

**Planning Appeal Ref: APP/W0530/W/21/3280395**

**November 2021**

**Land Between Haverhill Road and Hinton Way,  
Stapleford,  
Cambridge**

**Alternative Site Assessment Proof of Evidence**

**SUMMARY**

**Robert J Belcher**

## **1. Introduction**

1.1. My name is Robert Belcher. I am a consultant at Carterwood, specialist advisers dedicated to the care home, older people's housing and care village sectors.

## **2. Scope of Evidence**

2.1. My evidence relates to alternative sites and my proof relates to the Alternative Site Assessment April 2020 (ASA).

2.2. I consider the:

- site size;
- identified alternative sites and their current status, relating to their suitability, availability and achievability;
- sites in the Green Belt;
- appeal decisions regarding to the methodology adopted in determining alternative sites for care provision and development in the Green Belt.

## **3. Site Size**

3.1. For a site to be suitable for the proposed scheme, care village operators typically require at least 3.5 ha up to 7.5 ha. The search criteria adopted utilises a range of 3.5 ha to 7.5 ha, therefore sites above and below the subject site area. The Council acknowledged the findings of the ASA in their Statement of Case.

3.2. An important part of the proposal is the countryside park.

## **4. Alternative Sites**

4.1. The 2020 ASA identified all suitable, available and achievable sites (the three main tests for the development of the elderly care facility) within the South Cambridgeshire District Council and Cambridge City Council; none met all three criteria.

4.2. The 2020 ASA was based on desktop research in publicly available policy documents (each council's Strategic Housing Land Availability Assessment - SHLAA), commercial and residential agent research, national healthcare property agent enquiries, the local authority estates department, and planning and property websites.

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- 4.3. It is my experience that in order for operators to provide a care development, such as that proposed which covers the needs of the residents, the development must be provided on a site within the search size range adopted, albeit the proposed care village development extends to approximately 4.85 hectares. The success of such developments depends upon the full range of facilities, as proposed, on one contiguous site and any disaggregation of the facilities across a number of sites would make the scheme unworkable and unsuccessful at a human and economic level. Smaller sites will not provide the range of facilities.
- 4.4. In appeal, APP/G2245/W/21/3271595 Kent and Surrey Golf and Country Club, Crouch House Road, Edenbridge TN8 5LQ the inspector accepted that there is a minimum number of units and site area that would be likely to be required to support the retirement village concept and “the viable provision of shared on-site facilities for residents”. Furthermore, the “availability” of sites was constrained by the Green Belt.
- 4.5. Factors regarding site suitability for an elderly care development include level topography, reasonable accessibility and complementary adjoining land uses.
- 4.6. There is a current unfulfilled need for the forms of care and accommodation proposed by the appeal scheme.
- 4.7. A site is considered achievable if it is capable of being developed and ready for occupation within a 3-year timescale.
- 4.8. The report assessed all 109 sites against elderly care facility operator requirements and excluded those sites that have not been previously developed that are within the Green Belt. This identified 3 potential sites that required further investigation.
- 4.9. These 3 sites were not suitable for the proposed elderly care scheme.
- 4.10. In appeal decision APP/H2265/W/18/3202040, Land to the rear of 237-259 London Road, West Malling, Kent ME19 5AD, the inspector accepted that extra care developments need to be of a sufficient size to support the shared facilities. The Inspector accepted that the retirement village concept requires a minimum number of units and minimum site area in order to support the viable provision of shared on-site facilities for residents, adding that this development aspect, of itself, would limit the choice of suitable sites, including where there were extensive areas of Green Belt, as is the case with the subject appeal site.
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- 4.11. No sites identified in the planning system met all criteria for suitability, availability and achievability.
- 4.12. The ASA concluded that the subject site, was the only site that was suitable, available and achievable in the South Cambridgeshire and Cambridge City local authority areas for the subject proposed scheme.
- 4.13. The Council have not disagreed with my methodology.
- 4.14. Following site visits there were no sites that met both the criteria of being suitable and achievable, so no approaches to land owners have been made.
- 4.15. The appeal decision APP/B1930/W/19/3235642, Land to the rear of Burston Garden Centre, North Orbital Road, Chiswell Green, St Albans, AL2 2DS the Inspector only raised comment over the availability test regarding the three sites that I identified as being suitable and achievable, in so far as no direct approaches to the land owners of those three sites were made. This is not the position at this appeal as no sites meet both the criteria of suitability and achievability.
- 4.16. As part of the update to the ASA, further research was undertaken on potential sources of sites (Appendices A and B).
- 4.17. Appendix A is a schedule of further research since the ASA, and contains 166 sites. The annotation adopted follows the same methodology used in the ASA, namely:
- Red Site area outside required size; sites must be between 3.5 and 7.5 ha.
  - Pink Green Belt and Not Previously Developed (but within size range).
  - Black Outside required timescale - development process cannot be achieved in a 3-year timescale (but within size range).
  - Orange Already under development or developed (but within size range).
  - Green Sites that require further investigation.
- 4.18. No sites identified at Appendix A were established as meeting all criteria. Of the 9 sites in Appendix A that required further investigation (green traffic light), two would not be suitable for a care village as they are close to railway lines. The other 7 sites are in remote, rural locations that would not be suitable for a care village due to the problem of accessibility for staff and visitors. Development of these rural sites is not achievable within a 3-year timescale due to the time needed to achieve planning
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permission to develop peripheral green field sites outside the development framework.

- 4.19. Appendix B is the updated planned provision as at 4 October 2021.
- 4.20. I inspected the three sites identified in the ASA, all 3 sites remain unsuitable alternatives for the appeal development.
- 4.21. I updated the online search of the commercial agents and healthcare agents buyacarehome.com, Rightmove and the major marketing agents. None of these enquires identified any alternative sites.
- 4.22. In appeal APP/B1930/W/20/3259161, Chelford House, Coldharbour Lane, Harpenden AL5 4UN the Inspector accepted my approach, around suitability, availability and achievability. In particular, the Inspector commented,
- 4.23. *“Under the ASA, a key availability criterion is that sites can be developed within 3 years which is based on the appellant’s experience and need to meet an acute need. For suitability, a fixed plot size has been used which excludes smaller and larger sites. Smaller sites would necessitate less bedrooms or an additional fourth floor resulting in considerably greater building costs. Once operational, greater staffing costs would also be incurred because of the need for proportionately more staff due to more floors. For larger sites, negotiations with other parties would also inevitably delay the timeframe for development. The ASA’s methodology does not follow the approach for assessing housing and economic land availability in Housing and Economic Land Availability section in the Planning Practice Guidance, but nor should it have to, as this relates to housing supply. Overall, the ASA is comprehensive, well-reached and demonstrates the difficulties of finding alternative sites which lends further weight in favour of the proposal”.*

## **5. Green Belt Sites**

- 5.1. Additional research in relation to the impact of development on openness of the Green Belt, indicates that only 7 of those sites would have a lesser effect on openness.
- 5.2. Five of those sites I have discounted, due to existing proposals or title restrictions.

- 5.3. On the two remaining sites whose development could have a lesser effect on openness, development could not be achieved within 3 years, due to the lengthy planning application process for a green field, Green Belt site outside the development framework in the countryside, given that the need is now.

## **6. Conclusion**

- 6.1. The ASA identified 3 potential sites that required further investigation but were dismissed as unsuitable together with the planned provision which did meet the criteria of suitable, available and achievable.
- 6.2. None of the further research and analysis to update the ASA identified any sites meeting the same criteria.
- 6.3. The two Green Belt sites that could have a lesser effect on openness than the appeal site, would not meet the achievability test of development within 3 years, given that the need is now.
- 6.4. It is my conclusion that the land between Haverhill Road and Hinton Way, Stapleford is the only site that is suitable, available and achievable in the South Cambridgeshire and Cambridge City local authority areas for the subject proposed development.