

Former Hotel Felix, Whitehouse Lane, Girton, Cambridgeshire, CB3 0LX  
On behalf of Cassel Hotels (Cambridge) Ltd  
Juliet Clark  
18/10/2021



**FORMER HOTEL FELIX**  
**– VERY SPECIAL**  
**CIRCUMSTANCES**  
**SUPPLEMENTAL**  
**REPORT**

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## Executive Summary

National planning guidance is unequivocal; the need to provide housing for older people is critical (Paragraph: 001 Reference ID: 63-001-20190626).

The Council's Development Plan acknowledges that the population of the District is aging. It is commonly agreed that there is a significant need for specialist older people's accommodation within South Cambridgeshire.

It is acknowledged that the need for Dementia care provision is even more pressing

The Council's Development Plan does not expressly allocate any land for the provision of specialist older people's accommodation. Neither does the Council's Development Plan contain any prescriptive policies that expressly require new housing or other developments to provide a minimum proportion of units as specialist accommodation for older people. The Development Plan is silent in this regard.

The needs of older people are not reflected within the planning policies of the Development Plan.

The Council's evidence base for the Local Plan issued in September 2021 acknowledges a shortfall of 642 care bed spaces in 2020, growing to 1,668-1,798 by 2041.

The LPA, when approving application S/3418/17/ FUL for a 72-bedroom care home in Fulbourn, accepted that the need for care homes to meet provision for an ageing population represented very special circumstances in the Green Belt. That need has not diminished.

The Site is previously developed land and its reuse encouraged in policy.

The application does not conflict with any of the five purposes for including land within the Green Belt. Whilst Planning Officers consider the impact of the building harmful to the openness of the Green Belt, that view is not shared by their Landscape Officer, who opines that not only does the building have a negligible impact on openness, the removal of the surface car parking is beneficial to the openness of the Green Belt.

If any harm to openness of the Green Belt is deduced, the applicant considers that very special circumstances exist, which would allow the LPA to approve the application as according with the Development Plan and other material circumstances.

## 1.0 Introduction

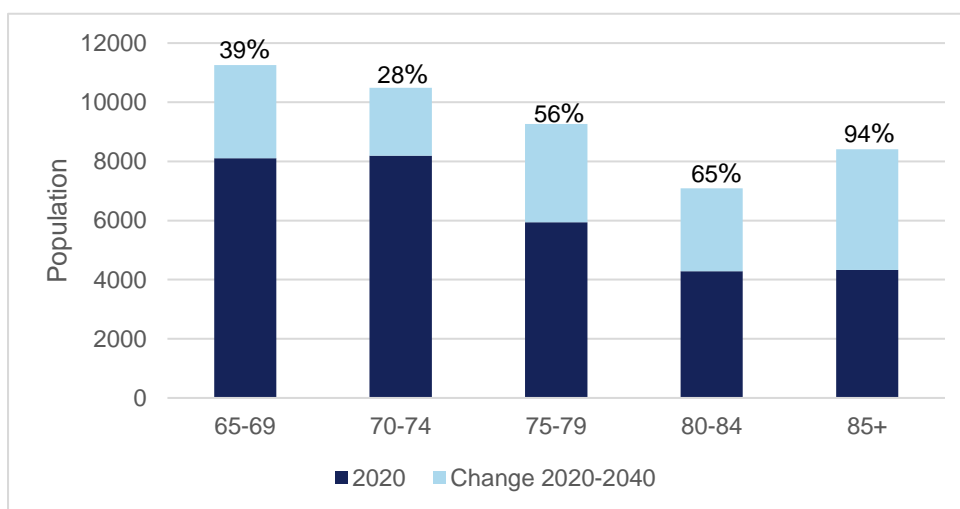
- 1.1 This report has been prepared in support of planning application reference 21/00953/FUL.
- 1.2 The starting point for this supplemental report is the request from the Local Planning Authority (LPA) to set out the very special circumstances (VSC) that the applicant considers relevant to the determination of the application. The applicant is of the view that the proposal is consistent with paragraph 149 of the NPPG - the LPA disagree and consider it an inappropriate development.
- 1.3 This report sets out the VSC relating to:
- Supply of specialist elderly accommodation in a location where there is a current substantial shortfall in provision and long-term rising demand;  
**Current agreed shortfall 642 care beds rising to 1650 by 2041.**
  - The provision of dementia accommodation;  
**Significant current unmet need of 242 bedroom.**
  - The location of the development and its importance in providing greater choice of older persons' accommodation in the local area;  
**It is located within walking distance of amenities and public transport, it is ideally located for a care home within SCDC.**
  - The lack of harm to the openness of the Green Belt;  
**The landscape officer says the harm to the openness is negligible and the removal of surface car parking beneficial**
  - Employment and economic benefits;  
**An investment of £25million locally, creating 115 jobs.**
  - Health, wellbeing and social benefits to the residents and wider community;  
**The proposed development co-locates a Dementia Research Centre with residential and nursing care, providing unique support for people with Dementia and their carers.**
  - The release of approximately 42 currently under occupied homes to the general market;  
**Para 60 of the NPPF requires a significant boost to the supply of housing.**
  - It will relieve pressure on an overstretched NHS and local authority health services as private pay model, and
  - The overall planning balance

## 2.0 Need for Elderly Care Accommodation

- 2.1 There is a critical need for elderly care home accommodation to address the current shortfall in provision in South Cambridgeshire. The Applicant submitted a Detailed Needs Assessment,

prepared by Carterwood, in support of the original submission, but since that date the Council's own evidence base has been published, demonstrating a critical need for older persons' care home accommodation in the district.

- 2.2 The Council's Local Plan evidence base<sup>1</sup> issued in September and, therefore, a contemporary and up to date assessment, notes a current **shortfall of 642 care bed places in South Cambridgeshire**. The proposed development could provide accommodation for 12% of these men and women currently living in inappropriate accommodation. This shortage of care home places is predicted to exceed **1,650 bed spaces by 2041** as the existing population gets older (See Table 1, below).
- 2.3 Future population estimates by age band, prepared as part of the Local Plan evidence base<sup>2</sup>, suggests a 50.8% increase in South Cambridgeshire's population aged over 65 years between 2020 and 2040. The over 85s, which create greatest demand for residential nursing and dementia care, almost doubles to 8,410 (see below). The sensitivity of this requirement to different population growth scenarios has been tested and the variation in % increase in over 65s across Greater Cambridge is only 6%<sup>3</sup>. As such, the predictions for bed space needs are robust and not dependent on any particular level of economic growth.



- 2.4 The shortage of bed spaces is also evident in Greater Cambridge and the wider Housing Market Area (HMA), indicating neighbouring areas will not be able to absorb South Cambridgeshire's excess demand. Despite a current surplus of spaces in Cambridge City, Greater Cambridge has an immediate need for 327 bed spaces, and across the HMA there is a 2,143 bed-space shortage (Table 1).

<sup>1</sup> GL Hearn (September 2021) Housing Needs of Specific Groups - Greater Cambridge Addendum

<sup>2</sup> GL Hearn (August 2021) Housing Needs of Specific Groups

<sup>3</sup> GL Hearn (September 2021) Housing Needs of Specific Groups - Greater Cambridge Addendum. Population growth in the model is driven largely by migration (typically the under 65s) and hence the population over 65 is not sensitive to the modelled scenarios.

**Table 1: Older Persons Care Bed Space Requirements 2020-2040**

	CURRENT SUPPLY	2020 SHORTAGE	ADDITIONAL DEMAND TO 2041	SHORTFALL BY 2041
<b>South Cambridgeshire</b>	742	642	1026-1155	1,668-1,798
<b>Greater Cambridge</b>	1,912	327	1556-1720	1884-2048
<b>Cambridgeshire and Suffolk HMA</b>	5,432	2,134	5,567 <sup>(a)</sup>	7,701 <sup>(a)</sup>

(a) 2040 figures. Source: GL Hearn September 2021, p52

- 2.5 This latest research confirms that “*the number of care beds in Greater Cambridge is insufficient to meet existing needs*”, as stated in the Greater Cambridge Housing Strategy<sup>4</sup>.
- 2.6 This narrative is not new in the Authority. When considering application S/3418/17/FUL for a 72-bedroom care home at Fulbourn, the Authority accepted that the need for a care home was sufficient to represent very special circumstances in the Green Belt and permission was granted for the application. As the latest figures above show, the need has not diminished and is as acute now as it was in March 2018, when the Fulbourn application was considered. Slightly bewildering is the lack of policy response in the new Local Plan to a need that was acknowledged as compelling, and which is recognised within the Plan. The NPPF at 11 a) requires LPAs to plan positively to meet the development needs. Despite the Authority’s own evidence on need (sufficient in 2018 to allow development in the Green Belt), there are no policies in the new Local Plan that proactively seek to deliver housing for an ageing population.

### Increased Choice

- 2.7 Providing a range of elderly care options that offer customers choice is important to the care home selection process, but also can encourage people to seek out residential care, who might otherwise remain in their own homes. National Planning Policy guidance recognised this:

*“Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.”<sup>5</sup>*

- 2.8 Location is the most important factor for residents and their representatives in choosing a care home and people want to have a choice of suitable care homes that are easily accessible. Often the deciding factor is the feel of the home. Where there is a limited supply of places, often a sense of needing to make a quick decision, lack of time to visit different locations, low

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<sup>4</sup> SCDC, Cambridge CITY council (2019) Homes for Our Future

<sup>5</sup> Planning policy guidance. Paragraph: 001 Reference ID: 63-001-20190626 Revision date: 26 June 2019

expectations of finding other places, when coupled with an urgency of need for a place, can prompt people to settle for a care home they feel is 'good enough' rather than ideal<sup>6</sup>.

- 2.9 UK research indicates that 11% of people would prefer to move to a private residential home should they need care, whilst the majority would prefer to stay in their own home (62%). However, in countries such as the Netherlands, where there is a wider choice of specialist accommodation, the number of people preferring to move out of their own home is greater than in the UK<sup>7</sup>.
- 2.10 This development compliments Girton's elderly care opportunities helping to improve the very stressful, home selection process and encourage people into appropriate accommodation when they might otherwise have remained at home, missing out on the healthy benefits that arise from this housing option. This includes:
- Social stimulation and companionship, helping to prevent loneliness and social isolation, which in turn affects health, wellbeing and lifespan<sup>8</sup>. Combatting loneliness is noted as a priority in the SCDC Housing Strategy<sup>9</sup>;
  - Activities that keep a person occupied and can encourage exercise;
  - Daily monitoring of health conditions and ready access to medical care, helping people to recover from, cope with and prevent more serious illness;
  - Specialist dementia care and activities;
  - Peace of mind for carers that loved ones are receiving 24-hour professional care; and
  - Reduced risk of falls leading to hospitalisation and death. "*Falls are the most concern cause of injury related deaths in people over the age of 75 with over 5,000 older people dying as a result of a fall in 2017, a 70% increase in numbers since 2010*"<sup>10</sup>.

## 3.0 Dementia Provision

- 3.1 The proposed care home has been designed to focus on the inclusion of Dementia Care for the elderly. 85% of people aged 80 and over will have some form of dementia, hence care facilities of the future need to be designed with this care provision as a minimum, and not just a dedicated wing. Most homes isolate dementia residents from areas within the home, with the residents being restricted to only using a floor or designated wing.

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<sup>6</sup> Competition and Markets Authority (2017) Care Homes and Market Study. Pub <https://assets.publishing.service.gov.uk/media/5a1fdf30e5274a750b82533a/care-homes-market-study-final-report.pdf>

<sup>7</sup> Directors of Adult Social Services (2011) Strategic Housing for Older People. Pub Housing Learning and Improvement Network

<sup>8</sup> Age UK (July 2015) Loneliness Evidence Review

<sup>9</sup> SCDC (2019) Greater Cambridge Housing Strategy 2019-2023

<sup>10</sup> Age UK, (May 2019) Falls in Life: A Huge Concern for Older People. Available at <https://www.ageuk.org.uk/latest-press/articles/2019/may/falls-in-later-life-a-huge-concern-for-older-people/>

- 3.2 The proposal has been designed to adhere to the HAPPI principles, which are based on 10 key design criteria. Many are recognisable from good design generally – good light, ventilation, room to move around and good storage – but they have particular relevance to the spectrum of older persons' housing, which needs to both offer an attractive alternative to the family home, and to be able to adapt over time to meeting changing needs.
- 3.3 This proposal looks to create a building that is inclusive of Dementia and enables a resident to age in place:
- The ground floor has been designed to house a 'Great Room', which allows for all the residents of the home to meet and dine with friends and family, regardless of their mobility or frailty;
  - The footprint itself has been designed to create an internal wander route, which avoids dead end scenarios, encouraging a resident to be able to wander both internally and externally;
  - The first floor has been designed to allow for the centre of the floor to offer additional communal facilities to assist in the residents' wellbeing. This area includes for a spa area and cinema/theatre space, which will be live streamed into every residents' room should they request it;
  - The ground and first floor bedrooms are identical in size, offering a full wet room for independent or assisted use; and
  - The ground floor rooms have external doors and small garden patio areas to encourage independence and dignity.
- 3.4 Unlike most schemes, this proposal leads in its design, ensuring all external areas are suitable for Dementia residents, whilst also offering dedicated spaces. Safe and secure outside spaces are essential for Dementia residents to enable freedom of movement along with stimulation of the senses. This proposal provides:
- A designated Dementia Garden with an independent service room on the ground floor, which enables independent use; and
  - Terraces are proposed on the first floor at each end of the building, providing dedicated external space to the residents on the upper floor.
- 3.5 Committed to be a care home that represents excellence in Dementia Care and facilities. The proposal includes for a dedicated area for a leading dementia research space, where KYN are looking to partner with leading universities and local NHS departments to further understand the Dementia journey. KYN have reached out to organisations such as the Memory, Disorders of Movement and Cognition and Dementia Genetics Clinic at Addenbrookes Hospital, to how they might integrate with these existing services. This facility is excellently located in order to tap into the existing NHS services and academia.



## 4.0 Lack of Harm to the Green Belt

- 4.1 Paragraph 138 of the NPPF identifies that there are five purposes to including land within the Green Belt. These are set-out in the left-hand column of the table below with responses in the right hand column:

PARA 138	BIDWELL RESPONSES
a. to check the unrestricted sprawl of large built-up areas;	The form of the development is more compact than the existing and the removal of the car parking beneficial to the openness of the GB .
b. to prevent neighbouring towns merging into one another;	As above.
c. to assist in safeguarding the countryside from encroachment;	The site is brownfield with a building on it. The significant reduction in surface parking allows the potential for more planting
d. to preserve the setting and special character of historic towns; and	The significant reduction in surface area car parking allows the potential for more planting. Retaining the footprint in broadly the same position but pushed back from Whitehouse Lane creates a greater gap between the urban edge and the site
e. to assist in urban regeneration by encouraging the recycling of derelict and other urban land.	The proposals re-use previously developed land and 149 (g) applies.

- 4.2 The proposal does not conflict with any of the above purposes for including land within the Green Belt.

- 4.3 There is disagreement between the parties on impact on the openness of the Green Belt, although, it is agreed, that openness is a fundamental characteristic. A Green Belt Study and LVIA was submitted at the request of the LPA. The view points and methodology were agreed and the Landscape Officer’s comments are copied below:

**“Greenbelt and LVIA**

***The findings of the Landscape and Visual Appraisal are generally acceptable. It is considered that the impact of the development on the openness of the Green Belt is negligible due to the existing presence of a similarly functioning and sized building as discussed within the report. The new building will be further away from development along White House Lane, but it will become closer to the back of properties along The Brambles. The gap between the building and both these developments, however, remains deep and open. A significant reduction in surface car parking area which can be converted into landscaping is also an improvement to the overall character and openness of the area. The placement of the new building has allowed for the retention of significant trees within and at the boundaries of the development site”***

**Table 2: Existing and Proposed Building Parameters**

	EXISTING (APPROXIMATE)	PROPOSED (APPROXIMATE)	INCREASE / DECREASE
Perimeter (m)	298 m	249 m	- 16.44%
Footprint (m <sup>2</sup> )	2,110 m <sup>2</sup>	2,395 m <sup>2</sup>	+ 13.5%
Volume (m <sup>3</sup> )	14,120 m <sup>3</sup>	18,790m <sup>3</sup>	+ 33.07%

**Figure 1: Outline footprint comparison highlighting compact form and increase gap between urban edges - green as proposed, grey, original**



**Figure 2: Compared elevation - north (red as existing)**



**Figure 3: Technical visualisation of the proposed development viewed from the east (Viewpoint 4)**



“Turner V Secretary of State for Communities and Local Government 2015” shows that openness is not “narrowly limited to (a) volumetric approach”, in this case it is considered that the “visual impact is implicitly part of the concept of the openness of the Green Belt and it relates to the capacity of the Green Belt to fulfil its purpose”. It is for the Authority, in light of the comments and authority above, to define the overall impact on openness, having regard to the location of the building and the removal of the surface car parking. But even if the VSC requirements under paragraphs 148 and 149 are engaged, the level of harm to the openness of the Green Belt still needs to be assessed.

## 5.0 Development Benefits

- 5.1 It is considered, that there are other positive aspects to the development in support of the proposals, with the key ones being:

### Development / economic benefits

- The Site is previously developed land and its redevelopment is encouraged both at a national level within the Framework and at local level;
- The Site is currently a derelict hotel, which does not make a positive contribution to the character or appearance of the Green Belt location;
- The proposed development will contribute to the supply of high quality and purpose-built elderly accommodation within the District;
- 115 on site jobs. The mix of full and part time opportunities, diversity of roles, operator's commitment to on-the-job training and a locally focused recruitment strategy maximises the potential for local people to access these jobs. The former employees of Hotel Felix will be particularly encouraged to apply for the numerous job opportunities created by this venture. The employment will contribute to reducing poverty and illness, encourage personal and social esteem and aid recovery from physical and mental illnesses;
- 90% of older people in South Cambridgeshire live in under-occupied homes. "If this stock could be used more efficiently, then the amount of land required for additional housing would be reduced." 1.89 bed spaces in South Cambridgeshire equates to 1 non-communal housing unit<sup>11</sup>. The development could, therefore, be expected to reduce housing supply requirements by 42 dwellings;

### Community and Health Benefits

- The proposed development co-locates a Dementia Research Centre with residential and nursing care, providing unique support for people with Dementia and their carers;
- The proposed Dementia Research Centre will provide training and research into Dementia care, helping to upskill the sub-regional population, support the voluntary sector and deliver better outcomes for people with Dementia;
- Facilities and staff that potentially reduce demand on some external health and social care services, as compared to 80 individuals in separate residences seeking services. Thus, conserving health care resources for other patients and potentially improving their health outcomes;
- Community outreach events that support those with Dementia and their carers, helping to reduce stress;
- Access to grounds, planned activities and facilities for other local Dementia based groups and their carers;

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<sup>11</sup> Based on Housing Delivery Test rulebook. Local housing multiplier determined by GL Hearn (2020) Housing Needs Specialist Groups, page 180

- Providing a focal point for the local Dementia community to share, support and be among those who understand; and
- Providing an emergency Police dementia care drop off monitoring point ( if a person with dementia is found in the wider community wandering around and their address cannot be immediately found the home will watch over them until the police can locate their family or home).

5.2 The development is one of a mix of employment uses in and around Girton within short walking distance of good public transport connections and local amenities, as accords with NPPF paragraph 106. Residents unable to walk will be able to use inhouse transport services.

5.3 The factors considered above individually do not represent Very Special Circumstances and the question for the decision taker is whether collectively those factors combine with sufficient weight to represent the Very Special Circumstances that would overcome harm to the Greenbelt. Table 2 sets out the applicant’s assessment of the weight of these factors:-

**Table 2: Very Special Circumstances Assessment**

MATERIAL CONSIDERATION		VERY SPECIAL CIRCUMSTANCE - GREEN BELT	WEIGHT TO BE AFFORDED (APPLICANT)	IMPACT IN BALANCING EXERCISES
			limited / moderate. substantial	negative, neutral, positive
<b>Housing Need</b>				
1.	<b>Critically needed housing for older people</b>	<p>NPPF requires that the needs of specific housing groups are addressed. There are no allocated sites for care homes in the Local Plan. Officers within the Committee Report and Appeal Case Statement for 20/02929/OUT accepted that there is an unmet need and that this carries ‘significant’ weight in favour of proposals for new older people housing. Supported by PPG, which states, “<i>the need to provide housing for older people is critical</i>”<sup>12</sup>.</p> <p>In addition, with application S/3418/17 considered in March 2018, the Authority accepted that the level of need for care bed spaces at that time was sufficient to represent Very Special Circumstances. That need has not materially diminished.</p>	Very Substantial	POSITIVE
2.	<b>Critically needed dementia care facilities</b>	<p>NPPF requires that the needs of specific housing groups are addressed, yet there is a critical shortfall of spaces available and no site allocations in the Local Plan for dementia care bed spaces.</p>	Weight	POSITIVE

<sup>12</sup> Planning policy guidance. Paragraph: 001 Reference ID: 63-001-20190626 Revision date: 26 June 2019

3.	Improves <b>choice of care bed spaces</b>	Provides a better choice of accommodation to suit changing needs, providing health benefits (as supported by PPG) and encourages take-up of bed spaces, thereby avoiding people having to live in inappropriate accommodation.	Substantial	POSITIVE
4.	The development will indirectly contribute to the <b>housing land supply</b> within the district	Although not formally a part of the housing land supply requirements, 80 beds could release 42 homes from underoccupancy, reducing the housing need requirement in an area where there is substantial housing need. The Council in Appeal Case Statement (20/02929/OUT) states very significant weight should be given to this benefit.	Very Substantial	POSITIVE
<b>Dementia Care</b>				
5.	There would <b>be social opportunities</b> and resultant health benefits arising from delivery of specialist dementia facilities	Benefits accrue to residents, carers, visitors and the wider elderly and Dementia community through use of facilities and community activities. The NPPF promotes the creation of places which <i>“promote social interaction, including opportunities for meetings between people who might otherwise not come into contact with each other”</i> (para92(a))	Substantial	POSITIVE
6.	Wide range of <b>health benefits</b>	NPPF para 92(c) states planning decisions should <i>“aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles.”</i> Staying healthy throughout life including aging well is a policy priority of the Health and Wellbeing Board <sup>13</sup> .	Medium	POSITIVE

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<sup>13</sup> Cambridgeshire and Peterborough Health and Wellbeing Board (February 2020) Cambridgeshire and Peterborough Consultation Draft Health and Wellbeing Strategy

		<p>Significant health benefits arise for older people through this development as a result of:</p> <ul style="list-style-type: none"> <li>• Dementia inclusive design of the internal and external spaces;</li> <li>• Enhanced opportunity for social stimulation, movement / exercise, stimulating activities;</li> <li>• Reduced risk of falls;</li> <li>• 24-hour health monitoring; and</li> <li>• Access to health care.</li> </ul>		
<b>Harm to the Green Belt</b>				
7.	<b>The openness of the Green Belt is improved</b>	Through the removal of parking and increased landscaping, which improves Green Belt openness.	Moderate weight	POSITIVE
	<b>Paragraph 149 (g)</b>	This essentially accepts that existing buildings have some impact and redevelopment of existing buildings is permitted if no greater harm to the openness of the Green Belt is caused. The judgment is harm to openness, not increase in floor area.	Moderate weight	
<b>Employment and economic benefits</b>				
	The site is <b>previously developed land</b> , in which buildings are now empty	<p>This is a benefit, as nationally the Government encourages the effective use of land by re-using land that has been previously developed (brownfield land). The NPPF promotes “<i>effective use of land in meeting the need for homes.</i>” (Para 119).</p> <p>The site would contribute to the Council’s brownfield land development commitments, which have been declining in recent</p>	Moderate	POSITIVE



		years due to dwindling opportunities. Delivery of housing on brownfield land has declined over the past 5 years to 19% in 2019 (Greater Cambridge (2020) Authority Monitoring Report 2019-2020)		
	Take up of the site for its previous <b>hotel use</b> is unlikely.	NPPF states “ <i>Local Planning Authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.</i> ” (para 123).  Since the closure of Hotel Felix, Turing Locke aparthotel and Hyatt Centric have opened in Eddington, providing 330 new rooms. Consent has been granted for a new 150 bed hotel at the Imperial War Museum, a 120 aparthotel next to Cambridge train station and a 200 bedroom aparthotel approved to replace the MSCP at Park Street	Moderate	POSITIVE
	The site would provide economic benefits by <b>generating jobs</b> in the construction and operational phases of the development and by residents spending locally	“ <i>Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth</i> ” NPPF (para 81). 115 jobs would be created with a £25M investment in the local community.	Moderate weight	POSITIVE
	<b>Dementia research and training</b> to support carers in the wider community	The care home provides the basis of the research and training facility designed to improve dementia care and patient outcomes. The location of the new facility, close to public transport, allows for staff and visitors to use alternative transport modes. It also means a good pool of qualified staff is proximate.		
<b>Community and Health Benefits</b>				

	Open space provides recreational space designed specifically for those with dementia	This is a benefit to the wider community, particularly the Dementia community. Gardens designed for people with Dementia will be useable by the wider community during organised activities. (Note, unlimited public access is not appropriate given the need to keep residents safe.)	Moderate	POSITIVE
	Facilities enable residents to age well.	See health benefits associated with item 6.	Moderate	
<b>Environmental Benefits</b>				
	<b>The development would be in a sustainable location</b>	The development is one of a mix of employment uses in and around Girton, within walking distance of good public transport connections and local amenities, as accords with NPPF para 106. Residents unable to walk will be able to use inhouse transport services.	Substantial weight	POSITIVE
	<b>The environmental benefits of the scheme are a clear benefit</b>	<ul style="list-style-type: none"> <li>See attached plan from LUC showing benefits</li> </ul>	Moderate weight	POSITIVE

## 6.0 Conclusion

## 6.0 Conclusion

- 6.1 If any harm to openness of the Green Belt is adduced, the applicant considers that very special circumstances do exist which would allow the LPA to approve the application as according with the Development Plan and other material circumstances.

