The background of the cover is a black and white aerial photograph. The top half shows a wide view of a town with various buildings and a large open area. The bottom half shows a steep, grassy hillside with a few trees and buildings at its base.

Representations to the South Staffordshire Council Local Plan Preferred Options Consultation

On behalf of:

Completelink Ltd
December 2021

Contents

| | | |
|-----|---|----|
| 1.0 | Introduction | 2 |
| 2.0 | Representations on the Proposed Strategy and Policies | 3 |
| 3.0 | Promotion of Prestwood House Care Home & Estate..... | 11 |

1.0 Introduction

- 1.1. Zesta Planning Ltd has been instructed by Completelink Ltd to make formal representations on the South Staffordshire Council Local Plan Preferred Options consultation (hereafter referred to as the “Preferred Options”). This document and associated evidence base were published for a 6-week consultation period between 1st November 2021 to 13th December 2021.
- 1.2. The purpose of this representation is twofold: firstly, to make our views known on the content of the policies and site options contained within the Preferred Options document, and secondly, to promote the allocation of a specialist housing/care accommodation site at the Prestwood House Care Home & Estate, Prestwood, Stourbridge. DY7 5AL.
- 1.3. Prestwood House Care Home & Estate sits within a site ownership of 55 acres, including a number of buildings, including Prestwood House, Boiler House, The Coach House and Prestwood Lodge as care facilities, as well as a wider complex of over-55s dwellings, known as The Oval. This is an established older people and care home site of nearly 40 years, offering a range of high quality care services, within a landscaped setting.
- 1.4. Importantly, there is an acknowledged shortfall in the existing delivery of care bed spaces within South Staffordshire and this has been documented through the Council’s Authority Monitoring Reports and evidence base supporting this Preferred Options consultation.
- 1.5. Despite this, we have grave concerns that the Council does not adequately allocate anywhere near enough land within the Preferred Options for dedicated specialist housing/care accommodation. Without further allocations, this need will simply not be met within the plan period and the existing deficit of care bed spaces will continue to grow. It is on this basis that we submit these representations.
- 1.6. This representation is structured as follows:
 - Section 1 – Introduction
 - Section 2 – Representations on the Proposed Strategy and Policies
 - Section 3 – Promotion of Prestwood House Care Home & Estate as an Additional Allocation

2.0 Representations on Proposed Strategy & Policies

The Need for Specialist Care Accommodation

- 2.1. In order to fully assess the emerging planning policy position outlined within the Preferred Options consultation, it is important to understand the adopted policy position and in relation to specialist housing/care accommodation and the performance against the adopted requirements.

Adopted Policy Background and Existing Need Position

- 2.2. The Development Plan currently comprises the South Staffordshire Council Core Strategy to 2028 and the Site Allocations Document (SAD).
- 2.3. The Core Strategy was adopted in December 2012 and covers the plan period for 2006-2028. The most relevant policies to establish the background for these representations are as follows:
- 2.4. **Core Policy 6** partly requires the delivery of housing for South Staffordshire's ageing population, supporting proposals for extra care and residential care homes, dementia care units and retirement villages of an appropriate scale, in line with identified need. The policy is to provide the required accommodation within the housing markets areas.
- 2.5. **Policy H1** in line with Core Policy 6 supports proposals for housing to meet specific needs for support and adapted housing, including extra care, to reflect the District's needs, particularly that catering for the growth in the over 65 and over 85 age groups.
- 2.6. **Policy H5** further considers specialist housing accommodation, setting out that retirement villages to meet the needs of the District will be supported. These sites are not required to come through the Site Allocations SPD. In determining planning applications, the site must be sustainably located and seek to re-use brownfield land.
- 2.7. The **explanation** of the policy under Paragraph 8.30 states that the Council's evidence base projected that by 2025 there will be a need for 590 extra care bed spaces. The section on the Authority Monitoring Reports below sets out the level of care development delivered so far against this policy requirement.

2.8. The Council's Authority Monitoring Reports establishes the delivery of care bed spaces since 2012. The relevant documents show the following spaces have been provided:

- **13 units at Womborne – 2018**
- **39 units at Bilbrook – 2018**
- **41 units at Penkridge – 2017**
- **59 units (net) in Penkridge – 2014**
- **52 units at Womborne – 2013**

Total = 204 units delivered over the plan period to date.

2.9. It is important to note that the Authority Monitoring Reports have not been updated since 2018.

2.10. These representations identify a substantial need for new elderly care accommodation in South Staffordshire. This need is established by the Council's Annual Monitoring Reports and within the Explanation for Policy H5 of the adopted Core Strategy. The evidence base demonstrates a requirement for **386** additional bed spaces over the next 4 years, which equates to around 96 new specialist bed spaces per year. This is a significantly high requirement and would require new care facilities to be delivered at a rate substantially quicker than has ever been delivered by the Council in the recent years.

2.11. The site is located outside of a Settlement Boundary, with the principle of new elderly care accommodation limited to the housing market areas as set out in Core Policy 6. Policy H5 which refers to Specialist Housing Accommodation, similarly, requires these sites to be within 'a sustainable location', with a 'relation to an existing village and its services, and its proximity to public transport links and key infrastructure and services'. However, the policy does not refer to care home proposals outside such areas.

2.12. A significant material consideration is the Council's delivery of care bed spaces since 2012, has delivered only 204 out of a need of 590. This leaves a residual of 386 units between now and 2025, which results in a requirement of 96 units per annum. This is a significant increase of the current rate of delivery over the plan period, which is only 23 per annum, proving care units are not coming forward in the housing market

areas. It should be acknowledged that the Prestwood House Care Home & Estate facility is having to turn away requests for care spaces both from individuals and care services.

- 2.13. It is clear that this need will not be met under the current adopted policy, and as a result the Council is heading towards a substantial shortfall against its current requirements.

Emerging Local Plan Evidence Base and Need Position

- 2.14. In relation to specialist housing/care accommodation, the key evidence base provided to support the South Staffordshire Council Local Plan Preferred Options is found within the South Staffordshire Housing Market Assessment 2021 and the Specialist Housing: Local Need & Site Allocations Topic Paper (September 2021) and the Housing Site Selection Topic Paper (September 2021).
- 2.15. The South Staffordshire Housing Market Assessment 2021 highlights a predicted significant increase in older people in the district over the plan period with the number of people aged 75+ set to increase by **58.8%** (p.65), whilst those aged 65+ are set to increase by **40.7%** over the plan period from **27,238 in 2018, to 38,333 in 2038** (p.81). Cohorts of the population expected to be living with a range of health issues are also expected to increase e.g. the number of people aged 18-64 with impaired mobility will go up by 70.2% (p.90).
- 2.16. The need for specialist accommodation is set out in Table 7.2 (p. 84), indicating **568 additional units will be required up to 2038**, as a mixture of sheltered/retirement (417 units) and extra care/supported living homes (151 units) (both market and affordable).
- 2.17. The requirement for 568 additional specialist units for older person households represents 6.3% of the total household growth in South Staffordshire for the period 2018 to 2038.
- 2.18. As well as the need for specialist housing for older people, there is also an additional requirement for Registered Care, i.e., residential care homes and nursing homes which provide a high level of care of individuals, such as dementia care. There are currently 1,140 spaces in nursing and residential care homes in South Staffordshire and the model suggests there will be 2,033 people aged 65 and over in South Staffordshire needing Registered Care by 2038.

- 2.19. There will be a requirement for **893 additional Registered Care spaces between 2018 and 2038**, of which 49.7% should be in the affordable sector and 50.3% within a market tenure.
- 2.20. The identified need between 2018 - 2038 is therefore:
- Sheltered/Retirement and Extra Care/Supporting Living - 568 additional units
 - Registered Care – 893 additional spaces
- 2.21. The Specialist Housing: Local Need & Site Allocations Topic Paper (September 2021) then goes on to discuss the allocation of potential sites to meet the need for specialist accommodation **only**. There is no discussion on meeting the need for Registered Care spaces at all, which is a clear failure of this Local Plan preparation.
- 2.22. In addition, the Council have only assessed the most sustainable locations and specifically within Tier 1 and Tier 2 settlements, as potential locations for allocations for specialist accommodation. There is no assessment of the potential to allocate sites in Tier 3 or 4 settlements or importantly to expand established existing specialist accommodation sites, such as Prestwood House Care Home & Estate, within South Staffordshire wherever they may be located.
- 2.23. Furthermore, the assessment is then considered on the basis of the demographics, health and existing provision within the individual Tier 1 & Tier 2 settlements, rather than as a Council-wide area approach. The conclusion seems to be that older people will automatically seek care provision in their existing village and given that the need is Council-wide this seems parochial view.
- 2.24. Ultimately the recommendations of the Specialist Housing: Local Need & Site Allocations Topic Paper (September 2021) suggest exploring specialist housing allocations within Cheslyn Hay/Great Wyrley, Codsall/Billbrook, Brewood and Kinver **only**. The majority of which are located in the northern half of the Council area.
- 2.25. Overall, we are very concerned that this provides a very narrow assessment of potential allocation sites for specialist care and the ability to meet the need is called into question.
- 2.26. The final piece of evidence that feeds into the Preferred Options is the Housing Site Selection Topic Paper (September 2021). This paper outlines the proposed allocations in the above target settlements, as follows:

- **Cheslyn Hay/Great Wyrley** – Site 536a (Land off Holly Lane Part 1 – East of Chase Line Railway) – approx. 84 dwellings with specialist sheltered, extra care or supported living delivered as part of this. No clarity on how many of these 84 dwellings would be specialist accommodation. This is a Green Belt release.
- **Codsall/Billbrook** – Despite the conclusions of the Specialist Housing: Local Need & Site Allocations Topic Paper (September 2021), no specific discussions on specialist accommodation allocations and inexplicably no reasons are given.
- **Brewood** – Site 079 (Land South Kiddemore Green Road) – approx. 43 dwellings with specialist elderly retirement living delivered as part of this. No clarity on how many of these 84 dwellings would be specialist accommodation. This is a Green Belt release.
- **Kinver** – No sites found despite an identified need. Locational sustainability only factor considered. Clearly if expansion of existing established sites had been assessed then Prestwood House Care Home & Estate would be a great opportunity to deliver the need for Kinver, just under 2 miles away to the north east.

Conclusion on Specialist Housing/Care Accommodation Need & Evidence Base

- 2.27. Firstly, it is important to note that we have identified a clear shortfall in the existing provision of specialist accommodation under the adopted Cores Strategy 2012 totalling some **386** care bed spaces.
- 2.28. The evidence base for the emerging Local Plan states that there is a need for **568 additional units will be required up to 2038**, as a mixture of sheltered/retirement (417 units) and extra care/supported living homes (151 units) (both market and affordable). There is also a clear requirement for **893 additional Registered Care spaces between 2018 and 2038**.
- 2.29. However, there is absolutely no discussion on whether the identified need up to 2038, also includes the shortfall from previous years against the level of need identified within the adopted Core Strategy. This is a clear flaw in the assessment, potentially resulting in a significant undersupply being rolled over to the new Local Plan.
- 2.30. There is a critical failure in the evidence base to assess any potential allocations or sites for Registered Care spaces or any discussion whatsoever. This is despite a

clear identified need, even greater than the specialist accommodation requirement. Again, this is another clear flaw in the assessment.

- 2.31. As outlined above, the site allocation assessment has solely been based on the sustainability of locations within Tier 1 & 2 settlements only and does not make any reference to options for Tier 3 & 4 settlement or importantly the potential to expand existing established care facilities wherever they may be in South Staffordshire. Existing established care facilities would include Prestwood House Care Home & Estate.
- 2.32. Finally, the allocation assessment process only yields **two** site allocations to include specialist accommodation, resulting in up to 127 dwellings. This is very much a maximum and is unlikely to be anywhere near this level of provision, as the allocations are written to suggest that specialist accommodation is secondary to standard market/affordable housing.
- 2.33. Even taking the maximum figure, this only represents 22% of the total need to 2038 and there is no assessment as to where or how the rest of the need will be delivered over the Local Plan period. This is fundamentally inadequate.

Preferred Options Questions

- 2.34. With the above assessment in mind, we turn to the specific questions asked within this Preferred Options Consultation, as follows. We will only respond to the questions where they relate to our position.
- 2.35. **Question 1 - Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?**
- 2.36. We have fully set out our position above in relation to the evidence base where it relates to the need and associated land allocation for specialist accommodation.
- 2.37. In short, we consider the Specialist Housing: Local Need & Site Allocations Topic Paper (September 2021) and the Housing Site Selection Topic Paper (September 2021) woefully inadequate to address the needs established in the South Staffordshire Housing Market Assessment 2021, as well as the built-up deficit from the Core Strategy 2012.
- 2.38. No discussion or allocation for Registered Care is also a huge gap in the overall assessment.

Question 3 (a) Have the correct vision and strategic objectives been identified?

2.39. Yes.

Question 3(b) Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives?

2.40. No. Specifically in relation to, “Strategic Objective 3: To provide housing to meet the needs of different groups of the community, including a good range of market and affordable housing of varying sizes and **housing that meets the need of an ageing population and people with specialist housing needs.**”

2.41. As we have outlined above, the Preferred Options doesn’t even come close to meeting the established needs for specialist accommodation or Registered Care. Therefore, it would fail to meet this objective.

Question 6 - Do you support the policy approach in and Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

2.42. The aspiration for a new settlement is not objectionable. However, this is intended to come forward beyond the plan period some 17 years in the future, whereas the need for pressing need for specialist accommodation is **today**. There is also no mention of specialist accommodation within the policy itself.

Question 7(a) - Do you support the proposed strategic housing allocations in policies SA1-SA4?

2.43. Despite the four strategic development locations seeking to contribute in excess of 3,000 dwellings, none of Policies SA1, SA2, SA3 or SA4 make any specific reference to the provision of specialist accommodation to meet the established needs. These appear to be solely focussed on standard market and affordable housing. In any event, all of the strategic development locations are in the northern half of the Council area, further increasing the disparity in housing need distribution within the Council area.

Question 8 – Do you support the proposed housing allocations in Policy SA5?

2.44. For the reason given above, no, we do not support the proposed housing allocations.

2.45. In relation to specialist accommodation, only two sites have been allocated (Sites 079 – Brewood & 536a – Great Wyrley), as part of wider standard market and affordable residential allocations totalling 43 units and 84 units respectively.

- 2.46. Firstly, these allocations do not specify the number of specialist housing units including within the total numbers. They will likely be minor percentage of the total. Even if the total allocations units were for specialist accommodation, this would only represent 22% of the total need. As we say, in reality it is likely to be much less than half of this amount. This is woefully inadequate given the established need and existing undersupply.
- 2.47. Both of these allocations are located in the north of the Council area and no specialist accommodation is allocated in the south. The established need is Council-wide. For example, there are 3no. allocations in Kinver in the south (and near to Prestwood House Care Home & Estate) totalling 164 dwellings, but no requirement for specialist accommodation, despite a clear established need.
- 2.48. Both of these housing allocations are as a result of Green Belt releases. This would suggest that no land within existing urban areas is available for specialist accommodation. With this in mind and given that the needs will not be remotely met, it is clear that further allocations and Green Belt releases will be required.
- 2.49. As a result, Section 3 of this report below outlines that Prestwood House Care Home & Estate should be considered for Green Belt release and allocation for specialist accommodation to help towards meeting this need.

Question 11 - Do you agree with the proposed policy approaches set out in Chapter 6?

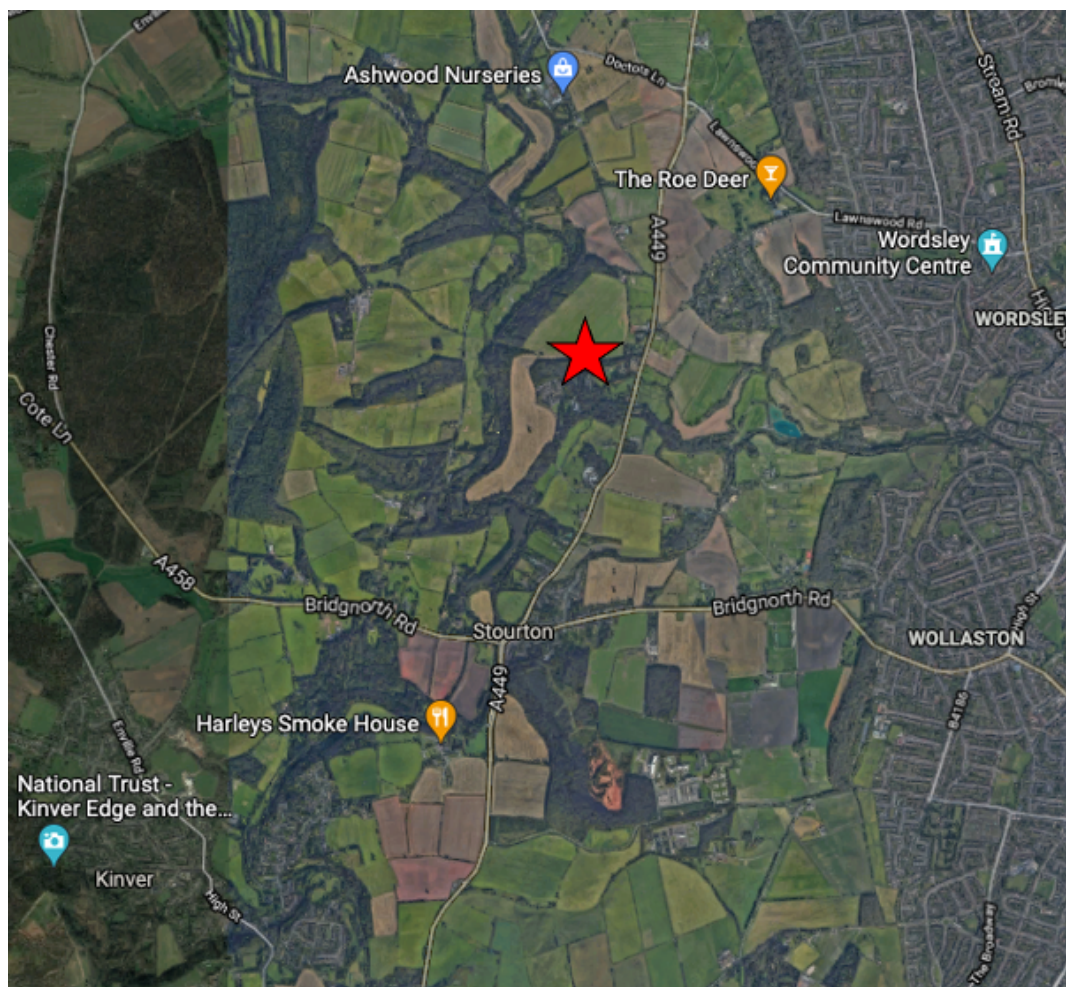
- 2.50. Policy HC4 (Homes for Older People) is far too vague in relation to the requirement for major development to make a “clear contribution” towards meeting the needs of the district’s ageing population.
- 2.51. There is no trigger or numerical requirement here, nor is there a request for a specific type of specialist accommodation to be provided. The way this policy is written, a major development could simply provide a few bungalows to comply. The specialist accommodation needs for the District are clearly more complex than that.
- 2.52. We would support the general thrust of Policy HC5 (Specialist Housing Schemes) to strongly support specialist housing schemes.

3.0 Promotion of Prestwood House Care Home & Estate

3.1. This Section of the document provides site-specific representations for the promotion of an additional allocation site for specialist care accommodation at Prestwood House Care Home & Estate, Prestwood, Stourbridge. DY7 5AL

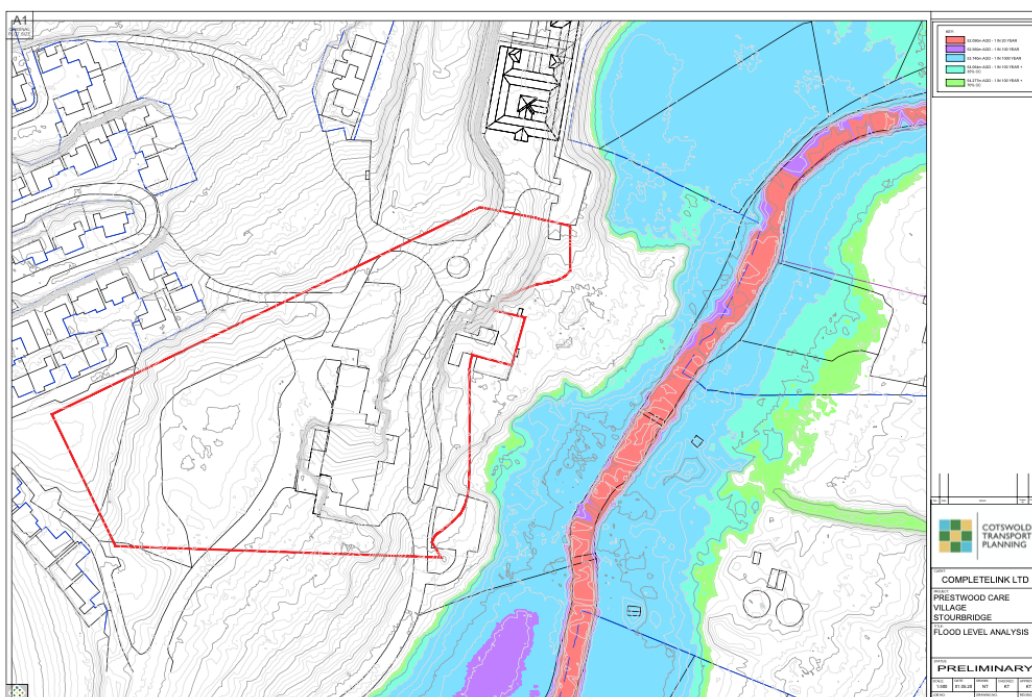
The Site and its Context

3.2. Prestwood House Care Home & Estate sits within a site ownership of 55 acres, including a number of buildings, including Prestwood House, Boiler House, The Coach House and Prestwood Lodge as care facilities, as well as a wider complex of over-55s dwellings, known as The Oval. This is an established older people and care home site of nearly 40 years, offering a range of high quality care services, within a landscaped setting.



*Aerial Photo showing location of the site in context of
Kinver to south and the Stourbridge to east*

- 3.3. The site is located to the west of the A449 Wolverhampton Road and includes areas of private woodland and grassland. The site includes a number of trees subject to Tree Preservation Orders (TPO), however there are vast areas of the site that could be developed that would have little to no impact on those TPO's. The River Stour runs along the southern and eastern boundaries, but flood modelling work undertaken by the applicant demonstrates that the majority of the Prestwood Estate falls within Flood Zone 1 (low risk).
- 3.4. In the wider context, the site is within half a mile of Lawnswood and Stourton and is within 1.5 miles of Kinver, a Tier 2 Settlement. The site is also to the western edge of Dudley Metropolitan Borough.
- 3.5. The existing care facilities are dotted across the site, with Prestwood House and Boiler House positioned centrally and the Coach House and Prestwood Lodge to the north. A complex of over 55's bungalows and houses, known as The Oval, are located to the west.
- 3.6. This is not a Conservation Area and no buildings on the site are Listed or are considered to be non-designated heritage assets.
- 3.7. The lower land to the east around the River Stour is acknowledged to be in Flood Zone 3, although all built form on site is located on higher ground and is within Flood Zone 1. The Environment Agency has recognised the flood modelling work carried out by the applicant in this regard. See detailed flood modelling map below:



- 3.8. It is acknowledged that the site is covered by the West Midlands Green Belt, but there are no other planning or environmental constraints or designations affecting the site.



Aerial Photo of the extent of the site

- 3.9. The type of accommodation on site ranges from the over-55s bungalows and housing within The Oval to residential care, 24-hour nursing care, respite care, palliative care and day care. They also have a firmly established community care service.

Suitability of the Site

- 3.10. As demonstrated in Section 2 of this document not only did the evidence base for the Preferred Options not assess the potential of expanding any existing and established specialist care accommodation facilities, the only provided an allocation on two sites in the northern half of the District. Importantly, these two allocations are formed of Green Belt releases, which suggest that there is no available land within settlement boundaries and/or brownfield land. The allocations put forward do not in any way meet the established need for specialist accommodation. Assessment of Tier 1 & 2 settlements only has clearly been far too narrow.

- 3.11. It is clear that further allocations and Green Belt releases are necessary to meet the needs.
- 3.12. We are therefore promoting Prestwood House Care Home & Estate as an established specialist care accommodation site within the southern part of the District, which is capable of both allocation and associated Green Belt release.
- 3.13. As mentioned above, the site already consists of a number of significant buildings, which have potential to be reorganised and extended or demolish and rebuilt to enhance facilities, increase density of accommodation and improve the living environment for residents. Because of the established nature of the Care facility here at Prestwood, there is an established pool of care professionals based in the area. This is a further significant benefit of expanding an existing facility, rather than developing a new site where the same work pool does not exist.
- 3.14. The site is currently under assessment by Completelink Ltd for a scheme which would partly demolish and replace the main Prestwood House and extend the Coach House and Prestwood Lodge. This could provide up to 150 additional bedroom units. This level of additional accommodation would have a significantly greater impact on the establish need for specialist accommodation than both the proposed allocation sites combined.
- 3.15. The only significant constraint to development on the site is its location within the West Midlands Green Belt.
- 3.16. As part of the evidence base for the Preferred Options consultation there is the South Staffordshire Green Belt Study (July 2019). This has informed the potential Green Belt releases included within the Preferred Options and has assessed the District against the five purposes for including land within the Green Belt (NPPF Paragraph 138).
- 3.17. The site is located within land Parcel S75 within the Green Belt Study. Please note that this relates to a significant land parcel totalling 559.5 ha in total. Within Stage 1 of the Green Belt assessment and against the five purposes, it performed as follows (Weak/No Contribution – Moderate – Strong):
1. Check the unrestricted sprawl of large built-up areas - **Strong**
 2. Prevent neighbouring towns merging into one another – **Weak/No Contribution**

3. Assist in safeguarding the countryside from encroachment – **Strong** (Note – this rating covered the entire District area)
 4. Preserve the setting and special character of historic towns – **Weak/No Contribution**
 5. Assist in urban regeneration, by encouraging the recycling or derelict and other urban land – **Unrated**
- 3.18. As the proposal site was not part of a promotion site for housing at the time of the Green Belt Study it was not assessed under Stage 2 of the Green Belt assessment.
- 3.19. The Stage 1 assessment under the Green Belt Study is of limited importance when it comes to the site itself, given that it was assessed as part of a significantly large parcel of land adjoining the urban areas within Dudley Borough.
- 3.20. If this promotion of the site is considered on its own merits it would likely have a Weak/No Contribution impact Purpose 1 (Unrestricted Sprawl) and Purpose 3 (Safeguarding the Countryside). Firstly, this is due to the fact that it is not located immediately adjacent to the urban areas within Dudley Borough. Furthermore, as there are existing buildings on the site, it would be the intention to develop the site on the basis of the location of these buildings, whether through extension or rebuild, protecting any significant encroachment into the countryside.
- 3.21. In addition, large parts of the site are covered in woodland or is subject to areas of Flood Zone 3, and so the main developable areas would be located around the existing buildings in any event.
- 3.22. South Staffordshire Council are already proposing Green Belt releases through their site allocations noted within the Preferred Options. These releases are predominantly required due to the scarcity of sites within settlement boundaries and/or brownfield land, to meet the housing need.
- 3.23. We have already established the needs for specialist accommodation and so, a further Green Belt release, in a location such as this, which would not result in any harm to the purposes of the Green Belt is entirely logical. This is especially considering that this is an established site used for this very purpose.
- 3.24. In landscape terms, it is noted that the site is within the open countryside. However, given that it is located within a dense and mature woodland setting, within a large

private land holding, any development located around the existing built form on the site would be unlikely to have any discernible impact on the landscape character of the wider area.

- 3.25. Another key reason why this site is suitable is due to the fact that as it is already established as a specialist care facility, it has significant benefits in terms of sustainability credentials. Whilst it is acknowledged that the site is not located within a defined settlement, it should be noted that the site features a range of facilities for residents on-site, including restaurants, hair salons, gyms, communal areas etc. This allows for a degree of self-reliance for the facility. Should residents need to travel for shopping etc, the facility provides dedicated transport and for residents that can drive, the local centres are in very close proximity.
- 3.26. In addition to this, the also has a significant employment and skills base involving many employees who are all locally based. The opportunity to expand the facility would only lead to additional job opportunities for local people within the south of the District.

Conclusion

- 3.27. As mentioned, there is both a clear identified need for specialist accommodation in the emerging Local Plan evidence base, as well as a clear undersupply of specialist accommodation under the current adopted Local Plan.
- 3.28. The proposed allocations for specialist accommodation in the north of the District, which themselves are Green Belt releases, do not go nearly far enough to meet this need. As a result of these releases there are obviously no available brownfield sites or sites within settlement boundaries.
- 3.29. The assessment of only providing specialist accommodation allocations at Tier 1 & 2 settlements is far too narrow and will not allow the needs to be met.
- 3.30. In order to meet the need, there will need to be further Green Belt releases and allocations. The Council have not assessed existing established specialist housing sites within the District and we would put forward that this is an error.
- 3.31. It would clearly be sequentially preferable to expand an existing facility, which has all the supporting infrastructure, skills, employees and services in place, rather than provide an entirely new facility. An existing facility would also be preferable for

Green Belt release due to the range of existing buildings on site and the ability to extend or rebuild.

- 3.32. In addition, the need is District-wide and the current allocations only caters for the northern half of the District. Consideration must also be given to the southern half of the District.
- 3.33. As with the other Green Belt releases, there are already established “Exceptional Circumstances” for this by virtue of the identified need for specialist accommodation. To meet the need, other sites simply must be considered and should also fall within Exceptional Circumstances for Local Plan preparation.
- 3.34. Prestwood House Care Home & Estate is a long established specialist accommodation facility within the southern half of the District. It has been assessed to have the capacity to expand by up to 150 new units of specialist accommodation. This would go a long way towards meeting the overall care need requirement over the plan period.
- 3.35. Furthermore, the proposed scheme is already within the setting of an existing care facilities which has proven to be acceptable, and the proposed development would provide a facility which is self-reliant, providing residents with services and facilities within the grounds of the development, such as restaurants, hair salons and gyms. Extending this site must be preferable to providing a completely new facility elsewhere.
- 3.36. The site is within a single ownership and is available for development immediately. It is suitable, available and achievable within the next 5 years, let alone the emerging Local Plan period.
- 3.37. We conclude that Prestwood House Care Home & Estate should be formally allocated for specialist care accommodation and associated facilities within the emerging South Staffordshire Local Plan. This site is a candidate for Green Belt release, not only because of its limited impact on the purposes of the Green Belt, but also because it is capable of providing a significant proportion of the unmet need for this type of accommodation, which cannot be met elsewhere in the District.
- 3.38. We would strongly encourage the Council to properly meet the needs of elderly and specialist care through the expansion of this well-established care site.



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