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24 June 2012

Development Policy Manager
Development Services
Warwickshire District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5QH

Formal letter of objection to proposed housing development on the Greenbelt of North Leamington

I am writing in order to record my formal objection to the proposal to develop of protected Greenbelt land in North Leamington.

Please send me formal written confirmation that this letter has been logged and will be considered in Planning Committee meetings/discussions about this development.

Having lived in Leamington Spa for nearly twenty years, I was shocked to discover the proposals to build on protected Greenbelt land in North Leamington. I set out the formal grounds of my objections below.

Green Belt Protection and Breach of Planning Guidance

This proposal does not follow the guidance laid out in the National Planning Policy Framework. Greenbelt land can only rarely be used for building land, and this in only where there is insufficient suitable and available sites outside the greenbelt.

This is NOT the case in Leamington Spa. There is sufficient alternative land which could be used without the destruction of greenbelt land – there is land south of Heathcote and east of the A452. There is also the question of infill of brownsite land. This should be fully outlined in the Options paper – it is not.

The Options Paper talks about ‘ distributing development around the district’. I am unclear where this approach is outlined in the NPPF. If it is not in the NPPF, how can it be used as a driver to support development – especially of greenbelt land areas which are expected to be protected?

The proposed development would create an urban sprawl – this is a vast development which would lead to merging of three distinct areas – Leamington, Old Milverton and Kenilworth, not to mention encroachment

towards Warwick. Planning is supposed to PREVENT this from happening – not to encourage it.

Summary – the case has NOT BEEN MADE to sacrifice greenbelt land. The planning guidance requirements have not been met and there is sufficient alternative building land to meet requirements.

Local Amenity – including fauna and flora

This area is used by walkers, joggers, cyclists and dog walkers. There is nothing else like it in Leamington. Other land is municipal. This is a natural open space.

It is also an important habitat. There is a bat colony within the site designated for development and the proposed building land is directly across the flight path. Bats may not be disturbed, nor their flight paths. Bats are a protected species and it is not clear how this development would do anything other than destroy their flightpath/ feeding grounds and thus risk the colony.

This is a habitat for Gliss Gliss dormice – another protected species.

This is an area where bees and butterflies are still seen in some abundance and it is alive with song birds. There are also badgers and foxes within the area designated. It is important that we protect our natural habitat – both for the pleasure of local residents, but also for the species that make their home there.

Summary – this land is a crucial local amenity and is a habitat for wildlife, including protected species.

Housing Provision and Projections

The estimates of housing requirements require revalidation. These levels were projected in different economic times. Revisions of housing estimates are taking place in other Authorities. Accurate projections need to be worked on the basis of the current demand and the projected demand given the long term economic forecasts.

Requests for building land should only be considered on the basis of more accurate projections and greenbelt land should only ever be considered when all other options have been exhausted which they have not in this case. As previously referenced, the current proposal does not take into account suitable land elsewhere in the town and is not in accordance with the NPPF.

Summary – the data upon which the proposal relies is flawed and needs revision.

Infrastructure

The proposed build is massive and will lead to serious congestion – with a knock on of pressure to build new roads. Most households have two cars (even if planning does not formally allow for this). The requirement for new roads will lead to even greater destruction of rural land.

This concentration of housing also brings requirements for sewerage and other services and will lead to pressure on other services such as GPs, hospitals and schools.

Summary – the local infrastructure is inadequate to support the proposed development and will lead to a domino of road building destroying further natural habitat.

Localism – putting people at the heart of decision making

Localism has stated that the views of local people should be at the heart of local government, that **local voices should be heard**. This must not be lip service. The local community is saying very strongly that this is a flawed proposal and that it should be rejected with long term protection for this Greenbelt area.

It is recognised that new homes are needed, but these need to be provided in a way which is sustainable, appropriate in size, scale and massing and which is in accordance with National Planning Guidance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Fiona McPhail', written in a cursive style.

Fiona McPhail

SJ. 6114

ADLINGTON

Philip Clarke
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5HZ

WDC PLANNING
Ref
Office
15 JUN 2012
SCANNED
CC CR PD MA
PRE GEN DIS

13 June 2012

Dear Philip

Planning for Specialist Older Person Accommodation

Gladman Care Homes Ltd (GCH) (trading under the Adlington brand) specialise in the development of specialist older person accommodation and are currently developing a number of schemes with care provided by MHA (Methodist Homes for the Aged).

GCH are keen to ensure a sound policy position is established for Warwick District Council should any potential development opportunities arise during the plan period and to ensure that the local planning policy properly reflects the evidence base documents.

As you are currently consulting on the Warwick New Local Plan, we enclose our representations document which outlines the key benefits of the development of specialist older person accommodation for people in need of care.

I would also like to request that our details are added to your consultation database.

Adlington Planning Team
Gladman House
Alexandria Way
Congleton
CW12 1LB
planning@adlington.co.uk

Yours sincerely



Kevin Waters
Planning and Development Manager

Independent living with care

Adlington, Gladman House, Alexandria Way, Congleton, Cheshire, CW12 1LB
T 01260 288900 www.adlington.co.uk

Representations by Gladman Care Homes Ltd

(T/A Adlington)



June 2012

1 INTRODUCTION

1.1 Purpose

- 1.1.1 Gladman Care Homes Ltd (GCH) (T/A Adlington) specialise in the development of specialist older persons accommodation with care and are currently developing a number of schemes with care provided by MHA (Methodist Homes for the Aged). GCH are keen to ensure a sound policy position is established for Warwick should any potential development opportunities arise during the plan period and to ensure that the Core Strategy properly reflects the evidence base documents.



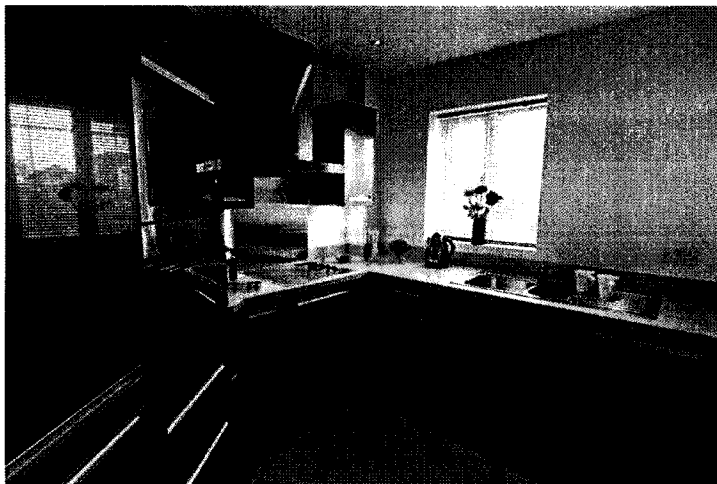
1.2 Demographics and older person strategies

- 1.2.1 It is apparent from the demographic profile and future population projections for the area that there is a current and rising future need for specialist accommodation with care for older people. It is therefore of paramount importance that this is properly planned for and included within specific policies alongside those for the other types of residential accommodation within the Core Strategy in order to provide an adequate mechanism to ensure delivery to this group of older people, who would otherwise not be provided for.



1.3 Specialist Housing with care for Older People

1.3.1 Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self contained homes, where people are able to readily access high quality, flexible support and care services on site to suit their individual needs (including dementia care).



1.3.2 Such schemes differ from traditional sheltered/retirement accommodation schemes and should provide internally accessible communal facilities including residents lounge, library, dining room, guest suite, quiet lounge, IT suite, assisted bathroom,

internal buggy store and charging facilities, reception and care managers office and staff facilities.



- 1.3.3 Ideally a range of 1, 2 and 3 bedroom apartments should be provided in order to provide flexibility and in order to maximise the care efficiencies to residents schemes should comprise 50-70 apartments.



- 1.3.4 Given the evidence base and the national strategy, a policy should be included within the Core Strategy, as follows:

The provision of purpose built and/or specialist accommodation with care for older people in sustainable locations will be supported in every settlement with more than 10,000 population. Schemes should also be considered in other sustainable settlements where there is proven need. Apartments should be

restricted for occupation by only those with care needs, include minimum compulsory care packages, should also include age restrictions and an extensive range of communal facilities.

Schemes are expected to be promoted in partnership with an on site 24/7 care provider to safeguard the delivery of care and support to residents.

Such schemes fall wholly within the auspices of C2 use, meet an otherwise unmet need for specialist accommodation for older people, deliver care and communal facilities and will not therefore be required to contribute towards affordable housing.

- 1.3.5 Additional evidence for the need for this type of accommodation has also been identified within the Warwick District Council Strategic Housing Market Assessment 2012 (Chapter 9) and the Core Strategy should reflect the evidence base.

2 KEY BENEFITS

The development of additional residential accommodation with care/extra care for people in need of care delivers a number of key benefits:-

- It represents one of the most efficient ways to deliver care and support and will contribute towards reducing the financial burden for Adult Social Care budgets.
- Meets the needs of those people who wish to live in self contained accommodation but who require support and care who can then be cared for in the privacy of their own home.
- The "Residential accommodation with care" model provides a real alternative to long term care in institutional residential care homes, for older persons or persons with a disability.
- The Government strongly support the concept of independent living with integrated care for people with care needs.
- Few alternatives are currently available in the local market.
- It will help to fulfil the unmet demand for this type of care accommodation designed specifically with older people in mind.
- It creates an environment where preventative measures to reduce ill health and active ageing is promoted, creating an alternative to current residential care homes thus allowing older people the enjoyment of a more fulfilled life in their elderly years.
- It facilitates greater integration between housing, health and social care providers and reduces the burden on local health and social services.
- Intensive care and support will be available for those in need.
- It has the potential to contribute towards the release of existing housing stock widening choice and opportunity within the general open market, particularly family housing.
- Providing good quality, appropriate housing for older people involves the basic principles of prevention of the need for higher dependency care, individuality and flexibility of care services, integration within the local community and maximising independent health and well being.
- This type of specialist accommodation offers an alternative to residential care for older people by combining the advantages of high quality, self-contained and secure accommodation, with the provision of flexible care services on a day to day basis to those in need of care. The service enables older people to retain control over their own lives while receiving the care and support they need.

3 GOVERNMENT AIMS

3.1.1 Reflecting the vital importance of meeting this need, a wide range of reports and strategies are in place recommending and advocating the delivery of specialist older persons accommodation with care and the benefits to such an approach including:

- "The Case for Change – Why England Needs a New Care and Support System." HM Government, 2008,
- The Care Services Improvement Partnership Toolkit "More Choice, Greater Voice" (CSIP 2008)
- More Choice, Greater Voice a Toolkit for Producing a Strategy Accommodation with Care for Older People – DCLG Feb 2008
- "HAPPI - Housing our Ageing Population - Panel for Innovation" was published in December 2009 by the Communities and Local Government, Department of Health and the Homes and Communities Agency
- 'Living Well with Dementia – A National Dementia Strategy – Department of Health 3rd February 2009
- "Under Pressure: Tackling the financial challenge for councils of an ageing population" Local Government Report February 2010
- Housing and Ageing Population: The Extra Care Solution – Tim Brown, Principle Lecturer, De Montfort University 2010
- Financial Benefits of Investment in Specialist Housing for Vulnerable and Older People – HCA September 2010
- Housing LIN Factsheet 33: Pretty Vacant chains and Extra Care Housing. Stimulating local housing markets – June 2011

3.1.2 The key conclusions from these, include:

- An ideal solution would be a private home but with all the support of a residential care home. It must be a community solution which requires full commitment of housing, health and social care agencies.
- The existing care and support system is not sustainable because of the changing demographics present in our society.
- The existing system does not always live up to peoples expectations, under funds the kind of preventative home based domiciliary care necessary to keep people active and healthy and has placed an over reliance on residential care.

- Many older people would prefer earlier intervention to help them stay in their own home and stay active.
- One of the factors driving change (and one which will influence the future of accommodation and care for older people) is emerging models of supported accommodation that offer a high level of dependency, but create an environment for lively and active old age.
- There is a need for an increasing proportion of extra care housing but its viability depends upon a stronger relationship between health, housing and social care agencies.
- There is a need for housing based models of accommodation and care for people with dementia.
- Proper design of extra care should mitigate the demand for an increase in residential care provision and may allow for some re-provision.
- Councils need to work with partners and older people to develop an area wide approach to later life that delivers value for money by integrating prevention, early intervention and care services.
- Specialist housing can cost 20% of the cost per year of residential care home costs and there are significant net benefits per person per year for specialist housing.
- The continuing development of extra care has to form part of addressing the challenge of an ageing population and also frees up the wider housing market.

3.1.3 Further detail and key quotations from some of these publications is included for reference in Appendix 1.

APPENDIX 1

Stephen Ladyman Quote 2004

The underlying aims of the Government are best captured within a quote from Stephen Ladyman in 2004 (the then Minister at the Department of Health who was responsible for social care policy), as follows: -

"most older people want to stay in their own homes for as long as possible. If they can't stay in their own houses for whatever reason, then they do not want to trade independence for dependence. What they want is to have control over their lives." "A private home with your own front door but all the support you might expect in a residential home. But it must be more than a housing solution – it must be a community solution, which requires full commitment of housing, health and social care agencies."

The Case for Change – Why England Needs a New Care and Support System : HM Government, 2008

The need for changes to the provision of care services to elderly people was explained by the Government within "The Case for Change – Why England Needs a New Care and Support System." HM Government, 2008, which states:

"The existing care and support system is not sustainable because of the massive challenge that changing demographics represent for our society. In 20 years time the cost of disability benefits could increase by almost 50%. We expect a £6 billion "funding gap" in social care just to deliver the same level of support that people experience now, if social care rises at the same pace as anticipated economic growth.

People also have changing expectations about the type and quality of services they experience, with ever increasing numbers wanting to stay in their own home and avoid institutionalisation. The existing system does not always live up to people's expectations. Too often, our existing system also under funds the kind of preventative home-based domiciliary care necessary to keep people active and healthy. The current system has a tendency to create an over reliance on residential care or even health care options, when the preference of many people would be earlier interventions to help them stay in their own home and help them stay active."

More Choice, Greater Voice: A Toolkit for Producing a Strategy Accommodation with Care for Older People – CSIP 2008.

The toolkit recognises that one of the factors that is driving change and will influence the future of accommodation and care for older people, is emerging models of supported accommodation that offer a higher level of dependency, but creating an environment for lively and active old age, hence the need for new policy within the Core Strategy.

Chapter 15 explores some of the ways that could be used to quantify the range of future provision of specialist accommodation for older people, and states:

"In seeking to look forward and to encourage a shift in the current pattern to one which offers a range of options to older people and is reflective of the key characteristics of the older population it will be important to take into account a number of factors:

- The demand for rented conventional sheltered housing is likely to decline.
- The suitability of the older stock for letting will become increasingly problematic.
- The potential for leasehold retirement housing will continue to grow.
- Some existing schemes will lend themselves to refurbishment and remodelling to provide enhanced sheltered housing to support rising levels of frailty.
- Some of this enhanced sheltered housing should be offered for sale alongside that for rent.
- There is a need for an increasing proportion of extra care housing but its viability depends upon a stronger strategic relationship between health, housing and social care agencies.
- Extra care housing should be provided for sale and rent.
- There is a need for housing based models of accommodation and care for people with dementia.
- The proper design and use of extra care housing should mitigate the demand for an increase in residential care provision and may allow some re-provision.
- Housing-based models of dementia care will provide an alternative to nursing home based strategies for meeting the needs of those living with moderate to severe dementia
- The need to adequately support those who are self-funding their accommodation and care needs and those whose care is provided informally, that is to say by family members and friends....

Previous estimates of the requirements for sheltered housing tended to look mainly at the need for social rented provision, rather than at the overall potential demand. The emergence of owner-occupation as a significant factor in old age had shifted the balance between estimates of need and demand."

HAPPI - Housing our Ageing Population - Panel for Innovation" DCLG, DoH and HCA.

From the report some of the highlights include:

- We should all plan ahead positively, creating demand for better choice through a greater range of housing opportunities. Local Planning Authorities should play a key role to ensure delivery of desirable housing in great places, tuned to local need and demand.
- Good quality housing for older people in accessible neighbourhoods can bring considerable benefits – not only to the lives of older people, but in contributing to inclusive, safer, sustainable communities; and supporting older people to live healthy, active lives can potentially mean longer term efficiencies across housing, health and care services.
- By putting older people at the heart of the community and providing facilities which complement what exists, everyone could benefit.
- Those 60+ are expected to increase by 7million over the next 25 years

- The challenge is not just to accommodate the 11% of 65+ currently living in nursing care or retirement housing, but the majority of this age group who will not move in later life and whose independence and well-being could be improved by appropriate housing.
- 56% of those over 65 under occupy, having 2 bedrooms or more than necessary.
- The HAPPI panel urges all those who have a role to play in improving housing choice and quality for older people to start work now. The challenges are huge and must be tackled head on.
- Paramount to the success of the care model is the flexibility/affordability of care from care providers and the critical mass that can be achieved from a development on 50-70 schemes.
- One of the panel members, Dru Vesty MBE is quoted : -

"If there is an opportunity to buy a well-designed apartment, with flexible care available, in the middle of town, near your children, and to sell your family house, you're buying more than just a good product: your buying a home which means that – as you get older – you're less of a burden on your children. The offer is peace of mind."

Living Well with Dementia – A National Dementia Strategy – Department of Health 2009.

This report identifies a strategic framework within which local services can deliver quality improvements to dementia services. One of the aims of the strategy is to ensure a higher quality of care for those with dementia, other relevant points include:

- Home care is probably the single most important service involved in supporting people with dementia in their own homes and that good quality, flexible home care services contribute significantly to maintaining people's independence, reducing social exclusion, preventing admissions to care homes and hospitals and supporting carers
- The importance of continuity, reliability and flexibility of home care in ensuring that people with dementia and their carers have choice and control over the services that they receive

Accordingly, additional specialist accommodation for older people could significantly improve the lives of those with dementia and assist their carers by providing respite care. Additional specialist accommodation for older people can also be designed specifically to assist those with dementia.

Under Pressure: Tackling the financial challenge for councils of an ageing population" – Local Government February 2010, produced by the Audit Commission.

The report sets out practical recommendations for promoting a better quality of life for older people.

The report identifies:

- Tighter finances create an opportunity to rethink and redesign services to improve lives, while spending less public money
- This is a whole system issue that goes beyond the boundaries of any one organisation
- Cheaper alternatives are often the services most valued by older people, their families and communities

Recommendations included:

- All councils should “build older peoples opinions and experiences into plans for services that deliver what older people need and value, and also deliver better value for money;” and
- All councils should “update commissioning strategies to reflect future roles in preventing, reducing, or delaying, health and social care costs.”
- For Councils with social care responsibilities, “work with partners, and older people, to develop an area-wide approach to later life that delivers value for money by integrating prevention, early intervention and care services”

Housing and Ageing Population: The Extra Care Solution – Tim Brown, Principle Lecturer, De Montfort University 2010

- There is a considerable amount of high quality guidance and reports on extra care housing for policy makers and practitioners. This is exemplified by the work of the Housing Learning and Improvement Network (LIN).
- There are fundamental changes taking place that will influence the future direction of provision. These include the emerging policies of the coalition government, tackling the public expenditure crisis and an ageing society (including addressing issues such as dementia).
- Even more effective partnership working is required between councils, the health sector, developers, registered providers and users on the development, funding and delivery of housing with access to care and support services.
- The role of councils as strategic enablers and facilitators will become more important because of the devolution of powers from national and regional bodies through, for example, the Localism Bill.
- Extra care housing has an important function in helping local housing markets to function more effectively by freeing up under-occupied family housing.
- Extra care provision will have an increasing role to play in meeting the needs of a wide range of types of vulnerable people such as those with learning difficulties and those with dementia.
- There are important lessons that can be learnt from other countries in debating a neighbourhood approach in meeting the needs of an ageing society. In the Netherlands and the USA, there is considerable interest in multi-generational housing. The concept of naturally occurring retirement communities (NORCs) has been at the centre of debates in the USA on improving the quality of life for older people who wish to remain in their own home and neighbourhoods, but require access to support services.
- It is clear that one future direction for extra care provision in this country is, to adopt an inclusive neighbourhood approach to local development plans and community regeneration, thus, placing extra care into the heart of all communities.

Financial Benefits of Investment in Specialist Housing for Vulnerable and Older People – HCA September 2010

- The total net benefit per person per year for older people in specialist housing is £444.
- The total net benefit for older people is the largest for any client group.

Housing LIN Factsheet 33: Pretty Vacant chains and Extra Care Housing. Stimulating local housing markets – June 2011

- The ability to demonstrate that extra care development not only helps to divert older people from more expensive health and care services but also helps other groups of people in the housing market is likely to become increasingly important.
- There is a strong case that suggests that the freeing up of accommodation reduces the pressure to build new housing. The Vacancy Chains approach provides a mechanism to support the development of specialist accommodation even in areas of high family housing demand.
- The opportunities to free up other housing are not always identified as an important element of extra care developments.
- The continuing development of extra care has to form part of addressing the challenge of an ageing population. Comparatively small numbers of older people occupy specialist accommodation in the UK while 17% do in the USA and 13% in Australia and New Zealand. This would suggest underdevelopment of specialist housing despite problems letting some forms of older specialist housing.
- The development of specialist accommodation therefore has to be concerned with the freeing up the wider housing market to meet lifestyle choices as well as addressing issues of prevention and frailty and strategically planned in that way to meet a plurality of needs and aspirations.