

PLANNING STATEMENT



Western Avenue

Emsworth

June 2017

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1. IPC REPORT "IDENTIFYING THE HEALTH GAIN BENEFITS FROM RETIREMENT HOUSING"
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INTRODUCTION

1. The proposal involves the demolition of the existing dwelling and outbuildings buildings and the erection of a total of 25 retirement apartments aimed at the over 60s who are seeking to downsize and who wish to benefit from a safe, secure environment with like-minded people. The proposal would provide a total of 28 car parking spaces for use by residents and their visitors. There would also be a store for mobility buggies.
2. The proposed building has been carefully designed to respect its setting as fully explained in the Design and Access Statement.
3. The development would provide the opportunity for a high quality residential development that would positively contribute to meeting a local housing need for older people. It represents a highly sustainable development, with wide ranging social and planning benefits, both for potential residents and the community as a whole.

NATURE AND CONCEPT OF RETIREMENT HOUSING

4. Retirement housing (Category II type sheltered housing) is a proven option for those older people who need to move into accommodation, which provides them with greater comfort, security and the ability to manage independently to a greater extent. It enables older people to remain living in the community and out of institutions while enjoying peace of mind and receiving the care and support, which they need.
5. The scheme provides a needs-based choice for residents to downsize and move to an age restricted form of accommodation of like-minded people. People seeking to downsize from larger houses can achieve comfort, care, security and the ability to manage independently in housing that is future proofed as they themselves age. It enables older people to remain living in the community and out of more institution type accommodation while enjoying peace of mind.
6. Moreover, retirement housing releases existing under-occupied housing (i.e. family houses that have become too large for small elderly households) and thereby helps make better use of the housing stock in general. The majority of residents of retirement schemes generally originate from the "local" area (45% of sheltered residents originate from within a 5 miles radius (approximately 72% within 20 miles) and thus the move to retirement accommodation aids in freeing up local under occupied housing stock. It is probable that the potential occupiers of this development will have a similar "origin" profile.
7. All McCarthy & Stone developments are specifically designed to provide specialised housing accommodation for the elderly, with communal facilities and specific features within the apartments designed to meet the particular needs of the elderly. While anyone may purchase

an apartment, the apartments are sold on the basis of a 125 year lease requiring the accommodation and subject to each apartment being occupied by persons over 60 years of age or in the case of a couple that one of the occupants is over the age of 60 years and the other is over the age of 55 years.

8. This is a reasonable and caring approach to the limitation on occupancy of retirement housing in that it recognises and allows for those exceptional cases where a spouse, who is in the need of special accommodation, may have a younger partner. Such occurrences are, in fact found to be extremely rare as between 60 and 70% of occupants are aged 78 years or more with about 30% aged 80 years or more. The vast majority of McCarthy & Stone residents (some 85-90%) are widowed or single, with 75% comprising single, female households.

THE SOCIAL AND ECONOMIC BENEFITS OF RETIREMENT ACCOMMODATION

9. The proposal provides a valuable form of specialised accommodation, which meets a specific housing need. In so doing, it gives rise to significant planning and social benefits accord with national planning objectives.
10. In terms of social benefits, the **Institute of Public Care (IPC)** produced a report entitled '**Identifying the Health Gain Benefits from Retirement Housing**', the executive summary of the report has been appended to this statement at **APPENDIX 1**. As the report states it considers the benefits in terms of health gain from specialised accommodation for older persons compared to the general market housing stock. The report identifies that retirement housing results in the following benefits (incrementally greater for extra care assisted living):
 - Specialist housing is associated with a reduced level of expected nights spent in hospital. This is estimated as producing an annual cost saving to the NHS of £2,598 per resident per annum.
 - On average residents of retirement living schemes experience a 35% improvement in mobility and 20% in functions of daily living. There is also a 25% reduction in the use of medication by residents.
 - Over 50% of residents believe that private sheltered housing helps to promote good health. More than half of all residents (55%) consider their health to be good or very good.
11. The above report supports earlier findings by ORB in its report entitled '**A Better Life: Private Sheltered Housing and Independent Living for Older People**', the Executive Summary is appended to this Statement at **APPENDIX 2**. In respect to health care benefits the report identified:

- The average number of visits per annum to a GP from current residents of retirement housing is 4.2 compared to 6 visits amongst the national population aged 75+.
 - 41% of residents of retirement housing felt that their health had improved from making the move into retirement housing.
12. With respect to the economic benefits of proposals, the Institute of **Public Care (IPC)** produced a report entitled ‘**Local Area Economic Impact Assessment**’ which economic considered the benefits of specialist accommodation for older people.
13. The report, attached at **APPENDIX 3**, identified that:
- £7.53 million of housing stock was released of which 66% was under occupied
 - A incase in local spending of £125,000 per annum compared to a general needs development
 - £1,419 directly attributable to savings on health and social care
 - £5,000 of social capital i.e. involvement in local community groups

SUPPORTING LOCAL HOUSING MARKETS AND FREEING UP UNDER- OCCUPIED HOMES

14. The UK is facing a crisis in housing provision. However, it is not just a question of supply; it is also about the way in which existing housing provision is made available to future generations. While millions of families and young people struggle to find and own property large enough for their needs, there are more than 25 million empty bedrooms in under-occupied homes in England. Very many of these are in the homes of the over 50s and retired; by 2026 empty bedrooms in the homes of older people will exceed 10 million.¹
15. The scheme provides a needs-based choice for residents to downsize and move to an age restricted form of accommodation of like-minded people. People seeking to downsize from larger houses can achieve comfort, care, security and the ability to manage independently in housing that is future proofed as they themselves age. It enables older people to remain living in the community and out of more institution type accommodation while enjoying peace of mind.
16. Moreover, retirement housing releases existing under-occupied housing (i.e. family houses that have become too large for small households) and thereby helps make better use of the housing stock in general. The majority of residents of the scheme are anticipated to originate from the area.

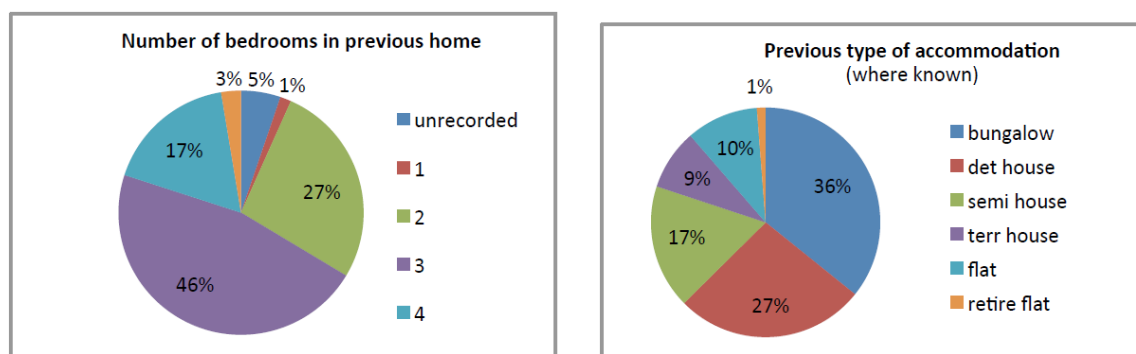
¹ Intergenerational Foundation, *Hoarding of Housing: Fairness for Future Generations*, October 2011

17. The solution to both better health and more downsizing relies on increased choice for older people. Specialist accommodation for older people such as this provides this choice. It is particularly important that any new provision focuses on accommodation built for owner-occupation. Nearly 80% of older people currently own their own, and few wish to move into social or rented accommodation at this time in their lives.
18. **Housing Markets and Independence in Old Age: Expanding the Opportunities by University of Reading (Professor Michael Ball May 2011)** concluded that policy makers must act now if they are to avoid a growing crisis in the provision of housing for older people. The Executive Summary is attached at **APPENDIX 4**.
19. The document highlights that there are only 100,000 specialist private retirement homes in the UK. Yet by 2033, there will be an extra 3.5 million households aged over 65 years, a 60% increase on today. Without suitable and affordable accommodation, these demographic changes could result in significant housing problems for the elderly.
20. The report comments that that private retirement accommodation, referred to in the report as owner occupied retirement housing (OORH), can address this problem. OORH is a form of retirement accommodation designed specifically with older people in mind and purchased on a leasehold basis, which has high levels of consumer satisfaction. OORH can also help reduce public expenditure, particularly health costs, and provide wider benefits to society.
21. However, the report notes that due to policy restrictions surrounding housing and planning, the supply of OORH does not meet present or growing demand. Build rates are low and need to grow four times from that achieved before the 2007/8 downturn to cope with just a moderate increase in demand.
22. The report states that the primary reason for the limited supply of OORH is 'strategic neglect' by policy makers, with public policy directly responsible. The report notes that a large number of planning applications by developers for OORH are refused by local authorities who fail to understand its benefits. This "strategic neglect" is referred within the NPPG which states that accommodation for older persons is "critical".
23. Lack of government guidance also means that often there is no stimulus for Councils to start thinking properly about this sector. There are also difficulties associated with the specialised nature of OORH, including land taxation in the form of affordable housing and increased building costs not incurred by more traditional house builders. These difficulties could be addressed with simple supply-side inducements

24. The report included an analysis of the sales records 5,000 older people who bought McCarthy & Stone properties between 2007 and 2010². They show how specialist housing frees up under-utilised family-sized housing in the local area.

- For every 5,000 owner-occupied retirement homes sold, family housing to the value of £1.1 billion is released back onto local housing markets.
- For an individual retirement housing scheme of 40 dwellings, this equates to the release of 40 family-sized homes – the majority of which are in the local area – worth nearly £9 million.
- The average value of the individual dwellings released is just under £220,000. Two thirds had three or more bedrooms.
- Property vacated is then usually bought by younger people and often used to raise families. In this way, local housing stock is recycled through the generations.
- Provision of specialist retirement housing has a multiplier effect through the housing chain. For each individual specialist dwelling built, housing for six people is provided; the classic' family of four in the vacated property, and the couple downsizing into specialist accommodation.
- A wider chain of moves is also triggered. As the initial property vacated is likely to be quite substantial, additional moves further down the chain occur. On many occasions, six or more moves can be stimulated.
- First time buyers also benefit. It is estimated that within six moves, a first time buyer is able to enter the housing market.

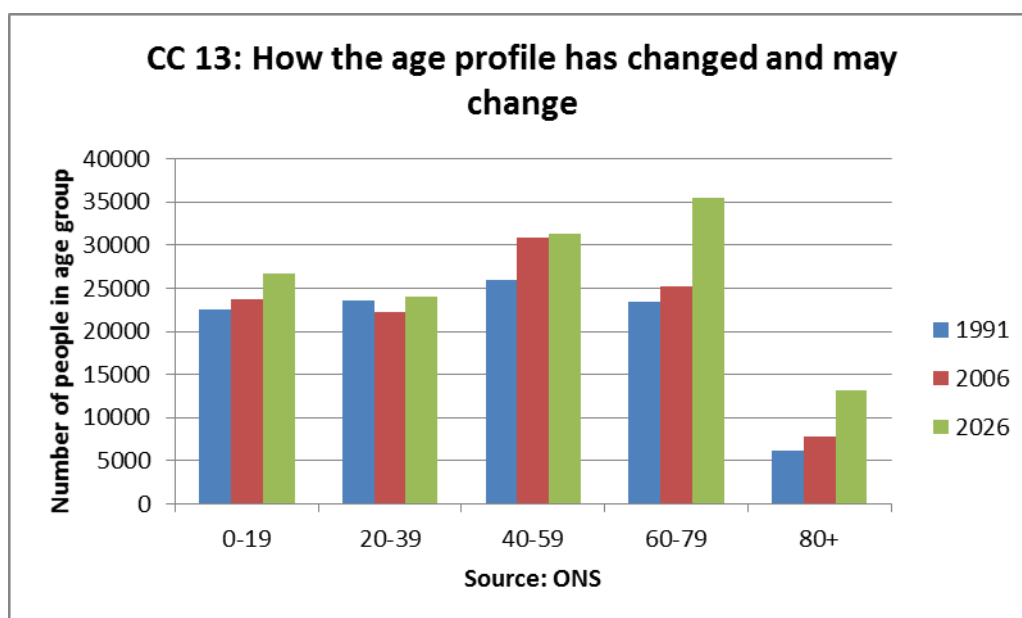
Figure 5.6: Characteristics of previous homes

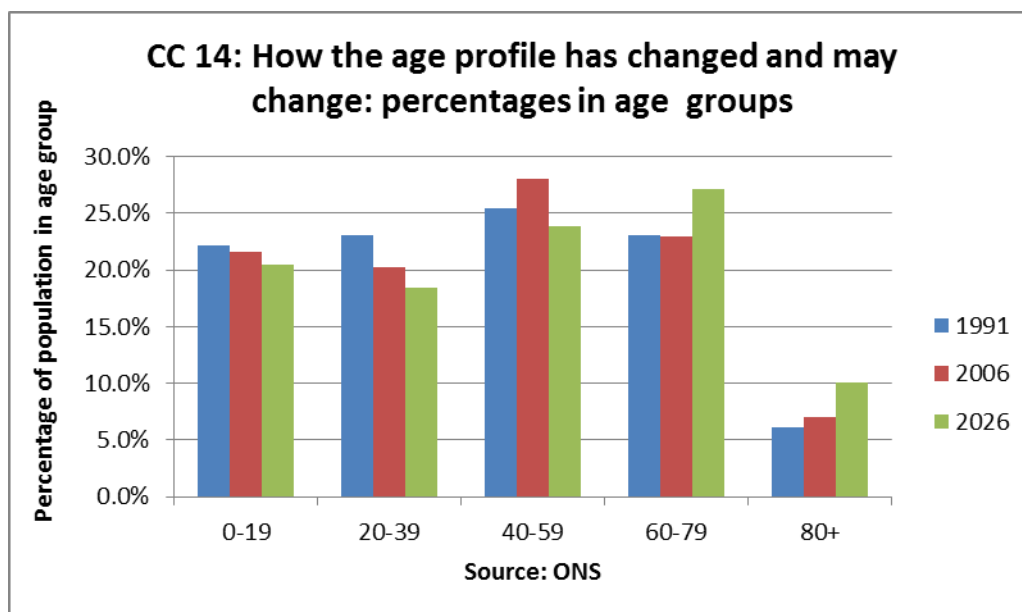


**Figures from the University of Reading report*

THE LOCAL NEED

25. The “**What Homes Where Toolkit**” developed by the Local Housing Requirement Assessment Working Group. This is an informal grouping of the major professional and representative bodies (e.g. T & C Planning Association, Local Government Association, RTPI, NBF, NHBC amongst others) with an interest in planning for housing in England. **The toolkit** uses statistical data and projections from the Office of National Statistics (ONS) and the Department for Communities and Local Government (DCLG) to provide useful data on current and future housing needs. The table below has been replicated from the toolkit and shows the projected change to the demographic profile of Havant 1991 and 2026.





26. In line with the rest of the country, this toolkit demonstrates that the demographic profile of the Authority is projected to age, with the proportion of the population aged 65 and over increasing from 22.9% to 27.2% between 2006 and 2026. A significant increase is also projected of the 'frail' elderly, those aged 80 and over, who are more likely to require specialist care and accommodation. In the Council's **Havant's Diversity Profile** which is partly based on Census data, it is stated that Emsworth has a population of approximately 8,628 of which approximately 27% are over the age of 65.
27. The clear expectation of the NPPF is that development should be encouraged except where this would compromise key sustainable development principles set out in national policy. The current appeal proposal would not compromise national policy, indeed it is wholly in concern with its aims.
28. The proposed development would provide specialist accommodation which would cater for the ageing population of Emsworth (& Havant). It would take place on previously developed land, it would provide a release of under-occupied housing thus reducing the need for new housing on greenfield sites, it would increase consumer choice, create a more balanced community by having greater housing choice available to it. It would result in the occupants of the development shopping locally thus assisting in the economic well being of the area. The construction phase would create employment approximately 50-80 jobs as well as some in related support industries.

29. Attached at **APPENDIX 5** is the **Compendium of Reports Promoting Specialist Housing for Older People** which outlines the various reports supporting the provision of specialist accommodation.

NATIONAL PLANNING POLICY GUIDANCE AND RELATED DOCUMENTS

30. **The National Policy Framework** requires the planning system to deliver sustainable development in terms of:
- **Planning for prosperity (an economic role)**
 - **Planning for people (a social role), and**
 - **Planning for places (an environmental role)**
31. The three components need to be pursued in an integrated way looking for solutions which deliver multiple goals. It is therefore clear that the National Planning Policy Framework wishes to see is balanced decision making with all factors considered rather than decisions made in isolation of the three overriding principles.
32. The development is a very sustainable form of development in a sustainable location. By achieving positive improvements in the built, natural and historic environment as well as the quality of older people's lives, in this particular case, there should be **“a presumption in favour of sustainable development.”** Furthermore for decision makers (paragraph 14 NPPF) this means approving development proposals that accord with the development plan without delay. Further commentary is set out in relating to the 5 year Housing Land supply position in paragraphs 77-79 and in the accompanying **5 Year Housing Land Supply Statement**.
33. In this respect it is notable that paragraph 19, bullet-point 2 states:
- “planning should proactively drive and support the development that this country needs. Every effort should be made to identify and meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Decision takers at every level should assume that the default answer to development proposals is “yes”, except where this would compromise the key sustainable development principles set out in this framework”.**
34. The 12 Core Planning Principles set out in the NPPF include the following relevant ones that planning should proactively drive and support sustainable economic development to deliver the ...homes that the country needs. It is also seeking to secure high quality design and a good standard of amenity for all existing and future occupiers of land and buildings. A further principle is to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.

35. Set out below are comments on some of the key sections of the NPPF.
36. Section 4 – Promoting Sustainable Transport: Transport Statements, Assessments or Travel Plans should only be required where developments generate “*significant amount of movement*”. The proposed development will not result in any significant traffic movements.
37. Section 6 – Delivering a Wide Choice of High Quality Homes: The proposed development will provide specialist accommodation for older persons who area significantly and growing sector of the local population.
38. **Housing need for the older population: NPPF. Paragraph 50** of the NPPF states that ... To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

“...plan for a mix of housing based upon current and future demographic trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities) ...

and “...identify the size, type, tenure and range of housing that is required in particular locations reflecting local demand...”

and ... “where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off site provision or financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time”

39. **Paragraph 159** also sets out that Strategic Market Housing Assessments (SHMAs) should assess full housing needs, the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period, and plan for all types of housing, ...including ...older people’s housing. The Core Strategy identifies the need for older person’s accommodation within the Borough due to the significant growth expected in the over 65s.
40. Section 7 – Requiring Good Design: **paragraph 56** reinforces the importance of Good Design in the built environment. Good design being a key aspect of sustainable development contributing positively to making places better for people. **Paragraph 59** seeks to ensure that design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape and layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.

41. Furthermore **paragraph 60** seeks to ensure that decisions should not attempt to seek to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is however proper to seek to promote or reinforce local distinctiveness. The scheme, as supported by the accompanying Design and Access statement, takes the opportunities available to improve the character and quality of the area and the way it functions.
42. **Paragraph 63** states *“in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area”*. Conversely Paragraph 64 advises *“permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”*.
43. **Paragraph 66** advises that *“applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably”*
44. The proposed development has been the subject of public consultation as detailed in the accompanying SCI. The design is fully explained and justified in the accompanying DAS statement, but inevitably differences of opinion remain.
45. Section 10 – Meeting the Challenge of Climate Change, Flooding and Coastal Change: Paragraph 96 also advises that new development should *“take account of land form, layout, building orientation, massing and landscaping to minimise energy consumption”*.
46. The proposed development is highly sustainable and will be constructed to meet the latest government and policy requirements.
47. **Viability: NPPF** Viability remains at the heart of decision making and the ability for a scheme to progress. **Paragraph 153** of the NPPF sets out that supplementary planning documents (SPD) should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.
48. Furthermore **paragraph 173**, sets out that in **“pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards,**

infrastructure contributions or other requirements should when taking account of the normal costs of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.” The proposal is subject of a viability assessment (Financial Viability Assessment Report) which is submitted with the application. This sets out the financial headroom available for Sec 106 contributions.

49. Section - Decision-taking: This implores LPA's to look for solutions rather than problems and decision-takers should approve applications for sustainable development where possible. **“Local Planning Authorities should work proactively with applicants to secure development that improve the social, economic and environmental conditions of the area”.** (Paragraph 186)
50. Section Pre-Application Engagement and Front-Loading: This generally encourages the resolution of as many issues as possible at the pre-application stage and requires consultees to be more responsive at this stage. **Paragraph 193** implores LPA's to only require supporting information which is “relevant, necessary and material”.
51. Planning Conditions and Obligations: The development will be liable for CIL. If additional; contributions are sought under the auspices of Section 106 of the Act, **Paragraph 204** sets out the legal tests under CIL Reg. 122, which requires that planning obligations should only be sought where they meet all of the following tests:
 - a. Necessary to make the development acceptable in planning terms
 - b. Directly related to the development
 - c. Fairly and reasonably related in scale and kind to the development

Paragraph 206 advises that planning conditions should only be imposed where they are ***“necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects”***.

52. Annex 2 – Glossary: **Older People** are defined as **“people over retirement age, including the active, newly retired through to the very frail elderly whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs”** (my emphasis). Clearly the proposed development will meet these aims and the NPPF as a whole.
53. **The National Planning Policy Guidance** places a new emphasis upon the **“critical”** need to provide housing for older people and housing for older people features heavily in the guidance.

54. **Paragraph 021 states: Housing for Older People:**

The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). The age profile of the population can be drawn from Census data. Projection of population and households by age group should also be used. 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. Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that are under occupied. The future need for specialist accommodation for older people broken down by tenure and type (e.g sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). 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. Local authorities should therefore identify particular types of general housing as part of their assessment.”

55. It is clear that the proposal would meet the fundamental aims of the NPPF and the NPPG. These broader benefits are explored below in the following sections.
56. **Health and Wellbeing - paragraph 005.** The scheme actively promotes a healthy community in that the retirement scheme creates a healthy living environment adaptable to the needs of the increasingly ageing population. As set out in the main submission the community / communal nature of this specialist form of housing creates a safe and secure environment for people to live together with a watchful eye of like-minded residents and the ability for residents to spend more time in their own homes rather than being a burden upon hospital or local care facilities.
57. **Design - paragraph 001** as well as reinforcing that “**good quality design is an integral part of sustainable development**” it states that achieving good design is about creating places, buildings or spaces that work well for everyone, look good, will last, and adapt for the needs of future generations.
58. Similarly in line with **paragraph 002** the scheme delivers a wide range of planning objectives enhances the quality of buildings and spaces, by considering amongst other things form and

function; efficiency and effectiveness and their impact on well-being addresses the need for different uses sympathetically.

59. **Paragraph 004.** LPAs are instructed to give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area. This could include the use of innovative construction materials and techniques. Planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design.
60. **Paragraph 005** acknowledges that to achieve good design the use of expert advice from appropriately skilled in house staff or consultants may sometimes be required. But design should not be the preserve of specialists, it is also important to seek the views of local communities.
61. **Paragraph 007** Design should promote local character **“Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation.”**
62. The scheme successfully integrates into its surrounding context. The DAS sets out clearly how new building due to its design and form contributes to the surrounding area.
63. Standard solutions rarely create a distinctive identity or make best use of a particular site. Here the architect has determined that a contemporary design solution is appropriate having regard to the mixed character of the area which does not have a particularly strong architectural character.
64. The opportunity for high quality hard and soft landscape design is also a high priority of the scheme that helps to successfully integrate the development into the wider environment.
65. The scheme also promotes access and inclusion (paragraph 012) being in a highly sustainable location close to local transport links shops and local facilities. It enables many older local people to downsize and remain very much part of the local community if they so wish.
66. **Paragraph 023** sets out the five key design considerations:
 - layout – the way in which buildings and spaces relate to each other
 - form – the shape of buildings
 - scale – the size of buildings
 - detailing – the important smaller elements of building and spaces

- materials – what a building is made from

67. The above are assessed in the submitted Design and Access Statement.
68. **Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society (February 2008).** This document sets out the government strategy for an ageing society.
69. It recognises that the number of households increasing to growth and that by 2026 over 50% of all householders will be aged over 65 years of age. In order to meet this challenge, the government wants to ensure that there is a right range of choices of specialised housing available to those who need more support. It recognises that housing is central to health and well-being.
70. The summary of chapter 2 identifies and recognises that the vast majority of householders (68%) own their own homes and this is expected to rise to around 75% by 2026. As such, these people are expected to wish to maintain their own independence by owning their own homes.
71. The government expects Local Authorities to plan for the housing needs for the whole community. This in effect reiterates NPPF paragraphs 50 and 159, as set out above, which requires that the full range of housing provision be considered. The **Council's Background Paper: Housing to meet the needs of the Ageing Population and Specialist Care October 2011** which is reflected in the Core Strategy identifies the need for such specialist accommodation.
72. Chapter 11 of the National Strategy – Lifetime Homes specifically deals with specialised housing such as retirement accommodation for the elderly. The guidance identifies that there is a continuing need for specialised housing and that such accommodation will continue to offer a certain advantage over private housing, particularly to those who need a physical environment designed for those with impairments, better access to help and care, company and a sense of safety.
73. In the provision of appropriate accommodation for the elderly it is also recognised that the private sector has a major strategic role in this.
74. **"HAPPI – Housing our Ageing Population: Panel for Innovation"**, published in December 2009, said *"The time has come for a national effort to build the homes that will meet our needs and aspirations as we all grow older"* and *"we should all plan ahead positively, creating demand for better choice through a greater range of housing opportunities"*.

THE DEVELOPMENT PLAN

75. The Development Plan comprises of the Havant Borough Core Strategy 2011 and the Havant Borough Local Plan (Allocation) July 2014.

CORE STRATEGY (2011)		
Characteristics of Havant Borough – Emsworth		
POLICY Although not a Development Plan policy, the characteristics of Emsworth is that in the 2011 Census its population was 8,628 of which 27% were aged over 65. (Author's summary).	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The proposal would meet an identified housing need and would take place within the settlement boundaries of Havant and Emsworth.
CS1 Health and Wellbeing		
POLICY Planning permission will be granted for various developments which broadly supports the health and wellbeing of the community, for example the provision of children's play space, cycle facilities, protection of available community facilities. (Author's summary)	RESPONSE Achieved/Addressed	EVIDENTIAL JUSTIFICATION The proposed development would meet an identified housing need, and indeed one whose provision is to be encouraged. The proposal would add to the choice of housing assisting in the creation of well-balanced communities. The health and social benefits of retirement accommodation are recognised and discussed in earlier sections of this statement
CS7— Community Support and Inclusion		
POLICY Planning permission will be granted for development that; (i) Has been informed and shaped by community and local stakeholder involvement; (iii) Provides services for older people. (Author's summary)	RESPONSE Achieved	EVIDENTIAL JUSTIFICATION The proposed scheme complies with Policy CS7 in respect to the provision of services for older people specifically through its proposal for specialised accommodation to meet an identified local housing need.
Policy CS8 – Community Safety		

POLICY	RESPONSE	EVIDENTIAL JUSTIFICATION
The policy identifies that planning permission will be granted for development proposals that ingrain community safety into development process from the beginning, provides opportunities for natural surveillance and maximise the amount of defensible space controlled or perceived to be controlled by a resident. (Author's summary)	Achieved	The proposal has been designed with the principles of Secured by Design in mind to ensure the safety and security of residents.
Policy CS9 – Housing		
POLICY	RESPONSE	EVIDENTIAL JUSTIFICATION
Planning permission will be granted for housing proposals that will; (i) Contribute to achieving a net total of 6,300 new dwellings between 2006 and 2026. (ii) Deliver on average 30-40% affordable housing on sites of 15 dwellings or more and secure a suitable contribution, or on site provision, equivalent to an average 30-40% on smaller housing developments between 5 and 14 dwellings, unless a lesser requirement has been transparently justified on viability grounds. (vi) Provide accommodation for the ageing population in sustainable locations, taking account of the need to provide for a variety of care needs and flexibility to accommodate differing requirements of ageing care. (Author's summary)	Addressed/Achieved	The proposal will provide dwellings towards the Council's overall housing target of 6300 dwellings during the plan period. It should however be noted that the Council's housing figures are not based on an Objectively Assessed Need as detailed in paragraphs 77-79 and in the accompanying 5 Year Housing Land Supply Statement. The scheme complies with Policy CS9 in the provision of accommodation for the ageing population in a sustainable location. In respect to affordable housing provision the application is supported by a Financial Viability Assessment demonstrating the viability of the scheme and the headroom available for AH/Sec 106 contributions.
Policy CS11— Protecting and Enhancing the Special Environment and Heritage of Havant Borough		

POLICY	RESPONSE	EVIDENTIAL JUSTIFICATION
Planning permission will be granted for development that protects and where appropriate enhances the borough's statutory and non statutory heritage designations, biodiversity including trees by appropriately managing development (Author's summary).	Addressed/Achieved	The site does not include any statutorily listed buildings or locally listed buildings. The development will result in the removal of some trees which are the subject of a TPO (please see Arboricultural Reports). However, the most important trees will be retained and the proposal will be subject to additional planting/landscaping. The tree loss has to be considered as part of the planning balance having regard to matters such as housing need, optimising the use of previously developed land, any public benefit including regard to Paragraph 14 of the NPPF. Having read to the aims of the NPPF (social, economic and environmental) the proposal is considered to be appropriate. The proposal would also meet the relevant SPA contributions obligation.
Policy CS14 – Efficient Use of Resources		
POLICY	RESPONSE	EVIDENTIAL JUSTIFICATION
Planning permission will be granted for development that meets Level 3 for Code for Sustainable Homes (Author's summary).	Achieved	Whilst the policy predates the recent Government announcement that Code for Sustainable Homes is to be subsumed within buildings regulations which is broadly equivalent to Level 4 of the Code for Sustainable Homes.
CS15 Flood and Coastal Erosion Risk		

POLICY The policy seeks to ensure that new development proposals do not increase the risk of flooding and all development proposals will be required to ensure that there is no net increase in surface water run-off. Drainage should be by way of sustainable drainage systems unless such are inappropriate. (Author's summary)	RESPONSE Addressed/Achieved	EVIDENTIAL JUSTIFICATION The site is located in Flood Zone 1, please see the accompanying FRA. In addition a Foul and Surface Water Statement also accompanies the application which demonstrates how the site can be appropriately drained.
Policy CS16 — High Quality Design		
POLICY Planning permission will be granted for development that is designed to a high standard, which creates places where people want to live, work and relax. All development should demonstrate that its design responds to and respects local context (Author's summary).	RESPONSE Achieved	EVIDENTIAL JUSTIFICATION The proposed design has had due regard to its context, including neighbouring properties as detailed in the Design and Access Statement.
Policy CS17 – Concentration and Distribution of Development within the Urban Area		
POLICY Development will be permitted that makes the most effective use of land in the Borough by granting planning permission that; (i) Concentrates land within the 5 urban areas; (ii) Prioritises development on previously developed land. (Author's summary)	RESPONSE Achieved	EVIDENTIAL JUSTIFICATION The redevelopment of the application site complies fully with Policy CS17 being a previously developed site within an existing urban area. The proposed scheme seeks to provide specialist accommodation by making effective use of a previously developed whilst having regard to its environmental context.
Policy CS20 — Transport and Access Strategy		
POLICY Development will be permitted that is consistent with and contributes to	RESPONSE Achieved	EVIDENTIAL JUSTIFICATION The proposed development is a recognised as having a low level of

the implementation of the 'reduce, manage, and invest' strategy and does not increase congestion and promotes better use of existing transport networks (Author's summary) .		traffic generation. In addition residents of retirement living schemes have a greater degree of flexibility over the time they make journeys and thus such trips are concentrated at off peak times. Please see the Transportation Statement for further information
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Policy CS21 – Developer Requirements

POLICY	RESPONSE	EVIDENTIAL JUSTIFICATION
Development will be permitted if on site and/or off site infrastructure requirements are met. Where new or improved infrastructure is essential for planning permission to be granted the council will require the on-site or off site provision and/or contributions through planning obligations, agreements or tariffs in accordance with the relevant legislation for off-site provision (Author's summary) .	Achieved	The Core Strategy Policy is out of date with the CIL regulations removing the collection of tariff style contributions from April 2015. In any event the Council's adoption of its Community Infrastructure Levy supersedes this policy. The CIL payment for this proposed development is approximately £299,622. The applicant will also meet the requirements of the Solent Recreation Mitigation Project (£181 x 25 units) of £4525.

Policy DM7 — Elderly and Specialist Housing Provision

POLICY	RESPONSE	EVIDENTIAL JUSTIFICATION
Within the defined urban areas development specific to the requirements of the elderly, people with disabilities or other forms of specialised supported housing provision will be encouraged (Author's summary) .	Achieved	The site is located in a good location as it is on a bus route and thus has easy access to Emsworth or Havant which have a range of services and facilities. The building as identified in the design and access statement has been specifically designed with regards to its context. The 2011 Census identifies that in Havant, 28% of the population is aged 60 years or over. Specifically

		in respect to Emsworth, the population aged over 60 is approximately 27%. As identified there is a pressing need both nationally and locally for further specialist accommodation for older persons, and this site provides a good opportunity in a suitable location for this form of accommodation.
DM8 Conservation, Protection and Enhancement of Existing Natural Facilities		
POLICY Development would be permitted where it protects and enhances local habitats and landscape distinctiveness which addresses various criteria including the protection of trees. (Author's summary)	RESPONSE Addressed/Achieved	EVIDENTIAL JUSTIFICATION The scheme has been designed to retain the perimeter trees. In additional landscaping is proposed. The SPA mitigation contribution will also be addressed via a Sec 106 Agreement
DM11 Planning for More Sustainable Travel.		
POLICY The policy identifies that opportunity will take opportunities for the integration of sustainable travel modes and the availability of non-motorised modes. The policy includes seeking safe and secure parking and turning facilities and reducing informal opportunities for parking in the area surrounding the development (Author's summary).	RESPONSE Achieved/Addressed	EVIDENTIAL JUSTIFICATION The proposal addresses these issues in the submitted Transport Statement. Access and egress would be safe and there would be sufficient parking to preclude "spillage" onto Western Avenue. Please also see comments regarding DM14
Policy DM13 – Car and Cycle Parking on Residential Development		
POLICY Residential development will only be permitted where it provides car parking and cycle storage in	RESPONSE Achieved/Addressed	EVIDENTIAL JUSTIFICATION Further information on parking provision is provided within the Transport Statement that

accordance with the standards set out in the residential car parking and cycle provision supplementary planning document (Author's summary).		accompanies the application. In respect of a recent appeal decision at 108-110 Elm Grove, Hayling Island the Inspector concluded that parking ratio of 0.40 spaces per unit would be appropriate. The recently approved McCarthy & Stone scheme on the former Hayling Billy, Hayling Island having regard to the earlier appeal achieved a ratio of 0.67 spaces per unit. The current application having regard to its location and to ensure that there will be no "spillage" achieves a parking ration of 1.12 spaces. This is well in excess of that advocated by the Inspector. In addition the proposal also includes buggy parking facilities within the building.
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HAVANT BOROUGH LOCAL PLAN (ALLOCATIONS) JULY 2014

Policy AL1 Presumption in Favour of Sustainable Development.

POLICY	RESPONSE	EVIDENTIAL JUSTIFICATION
This is a model policy provided by the Planning Inspectorate for inclusion in all plans to insure that they positively reflect the NPPF presumption in favour of sustainable development. The model policy was added to by the LPA to provide further clarity and states: Where there are no policies relevant to the application all relevant policies are out of date at the time of making the decision, then the council will grant	Address/Achieved	The proposed development is considered to accord with the aims and objectives of the NPPF and having regard to the Development Plan and material considerations. In particular, the full force of paragraph 14 of the NPPF applies in circumstances such as this where the Council cannot demonstrate a 5 year housing land supply position as in this case as set out in paragraphs 77-79 and in the accompanying 5 Year Housing Land Supply Statement.

permission unless material considerations indicate otherwise, taking into account whether: 1. Any adverse impact of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or 2. Specific policies in the NPPF indicate that the development should be restricted <i>Paragraph explanatory paragraph 2.03 states that "the council will seek to balance the three core elements of sustainable development – environmental, social and economic issues – in all its planning decisions."</i> (Author's summary)		
Policy EM1 Emsworth Housing Allocation		
POLICY The policy makes an allocation within Emsworth of between 785-826 dwellings for the period 2006-2026. Of this allocation the explanatory comments indicate a shortfall ranging between 179 and 250 dwellings. (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION It should be noted that the allocation is not based on OAN as commented in the paragraphs 77-79 and in the accompanying 5 Year Housing Land Supply Statement. Accordingly the proposed development will help to address the Council's housing need both in Emsworth and in the borough.
Policy DM17 Contaminated Land and Policy DM 18 Protecting New Developments from Pollution		

POLICY The policies identify that permission will be granted where appropriate investigations of potential risks or undertaking and such risks are mitigated. .(Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The application was accompanied by a Desk Study Site Investigation Report and the Geotechnical Investigation Report. They identify that that there are no reasons why development should not take place.
Policy DM24 Recreational Disturbance to Special Protected Areas from Residential Development		
POLICY The policy identifies that the new developments will be required to mitigate their impact on the SPA and that such mitigation can included a financial contribution towards a mitigation strategy. (Author's summary)	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION The appellant will submit a Unilateral Statement for a payment of £4,5252 towards the Solent Recreation Mitigation Project (£181 x 25 units).
Policy DM25 Managing Flood Risk In Emsworth		
POLICY Planning permission will be granted for development which can demonstrate that run off will be reduced at the greatest percentage rates having regard to costs technical feasibility and viability. Developments that may impact on flood risk within Emsworth may be required to make a contribution towards it into a flood of alleviation scheme (Authors summary) .	RESPONSE Addressed	EVIDENTIAL JUSTIFICATION Please see the attached FRA and Foul and Surface Water Drainage Reports which address the issue. The site is in FZ1 and can be appropriately drained. The development would not adversely impact on the drainage of other properties.

76. As can be seen, it is considered that there is there is overall compliance with the policies.

5 YEAR HOUSING LAND SUPPLY

77. The Council's position has recently been updated by the **Local Plan Housing Statement December 2016**. This document identifies that an Appeal in Purbrook determined that the

Council could not demonstrate a 5 Year Housing Land Supply in relation to an Objectively Assessed Need.

78. In terms of the potential need for new housing, the PUSH SHMA has identified a need for further 11,250 within Havant. The Council has responded by reviewing its housing land availability and by proposing the early release of sites before the prospective new Havant Local Plan 2036 is in place. But even so the Housing Statement concludes:

4.2 The Council has been extremely thorough in examining all potential land across the borough and has 'left no stone unturned' in the search for sustainable sites for development. Taking all the above potential sources into account the total potential supply from 2011-2036 is 9,517 dwellings. The Borough Council will continue to search for additional sustainable sites when formulating the new Local Plan in order to further reduce the 1,733 dwelling gap with the aim of fully meeting the objectively assessed need.

79. Accordingly as summarised above but more fully explained in the accompanying **5 Year Housing Land Supply Statement**, the Council cannot meet an OAN and thus the full aspects of paragraph 14 of the NPPF applies which gives added weight to the current proposals.

THE SITE AND NEIGHBOUR RELATIONSHIPS

77. The site is located within the settlement boundary of Emsworth and approximately 700m or so from its centre which has a reasonable range of shops and services and approximately 2.5 km from Havant town centre. The site is within walking distance of the bus stops on Havant Road and hence there is good connectivity with the respective centres.
78. The site is located in Western Avenue which is a private road serving a number of private dwellings and a nursing home.
79. The Design, Access and Sustainability Statement detail the design process in the light of constraints and opportunities of the site. The application itself proposes the erection of age exclusive apartments aimed at the over 60s. The apartments are self-contained although there are some communal facilities, which help to create a sense of community within the development.
80. Supervision and support will be provided by a house manager and a 24 hour Careline Alarm system to provide additional support and security. The scheme is also designed to Lifetime Homes Standards.
81. The Design and Access Statement sets out the relationship of the new building to its situation and surroundings. As set out in the DAS, the proposed building is T shaped and sits well within its plot. The rear wing of the building being set 30m and 17m off the northern and

southern boundaries respectively with the front g range being set approximately 24m and 30 m off the western and eastern boundaries respectively. Due to the siting, even having regard to the inset third floor (albeit that the building is predominantly 2 storeys) there is a limited impact on the amenities of neighbouring properties.

82. The proposed building not only sits well within its plot but also in its wider context as demonstrated by the Verified Visual Images which accompany the application.
83. While, invariably the proposed change in built form is likely to raise some objections, it is considered that it is a well-designed building which makes a good use of the site having regard to neighbour amenities and its general townscape context. The proposal is considered to be appropriate and to meet the objectives of good design and sustainability. The proposal is acceptable in its own right irrespective of the 5 Year Housing Land position.

AMENITY SPACE

84. McCarthy and Stone is the market leader in the provision of this form of specialised housing and therefore in assessing the functional requirements of its purchasers/residents. Put simply, if the Company were to provide sub-standard accommodation in this regard, then quite simply, it would experience difficulty in selling the apartments and in maintaining its position in this specialised field of housing. Additional information on this issue can be submitted if required.

CAR PARKING & ACCESS

85. Age Exclusive housing, because of its very nature and concept, is invariably located within reasonable walking distance of shops and other essential services and close to public transport facilities. The site is well situated for retirement housing as there is easy access using public transport to the centres of Emsworth and Havant.
86. The proposal would provide a total of 28 car parking spaces for use by residents and their visitors. This should ensure that there is no “spillage” in view of the lack of on street parking in the immediate vicinity of the site. In addition the proposed development also includes a buggy store.
87. It is considered that the level of car parking proposed on this site, will accommodate the needs of the proposed development. The car parking provision should meet all the normal peak demands for spaces and therefore would not be expected to add to pressures to the on-street parking in the area. The accompanying Transport Statement provides further background information on this issue.

CONCLUSION

88. The redevelopment of this previously developed site should be optimised, commensurate with environmental considerations and such is, of course, supported by extant Local and Government guidance.
89. This is best achieved by the beneficial redevelopment of the site. This well designed development would provide for much needed specialised accommodation within an urban location therefore, helping to prevent new housing on greenfield land.
90. The proposed development represents a sustainable development, with social and planning benefits, both for potential residents and the community as a whole. In summary, these are:

Balanced View of Policy and Other Material Considerations

- The development contributes to the wide spectrum and much needed housing for the older population. In doing so it thereby helps to prevent new housing on greenfield land and freeing up of existing under-occupied stock.
- A highly sustainable form of development that optimises the use of valuable previously developed land.
- Brings “previously developed land” land into more beneficial use. Maximises use of scarce residential land.
- Net environmental benefits in built form, streetscene, heritage asset, character and landscape terms.
- The provision of much-needed owner occupied accommodation that helps meet a recognized housing needs of an ageing population and the housing stock that is ill equipped to deal with its needs.
- Greater security and convenience and reduced feelings of isolation and vulnerability. Improved independence, health and well-being whilst maintaining an independent lifestyle.
- Most residents have family and friends in the locality and are able to remain an important part of the core of the local community.
- Reduced demand on public sector resources and health services. Residents manage better and spend fewer nights in hospital. Reduced impact upon NHS resources.
- Increases the availability of much needed family housing in areas of shortage boosting the supply in the local housing market.
- An accessible location and form of development that will ultimately lead to less reliance on the private motorcar.
- A development that serves to underpin local facilities, including the retail functions of the shops in close vicinity.

- A land use, which is entirely passive and a “good neighbour”.
 - A new building that provides substantial energy efficiency advantages over the existing and most open market residential schemes.
90. National, strategic and local planning policies all place strong emphasis on the need to re-cycle previously developed land, in order to safeguard greenfield sites and land in other sensitive areas. The proposed development successfully achieves a balance between the potentially competing objectives of development whilst respecting townscape setting and residential amenities.
91. This proposal will:
- Accord with national planning guidance in relation to sustainable development;
 - Accord with the relevant and material provisions of the development plan; and
 - Not cause any demonstrable harm to any interests of acknowledged importance.
92. Furthermore, although the proposal is acceptable in its own right, the application has to be considered with regards to paragraph 14 of the NPPF. The issue is fully detailed in the **5 Year Housing Land Supply Statement**.
93. This issue raises a fundamental point in that paragraph 14 of the NPPF is fully engaged. Paragraph 14 states:
- 14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.*
- For plan-making this means that:*
- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
 - *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or – specific policies in this Framework indicate development should be restricted (9)*
- For decision-taking this means:(10)*
- *approving development proposals that accord with the development plan without delay; and*

- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*

– specific policies in this Framework indicate development should be restricted.(9)

NB footnotes 6 and 9 do not apply in this case

94. As such, the full provisions of paragraph 14 of the NPPF in favour of the proposed development are applicable. Accordingly, the presumption in favour of granting planning permission in the NPPF should prevail.