates the settlement providing views towards the countryside. The proposed development will not adversely affect these.

Ponds and woodlands are common features of Cambridgeshire historic villages. The central pond within Comberton is a site of Natural Historic interest.



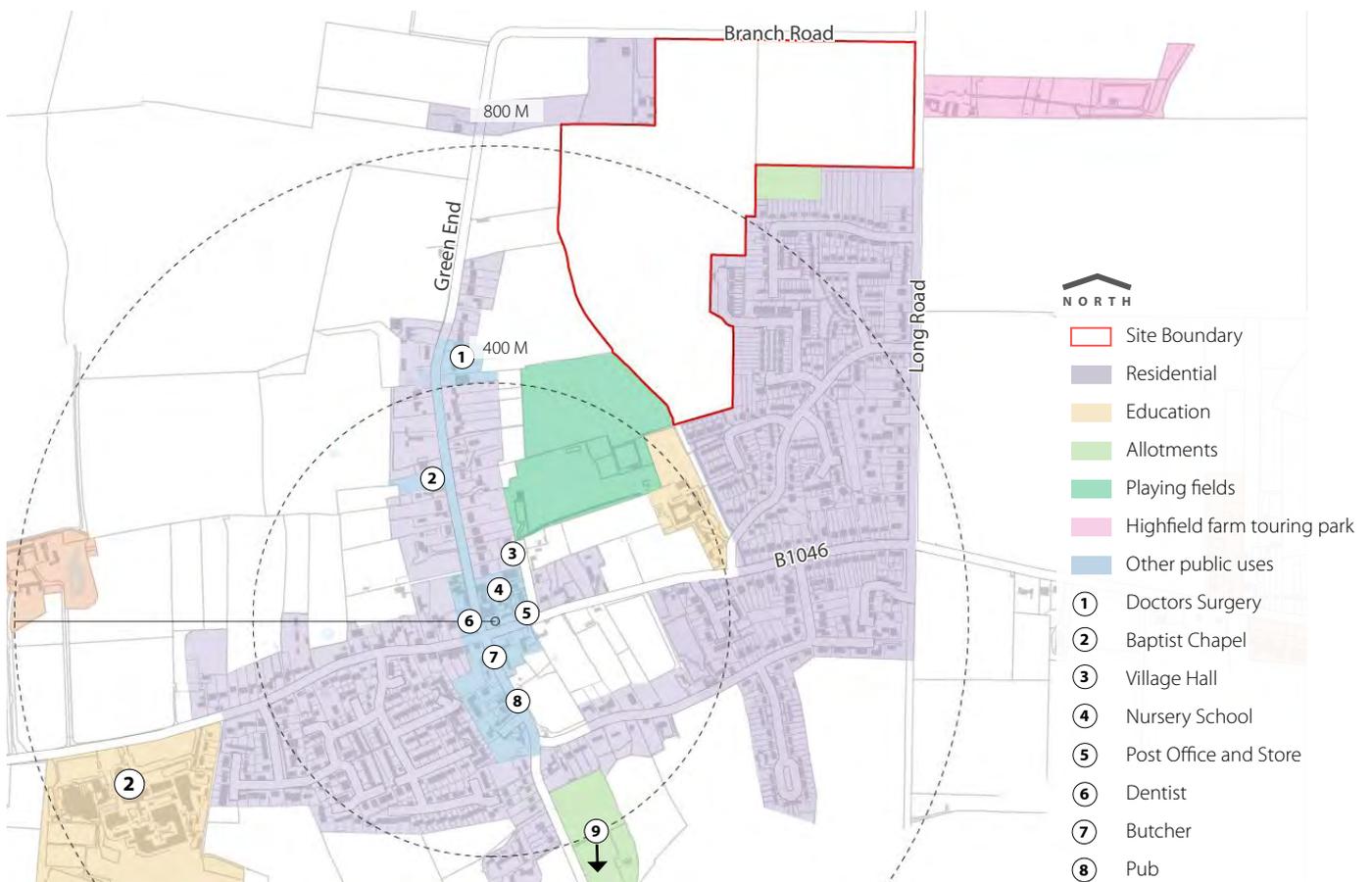
Traditional thatched cottage along Hines lane



Comberton village pond (Site of National historic interest.)

Land use and services

Comberton has a range of local facilities and services. This includes a village hall, post office, village shop, pub, primary school and doctors surgery. Comberton college sits on the west side of the village. Voted as outstanding by Ofsted this is a particular asset to the village and includes other sports facilities that are available for community use. Horizon business park is located roughly one km east of the village .



Comberton village hall located along Green End



Saint Mary the Parish Church of Comberton

SITE ANALYSIS

The majority of the site is characterised as being open farmland, which gently slopes from north to south. Field boundaries are defined by hedgerows. To the west of the site, newly planted woodland forms the boundary. A ditch runs along the south-western boundary.

To the north of the site lies open countryside. The site is bordered to the east by residential development. A short run of homes, recently constructed overlook the site. The south west boundary is utilised by community sports pitches and amenities.



Site Boundary



View looking South from Branch Road



View looking East from Branch Road



View looking South along the Watercourse



View looking North East across the Site



View looking South towards Meridian Primary School



View looking East along the footpath from Green End



View across Comberton village pond

CONSTRAINTS

Analysis of the site and surrounding area has enabled an understanding of the various constraints that will influence proposals for the site.

- 1 The hedgerows to the north of the site are broken in places enabling views into the site.
- 2 There is woodland to the west that comes into the site from the boundary.
- 3 There is a local overhead power cable running diagonally across the site

- 4 Topography falls from north to south.
- 5 There is a lack of positive frontages on the east boundary.
- 6 Important Countryside Frontage which stresses the importance of retaining views towards open countryside



OPPORTUNITIES

There is an opportunity to provide a sustainable intergenerational community in Comberton south of Branch Road.

- 1 There are existing informal footpaths running through the site from east to west. These can be enhanced and formalised to create safe and legible pedestrian and cycle connectivity between the site and Green End to the west, Valley Road in the east and Barton Road to the south, utilising an existing path that runs adjacent to Meridian Primary School.
- 2 There is an opportunity to improve the hedgerows to the north of the site alongside Branch Road strengthening the green edges to the site, enhancing the ecological corridor and providing a new landscape transition to the countryside.

- 3 There is significant woodland to the west, providing a strong landscaped edge and structure that can be enhanced and incorporated into the footpath network. Utilising existing assets such as these provides the opportunity to better integrate opportunities for exercise and improve the health and well-being of residents.
- 4 There is an opportunity to widen Branch Road and provide a segregated cycle and footpath that links into the Comberton Greenway.
- 5 There is an opportunity to create a central open space as a focal point of the new community, which is accessible by the existing community.







SECTION 02
THE VISION

DESIGN CONCEPT AND PRINCIPLES

Existing landscape

Existing hedgerows and tree belts will be retained throughout the site, providing a landscape framework from which to build on.

Enhancing the landscape

The existing hedgerows and woodland will be enhanced to form green corridors providing important habitats for wildlife. Green links will connect from these green corridors extending through the site. The existing ditch will be enhanced providing important wildlife habitats. Focal green open spaces will provide areas for leisure and play creating a vibrant community.



-  Site Boundary
-  Existing vegetation
-  Surrounding landscape
-  Existing ditch



-  Site Boundary
-  Existing vegetation
-  Surrounding landscape
-  Enhanced water course
-  Enhanced green corridors
-  Proposed green links
-  Proposed green spaces
-  Central community green
-  Existing recreation ground

Development parcels and Community uses

The new community will consist of a series of development parcels, which will respond to the existing context and surrounding landscape character. Central to the proposal is the retirement village located in the south of the site. The retirement village hub will provide shared use community amenity space, creating a vibrant and inclusive space for all Comberton Residents, instilling a greater sense of place and community.



Permeable streets

Primary vehicular access through the site will be provided off Branch road. This central road will become the main spine for the site connecting to further secondary and tertiary streets. Pedestrian and cycle routes will follow along the proposed green links and green corridors, connecting the site to the villages surrounding amenities.



- Site Boundary
- Existing vegetation
- Surrounding landscape
- Enhanced water course
- Enhanced green corridors
- Proposed green links
- Proposed green spaces
- Central community green
- Existing recreation ground
- Residential development parcels
- Later Living development parcels
- Retirement village Hub and amenities

- Site Boundary
- Existing vegetation
- Surrounding landscape
- Enhanced water course
- Enhanced green corridors
- Proposed green links
- Proposed green spaces
- Central community green
- Existing recreation ground
- Residential development parcels
- Later Living development parcels
- Retirement village Hub and amenities
- Key vehicular routes
- Vehicular Access point
- Pedestrian/Cycle route
- Proposed option for Comberton Greenway
- Potential connectivity to Comberton Greenway
- Surrounding amenities

LANDSCAPE STRATEGY

Land South of Branch road will offer a green, attractive, tranquil development, rich in biodiversity and wildlife. The landscape will create an inclusive and immersive environment, supporting the health and wellbeing of all residents in Comberton.



- 1 The hedgerow on the northern boundary will be retained, and the proposed homes set back from it behind a green corridor. New tree planting will be incorporated within the green corridor, to reinforce the existing vegetated edge, and to filter the views of the new homes from the north. This vegetated boundary will form an appropriate edge to the settlement, and mark the boundary between the settlement and the countryside beyond.
- 2 The access can be designed to minimise any hedgerow loss, by positioning the access where there is already a gap in the vegetated boundary.
- 3 The existing hedgerow along the boundary with Long Road will be retained. New tree planting will be incorporated along this boundary to continue the existing informal avenue character which occurs along this road and to filter views of the new homes.
- 4 The proposed residential areas will include incidental green open spaces which will break up the built form and create an attractive streetscape. These green spaces can include benches, wildflower planting, ornamental shrub planting and new trees, as well as play equipment for children. These incidental green spaces also aid in creating a legible development with identifiable spaces making it easier to navigate.
- 5 The primary movement routes will be tree-lined to create an attractive environment, while also increasing the habitat value of the Site.
- 6 The proposal includes new swales and a drainage basin as part of the Sustainable Drainage System (SuDS). These features will condition and control the flow of surface water while improving the water quality by filtering out particles. The swales will be planted with wildflowers which are capable of tolerating periodically wet conditions, while the drainage basin will include marginal plants and shrubs which thrive in wetter soil conditions. The landscaping of these features will ensure that they are not only attractive additions to the landscape but also provide ecological and environmental benefits.
- 7 The existing woodland belt and Branch Road will form permanent and identifiable Green Belt boundaries.
- 8 The existing woodland belt within the Site will be retained and enhanced with further planting to increase the habitat and ecological value of the Site.



CONCEPT MASTERPLAN

Land South of Branch Road Comberton offers an opportunity to deliver a new vibrant, characterful and intergenerational community that will deliver new homes and facilities that can cater for the local needs.



The development of the masterplan has been designed to respond to the existing connections surrounding the site in order to increase permeability. Proposed connections will be designed to prioritise pedestrians and provide for on-street cycling and cycle parking to promote sustainable transport modes.

Key to the vision for the new neighbourhood is the creation of an intergenerational place. The entrance to the retirement living will create a natural “heart” of the site, located within a short walking distance of the new and existing homes. A central green space will be created as part of this heart, in order to create a meeting space, play space and opportunities to maximise community interaction.

- 1 **Activate open spaces and footpaths.** Integrate existing informal walking routes and footpaths, currently along rear boundaries of properties into the masterplan, overlooked by new homes, providing surveillance to create a safe and legible neighbourhood with **increased permeability**.
- 2 **Promote a healthy walkable neighbourhood through well-defined streets.** The development will have a hierarchy of streets with a provision of clearly distinct public and private spaces.
- 3 **A variety of street types** will be incorporated across the masterplan with a hierarchy of routes clearly expressed through street design, materials and landscaping.
- 4 **Intergenerational living.** To propose a variety of housing types to suit a variety of needs. This includes a retirement village in the south which will include some community uses overlooking the central green and existing sports pitches.
- 5 Homes will be predominantly 2 and 2.5 storeys, with key corners and frontages featuring 3 storeys in order to create a varied **roofline and provide visual interest**.
- 6 Provide appropriate densities in the right locations, creating a **clear sense of place**, and identity whilst retaining connectivity with the landscape.
- 7 Incorporate existing green and blue features to bring the wider landscape into and through the site.
- 8 Create a gateway space in the north of the site with feature buildings to create a **welcoming entrance and clear sense of arrival**.



CHARACTER

The focus will be on the highest quality placemaking and sustainable living within a responsive approach to the local character.

Creating a complementary character and context is at the forefront of the vision for Land South of Branch Road. Consideration of the local context from the outset ensure proposals which will be rooted within rationale and relatable grain, character and form.

Ponds and woodlands are common features of Cambridgeshire historic villages. Creation of focal pond attenuation features, responsive approach to existing woodland features, and consideration of local building materials and tones will enable a characterful new neighbourhood to form.



Materiality: Buildings within the historic core use traditional building materials of timber, plaster, plain tile and thatched roofs.



Within the heritage core of the village there is variation in roof forms and pitches. Dormers and chimneys are a projecting element seen throughout the village skyline, helping to provide an appropriate scale and articulation of buildings.

The character can also draw on the agricultural and farmstead style agricultural buildings which are common around Cambridgeshire villages. This includes the informal and organic nature of the landscape and the simple built forms and colour palettes.



Green corridors and footpaths overlooked by active elevations, featuring Cambridgeshire buff brick and black timber



Varied roof forms and materials



Introduction of dormer features create recognisable roof forms



Homes forming a farmstead cluster including barn inspired materiality



Homes overlooking a focal pond attenuation feature

NB: The above sketches are illustrative, from other PRP schemes, to provide an indication of potential character of the new neighbourhood

LATER LIVING

The main element of the proposed development will be a retirement village (land use C2). The retirement village will have of the order of 200 units and with some close care units for those with more severe care requirements. The retirement complex has a range of facilities including a lounge, shop, restaurant, bar, library and medical centre. Integral to the retirement village is a Wellness Spa with treatment and consultation rooms, swimming pool, sauna, gym studio etc.

The elderly UK population is set to grow dramatically over the coming years and the increasing divide between demand and supply is likely to result in the next housing crisis. This need is also projected at the local level and the village provider's assessment of demand and supply analysis points to an acute shortage of the kind of provision required by many local residents including both traditional retirement-living accommodation and extra care/assisted living provision.

The proposal for the site will be the first of its kind in Comberton. The site is in a sustainable location for the proposed use and satisfies the locational and design objectives set out in both adopted and emerging Greater Cambridge Local Plan. A Later Living scheme provides the following benefits:

- Much of the existing retirement living stock in the village takes the form of smaller converted accommodation which does not meet current user or operator expectations and standards.

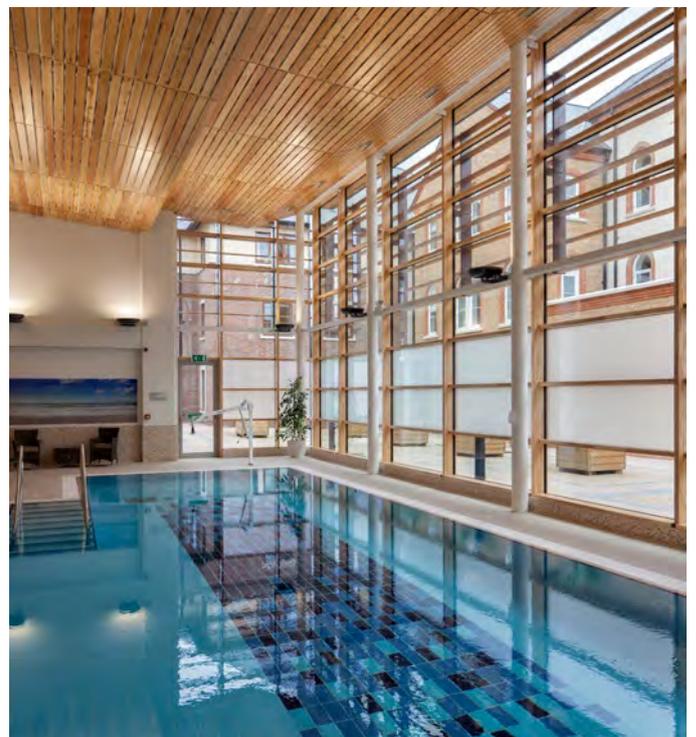
- The scheme will be an exemplar in terms of the standard of facilities and the provision of support and on-site facilities.
- The subject site is in a sustainable location for the proposed use and satisfies the locational and design objectives set out in the local plan.
- The proposal is compatible with existing uses, and there is no existing concentration of provision, thereby ensuring that the scheme will support the creation of a mixed, inclusive and sustainable community.
- The proposed accommodation will be designed with the needs of frailer older people in mind, and will offer varying levels of care and support that will be provided to meet individual requirements.
- The proposal will include an extensive range of communal facilities which are to be managed and operated as an integral part of the care concept to encourage social interaction and will be available to the wider community.
- The accommodation will be designed to provide a safe and enabling environment for future residents. In particular dwellings will be designed for the individual's changing care requirements allowing residents to age in place.
- The scheme will also introduce new landscaping and create good-sized and usable amenity spaces for prospective residents.



THE RETIREMENT VILLAGE HUB

<ul style="list-style-type: none"> • Studio • Lounge • Library • Garden Room • Private Dining • Artisan Bakery 	<ul style="list-style-type: none"> • Pool • Steam Room • Hair and Beauty • Gym Studio • Treatment
--	--

As set out in “Future of an Ageing Population’ prepared by the Government Office for Science (2016) ‘...residents of specialised housing generally show high levels of satisfaction, improved wellbeing, better health outcomes and reduced healthcare costs.”



LATER LIVING

Social Benefits and Community Cohesion

The proposed scheme can help to reduce the costs to health and social services. The proposal will reduce the burden on local GP practices by offering specialist care and support on site, reducing the need for residents (who might have previously lived alone) to call on local GP services. It is estimated that there is a reduction of 30% on the demands placed on the local NHS, from the residents living in such a community.

The village provider will commit to integrating their care facilities into the local community. The extensive communal and support facilities will therefore be opened to the local public. Collectively, these shared uses and shared spaces can help to foster social cohesion and inter-generational living, with interaction being at the heart of the proposed later living concept. The uses will promote activity within the site throughout the day and evening and will allow different members of the community to positively interact.

It is anticipated that the majority of residents to the new scheme will already be local to the site and that they will typically be moving out of larger, family homes. The proposal therefore has the potential to free up other sectors of the housing market by releasing much-needed family housing accommodation and freeing up further activity further along the housing chain. This in turn will help to reduce pressure on other sites in the area.



Employment Opportunities

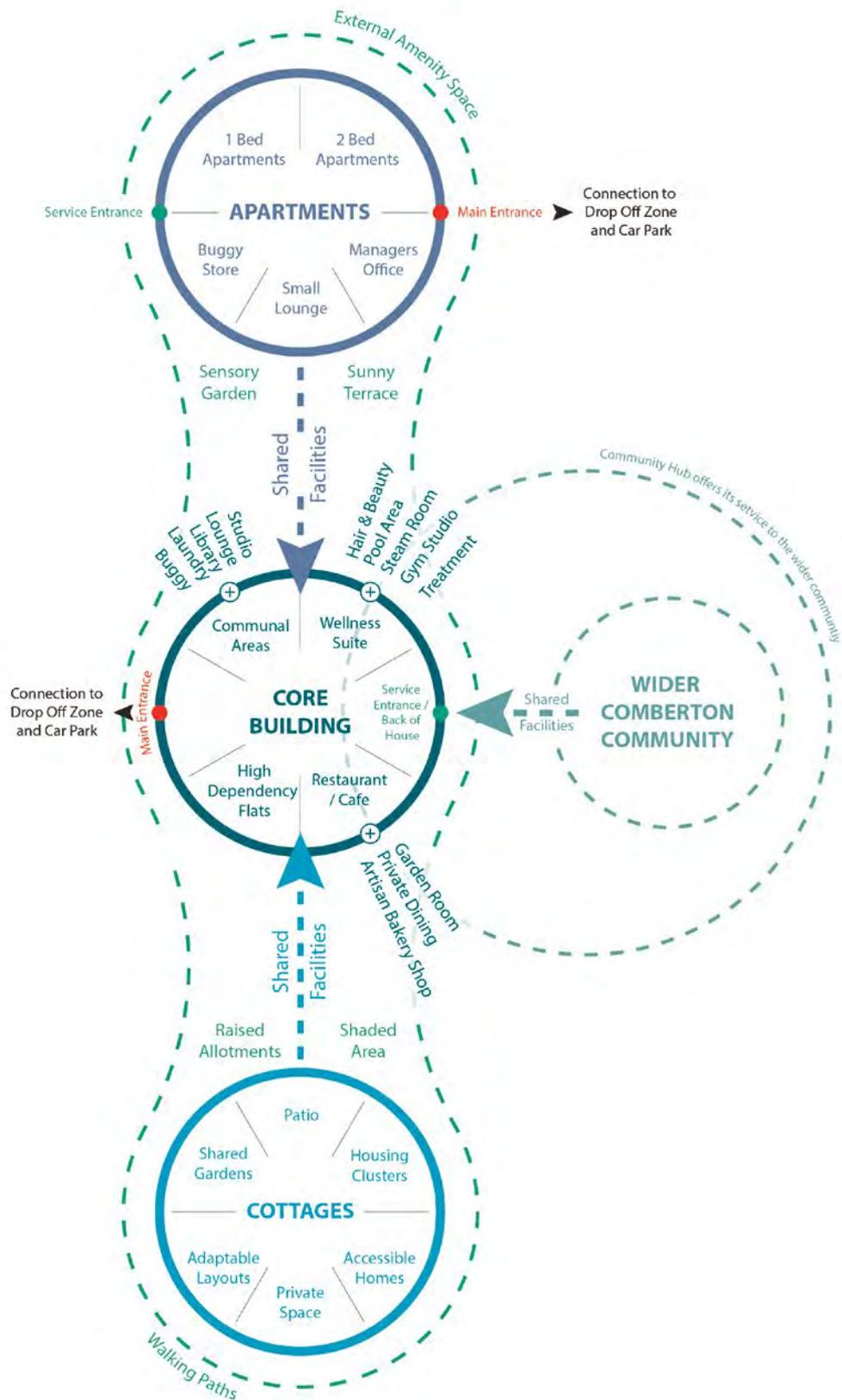
The scheme will generate a number of full and part jobs. The range of potential jobs includes on-site and off-site management, on-site administrator, support/domestic staff, housekeeping, commercial laundry, maintenance, security and gardener. In addition, the scheme will generate opportunities for continued employment through the proposed village provider's subsidiaries as well as further jobs in respect of the wellness facilities provided on site (hairdressing, physiotherapy, etc).

It is expected that most staff would be recruited locally and a site-specific recruitment strategy will be prepared to support this aspiration. The proposal will create further in-direct employment opportunities, for example, during construction and through associated facilities and services to support the on-going operation of the village.

These economic benefits may be seen as a significant planning gain, and will introduce an employment-type that is in keeping with the Comberton site.



Later Living Facilities and Adjacencies



TRANSPORT AND ACCESS STRATEGY

Promoting Walking and Cycling

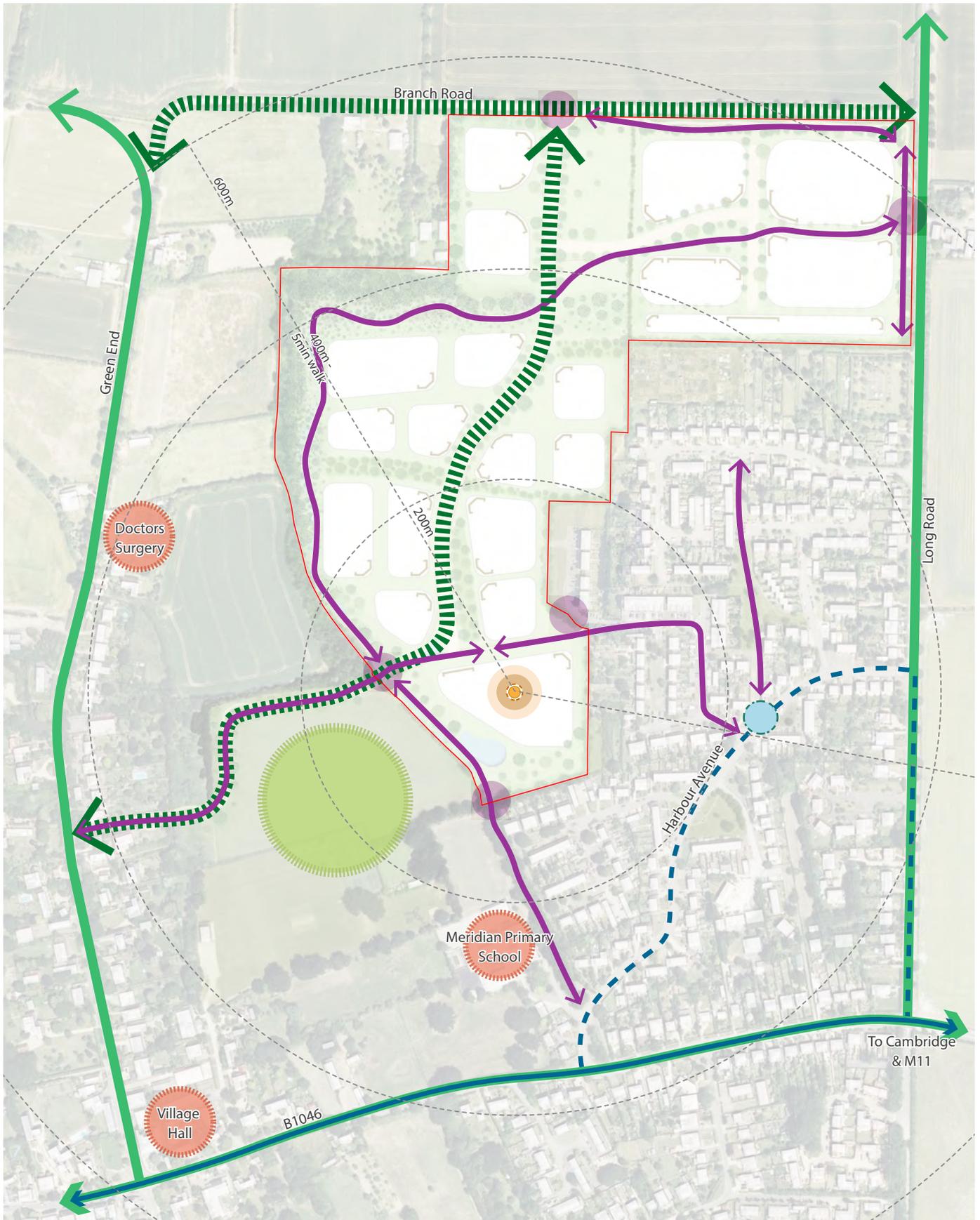
In order to maximise sustainable transport opportunities for this proposal it is essential that pedestrian and cycle porosity is created. A walk time of 10 minutes is generally considered the maximum acceptable to directly access any local facility or amenity and equates to a distance of approximately 800m. All local facilities, with the exception of the village college, are within this threshold, although it is generally accepted that a walk to a college or secondary school can be up to 2km. The village college is 1.4km from the site.

It is proposed that the development will connect to existing pedestrian routes to the west onto Green End, Barton Road to the south, utilising a footpath adjacent to the primary school, and to the east, via Normandy Close and The Valley.

Comberton Greenway

The Cambridge Greenways plan was developed in 2016 to achieve sustainable cycle routes into central Cambridgeshire from the surrounding villages and hinterland. Currently, there are a number of potential Greenway routes, which will only be made possible with the aid of landowners. As a result, there are gaps in the Greenway network. The development proposal will support the Comberton Greenway route options by a route passing through the site and aiding greater permeability across the village.





- | | | |
|--------------------------------|--|----------------------------|
| Site Boundary | Proposed option for Comberton Greenway | Proposed bus route |
| Pedestrian/cycle routes | Potential connectivity to Comberton Greenway | Proposed bus stop |
| Pedestrian/cycle access points | Existing bus route | Surrounding amenities |
| | | Existing recreation ground |

TRANSPORT AND ACCESS STRATEGY

Vehicular and Public Transport

The site is bordered to the north by Branch road where vehicular access will be made (without cause to enter agreement with a third party). Branch road currently has a 4.5m carriageway with a verge on both sides bound by a ditch. To the east, Branch Road meets Long Road at a priority-controlled junction.

The proposed amendment to Branch Road follows the Cambridgeshire Highways Design Guide, which suggests that a carriageway width of 5m and a 2m footway is suitable as an access road in a rural location. It is anticipated that the old route of Branch Road would 'give way', thus minimising any hedgerow removal.

It is proposed that an emergency access will connect to Branch Road towards the north west corner of the site. This would also form a pedestrian and cycle route access.

There is a potential opportunity for a bus route along Harbour Avenue, which serves as the spine route through the existing estate. This route has a suitable carriageway width of over 6m and two footways of 1.8m width, with occasional wide verges in the public domain. The proposal for a retirement development would have a considerable population who would have dependence on public transport. The diversion of the bus route into Harbour Avenue would add circa 2 minutes to the route, however it is anticipated the commercial gain would far outweigh the minor journey time extension.

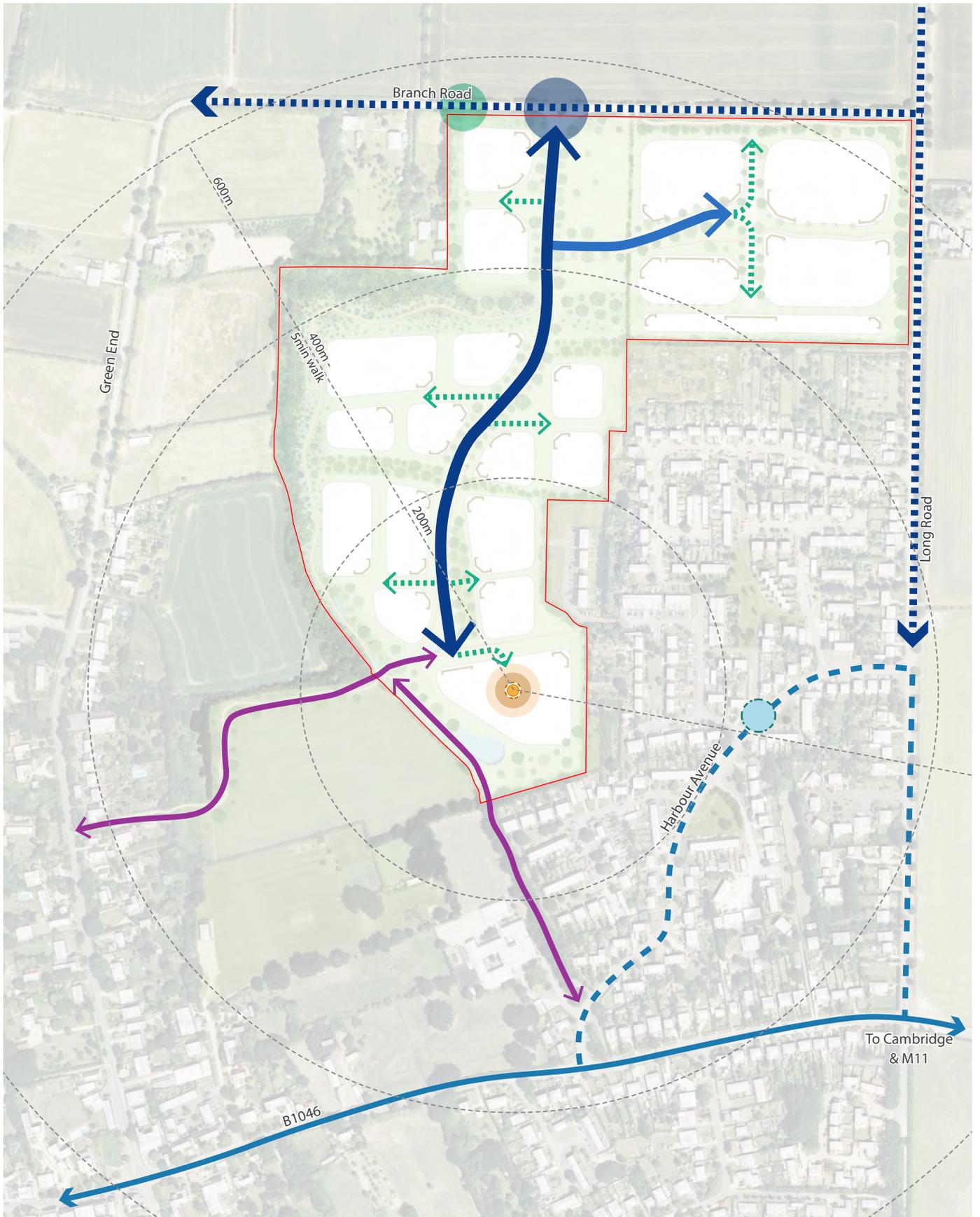


Vehicle Trip Generation

The Trip Rate database has been reviewed to determine an appropriate vehicle trip rate for the C3 element of the site. The TRICS data output is displayed in the adjacent table, and gives the following AM and PM trip rate and subsequent vehicle trips based on 200 C3 dwellings. The table shows the peak hourly flow from the site is around 98 to 120 peak hour vehicle movements. At this stage, we do not have the benefit of traffic flows to understand the distribution of existing traffic. However, we are aware traffic would generally all travel via Branch Road to its junction with Long Road; a relatively light trafficked road where an improved junction with Branch Road would accommodate this traffic increase.

	Trip Rate (Per Dwelling)		Vehicle Trips (200 Dwellings)		
	In	Out	In	Out	Total
AM Peak Hour	0.177	0.423	35	85	120
PM Peak Hour	0.294	0.197	59	39	98

Residential Vehicle TRICS Trip Rates and Trip Numbers (allow for rounding)



- | | | |
|---|---|--|
| Site Boundary | Proposed Bus stop | - - - - - Proposed tertiary routes |
| Existing vehicle route | ➔ Proposed main vehicular route | ● Proposed emergency access point |
| ➔ Existing bus route | ● Proposed vehicle access point | ➔ Pedestrian/cycle routes |
| Proposed bus route | ➔ Proposed Secondary route | |

CONCLUSION

Land South of Branch Road provides an opportunity to create a new intergenerational neighbourhood within Comberton, which benefits from a sustainable location and proximity to existing facilities. A new retirement village with facilities available to the wider community will be provided, whilst offering additional enhancements for the existing village. The proposals respond to the Big Themes set out in the Issues and Options Consultation and will ensure the highest quality of place-making to meet contemporary, sustainable living requirements and enable resilience for the future.



GREAT PLACES

- Provide a high quality development that with the inclusion of later living provision, will meet demand across generations, contributing to wellbeing and social inclusion
- Imaginatively design homes that will respond to Comberton's local historic context with ample public and private amenity to create a healthy community
- Permeability of the site and ability for existing residents to access facilities within the retirement village will assimilate the proposals into Comberton
- It is anticipated that both the later living and residential development will be constructed in a high energy performing manner



CLIMATE CHANGE

- Enhancements to Branch Road and Long Road to encourage pedestrian and cycle movements
- Improved permeability to the site, including access to the Comberton-Cambridge Greenway
- Proposed Retirement Village to include a centralised district heating system and be high-energy performing
- Sustainable location in close proximity to Cambridge and with good level of local services and facilities, including a primary school and college, reducing the need to travel
- The proposed retirement village will also bring its own facilities which will be made available to local residents who will be able to walk and cycle to these facilities given the site's high permeability without the need to travel longer distances to such facilities by private car







SECTION 03
APPENDIX





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