

Appendix IW1

Elderly Persons Needs Assessment

ELDERLY PERSONS NEEDS ASSESSMENT



ELDERLY PERSONS NEEDS ASSESSMENT

Appeal against refusal of Outline application for a residential development of up to 190 dwellings (including affordable homes) (Use Class C3), an extra care facility with up to up 80 beds (Use Class C2), together with the formation of vehicular access, landscaping, parking, open space, green and blue infrastructure, and all other associated development works. All matters reserved except access

Land South of Barrow Green Road, Oxted
Croudace Homes Ltd

December 2025

PINS REF: APP/M3645/W/25/3372747

LPA REF: 2025/245

OUR REF: 1101.01.RPT

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Introduction

Section 1

- 1.1 This report has been prepared by Tetlow King Planning on behalf of Croudace Homes Ltd in support of their appeal.
- 1.2 This report assesses the local need for specialist accommodation for older people within Tandridge now and up to 2045, whilst also providing a focus on the immediate level of need between 2025 and 2029.
- 1.3 This Statement includes an assessment of Development Plan policies and other material considerations that are relevant to the site, the proposed development and the provision of specialist accommodation for older people.
- 1.4 The ageing population prompts a housing response to meet this growing need. Whilst housing and care provision has increased significantly in the UK over the past few years, it is still not keeping up with demand from the growing ageing population.
- 1.5 This assessment sets out the findings of a care and accommodation needs assessment for older people within the local authority administrative area of Tandridge.
- 1.6 The report comprises 9 sections as follows:
 - Section 2 – Planning Policy Context;
 - Section 3 – Forms of Specialist Housing;
 - Section 4 – Local Assessment;
 - Section 5 – Review of Methodologies;
 - Section 6 – Needs Assessment to 2045;
 - Section 7 – Needs Assessment to 2029;
 - Section 8 – Alternative Growth Scenarios; and
 - Section 9 – Summary and Conclusions.
- 1.7 The assessment draws on a range of national and local publications as well as information on the local provision of care facilities.

Planning Policy Context

Section 2

Introduction

- 2.1 This section of the assessment provides a brief overview of the relevant development plan policies and national approach relating to the delivery of specialist older persons accommodation across Tandridge and at a national level.
- 2.2 The Development Plan for the area comprises Tandridge District Council Core Strategy [CD4.1], adopted in October 2008 and Tandridge Local Plan Part 2 – Detailed Policies, adopted July 2014 [CD4.2].
- 2.3 Other material considerations relevant to this application include the National Planning Policy Framework (December 2024) [CD5.1], the Planning Practice Guidance (ongoing updates) [CD5.2], and a number of corporate documents.

The Development Plan

Tandridge District Core Strategy (2008) [CD4.1]

- 2.4 The Core Strategy sets out the Council's strategic policies and proposals for the development and use of land within the District.
- 2.5 Policy CSP8 sets out the council's approach to the provision of extra care housing. This policy set out a need to provide for at least 162 units of Extra Care accommodation within the District by 2016 with an updated assessment to determine the need for 2017 to 2026. The only reference to care homes is linked to the provision of extra care housing and notes that regard will be had to:

“The potential to co-locate a nursing/residential care home on the site where there is an acknowledged need.”

- 2.6 The strategy is therefore silent in regard to any detailed policy seeking to deliver new care homes within Tandridge.

Tandridge Local Plan Part 2 (2014) [CD4.2]

- 2.7 The Part 2: Detailed Policies plan sets out the policies that will be used in the determination of all planning applications in the endeavour of working towards

achieving sustainable development. The adoption of the Part 2 plan superseded all of the remaining saved policies of the Local Plan from 2001.

2.8 The Part 2 plan contains no relevant policies relating to the provision of specialist accommodation for older people.

Material Considerations

Withdrawn Tandridge Local Plan

2.9 The Local Plan 2023 set out the strategic framework for development up to 2033. Within the draft plan it set out an updated approach to delivering specialist housing for older people through draft policy TLP14. This policy has regard to both SHMAs (the 2015 and 2018 update) as well as a Tandridge District Housing Strategy from 2018 (the updated document is discussed below).

2.10 The Local Plan 2023 was found unsound in the Planning Inspectors report [[CD4.25](#)], that being dated 14 February 2024, and was subsequently formally withdrawn on 18 April 2024 by the Full Council of Tandridge. Accordingly, the plan is of no relevance to this assessment, nor is any formal evidence prepared in support.

2.11 Following the withdrawal of the Local Plan 2023, it was agreed at a Full Council meeting on 18 April 2024 that TDC would start working on a new Local Plan. The published Local Development Scheme (June 2024) indicated that the new Local Plan will not be submitted for Examination until at least late 2026 or early 2027, demonstrating that it will be a number of years before a new Local Plan is adopted as part of TDC's Development Plan.

Material Considerations

National Planning Policy Framework [[CD5.1](#)]

2.12 In December 2024 the Government published the revised the National Planning Policy Framework (hereafter referenced as "**NPPF**"). The NPPF is a material consideration in the determination of planning applications and appeals.

2.13 Paragraph 61 of the revised NPPF establishes that:

"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay" [my emphasis added].

2.14 The revised NPPF retains the commitment to plan for and assess the housing needs of older people. Within the context of 'delivering a sufficient supply of homes' Paragraph 63 of the revised NPPF establishes that the size, type and tenure of housing needed for different groups in the community, including older people (as defined in Annex 2) and people with disabilities, should be assessed. The update now specifically defines older people as including:

"retirement housing, housing-with-care and care homes."

2.15 Paragraph 71 also notes that:

"Mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported). Mixed tenure sites can include a mixture of ownership and rental tenures, including Social Rent, other rented affordable housing and build to rent, as well as housing designed for specific groups such as older people's housing and student accommodation, and plots sold for custom or self-build." [my emphasis added]

National Planning Practice Guidance [CD5.2]

2.16 The Government also published the National Planning Practice Guidance (hereafter referenced as "PPG") in March 2014, and it has been subsequently updated, the most recent updates being July 2019. It provides further guidance on the interpretation and application of the NPPF. The elements of the PPG of particular relevance are detailed below.

2.17 As of June 2019, the government introduced a new section of the PPG entitled 'Housing for older and disabled people.' This new section in part reinforces earlier messages within the PPG, whilst in other places it takes the guidance further. It sets out from the opening that:

"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. 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. Therefore, an understanding of how the ageing population affects

housing needs is something to be considered from the early stages of plan-making through to decision-taking.” (Paragraph: 001 Reference ID: 63-001-20190626) [my emphasis added].

2.18 The guidance sets out clearly that:

“The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support. For plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people.” (Paragraph: 003 Reference ID: 63-003-20190626) [my emphasis added].

2.19 In order to determine the levels of need, the guidance sets out that:

“The age profile of the population can be drawn from Census data. Projections of population and households by age group can also be used. The future need for specialist accommodation for older people broken down by tenure and type (e.g., sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ (Strategic Housing for Older People Analysis Tool), which is a tool for forecasting the housing and care needs of older people. Evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can also be useful.” (Paragraph: 004 Reference ID: 63-004-20190626).

2.20 When considering the task of addressing the specific needs within plans, the guidance states:

“Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.” (Paragraph: 006 Reference ID: 63-006-20190626).

2.21 This section also provides guidance on the specific types of specialist forms of older persons housing that exist, which are:

“Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services.

Retirement living or sheltered housing: This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.

Extra care housing or housing-with-care: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

Residential care homes and nursing homes: These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.” (Paragraph: 010 Reference ID: 63-010-20190626).

2.22 The section goes on to state that:

“Plans need to provide for specialist housing for older people where a need exists. Innovative and diverse housing models will need to be considered where appropriate.

Many older people may not want or need specialist accommodation or ...

Plan-makers will therefore need to identify the role that general housing may play as part of their assessment. Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.” (Paragraph: 012 Reference ID: 63-012-20190626).

2.23 In respect of decision making the guidance sets out clearly that:

“Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need”.
(Paragraph: 016 Reference ID: 63-016-20190626).

Our Future Homes: Housing that promotes wellbeing and community for an ageing population [CD16.1]

2.24 Although not planning policy guidance in the same way as the NPPF or PPG, this report from the Older People’ Housing Taskforce (hereafter referenced as “OPTH”) provides the most up-to-date macro position in relation to future policy when read alongside the Written Ministerial Statement (26 November) by Matthew Pennycook, Minister of State for Housing and Planning [CD11.4].

2.25 The report itself sets out the need to amend the current planning policy framework to ensure that the sector can increase scale/output at pace to meet the needs of the ageing population. It notes in the executive summary that:

“[A]s our population ages, we need to expand these housing options – not just in variety, but in volume as well. Put simply, we need to offer senior citizens greater choice, particularly as their lifestyle and health needs evolve in later life. Ensuring suitable, accessible and affordable housing for later living is a societal obligation on which the current housing market falls significantly short.”

2.26 It then continues at page 8 stating:

“[W]e need to expand the market for the different models of OPH/LLH – incentivising greater investment to drive the development of new supply that is more affordable to the ‘lower to middle-affluence market’, both to buy, and importantly, to live in. We need to couple this with increased consumer awareness, confidence and demand for this housing, across all tenures.

But focussing on specialised OPH/LLH alone is not sufficient. We also need to ensure that mainstream housing better supports senior citizens to live well. We must focus on new build housing, but critically we must focus also on our existing housing stock.”

2.27 The report considers the case for new definitions to cover all forms of older persons housing (what it terms Later Living Homes), which are:

- *Mainstream homes/housing (e.g., existing, new build and adapted homes, rightsizing homes, bungalows, stacked bungalows with lift.);*
- *Community-led homes/ housing (e.g., Alms houses, Co-housing, collaborative housing, Shared Lives, home share.);*
- *Service-led homes/housing with support Supported living (e.g., sheltered homes, independent living or retirement apartments and sometimes bungalows.);*
- *Service-led homes/housing with care Assisted living (e.g., extra care, assisted living, integrated retirement communities, retirement villages.); and*
- *Care homes (e.g., residential and nursing homes.)*

2.28 The WMS specifically notes:

“There is rightly significant national interest in the Taskforce’s findings.”

2.29 It then continues:

“The Government recognises the importance of increased supply and improving the housing options for older people in later life, and we will give careful consideration to the many recommendations set out in the report.”

2.30 It concludes on the lines of:

“The Government is committed to helping older people to live comfortably and independently at home for as long as possible.”

Forms of Specialist Housing

Section 3

3.1 The Planning Practice Guidance provides a useful summary of the main types of specialist housing for older people as referenced above, this has been graphically represented best by Associated Retirement Community Operators (hereafter referenced as “ARCO”)¹ in the image below:

Figure 3.1: Types of Older Persons Housing (Source: ARCO)

Retirement Housing	Integrated Retirement Communities	Care Homes
 Also known as: <ul style="list-style-type: none">• Sheltered housing• Retirement flats or communities	 Integrated Retirement Communities Also known as: <ul style="list-style-type: none">• Extra care• Retirement villages• Housing-with-Care• Assisted living• Independent living	 Care Homes Also known as: <ul style="list-style-type: none">• Nursing Homes• Residential Homes• Old People's Home
 Offers self-contained homes for sale, shared-ownership or rent	 Offers self-contained homes for sale, shared-ownership or rent	 Communal residential living with residents occupying individual rooms, often with an en-suite bathroom
 Part-time warden and emergency call systems. Typically no meals provided	 • 24-hour onsite staff <ul style="list-style-type: none">• Optional care or domiciliary services available• Restaurant / Café available for meals	 24-hour care and support. Meals included
 Typical facilities available: <ul style="list-style-type: none">• Communal lounge• Laundry facilities• Gardens• Guest room	 Typical facilities available: <ul style="list-style-type: none">• Restaurant and Café• Leisure Club including: gym, swimming pool, exercise class programme• Communal lounge and/or Library• Hairdressers• Gardens• Guest room• Activity (Hobby) rooms• Social event programme	 Typical facilities available: <ul style="list-style-type: none">• Communal lounge• Laundry facilities• Gardens• Guest room
 Typically 40 - 60 homes	 Typically 60 - 250 homes	 Sizes vary considerably

3.2 This assessment only focusses on the final typology relating to care homes. Although the description of development references the term ‘extra care’ the proposal was recognised as relating to delivery of an 80 bed care home, for example the reference

¹ <https://www.arcouk.org/>

in the delegated report at paragraph 19 where it described the components of the application to include 0.6ha for an 80-bed Care Home.

- 3.3 The difference between personal care provision and nursing provision is that a nursing home has a qualified nurse on site to provide medical care and is registered with the CQC accordingly, personal care provision does not provide that level of medical care.

Local Assessment

Section 4

- 4.1 This section assesses the evidence base prepared for the council in terms of local housing needs assessments.
- 4.2 A series of relevant local factors are included at [Appendix 1](#) of this assessment obtained from POPPI (Projecting Older People Population Information).

Planning guidance for accommodation with care for older people (October 2025)

- 4.3 This document published by Surrey County Council (included at [Appendix 2](#)) considered the current and future needs for specialist housing for older people. In relation to care home provision it notes:
 - *“There is no single, recognised methodology for identifying future residential and nursing care need...”*
 - *“More granular assessments for future need on the basis of market “standard” accommodation (e.g. ensuite bathrooms) cannot prove that a new care home is absolutely necessary where the existing market is able to renovate or replace properties in response to market forces...”*
 - *“For residential care homes only, reduces the 2030 and 2035 need figures of Surrey’s Borough and District areas as a result of the delivery of new affordable extra care housing. This is because Surrey County Council’s focus will be on identifying and supporting older people who would benefit from affordable extra care through nominations processes to eliminate a need for future residential care as much as possible.”*
- 4.4 It is noted that in the introduction to the document it notes:

“For specialist housing for older people, Surrey County Council recognises that the biggest gap in provision is in affordable extra care housing. In response to this, the Right Homes Right Support Strategy has a target of achieving 725 additional affordable extra care housing units by the end of the decade. It is within this context that Surrey County Council presents its wider consideration of the future need for affordable extra care housing, alongside other market-facing models of housing with care for older people.”

4.5 This provides the context to the guidance and the individual district profiles, that being the County Council's primary aim of increasing its supply of affordable extra care to meet its obligations through the adult social care remit.

Planning profile for accommodation with care for older people – Tandridge (October 2025)

4.6 In support of the accommodation strategy the County Council also provided district profiles to identify future needs (included as [Appendix 3](#)). That profile noted the following for residential care as of October 2025:

- *The Tandridge District area had a supply of 319 residential care home beds against a 75+ population of 10,380. This provides a prevalence rate of 30.73 beds per 1,000 of the 75+ population.*
- *In comparison, England had a supply of 204,293 residential care home beds against a 75+ population of 5,573,642. This provides a prevalence rate of 36.65 beds per 1,000 of the 75+ population.*

4.7 The assessment considered the implications for 2030 and 2305 as below:

Year	Tandridge 75+ population	No. of beds to reflect England ratio in 2025	Reduction due to delivery of new affordable extra care housing	Projected (oversupply) / need for additional beds in Tandridge
2030	11,214	411	(35)	57
2035	12,095	443	(35)	89

4.8 The same profile also looked at nursing care provision and noted:

- *The Tandridge District area had a supply of 609 nursing care home beds against a 75+ population of 10,380. This provides a prevalence rate of 58.67 beds per 1,000 of the 75+ population.*
- *In comparison, England had a supply of 212,440 nursing care home beds against a 75+ population of 5,573,643. This provides a prevalence rate of 38.12 beds per 1,000 of the 75+ population.*

4.9 The assessment considered the implications for 2030 and 2035 as below:

Year	Tandridge 75+ population	No. of beds to reflect England ratio in 2025	Projected (oversupply) / need for additional beds in Tandridge
2030	11,214	427	(182)
2035	12,095	461	(148)

***Older People's Residential and Nursing Care Market Positioning Statement:
Update October 2024***

4.10 This update (included as [Appendix 4](#)) was produced with the main aim to:

"encourage commissioners, people who use services, carers and provider organisations to work together to explain what residential care (with or without nursing) is needed in each area and why."

4.11 The identified key objectives of the statement were to:

- *"Ensure there is the right care home provision available for the changing needs of the increasing population."*
- *Increase the capacity for ASC-funded placements in the residential and nursing care market, including for complex mental health needs and complex physical frailty.*
- *Secure strong relationships with care home providers and identify strategic partners to shape the social care market.*
- *Gain a comprehensive picture of what people want their residential and nursing care provision to be in the future by working with residents, carers, families, and providers.*
- *Improve our offer of support to providers to improve quality and outcomes for all residents receiving care.*
- *Ensure there are open and transparent processes and communication channels in place to enable residents to make well-informed choices about their care, understand how to manage their finances and know what to expect if their capital runs out.*
- *To identify gaps in provision and how these can be addressed through innovation and differing approaches to commissioning care."*

4.12 The statement then considered requirements for each individual local authority, with the relevant information for Tandridge noting as follows:

Localities in East Surrey	Service Category	No. of ASC Service Users in January 2024 (Actuals)	No. of ASC Service Users in January 2030 (Forecast)
Tandridge	Residential	27	7
Tandridge	Residential Enhanced	72	83
Tandridge	Nursing	101	109

4.13 It is to be noted that the figures relate only to those being provided care beds as part of the Adult Social Care element and does not reflect private paying users.

Housing Strategy (2019) [CD4.9]

4.14 The Housing Strategy was prepared by Tandridge District Council to address the period 2019 to 2023. It had been prepared in support of the withdrawn Local Plan 2023 as reflected by the text of the then draft policy HS2, stating:

“Draft Policy HS2: Specialist Housing for Older People

The loss of specialist housing may be acceptable where there is no longer an established need for this type of accommodation or adequate replacement accommodation can be provided.

The Council will support proposals for new specialist housing where it can be demonstrated that:

- I. There is an established local need for the form of specialist housing;*
- II. The standard of housing and facilities are suitable having regard to:*
 - c. The provision of appropriate amenity space, parking and servicing;*
 - d. There is a good level of accessibility to public transport, shops, services, pharmacies, open space and community facilities appropriate to the needs of the intended occupiers;*
 - e. The impact of the proposed development would not be detrimental to the amenity of the local area;*
 - f. Appropriate drop kerbs and pedestrian crossing to promote access for wheelchair users and mobility scooters; and*
 - g. Being in a well-lit and safe environment.*
- III. The development is appropriate for the end user based on the level of independence they require.”*

Surrey County Council Commission Statement (2019)

4.15 This statement relating to accommodation with care, residential and nursing care for older people was prepared by Surrey County Council for Tandridge District Council for April 2019 onwards. It sets out the needs for the next 20 years:

“for all accommodation based services we commission and provide for residents of Surrey...”

4.16 Addressing the scope of the document it is noted that it states:

“This document sets out Surrey County Council’s expectations for the market to respond to the Accommodation with Care & Support Strategy in terms of older people’s services within the Tandridge District Council area.”

4.17 When addressing the matter of extra care housing the statement states that:

“Of the specialised housing options on page 3, Extra care is regarded by Surrey County Council as being in greatest shortage. The Accommodation with Care & Support Strategy aims to address this shortage, because the increasing availability of attractive extra care options will reduce the likelihood of older people moving directly into a care home as their care needs increase. This is because extra care gives older people the opportunity to live in settings which are designed with increasing needs in mind, with shared facilities which encourage community living, and with care and support readily available should they need it.”

4.18 The statement considers the current and future requirements for care home beds within Tandridge over the plan period as reproduced below:

	Care Home	Nursing Care
1 April 2019 No. of care home beds	388	666
75+ pop. (2019)	8,800	8,800
Beds per 1,000 75+ pop. (2019)	44.09	75.68
75+ pop. (2025)	11,000	11,000
Beds per 1,000 75+ pop. (2025)	35.27	60.55
No. beds to reflect England 2019 ratio (2025)	485	507
Reduction due to rental extra care (2025)	74	
2025 indicated demand	23	-159
75+ pop. (2035)	13,500	13,500
Beds per 1,000 75+ pop. (2035)	28.74	49.33
No. beds to reflect England 2019 ratio (2035)	595	623
Reduction due to rental extra care (2035)	91	
2035 indicated demand	116	-43

4.19 The statement provides a link with the provision of more extra care housing and a corresponding reduction in the provision of care home beds due to the improved accommodation choice for residents.

Addressing the Needs of All Household Types (June 2018)

4.20 This technical paper prepared by Turley on behalf of the council formed part of the evidence base to the withdrawn Local Plan 2023 and was an update to the earlier main report from 2015.

4.21 It was the 2015 report that identified the projected need for specialist housing for older people stating at paragraph 4.9 that:

“over the plan period – from 2013 to 2033 – an additional 9,825 older residents aged 65 and over are projected to live in Tandridge in 2033, relative to 2013. This represents a 59% increase in the older population, although it is notable that the number of residents aged 85 and over will see a greater proportionate increase, growing by 136%.”

4.22 The paper then continues to show in figure 4.3 that over the plan period there is a recognised need for 146 units of extra care accommodation, together with the other acknowledged need for specialist housing accommodation.

Figure 4.3: Projected Need for Specialist Housing 2013 – 2033

	Change 2013 – 2033
Projected change in population aged 75+	5,846
Sheltered housing – 125 units per 1,000 75+	731
Enhanced sheltered housing – 20 per 1,000 75+	117
Extra care with 24/7 support – 25 per 1,000 75+	146
Total specialist housing need (units)	994
Specialist housing need per annum	50

4.23 Importantly, the paper notes that the growth for care home accommodation is expressed outside of this modelling. That future growth was set out separately at figure 4.4 reproduced below.

Figure 4.4: Modelled change in communal population 2013-2033

	2013	2033	Change	% Change
Under 74	1,351	1,351	0	0
75-84	265	433	169	64%
85+	495	933	438	89%
Total	2,111	2,717	607	29%

4.24 The paper goes on to note at paragraph 4.19 that:

“The overall increase of 607 in the communal population relates to individual persons, indicating that there will be an increased need for bedspaces in communal establishments in Tandridge over the plan period. There is no specific methodology for translating this growth into dwellings or establishments, however, and this will therefore need to be considered in the context of individual care home proposals.”

Local Provision

4.25 Home ownership data for Tandridge for those aged 65 and over provided by POPPI indicates the following:

Table 4.1: Percentage of Population Aged 65 Plus, by Tenure for Tandridge

	People Aged 65-74	People Aged 75-84	People Aged 85+
Owned	85.20%	85.57%	75.28%
Rented from Council or other social rented	8.79%	7.56%	6.33%
Private Rented or Living Rent Free	5.10%	4.28%	4.28%

(Source: *POPPI*)

Supply of Care Home bed spaces

4.26 At present across Tandridge the provision of specialist care accommodation is summarised in table 4.2, with the full list of relevant schemes included at [Appendix 5 \(personal care\)](#) and [6 \(nursing care\)](#).

4.27 A search of the EAC website was also used to identify the provision of care homes within Tandridge, either with or without nursing care.

Table 4.2: Indicative Levels of Care Bed provision, for Tandridge

	Number of Units/ Places	Current Provision Per 1,000 of Aged 75+ (10,300) ²	Housing in Later Life Benchmarks	Change in Units to Meet Housing in Later Life Benchmarks (2025)
Personal Care	317 ³	32.91	65	+330.5
Nursing Care	537 ⁴	50.97	45	-61.5
Total Provision	854	82.91	110	+279

(Source: <http://www.eac.org.uk> and *Housing in Later Life*)

4.28 Table 4.2 also includes the benchmark rates of provision set out within Housing in Later Life for care homes, alongside an estimate of existing under provision. In summary it is clear that at the present time the provision of care beds for both personal and nursing care fall below the present demands.

4.29 Across the 22 care homes there are a total of 854 care home beds. 262 are provided for personal care and 457 are provided as nursing care. A further 135 beds are provided within homes offering both personal and nursing care such that the split is not easily determined. In such circumstances the total provision has been calculated to identify a present requirement overall. For the purposes of this assessment, we have therefore assumed the split of beds as per the Housing in Later Life approach.

4.30 It is relevant to note that of the current supply several of the homes do not offer all rooms as single occupancy, or all as en-suite accommodation either. A list of those homes only offering such accommodation is include at [Appendix 7](#). The provision of

² This figure is taken from table 6.1 below.

³ It is to be noted that this figure includes 2 homes providing care and nursing care amounting to a total of 135 beds

⁴ It is to be noted that this figure includes 2 homes providing care and nursing care amounting to a total of 135 beds

en-suite single occupancy bedrooms was set out as an industry standard in the 2003 National Minimum Standards for Care Homes for Older People published by the Department of Health, albeit that these standards are no longer in place. The relevance of considering such minimum standards was considered in the context of an appeal for a 64 bed care home in Mid Sussex (ref: APP/D3830/W/21/3281350 and included as [Appendix 8](#)) where the Inspector noted at paragraph 50 that:

“Furthermore, they do not take account of the significant number of rooms which are not single occupancy and are without any ensuite facilities, agreed by the Council and Appellant to now be a reasonable minimum expectation for registered care bedrooms for older people. On that basis, the need over the plan period would be for 1294 beds, with an immediate need, agreed to be the more important figure, of 658 beds based on a current supply of rooms with at least an ensuite toilet and/or bathroom of 1148 rooms...”

4.31 The Inspector then went on to note at paragraph 51 that:

“On the Appellant’s figures, in the absence of anything similar from the Council, only 11 of the 37 registered care homes in the District have any rooms with an ensuite facility including a wetroom, with an estimate of a small number more than 589 of the current 1518 supply of bedrooms having such a facility. I have no substantive basis to disagree with this analysis and acknowledge that such provision, as is proposed in this case, would prevent the need for sharing such facilities, both from a wellbeing perspective and to minimise the spread of infections. On that basis the need would be much greater than the consideration relating to provision of only the minimum ensuite facilities.”

4.32 It is therefore considered unacceptable to still have shared rooms within care homes, and similarly to expect residents to use communal toilet facilities in place of en-suite provision. There is therefore a qualitative assessment that needs to be factored into the approach to determining existing quantitative provision of care home beds.

4.33 It is also entirely appropriate to consider whether or not older care homes, particularly those derived from the conversion of larger properties meet modern access requirements in respect of level access, appropriate corridor widths or even suitable staircases for those with mobility access. This was a factor considered in the context of an appeal for a 32 bed care home in Elmbridge (ref: APP/K3605/W/20/3257109 and included as [Appendix 9](#)) where the Inspector commented at paragraph 32 that:

“...the existing buildings are no longer suitable for their current use; I agree. There is no level access from the street, and the buildings have a number of levels, with narrow corridors and a number of short staircases making them unsuited for those with mobility issues. Some of the rooms have en-suite facilities, but others do not and are therefore not to expected modern standards. Some of the bedrooms and bathrooms are sub-standard in size. The communal areas are also sub-standard and there are operational difficulties with the kitchens and the distance to some of the rooms.”

Pipeline assessment

4.34 Tandridge Council do not provide a public online search register to assess any current or recent applications pertaining to new care homes that might be delivered over the assessment period to determine pipeline capacity.

Review of Methodologies

Section 5

National Approach

- 5.1 There are a series of national documents that consider how to determine the need for new extra care developments. The starting point being the NPPF (paragraph 60) and moreover the PPG which recognises that the need for greater provision of specialist housing for older people is critical.

Housing for Older People (2018)

- 5.2 The Communities and Local Government Committee published their second report in February 2018 having received evidence during 2017 from a broad range of experts associated with the delivery of specialist housing for older people. The aim of the report was to understand the issues that were experienced with the delivery of this specialist housing sector and what could be done to ensure that the housing offer for older people was suitable and in sufficient quantum.
- 5.3 The report was published with a series of specific recommendations that were felt necessary by the panel to ensure that the delivery issues were addressed to ensure an appropriate level of provision of this specialist housing is delivered. The headline recommendation of the report was that a national strategy was required to "*bring together and improves the policy on housing for older people...*"
- 5.4 Other key recommendations within the report were:

"The National Planning Policy Framework should be amended to emphasise the key importance of the provision of housing for older people and the new standard approach to assessing need should explicitly address the housing needs of older people.

To facilitate the delivery of new homes, specialist housing should be designated as a sub-category of the C2 planning classification or be assigned a new use class.

Councils should publish a strategy explaining how they intend to meet the housing needs of older people in their area and, in Local Plans, identify a target proportion of new housing to be developed for older people along with suitable, well-connected sites for it."

HAPPI 4 – Rural Housing (2018)

5.5 The fourth Housing our Ageing Population Panel for Innovation (hereafter referenced as “HAPPI”) report focusses on the specific challenges that older people within rural communities face in regard to their independence and wellbeing as they age within their homes that may prove to be unsuitable.

5.6 The foreword of the report was written by Lord Best and noted that:

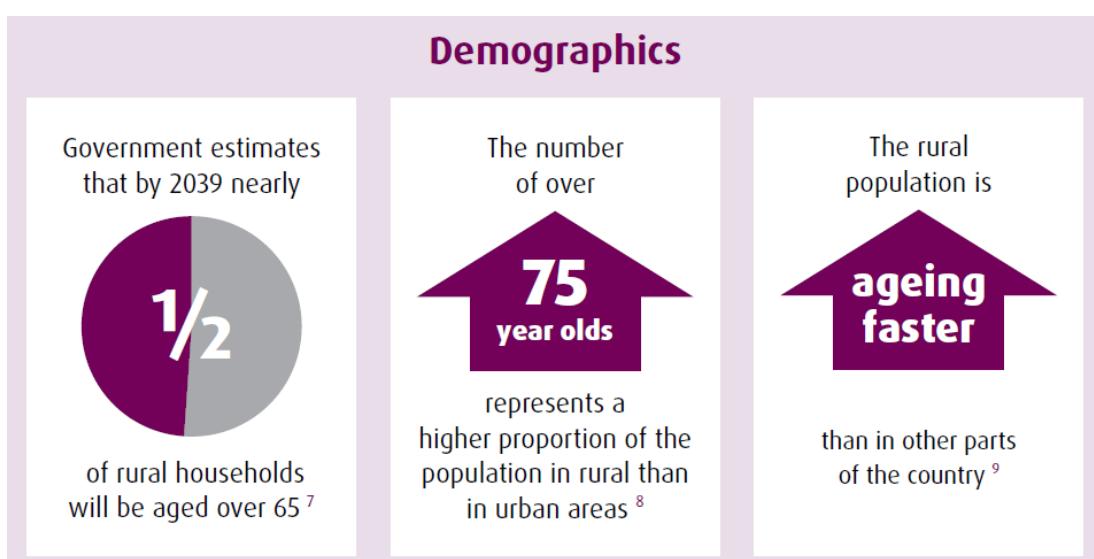
“Our underlying concern is with the growing numbers of older people in rural communities who will face a huge challenge to their independence and wellbeing if their homes are no longer suitable... Our recommendations, therefore, seek to remove the barriers to more and better homes for the ageing population in rural areas.”

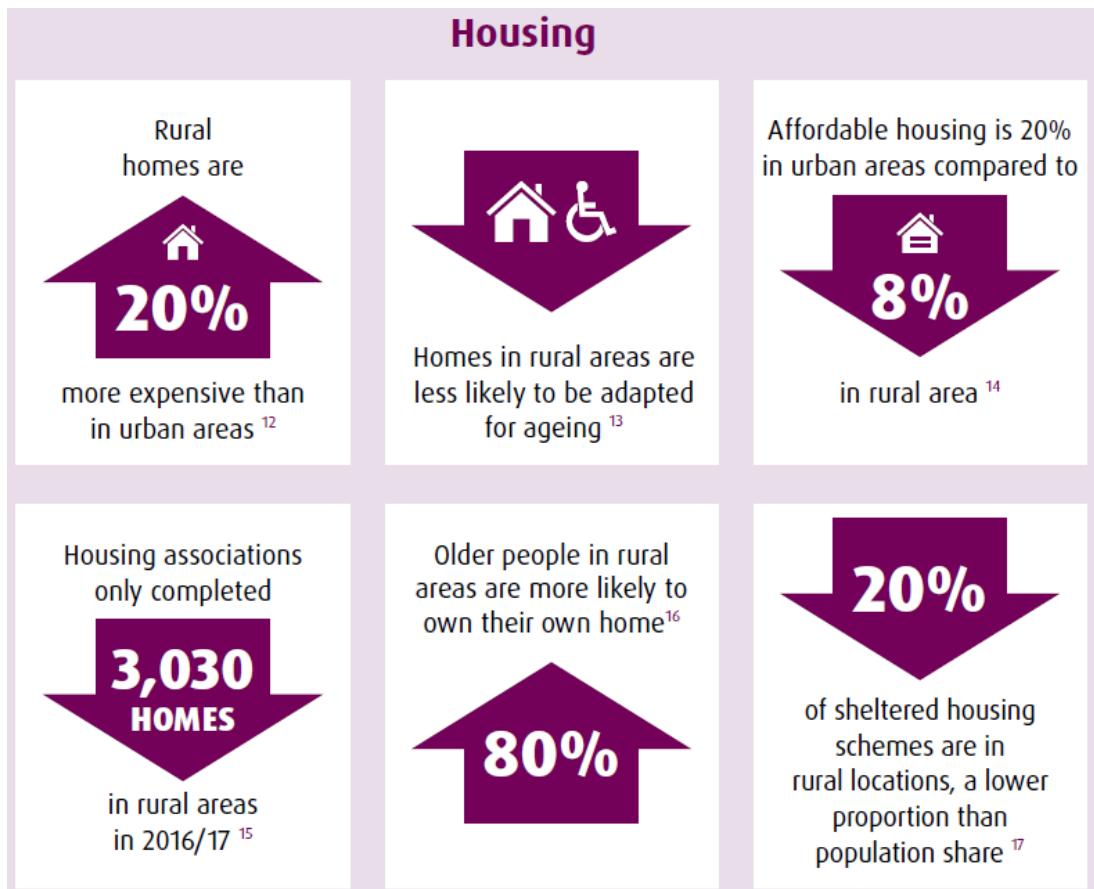
5.7 The 2018 report reflected on the previous report ‘Housing our Ageing Population: Positive Ideas’ from 2016, noting that:

“there was still an urgent need to transform supply and scale-up delivery. It may come as no surprise that, two years on and in our focus on rural housing for older people, we have reached similar conclusions.”

5.8 The report clearly set out that:

“the ageing population in rural areas deserves a new drive for more and better homes, preferably where older people can stay close to friends and family – and the informal networks they provide – and always where the independence can be preserved.”





5.9 It confirmed that the requirement to deliver such specialist housing should be an integral part of national housing strategy and the development plan process.

5.10 The report included a series of recommendations to improve delivery of such accommodation within rural areas; including the following suggestions:

- *“Secretary of State for Housing, in taking forward the powers conferred by the Neighbourhood Planning and Infrastructure Act 2017, issues guidance to Local Planning Authorities on meeting the needs of older people in rural communities, e.g., by the allocation of sites in the Local Plan specifically for the housing of older people.*
- *every Strategic and Local Plan ensures specific sites are allocated for the housing of older people across all tenures.*
- *to encourage Local Planning Authorities, consider not only the clear advantages from larger developments for older people in market towns but also the community and wellbeing benefits from small retirement housing projects, including almshouses, in villages.*

- *landowners take up the opportunities for supporting their local communities while raising capital and/or revenue from developing homes for older people, not least those who are in tied agricultural accommodation and are now retiring.”*

5.11 In considering specific needs of older people the report reflected on a Market Insight report published by Strutt and Parker which identified that by 2033 60% of household growth in the UK would be headed by those aged over 65 and the sole occupiers would make up 41% of all households in the UK. When translated to the older population this amounts to approximately 3.8 million people, of which 70% are women. The report therefore recognised the challenge in ensuring provision of suitable accommodation for this age profile.

Inquiry into decent and accessible homes for older people (2019)

5.12 This report was published by the All Party Parliamentary Group (hereafter referenced as “**APPG**”) with the aim of understanding;

“the detrimental impact of poor housing on older people’s physical, mental and social wellbeing.”

5.13 The report highlights that

“Many older people are living in unsafe, unsuitable and unhealthy accommodation, with little hope of being able to move somewhere better or improve their homes.”

5.14 It considers the linkages between housing, health and care recognising that there are:

“links between living in unsuitable accommodation and increased feelings of social isolation and loneliness among older people.”

5.15 The report suggests 13 recommendations that it suggests that the government should accept, including recommendation 11 which states specifically that:

“Government must make it easier to deliver better alternatives for older people living in unsuitable housing. This should include funding and planning reforms to expand the availability of housing with care, such as extra care housing, in both the private and social sectors as well as making sure alternative accessible and affordable general purpose housing is available to buy or rent.”

5.16 When considering the justification for this recommendation the report noted that:

“less than 10 per cent of local authorities have both an older persons’ housing planning policy and allocated site for such housing.”

5.17 The report also specifically quotes the Retirement House Builder Group who told the committee that:

"At a local level we need to see forward-looking local planning policies that predict, monitor and encourage the supply of retirement housing. Planning authorities should be required to publish a strategy explaining how they intend to meet needs of older people in their area alongside a target housing number for older people in their Local Plan."

Too Little, Too Late: Housing for an Ageing Population (2020)

5.18 This report, published by the Centre for the Study of Financial Innovation, is not a report on methodology but a review of the present situation concerning the supply of specialist accommodation to address the housing stock, as well as the implications on the health and social care sector.

5.19 The report sets out that if people lived in homes more suited to their needs than 50,000 fewer homes may need to be built every year, recognising that the average household size has been dropping since the 1980s. Statistically it indicated that by 2040 within those households for the over 65s cohort would have 12.8million surplus bedrooms in their properties (previously in 2000 the figure was 6.6million).

5.20 The report also set out that on average only 7,000 specialist retirement properties have been built annually since 2010 despite the over 65s households rising annually by 180,000 by 2030. It confirmed that retirement housing accounted for approximately 125,000 new homes built since 2000 (equivalent to approximately 2% of all homes), whilst each year around 700,000 people turn 65 years old.

5.21 The report identified a set of key recommendations for the government and the industry, chief amongst them was to ensure greater delivery through new government strategies and joined up working.

Mayhew Review 2022

5.22 The Mayhew Review was authored by the same author of 'Too Little, Too Late' and sought to build on earlier work with the input of the retirement sector in order to reflect the present difficulties in delivering schemes and provide a resource for the taskforce for older people.

5.23 The report set out the clear demographic picture in the executive summary, noting that

“The population aged 65+ is set to increase from 11.2 million today to 17.2 million by 2040. It will be much more evenly spread than at present, with older people accounting for 25-30% of the population in many areas. The vast majority will live in standard housing while as many as 6.2 million will live alone – half of them aged 80+ – piling pressure on geographically dispersed care services.”

5.24 It then noted that:

“If everybody lived in homes that were appropriate in size for their needs, it has been estimated that 50,000 fewer homes would need to be built each year⁵. Almost as many bedrooms are being decommissioned through under-occupation as are being replenished by new homes. In contrast, we estimate that for each bedroom added to the retirement stock, two to three are released in mainstream housing.”

5.25 Noting the historical low rate of delivery (again the reference back to the ‘Too Little, Too Late’ report) the Mayhew Review considered options for a new approach to delivery that would:

“entail the acceleration of building to 10,000, 30,000 and 50,000 new retirement units a year. The third scenario is especially significant because it implies around 25% of all new homes built would be specialist retirement accommodation, representing a radical departure from present housing policy which focuses on first time buyers.”

5.26 The reasoning behind the highest delivery rate would be to:

“displace more expensive nursing and residential care as people would be healthier and supported in their own homes for longer.”

5.27 Whilst not therefore a methodology towards increasing delivery, the review links the clear benefits from provision of specialist accommodation with freeing up under occupied family housing as well as savings in the health and social care system as well as welfare benefits for residents themselves.

Our Future Homes: Housing that promotes wellbeing and community for an ageing population.

5.28 As with the Mayhew Review, this report does not of itself set out a methodology to determine future need and supply. It does however reaffirm the position of the Mayhew Review stating at page 49 that:

⁵ Linking back with the ‘Too Little, Too Late’ report

“It is estimated that the number of households aged 65+ will grow by 37.3% by 2040, so the supply of later living housing will need to be boosted by over a third just to maintain its current coverage. Indeed, the Mayhew Review found that to ease the pressure on the NHS and social services the Government needs to construct OPH/LLH at the rate of 50,000 new units a year compared with the “meagre” 5-7,000 currently being built. This is particularly worrying given that there has been a reduction in the numbers of private developers of OPH/LLH in the UK in the last 40 years. Current delivery rates are at a fraction of late 1980’s peak and falling. Overall, the UK is significantly far behind other developed countries in delivering the volume of stock required.”

5.29 Chapter 6 of the report is dedicated to recommendations to strengthen planning policies, noting at paragraph 61 that:

“There is currently no consensus on the best way of evidencing need for OPH/LLH and there was frustration at this expressed from all quarters. LPAs who responded to the Taskforce’s housing survey reported using multiple methodologies, including external consultants, census and survey data and the Housing LIN model (currently being updated). The inconsistent approaches and subsequent lengthy and costly appeal decisions have endorsed appellants’ views that the standard toolkits underestimate need, are over complicated, are based on past data rather than aspiring to meet future needs, and are not always transparent or consistent.

LPAs frequently underestimate need by extrapolating from past delivery, which means ignoring both previously unmet demand and the increased demand arising from the ageing population.

Evidence taken from industry experts also made clear that housing needs assessments do not recognise the benefits for senior citizens of moving into supportive communities ahead of reaching a personal crisis and undervalue the benefits of more age-appropriate housing.”

5.30 It continues on page 62 to note:

“A standard approach to housing needs assessment should reconcile simplicity with enough flexibility to reflect local variations. One way forward would be for the Government to publish proposed prevalence rates for OPH/LLH for age cohorts starting from the age of 55 years. LPAs can then model their future population age profile and apply the prevalence rates to their estimates to assess their future OPH/LLH needs.”

5.31 The ambitions from the report are then set out across pages 64 and 65 noting:

“Introducing a planning policy presumption in favour of OPH/LLH to scale up appropriate housing for an ageing population. The recent revision to paragraph 63 of NPPF should be used as the platform and OPH/LLH should be given an increased profile in the NPPG. The language needs to give significant weight to the urgency of provision and to ensure that planning for OPH/LLH is aligned with local objectives, supports wellbeing and community integration and delivers viable high-quality design and the provision of social infrastructure.”

...

“Revising the NPPG and developing a new National Development Management Policy (NDMP) to positively profile OPH/LLH and include specific agreed requirements for LPAs to make provision, allocate sufficient land in varied locations (town centre to greenfield) and recognise the nuances of the form and function of the various types of OPH/LLH to ensure the viable delivery of sufficient OPH/LLH.”

...

“Establishing a common standardised methodology for local assessment of minimum need for the various forms of OPH/LLH (as a subset of overall housing) which is simple, universally recognised, transparent and available for LPAs to use free of any costs. Also, to establish national prevalence rates for each type of OPH/LLH which are not based on past delivery but is instead aspirational and outcome driven in line with the Chief Medical Officer’s annual report from 2023 to help guide practice.”

5.32 The OPTH report importantly recognises a need for a standardised methodology to positively plan for the increased delivery of older persons housing, and importantly that this needs to start from the age cohort of 55 and over.

Alternative Methodologies

5.33 As outlined previously in Section 2 of this report, the PPG sets out that understanding how the ageing population affects housing needs should be considered from the early stages of plan-making. In identifying the housing requirements of older people, the PPG refers to the use of Census data to establish population profiles as well as projections of population and households by age group. The PPG (paragraph 004) also states that the future need for specialist accommodation for older people broken

down by tenure and type may need to be assessed and can be obtained from a number of online toolkits provided by the sector.

5.34 This assessment for demand for specialist older persons accommodation has been based on the general methodology adopted by Contact Consulting as referenced in 'Housing for Later Life' and the @SHOP toolkit as referenced within the NPPF.

5.35 For comparison the various available models to predict need are set out in table 5.1 below.

Table 5.1: Summary of alternative needs modelling (per 1,000 population aged 75+)

	Sheltered housing		Extra Care Housing		Care Homes
	Rent	Lease	Rent	Lease	
More Choice, Greater Voice (2008)	50	75	12.5	12.5	110*
SHOP@ (2011)	50	75	15	30	
Housing in Later Life (2012)	60	120	15	30	
SHOP@ 2013	50	75		25	

* Split as 65 for personal care and 45 for nursing care

5.36 Although it provides no methodology, as set out above the Mayhew Review commissioned jointly by ARCO sets out the aspirational target of delivering 50,000 units per year.

Local Level

5.37 At present there is no standardised methodology used to calculate future demand for care accommodation and many of the existing models are based on existing prevalence rates of provision rolled forward as population changes. This tendency to base need on prevalence rates results in a skewing of data in that it assumes a lack of any provision is due to a lack of demand and not due to any historic under supply.

5.38 Similar issues have arisen in the past with the misuse in particular of the @SHOP toolkit referenced in the PPG when preparing SHMAs or LHNAs in particular, resulting in the removal of this toolkit as a free at source option. The @SHOP toolkit required a consideration of local factors to determine the supply ratios.

5.39 The lack of clear guidance on a standardised methodology is also evident from the recently published NPPF 2025 consultation where, in respect to a continued requirement for local planning authorities to take into account an assessment of the size, type and tenure of housing or other accommodation needed for different groups through policy HO1, Question 49 of the consultation specifically notes:

"49) Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and

affordable housing? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

If so, what elements should this guidance cover?"

Needs Assessment to 2045

Section 6

6.1 The needs assessment is based on the entire area of Tandridge as opposed to any defined catchment area as can sometime be referenced within assessments. The data in this section has been obtained via POPPI (Projecting Older People Population Information), which only looks at the specific needs of the over 65s age group.

Requirement between 2025 and 2045

6.2 Population projections for the over 65 age group within Tandridge are also provided by POPPI as below:

Table 6.1: Population Aged 65+ between 2025 and 2045

	2025	2030	2035	2040	2045
People aged 65-69	4,900	5,600	5,600	5,300	5,200
People aged 70-74	4,200	4,500	5,200	5,200	5,000
People aged 75-79	4,400	3,800	4,200	4,800	4,900
People aged 80-84	2,900	3,800	3,400	3,700	4,300
People aged 85-89	1,800	2,200	2,800	2,600	2,900
People aged 90+	1,200	1,400	1,700	2,200	2,400
Total population 65+	19,400	21,300	22,900	23,800	24,700
Total population 75+	10,300	11,200	12,100	13,300	14,500

(Source: POPPI)

6.3 The total population of Tandridge over 75 years of age is projected to increase by 4,200 between now and 2045. The largest increase in absolute terms between 2025 and 2045 is in the 80-84 age range with 1,400 additional people in the age group. The smallest increase in absolute terms being within the 65-69 age range with 300 additional people.

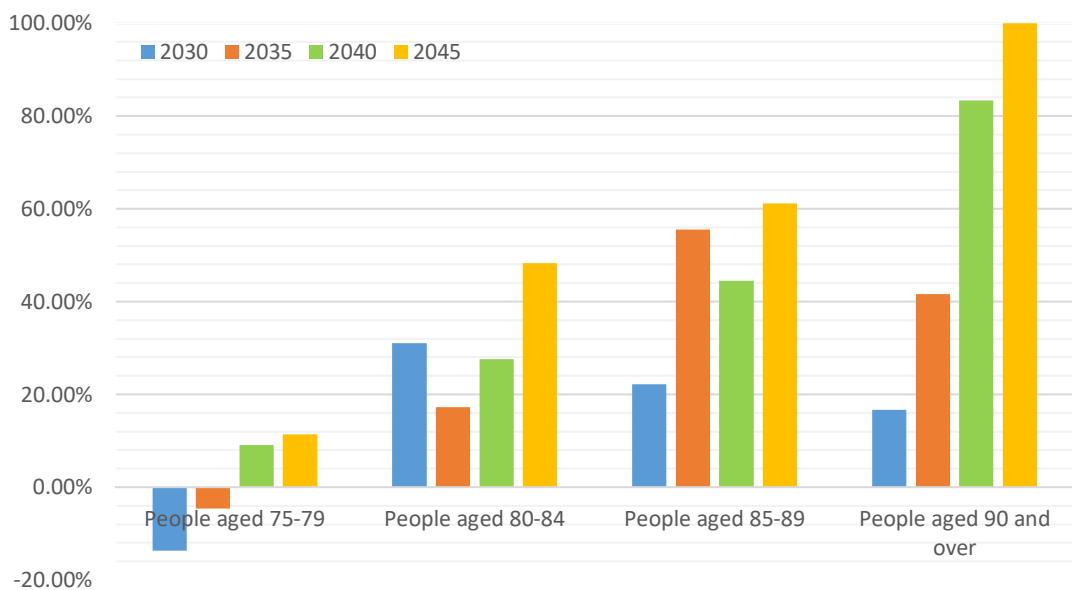
6.4 The growth is represented as below:

Table 6.2: Population Aged 75+ between 2025 and 2040 as real growth and % change

	2030		2035		2040		2045	
	Change	%	Change	%	Change	%	Change	%
People aged 75-79	-600	13.64%	-200	-4.55%	400	9.09%	500	11.36%
People aged 80-84	900	31.03%	500	17.24%	800	27.59%	1,400	48.28%
People aged 85-89	400	22.22%	1,000	55.56%	800	44.44%	1,100	61.11%
People aged 90+	200	16.67%	500	41.67%	1,000	83.33%	1,200	100.00%
Total pop.75+	900	4.64%	1,800	9.28%	3,000	15.46%	4,200	21.65%

(Source: POPPI)

Figure 6.1: Population Change between 2025 and 2045 (over 75s)



6.5 Having identified the current position (namely that set out in table 4.2), it is relevant to project the need through to 2045 which as per table 6.1 identified a further 4,200 people.

Table 6.3: Projected Levels of Provision of Various Forms of Accommodation for Older People 2025-2045, for Tandridge

	Housing in Later Life Benchmarks	Increase in Units Required to Meet Housing in Later Life Benchmarks (2025-2045)
Personal Care	65	+273
Nursing Care	45	+189
Total beds	110	+462

(Source: <http://www.eac.org.uk> and *Housing in Later Life*)

6.6 The total need for 2025 to 2045 therefore must include the current unmet need as set out in table 4.1 and the future requirement from table 6.3. This is set out in table 6.4 below. This demonstrates that over the 20-year period there would be a need to provide a further 603.5 beds for personal care and 127.5 beds for nursing care.

Table 6.4: Cumulative Projected Levels of Need up to 2045, for Tandridge

	2025 requirement	2025 to 2045 requirement	Total number required up to 2045
Personal Care	+330.5	+273	+603.5
Nursing Care	-61.5	+189	+127.5
Total beds	+279	+462	+741

(Source: <http://www.eac.org.uk> and *Housing in Later Life*)

6.7 Within the care home sector, a total of 741 additional beds are required over this period, predominantly within the personal care sector. As noted in section 4 though,

this does not take into account current provision that fails to meet the single person occupancy within en-suite accommodation.

6.8 The operators have not all provided details on the quality of room provision but from those who have given details it indicates that 77.67 % of the care home beds are single occupancy with en-suite (260 beds from 339) whilst in the nursing home sector the figure is 63.43 % (333 beds from the present 525). If these figures were used instead to determine current provision, then it is clear that within both elements there would be significant under provision as of 2025 as shown in table 6.5 below.

Table 6.5: Cumulative Projected Levels of Need up to 2045, for Tandridge (single, en-suite rooms only)

	2025 requirement	2025 to 2045 requirement	Total number required up to 2045
Personal Care	+409.5	+273	+682.5
Nursing Care	+130.5	+189	+319.5
Total beds	+540	+462	+1,002

(Source: <http://www.eac.org.uk> and *Housing in Later Life*)

Dementia provision

6.9 In addition to normal care home provision, the need for specialist dementia care provision also needs to be considered. There is no specific means of identifying the current level of provision however within these homes as all beds could be used for those with dementia, similarly none could be in use. It is therefore only realistic to consider what the future requirements would be above and beyond the current levels as of 2025.

6.10 Having identified the current position, it is relevant to project the need through to 2045 based upon the population projections set out above. This sets out that between 2025 and 2045 the 75+ age group was projected to increase by 4,200 to a total of 10,500 people aged 75+.

Table 6.6: Cumulative Projected Levels of Dementia Need up to 2045, Tandridge

Housing in Later Life Benchmarks	Current Requirement to Meet Housing in Later Life Benchmarks (2025)	Increase in Units Required to Meet Housing in Later Life Benchmarks (2025-2045)	Total number required up to 2045
Dementia care	6	61.8	25.2

(Source: *Housing in Later Life*)

6.11 The total need for 2025 to 2045 therefore must include the current unmet need as well as the future requirement through to 2045. This is set out in table 6.6 above, indicating

a need for 87 specialist dementia beds within the care home sector, in addition to those numbers identified in table 6.4 above.

Conclusion for 2025 to 2045 need

- 6.12 The data indicates that on a quantitative assessment by 2045 there would be a need for an additional provision of 603.5 beds for personal care and 127.5 beds for nursing care. In addition, there would be a total requirement for 87 dementia beds.
- 6.13 If the qualitative assessment were used (the figures in table 6.5) then the future need would be read as 682.5 beds for personal care and 319.5 beds for nursing care. The dementia requirement would remain the same at 87 dementia beds.
- 6.14 Whilst the implications of the qualitative assessment are relatively minor in respect of the personal care provision, there is a substantial impact on nursing care provision when adopting the qualitative assessment.

Needs Assessment to 2029

Section 7

7.1 For the purposes of a needs assessment looking to address short term needs as well as future requirements the immediate 5-year period is of great relevance. The same population figures for the period 2025 to 2029 are therefore reflected below.

Table 7.1: Population Aged 65+ between 2025 and 2029

	2025	2026	2027	2028	2029
People aged 65-69	4,900	5,000	5,200	5,300	5,500
People aged 70-74	4,200	4,200	4,300	4,300	4,400
People aged 75-79	4,400	4,300	4,000	3,900	3,900
People aged 80-84	2,900	3,200	3,500	3,700	3,700
People aged 85-89	1,800	1,800	1,900	2,000	2,100
People aged 90+	1,200	1,200	1,300	1,300	1,400
Total population 65+	19,400	19,700	20,200	20,500	21,000
Total population 75+	10,300	10,500	10,700	10,900	11,100

(Source: POPPI)

7.2 This 5-year figure shows that the population aged 75 and over will increase by 800 residents. The largest growth is in the 80-84 age group with 800 additional people, whilst the 75-79 age group reduces by 500 people.

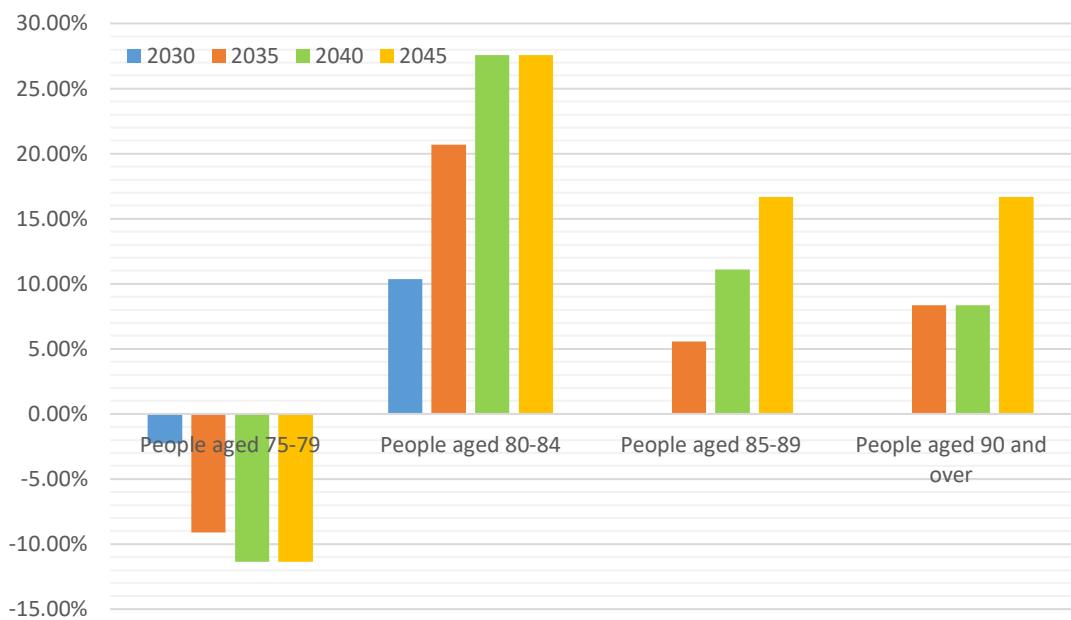
7.3 The growth is represented as below:

Table 7.2: Population Aged 75+ between 2020 and 2029 as real growth and % change

	2026		2027		2028		2029	
	Change	%	Change	%	Change	%	Change	%
People aged 75-79	-100	-2.27%	-400	-9.09%	-500	11.36%	-500	11.36%
People aged 80-84	300	10.34%	600	20.69%	800	27.59%	800	27.59%
People aged 85-89	0	0.00%	100	5.56%	200	11.11%	300	16.67%
People aged 90+	0	0.00%	100	8.33%	100	8.33%	200	16.67%
Total pop.75+	200	1.03%	400	2.06%	600	3.09%	800	4.12%

(Source: POPPI)

Figure 7.1: Population Change between 2025 and 2029 (over 75s)



7.4 Having identified the current position, it is relevant to project the need through to 2029 based upon the population projections set out above. This sets out that between 2025 and 2029 the 75+ age group was projected to increase by 800 to a total of 11,100 people aged 75+. Future provision would be calculated using the same benchmark figures used in table 4.2 above.

7.5 The total need for 2025 to 2029 therefore must include the current unmet need as of 2025 and the future requirement through to 2029. This is set out in table 7.3 below.

Table 7.3 Cumulative Projected Levels of Need up to 2029, for Tandridge

	2025 requirement	2025 to 2029 requirement ⁶	Total number required up to 2029
Personal Care	+330.5	+52	+382.5
Nursing Care	-61.5	+36	-25.5
Total beds	+279	+88	+357

(Source: <http://www.eac.org.uk> and *Housing in Later Life*)

7.6 This demonstrates that up to 2029 there would be a need to provide a further 357 care beds, albeit there would remain a small oversupply of nursing beds to the amount of 25.5 beds.

7.7 As with the consideration of need to 2045, if only considering single occupancy ensuite provision, then by 2029 there would still be a significant demand for new care home bed provision.

⁶ These figures reflect the pipeline supply identified in table 7.1

Table 7.4: Cumulative Projected Levels of Need up to 2029, for Tandridge (single, en-suite rooms only)

	2025 requirement	2025 to 2029 requirement	Total number required up to 2029
Personal Care	+409.5	+52	+461.5
Nursing Care	+130.5	+36	+166.5
Total beds	+540	+88	+628

(Source: <http://www.eac.org.uk> and *Housing in Later Life*)

Dementia provision

7.8 Having identified the current need (that set out in table 5.7 above), it is relevant to project the need through to 2029 based upon the population projections set out above. This sets out that between 2025 and 2029 the 75+ age group was projected to increase by 800 to a total of 11,100 people aged 75+. As set out in table 7.5 below, this results in the need for a further 66.6 specialist dementia beds.

Table 7.5: Cumulative Projected Levels of Dementia Need up to 2027, Tandridge

Housing in Later Life Benchmarks	Current Requirement to Meet Housing in Later Life Benchmarks (2025)	Increase in Units Required to Meet Housing in Later Life Benchmarks (2025-2029) ⁷	Total number required up to 2029
Dementia care	6	61.8	4.8

7.9 The total need for 2025 to 2029 therefore must include the current requirement as set and the future requirement through to 2029. This is set out in table 7.5 above, indicating a need for 66.6 specialist dementia beds within the care home sector, in addition to those numbers identified in table 7.3 above.

Conclusion for 2025 to 2029 need

7.10 The data indicates that on a quantitative assessment by 2029 there would be a need for an additional provision of 382.5 personal care beds, whilst there would be an oversupply of 25.5 nursing beds. In addition, there would be a total requirement for 66.6 dementia beds.

7.11 If the qualitative assessment were used the supply of current personal care beds would be reduced by 461.5 beds, whilst in the nursing care sector the supply would need to increase by a total of 166.5 beds. The dementia requirement would remain the same at 66.6 dementia beds.

⁷ Based on the figure from table 7.2 above for those aged 75+ in 2040

7.12 Whilst the implications of the qualitative assessment are relatively minor in respect of the personal care provision, there is a substantial impact on nursing care provision when adopting the qualitative assessment.

Alternative Growth Scenarios

Section 8

8.1 Noting the continuing debate regarding the appropriate levels for determining demand and future provision for specialist accommodation for older people, this section of the report considers the implications of alternative growth scenarios when moving away from the figures adopted in the Housing in Later Life publication and opting for more ambitious targets as acknowledged in recent appeals⁸. This is only in respect care home beds.

Care home provision

8.2 It is also relevant to note that separate to the Housing in Later Life approach there are other methodologies to determine future demand for care homes. One such alternative is the LaingBuisson model which assumes the following demand:

- 65 to 74 years: 0.57% of the population;
- 75-84 years: 3.6% of the population; and
- 85+ years: 14.7% of the population.

8.3 If the LaingBuisson approach were therefore used instead then the assessment would be as follows, based on the population figures included in table 6.1:

Table 8.1: Care home bed demand (2025 to 2045)

	2025	2045
People aged 65-74	51.87	58.14
People aged 75-84	262.8	331.2
People aged 85+	441	779.1
TOTAL	755.67	1,168.44

Table 8.2: Care home bed demand (2025 to 2029)

	2025	2029
People aged 65-74	51.87	56.43
People aged 75-84	262.8	273.6
People aged 85+	441	514.5
TOTAL	755.67	844.53

8.4 These figures demonstrate a lower level of demand than using the Housing in Later Life referenced in sections 6 and 7 above. Moreover, this model does not seek to

⁸ APP/Q3115/W/20/3265861

differentiate the level of provision between those for personal or nursing care and only provides for the global figure of need.

- 8.5 Even using the lower modelling as provided by the LaingBuisson methodology, whilst as of 2025 there would be an oversupply of 98 beds against the modelled demand, by 2029 the oversupply is a mere 9 beds in 2029, and by 2045 there is a shortfall of 314 beds when modelled against current and pipeline supply.
- 8.6 As with the assessment undertaken in sections 6 and 7 though, the LaingBuisson approach does not take into account the inclusion of double occupancy rooms or non en-suite accommodation within the existing supply. Factoring in such provisions would reduce the supply to generate shortfalls at every year.
- 8.7 The operation of care homes is also an important consideration when assessing supply against demand given that there needs to be choice in the market, a buffer for spare capacity in the case of home closures (an issue that is more common of late), and the need for the necessary procedures to clean rooms on the death of occupants before rooms are available again. Other factors that may limit the availability of beds within homes can include staffing constraints, rooms being reconfigured for other uses, or rooms undergoing refurbishment. It is therefore standard practice for homes to only remain occupied at around 90% of their full capacity to handle such events.
- 8.8 POPPI itself also provides data on likely care home occupancy and dementia numbers over the same period considered in this assessment, namely 2025 to 2045 as well as 2025 to 2029.
- 8.9 In respect of care home occupancy, the relevant information for both periods is included in [Appendix 1](#).
- 8.10 For the period through to 2045 the data indicates 370 additional residents likely to be living in a care home environment, which is a 60.8% increase. For the period through to 2029 the same data indicates an additional 77 residents likely to be living in a care home environment, which is a 12.6% increase.
- 8.11 Similar data is also provided in respect of dementia prevalence over the same periods.
- 8.12 For the period through to 2045 the date indicates 769 additional residents likely to be living with dementia, which is a 59.5% increase. For the period through to 2029 the same data indicates an additional 138 residents likely to be living with dementia, which is a 10.7% increase.

Summary & Conclusions

Section 9

9.1 The requirement to ensure delivery of a suitable supply of specialist housing for older people to meet their identified needs was set out as far back as PPS3: Housing and is presently reflected at paragraphs 61 and 63 of the NPPF.

9.2 It is the PPG that takes this position further noting in the June 2019 update for "Housing for older and disabled people" that:

"The need to provide housing for older people is critical." (Paragraph: 001 Reference ID: 63-001-20190626)

9.3 This was also acknowledged by the announcement of a taskforce to address the improved delivery of specialist older persons housing in the Levelling Up white paper released in February 2022.

9.4 At present there is no statutory requirement to set out through development plan policy a figure on need, although the PPG notes that:

"Plan making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period." (Paragraph 006 Reference ID 63 006 20190626)

9.5 This assessment has indicated that there is a significant under supply at present of personal care beds, which is set to increase not only by 2029 but significantly so by 2045. In respect of nursing care beds, the current provision results in an oversupply which remains as of 2029, with a relatively small under provision by 2045.

Table 9.1: Overall demand for specialist accommodation between 2025 and 2045 for Tandridge

	2025 requirement	2045 requirement	Total requirement (2025-2045)
Personal Care beds	+330.5	+273	+603.5
Nursing Care beds	-61.5	+189	+127.5
Dementia beds	+61.8	+25.2	+87
TOTAL	+330.8	+487.2	+818

9.6 In the alternative, the picture of need in the next immediate 5 years is also summarised below.

Table 9.2: Overall demand for specialist accommodation between 2025 and 2029 for Tandridge

	2025 requirement	2029 requirement	Total requirement (2025-2029)
Personal Care beds	+330.5	+52	+382.5
Nursing Care beds	-61.5	+36	-25.5
Dementia beds	+61.8	4.8	66.6
TOTAL	+330.8	+92.8	+423.6

9.7 However, if current provision is assessed in terms of only those beds meeting the modern requirements of single occupancy ensuite rooms, then the provision changes considerably to under supply within both sectors from 2025.

9.8 The Surrey County Council planning guidance (October 2025) set out that it may be possible to renovate or replace properties to bring them up to modern standards, however for older properties that will inevitably result in reduced capacity if renovating to bring all rooms to current standards, or significant financial investment to redevelop sites. Typically, for those less suitable sites redevelopment for alternative uses is more common hence the future need for modern, purpose built care homes to meet future needs.

Appendix 1

Relevant POPPI data

POPPI Data for Tandridge

This appendix to the assessment focuses on the specific over 65 characteristics that relate to propensity for specialist accommodation for older people. The data in this section has been obtained via POPPI (Projecting Older People Population Information), which only looks at the specific needs of the over 65s age group.

As with the main assessment this information considers the impacts both in terms of the longer term (2025 to 2045) and the immediate term (2025 to 2029)

2025 to 2045

1. Care home occupancy

These figures show an expected increase of 379 additional residents to be living within some form of care home accommodation by 2045 against the 2025 baseline data, representing a 35.6% increase.

	2025	2030	2035	2040	2045
People aged 65-74 living in a care home with or without nursing	76	84	90	87	85
People aged 75-84 living in a care home with or without nursing	191	199	199	223	241
People aged 85 and over living in a care home with or without nursing	418	501	641	682	738
Total population aged 65 and over living in a care home with or without nursing	685	784	930	992	1,064

2. Dementia

These figures show an increase of some 797 additional people expected to suffer from dementia by 2045 when measured against the current baseline, which is a 34.7% increase on current levels.

	2025	2030	2035	2040	2045
People aged 65-69 predicted to have dementia	81	93	93	86	86
People aged 70-74 predicted to have dementia	128	137	155	158	152
People aged 75-79 predicted to have dementia	264	235	247	288	295
People aged 80-84 predicted to have dementia	323	411	378	400	478
People aged 85-89 predicted to have dementia	328	399	525	474	545
People aged 90 and over predicted to have dementia	377	436	530	684	743
Total Population Aged 65 and Over Predicted to have Dementia	1,501	1,710	1,929	2,091	2,298

3. Living alone

These figures show an increase of 2,115 people aged 65 and over to be living alone by 2045, otherwise expressed as a near 25.9% increase on current levels.

	2025	2030	2035	2040	2045
Males aged 65-69 predicted to live alone	455	535	535	495	495
Males aged 70-74 predicted to live alone	382	422	482	482	462
Males aged 75-79 predicted to live alone	430	366	387	473	473
Males aged 80-84 predicted to live alone	305	406	356	381	457
Males aged 85-99 predicted to live alone	226	291	388	323	388
Males aged 90+ predicted to live alone	170	213	255	340	383
Females aged 65-69 predicted to live alone	632	705	705	656	656
Females aged 70-74 predicted to live alone	679	708	797	826	797
Females aged 75-79 predicted to live alone	893	818	856	967	1,004
Females aged 80-84 predicted to live alone	813	1,004	956	1,004	1,195
Females aged 85-99 predicted to live alone	622	735	961	904	1,017
Females aged 90+ predicted to live alone	450	507	619	788	845
Total population aged 65 and over predicted to live alone	6,056	6,708	7,295	7,640	8,171

4. Hospital admissions from falls

These figures show an increase of 296 people likely to require hospital admission as a result of falls by 2045, representing a 31.6% increase.

	2025	2030	2035	2040	2045
People aged 65-69 predicted numbers of hospital admissions due to falls	44	50	50	47	47
People aged 70-74 predicted numbers of hospital admissions due to falls	60	64	74	74	72
People aged 75-79 predicted numbers of hospital admissions due to falls	105	91	100	115	117
People aged 80 and over predicted numbers of hospital admissions due to falls	431	540	584	628	701

Total population aged 65 and over predicted numbers of hospital admissions due to falls	640	745	809	864	936
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5. Mobility tasks

These figures show that there are likely to be a further 1,536 residents aged 65 and over unable to undertake on basic task themselves due to mobility issues by 2045, representing an increase of 28.8%. Such basic tasks (although not exhaustive) can include:

- going out of doors and walking down the road;
- getting up and down stairs;
- getting around the house on the level;
- getting to the toilet; and
- getting in and out of bed

	2025	2030	2035	2040	2045
People aged 65-69 unable to manage at least one activity on their own	418	477	477	443	443
People aged 70-74 unable to manage at least one activity on their own	558	594	672	688	662
People aged 75-79 unable to manage at least one activity on their own	744	666	699	810	831
People aged 80-84 unable to manage at least one activity on their own	709	897	832	879	1,049
People aged 85 and over unable to manage at least one activity on their own	1,370	1,590	2,030	2,165	2,350
Total Population aged 65+ Unable to Manage at Least One Activity on Their Own	3,799	4,224	4,710	4,985	5,335

6. Self-care activity

These figures show that by 2045 an additional 1,822 people aged 65 and over will need help with at least one self-care activity, representing a growth of 25.2%. Such self-care activities relate to personal care and mobility (although not exhaustive) can include:

- Having a bath or shower;
- Using the toilet;
- Getting up and down stairs;
- Getting around indoors;
- Dressing or undressing;
- Getting in and out of bed;
- Washing face and hands;
- Eating, including cutting up food; and
- Taking medicine.

	2025	2030	2035	2040	2045
Males aged 65-69 who need help with at least one self-care activity	382	448	448	415	415
Males aged 70-74 who need help with at least one self-care activity	376	416	475	475	455
Males aged 75-79 who need help with at least one self-care activity	506	430	455	557	557
Males aged 80+ who need help with at least one self-care activity	898	1,122	1,197	1,272	1,421
Females aged 65-69 who need help with at least one self-care activity	484	539	539	502	502
Females aged 70-74 who need help with at least one self-care activity	515	538	605	627	605
Females aged 75-79 who need help with at least one self-care activity	715	656	685	775	805
Females aged 80+ who need help with at least one self-care activity	1,534	1,832	2,045	2,173	2,471
Total Population Aged 65+ who need help with at least one self-care activity	5,409	5,981	6,450	6,795	7,231
Males aged 65-69 with unmet need for at least one self-care activity	327	383	383	355	355
Males aged 70-74 with unmet need for at least one self-care activity	283	313	358	358	343
Males aged 75-79 with unmet need for at least one self-care activity	468	398	421	515	515
Males aged 80 and over with unmet need for at least one self-care activity	806	1,008	1,075	1,142	1,277
Females aged 65-69 with unmet need for at least one self-care activity	377	421	421	392	392
Females aged 70-74 with unmet need for at least one self-care activity	442	461	518	538	518
Females aged 75-79 with unmet need for at least one self-care activity	590	541	566	640	664
Females aged 80 and over with unmet need for at least one self-care activity	1,397	1,668	1,862	1,979	2,250
Total population aged 65 and over with unmet need for at least one self-care activity	4,690	5,193	5,605	5,917	6,314

7. Domestic tasks

These figures show that by 2045 an additional 1,956 people aged 65 and over will need help with at least one domestic task, representing a growth of 26.6%. Such domestic tasks relate to activities which are fundamental to living independently and (although not exhaustive) can include:

- Doing routine housework or laundry;
- Shopping for food;

- Getting out of the house; and
- Doing paperwork or paying bills

	2025	2030	2035	2040	2045
Males aged 65-69 who need help with at least one domestic task	306	359	359	333	333
Males aged 70-74 who need help with at least one domestic task	323	357	408	408	391
Males aged 75-79 who need help with at least one domestic task	376	320	338	414	414
Males aged 80+ who need help with at least one domestic task	890	1,113	1,187	1,261	1,410
Females aged 65-69 who need help with at least one domestic task	528	589	589	548	548
Females aged 70-74 who need help with at least one domestic task	481	502	564	585	564
Females aged 75-79 who need help with at least one domestic task	658	603	630	712	740
Females aged 80+ who need help with at least one domestic task	1,829	2,184	2,438	2,591	2,946
Total Population Aged 65+ who Need Help with at Least One Domestic Task	5,390	6,026	6,514	6,852	7,346
Males aged 65-69 with unmet need for at least one domestic task	179	211	211	195	195
Males aged 70-74 with unmet need for at least one domestic task	232	256	293	293	281
Males aged 75-79 with unmet need for at least one domestic task	232	197	209	255	255
Males aged 80 and over with unmet need for at least one domestic task	533	666	710	755	844
Females aged 65-69 with unmet need for at least one domestic task	294	328	328	305	305
Females aged 70-74 with unmet need for at least one domestic task	283	295	332	344	332
Females aged 75-79 with unmet need for at least one domestic task	370	339	354	400	416
Females aged 80 and over with unmet need for at least one domestic task	997	1,191	1,330	1,413	1,607
Total population aged 65 and over with unmet need for at least one domestic task	3,120	3,483	3,766	3,960	4,234

8. Limiting long-term illness

These figures are split between those who will be affected to a small degree but a long-term illness, and those who will be affected a lot. There is a growth of 1,048 for those affected slightly (a 23.9% change), compared with 1,093 for those affected a lot (a 29.1% change).

	2025	2030	2035	2040	2045
People aged 65-74 whose day-to-day activities are limited a little	1,222	1,357	1,451	1,410	1,370
People aged 75-84 whose day-to-day activities are limited a little	1,430	1,489	1,489	1,665	1,802
People aged 85 and over whose day-to-day activities are limited a little	689	826	1,056	1,125	1,217
Total Population Aged 65+ with a Limiting Long-Term Illness whose Day-To-Day Activities are Limited a Little	3,341	3,672	3,995	4,200	4,389
People aged 65-74 whose day-to-day activities are limited a lot	696	772	826	803	780
People aged 75-84 whose day-to-day activities are limited a lot	989	1,029	1,029	1,151	1,246
People aged 85 and over whose day-to-day activities are limited a lot	979	1,175	1,501	1,599	1,730
Total Population Aged 65+ with a Limiting Long-Term Illness whose Day-To-Day Activities are Limited a Lot	2,663	2,976	3,356	3,553	3,756

2025-2029

9. Care home occupancy

These figures show an expected increase of 84 additional residents to be living within some form of care home accommodation by 2029 against the 2025 baseline data, representing a 10.9% increase.

	2025	2026	2027	2028	2029
People aged 65-74 living in a care home with or without nursing	76	77	79	80	82
People aged 75-84 living in a care home with or without nursing	191	196	196	199	199
People aged 85 and over living in a care home with or without nursing	418	432	446	460	487
Total population aged 65 and over living in a care home with or without nursing	685	705	721	738	769

10. Dementia

These figures show an increase of some 154 additional people expected to suffer from dementia by 2029 when measured against the current baseline, which is a 9.3% increase on current levels.

	2025	2026	2027	2028	2029
People aged 65-69 predicted to have dementia	81	83	86	89	91
People aged 70-74 predicted to have dementia	128	131	131	131	134
People aged 75-79 predicted to have dementia	264	259	247	235	235
People aged 80-84 predicted to have dementia	323	345	389	411	411
People aged 85-89 predicted to have dementia	328	328	343	363	383
People aged 90 and over predicted to have dementia	377	377	401	401	401
Total Population Aged 65 and Over Predicted to have Dementia	1,501	1,523	1,597	1,630	1,655

11. Living alone

These figures show an increase of 519 people aged 65 and over to be living alone by 2029, otherwise expressed as a near 7.9% increase on current levels.

	2025	2026	2027	2028	2029
Males aged 65-69 predicted to live alone	455	475	495	515	535
Males aged 70-74 predicted to live alone	382	402	402	402	402

Males aged 75-79 predicted to live alone	430	409	387	366	366
Males aged 80-84 predicted to live alone	305	330	381	406	406
Males aged 85-99 predicted to live alone	226	226	258	258	258
Males aged 90+ predicted to live alone	170	170	213	213	213
Females aged 65-69 predicted to live alone	632	632	656	680	680
Females aged 70-74 predicted to live alone	679	679	679	679	708
Females aged 75-79 predicted to live alone	893	893	856	818	818
Females aged 80-84 predicted to live alone	813	860	956	1,004	1,004
Females aged 85-99 predicted to live alone	622	622	622	678	735
Females aged 90+ predicted to live alone	450	450	450	450	450
Total population aged 65 and over predicted to live alone	6,056	6,147	6,354	6,469	6,575

12. Hospital admissions from falls

These figures show an increase of 91 people likely to require hospital admission as a result of falls by 2029, representing a 12.4% increase.

	2025	2026	2027	2028	2029
People aged 65-69 predicted numbers of hospital admissions due to falls	44	45	47	47	49
People aged 70-74 predicted numbers of hospital admissions due to falls	60	60	61	61	63
People aged 75-79 predicted numbers of hospital admissions due to falls	105	103	96	93	93
People aged 80 and over predicted numbers of hospital admissions due to falls	431	460	489	511	525
Total population aged 65 and over predicted numbers of hospital admissions due to falls	640	667	693	713	731

13. Mobility tasks

These figures show that there are likely to be a further 321 residents aged 65 and over unable to undertake on basic task themselves due to mobility issues by 2029, representing an increase of 7.8%. Such basis tasks (although not exhaustive) can include:

- going out of doors and walking down the road;
- getting up and down stairs;

- getting around the house on the level;
- getting to the toilet; and
- getting in and out of bed

	2025	2026	2027	2028	2029
People aged 65-69 unable to manage at least one activity on their own	418	426	443	460	468
People aged 70-74 unable to manage at least one activity on their own	558	568	568	568	584
People aged 75-79 unable to manage at least one activity on their own	744	732	699	666	666
People aged 80-84 unable to manage at least one activity on their own	709	756	850	897	897
People aged 85 and over unable to manage at least one activity on their own	1,370	1,370	1,370	1,455	1,505
Total Population aged 65+ Unable to Manage at Least One Activity on Their Own	3,799	3,852	3,930	4,046	4,120

14. Self-care activity

These figures show that by 2029 an additional 453 people aged 65 and over will need help with at least one self-care activity, representing a growth of 7.7%. Such self-care activities relate to personal care and mobility (although not exhaustive) can include:

- Having a bath or shower;
- Using the toilet;
- Getting up and down stairs;
- Getting around indoors;
- Dressing or undressing;
- Getting in and out of bed;
- Washing face and hands;
- Eating, including cutting up food; and
- Taking medicine.

	2025	2026	2027	2028	2029
Males aged 65-69 who need help with at least one self-care activity	382	398	415	432	448
Males aged 70-74 who need help with at least one self-care activity	376	396	396	396	396
Males aged 75-79 who need help with at least one self-care activity	506	481	455	430	430
Males aged 80+ who need help with at least one self-care activity	898	935	1,010	1,085	1,085
Females aged 65-69 who need help with at least one self-care activity	484	484	502	521	521
Females aged 70-74 who need help with at least one self-care activity	515	515	515	515	538

Females aged 75-79 who need help with at least one self-care activity	715	715	685	656	656
Females aged 80+ who need help with at least one self-care activity	1,534	1,576	1,661	1,747	1,789
Total Population Aged 65+ who need help with at least one self-care activity	5,409	5,500	5,640	5,781	5,862
Males aged 65-69 with unmet need for at least one self-care activity	327	341	355	369	383
Males aged 70-74 with unmet need for at least one self-care activity	283	298	298	298	298
Males aged 75-79 with unmet need for at least one self-care activity	468	445	421	398	398
Males aged 80 and over with unmet need for at least one self-care activity	806	840	907	974	974
Females aged 65-69 with unmet need for at least one self-care activity	377	377	392	406	406
Females aged 70-74 with unmet need for at least one self-care activity	442	442	442	442	461
Females aged 75-79 with unmet need for at least one self-care activity	590	590	566	541	541
Females aged 80 and over with unmet need for at least one self-care activity	1,397	1,436	1,513	1,591	1,630
Total population aged 65 and over with unmet need for at least one self-care activity	4,690	4,768	4,894	5,019	5,091

15. Domestic tasks

These figures show that by 2029 an additional 511 people aged 65 and over will need help with at least one domestic task, representing a growth of 8.7%. Such domestic tasks relate to activities which are fundamental to living independently and (although not exhaustive) can include:

- Doing routine housework or laundry;
- Shopping for food;
- Getting out of the house; and
- Doing paperwork or paying bills

	2025	2026	2027	2028	2029
Males aged 65-69 who need help with at least one domestic task	306	319	333	346	359
Males aged 70-74 who need help with at least one domestic task	323	340	340	340	340
Males aged 75-79 who need help with at least one domestic task	376	357	338	320	320
Males aged 80+ who need help with at least one domestic task	890	928	1,002	1,076	1,076

Females aged 65-69 who need help with at least one domestic task	528	528	548	568	568
Females aged 70-74 who need help with at least one domestic task	481	481	481	481	502
Females aged 75-79 who need help with at least one domestic task	658	658	630	603	603
Females aged 80+ who need help with at least one domestic task	1,829	1,880	1,981	2,083	2,134
Total Population Aged 65+ who Need Help with at Least One Domestic Task	5,390	5,490	5,653	5,816	5,901
Males aged 65-69 with unmet need for at least one domestic task	179	187	195	203	211
Males aged 70-74 with unmet need for at least one domestic task	232	244	244	244	244
Males aged 75-79 with unmet need for at least one domestic task	232	220	209	197	197
Males aged 80 and over with unmet need for at least one domestic task	533	555	599	644	644
Females aged 65-69 with unmet need for at least one domestic task	294	294	305	316	316
Females aged 70-74 with unmet need for at least one domestic task	283	283	283	283	295
Females aged 75-79 with unmet need for at least one domestic task	370	370	354	339	339
Females aged 80 and over with unmet need for at least one domestic task	997	1,025	1,080	1,136	1,163
Total population aged 65 and over with unmet need for at least one domestic task	3,120	3,178	3,270	3,362	3,409

16. Limiting long-term illness

These figures are split between those who will be affected to a small degree but a long-term illness, and those who will be affected a lot. There is a growth of 281 for those affected slightly (a 7.8% change), compared with 265 for those affected a lot (a 9.1% change).

	2025	2026	2027	2028	2029
People aged 65-74 whose day-to-day activities are limited a little	1,222	1,236	1,276	1,290	1,330
People aged 75-84 whose day-to-day activities are limited a little	1,430	1,469	1,469	1,489	1,489
People aged 85 and over whose day-to-day activities are limited a little	689	712	735	758	804
Total Population Aged 65+ with a Limiting Long-Term Illness	3,341	3,417	3,480	3,536	3,622

whose Day-To-Day Activities are Limited a Little					
People aged 65-74 whose day-to-day activities are limited a lot	696	703	726	734	757
People aged 75-84 whose day-to-day activities are limited a lot	989	1,016	1,016	1,029	1,029
People aged 85 and over whose day-to-day activities are limited a lot	979	1,012	1,044	1,077	1,142
Total Population Aged 65+ with a Limiting Long-Term Illness whose Day-To-Day Activities are Limited a Lot	2,663	2,731	2,786	2,840	2,928

Appendix 2

Planning guidance for accommodation with care for older people (October 2025)

Planning guidance for accommodation with care for older people

Published October 2025



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Introduction

Surrey County Council's [Accommodation with Care & Support Strategy](#) (now known as the Right Homes Right Support Strategy) is set out in item 16 of a Cabinet report of 16 July 2019, and presents the overarching approach for all accommodation based services we commission and provide for residents of Surrey.

It is an ambitious programme for a more diverse range of accommodation with care options for people with a range of disabilities and needs, with the aim of maximising their independence, choice and control. It will allow people, regardless of their financial circumstances, to access settings where the built environment and on-site support can address their current and future needs, and this will reduce the risk of hospital admissions and having to access more restrictive environments as a result of crisis.

For specialist housing for older people, Surrey County Council recognises that the biggest gap in provision is in affordable extra care housing. In response to this, the Right Homes Right Support Strategy has a target of achieving 725 additional affordable extra care housing units by the end of the decade. It is within this context that Surrey County Council presents its wider consideration of the future need for affordable extra care housing, alongside other market-facing models of housing with care for older people.

Scope of this document

This document sets out Surrey County Council's expectations for the market to respond to the Accommodation with Care & Support Strategy in terms of older people's services.

Surrey County Council is mindful of the [National Planning Practice Guidance](#) for housing for older and disabled people (NPPG), which states that the "need to provide housing for older people is critical", and of its requirement for planning authorities to take into account of the need for this area of specialist housing specifically alongside other future housing needs.

In order to provide guidance to existing providers of care and support, prospective developers and the planning authorities in the Surrey County Council area, this document will therefore:

- Set out the various typologies of specialist housing for older people
- Define extra care housing in detail as a housing with care model
- Examine the planning context regarding extra care housing
- Present a methodology for calculating the need for extra care housing across all tenures
- Present a methodology for calculating the need for residential and nursing care, which considers the impact of the Right Homes Right Support Strategy

The statistics will be set out separately in profiles for each Borough and District area of Surrey.

The specialist accommodation options for older people

Older people currently have a range of specialist accommodation options that may be available for them. The key types, beyond age restricted general housing, are set out below and elaborate on the descriptions in the [National Planning Practice Guidance](#) for housing for older and disabled people.

Type of accommodation setting	Retirement Housing (Sheltered Housing, Retirement Living, Senior Living etc)	Extra Care Housing (Assisted Living, Integrated Retirement Communities etc)	Residential Care Homes & Nursing Homes
Accommodation arrangements	Self-contained homes for ownership, shared-ownership or rent as part of a wider setting	Self-contained homes for ownership, shared-ownership or rent as part of a wider setting	Communal residential living with residents occupying individual rooms, often with an en-suite bathroom.
Support model	Housing only	Housing with Care	Care facility
Planning classification	C3	C2 or C3	C2
Referral process (where affordable)	Local allocation policy of housing authority	Through nominations agreement between operator, care authority and housing authority	Direct contact from person needing a care home place or their representative.
Occupancy rights	Ownership / shared-ownership – leasehold rights. Rental arrangements – tenancy rights, or almshouses' licences to occupy with equivalent rights. Can only be evicted through breaching the agreement.	Ownership / shared-ownership – leasehold rights. Rental arrangements – tenancy rights, or almshouses' licences to occupy with equivalent rights. Can only be evicted through breaching the agreement.	Rights as set out in licences to occupy, which reference accommodation and care arrangements together. 28 days' written notice to leave at any point is deemed reasonable.
Regulation	For affordable/social rent and shared ownership only: Regulator of Social Housing	Housing management (for affordable/ social rent and shared ownership only): Regulator of Social Housing Dedicated care provider: Care Quality Commission	Care Quality Commission

Typical facilities	Communal lounge Laundry facilities Gardens Guest room Mobility scooter parking/charging	Extensive. The following are common elements: Restaurant /café Activity rooms/spaces Communal lounge Hairdressers Gardens Guest room Mobility scooter parking/charging	Communal lounge Laundry facilities Gardens Guest room
Support arrangements	Warden assistance – part-time or full-time office hours Emergency call systems Limited or no dedicated care service Individual tenants purchase any care and support from the care market	24 hour on-site staff who can respond to emergency calls Dedicated care service working in partnership with housing management. Tenants with care needs can choose an alternative care provider if they wish	24 hour on-site care and support staff. Nursing care home has registered nurse on-site at all times. Meals etc included and paid for as part of occupancy.

Extra care housing

“Extra care housing” is an umbrella term – while it is commonly used as a direct description for suitable settings delivering publicly funded housing and support, other terms such as “assisted living”, “retirement village” and, most recently, “integrated retirement community” are regularly used by operators of settings whose residents are privately funded.

Regardless of the name used to describe a setting, there are common elements to developments which lead them to be defined as “extra care housing”. In “[Extra care housing: What is it?](#)” the Housing Learning and Improvement Network (Housing LIN) provides the following broad definition of extra care housing:

“Extra care housing is housing with care primarily for older people where occupants have specific tenure rights to occupy self-contained dwellings and where they have agreements that cover the provision of care, support, domestic, social, community or other services. Unlike people living in residential care homes, extra care residents are not obliged as a rule to obtain their care services from a specific provider, though other services (such as some domestic services, costs for communal areas including a catering kitchen, and in some cases some meals) might be built into the charges residents pay.”

Alongside this the NPPG is also of key importance in helping to define what extra care housing is in comparison to other specialist housing typologies. While the NPPG equates extra care housing with “housing-with-care”, the model is presented as one which:

“... usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.”

ARCO, as the representative body for (mainly) private operators of housing with care settings, has coined the term “Integrated Retirement Community” for the sector it represents, after extensive market research and engagement with older people. It sets out the key features of an [“Integrated Retirement Community”](#) on its website. A brief summary is as follows:

Apartment homes are available for purchase, part purchase or rent, alongside a range of choices:

- **Integrated Lifestyle:** Facilities like restaurants, bars, gyms, cinemas, community halls and gardens offer optional activities and social opportunities.
- **Integrated Well-being and Care:** Personal and domestic care can be delivered within people’s homes if they wish. Dedicated staff teams are on site 24/7.
- **Integrated with Wider Communities:** Connections with wider communities through family, friends, intergenerational, volunteering or leisure opportunities are valued and cherished.

Surrey County Council recognises the term “Integrated Retirement Community” as a model of housing with care which is equivalent to “extra care housing”, and sees it as a term usually employed by operators of settings which provide market sale and rental units of accommodation.

Extra care housing and planning use classes

Determining a planning use of C3 (“dwelling houses”) or C2 (“residential institutions”) for specialist housing settings is challenging for planning authorities. There are elements of extra care housing which may suggest C3, as residents in extra care housing settings have security of tenure and housing rights afforded by their occupancy agreements and cannot be required to move, unless in breach of the occupancy agreement. In addition, residents’ accommodation in extra care housing settings are comprised of self-contained units, and while housing services and care services on-site will be expected to be co-ordinated effectively, in regulatory terms the housing is a separate entity from the care (with the latter subject to regulation by the Care Quality Commission).

When determining the appropriate planning use class for proposed housing with care settings, planners should bear the above definitions of extra care housing in mind alongside the outcomes of previous planning appeal decisions, and then establish whether planning applicants have provided suitable evidence and undertakings to justify a C2 classification for their particular proposals. Conversely, planning applicants should understand that planning authorities may make default assumptions that self-contained accommodation is C3, and so, if C2 is sought, they will be expected to clearly justify an alternative classification.

Ultimately, any proposal for specialist housing for older people on a C2 planning basis must present substantially more than a housing model on-site, with facilities, staffing and operational support for residents which is clearly more intensive than that found in more mainstream housing settings or in retirement/sheltered housing, and in keeping with the NPPG definition of “extra care housing or housing-with-care”.

C2 planning applications for housing with care settings should cover off the following elements:

Regarding the aim of the setting:

- Is the setting focused on supporting older people with care and support needs? Will the setting have restrictions on occupancy to control access?
- Does the setting anticipate a range of need levels on site, which could include support to people living with dementia?
- How will residents be supported to stay as independent as possible and remain active in old age?
- How will residents be supported to avoid admission into care homes as their needs increase?

Regarding facilities:

- Does the proposed setting have facilities not normally associated with retirement or sheltered housing such as bar/ lounge, kitchen/dining room, laundry, crafts room, IT suite, shop, gym etc?
- Are the communal facilities maintained and funded through the rent and/or service charges paid for by the residents?
- What facilities are there for care staff to deliver care and support to residents? Does this include an office with space for secure record keeping, potential changing facilities?

- Does the proposed setting have alarm systems for residents to call on support in the case of emergencies, and opportunities for residents to make use of telecare and other assistive technology?
- Does the overall design of the proposed setting respond to best practice in design standards, space standards, layout and accessibility?

For further guidance the [Design Principles for Extra Care Housing](#) produced by the Housing LIN are instructive.

Regarding care and support on site:

- Will 24/7 on-site support be available to all residents? Will this be ensured through residents paying towards this support through service charges, or (in the case of a settings run by Housing Associations) enabled through a care service commissioned by Surrey County Council?
- For emergency care responses, will the setting be able to guarantee a direct response from on-site staff, and if so how?
- Will residents receive/purchase care from an on-site, CQC registered home based (domiciliary) care team based on-site, which will operate in partnership with the future operator?

The background of the developer may also be of interest in planning discussions, and, where the developer has opened similar schemes in other parts of the country, the following questions can be asked:

- What is the average age on entry to existing schemes?
- How much care per week was purchased during the first year of operation?

Where planning applicants can respond to the above, and show how the built environment is designed in a manner which is substantially different to that seen for C3, with a clear focus on care and support as a key driver for the proposal alongside the provision of accommodation, a planning classification of C2 could be considered.

Planning use class and other planning matters relating to extra care housing or housing-with-care have been explored within appeal hearings in recent years. The decisions of Inspectors may prove instructive to both planners and prospective developers, and so a list of relevant appeal decisions up to April 2025 have been set out in the Appendix.

The use of s106 agreements

In order to ensure that the planning classification of C2 is adhered to in the development and operation of a proposed setting, appropriate conditions can be set out within a s106 agreement. ARCO has developed a model s106 agreement with key operational terms relating to use, occupancy and the provision of services, and it is recommended that local planning authorities consider it while drafting their own s106 agreement conditions: [Model Section 106 Agreement for Integrated Retirement Communities | ARCO](#).

The accessibility and location of extra care settings

As stated by the [DWELL research project](#) “The preventative agenda often associated with extra-care housing requires a focus on ‘HAPPI’ design quality principles (attractive, accessible, good daylighting and thermal comfort) and links to local infrastructure (facilities, services and social opportunities)”.

Accessibility

Development proposals for extra care should clearly demonstrate how HAPPI quality principles have been used in the design of buildings and their environments. Alongside this, given the range of care and support needs that need to be accommodated on extra care sites, proposals should be accessible to people who use wheelchairs and allow for adaptations to accommodate them. While individual units of accommodation should meet the Building Regulations Part M, category 2 standards as a minimum, it would be ideal for Part M, category 3 to be factored into development proposals too.

The level of accessibility should be evident throughout the extra care setting – both with regard to internal and external areas on the site. In addition, as any extra care setting should meet a variety of needs it should evidence how people will:

- Be able to access local facilities through a choice of accessible transport options.
- Be able to leave and return to the setting without facing barriers (e.g. settings located on a hill or other gradients will automatically present challenges for people who have difficulties walking or who use wheelchairs). This includes clear access to transport options, e.g. paths and roads with pavements which will allow residents to safely walk to nearby bus stops.

Proximity to local facilities

The [NPPG](#) stresses that the location of specialist housing is very important for older people when downsizing or moving into more supportive environments, and extra care housing is no exception to this rule:

“The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation). Factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres.”

Within any extra care planning application it should therefore be evident that the setting will not only enable people to create a new community with their new neighbours on-site, but that the setting is sympathetic and supportive of people maintaining their links with the wider community.

Close care settings

“Close care settings” are generally larger developments than those seen for individual extra care settings or care homes, and are recognisable by being comprised of specialist housing for older people with an adjacent residential or nursing care home.

These settings, due to the proximity of a care home, can have the potential to offer specialist housing residents additional care and support which is beyond sheltered housing models, as the facilities and staff support may be made available to them. However, any planning

proposals arguing for C2 planning classification of the housing provision, due to the proximity of care home provision, should be very clear in setting out how there is an inseparable link between the two elements, such that they can be treated together as one overarching “residential institution”.

In order for such a determination to be made, Surrey County Council recommends that any planning authority should follow the above guidance in “Extra care housing and planning use classes”, and establish how this applied specifically for the residents living outside the care home in a close care setting. A C2 planning proposal for a close care setting should therefore:

- Be clear on the obligations on the part of the care home to deliver care and support and facilities to the external housing residents. This should include operational considerations to meet their needs alongside the needs of the care home residents, e.g. levels of facilities at the care home, staffing levels etc, CQC regulation where the care home delivers support to people’s individual homes.
- Specify the levels of communal facilities that the housing residents in the close care setting will have access to, and where. It should be assumed that these are available to them on the same basis as for residents elsewhere in extra care housing.
- Define how the housing residents will be supported to remain as independent as possible, with care delivered to their homes as they need it alongside an emergency response service
- Set out contingency plans for when any care and support may be temporarily unavailable from the care home to the housing residents at the setting (e.g. as during the Covid-19 pandemic)

Overall, planning applications with a mix of provision should not be treated as a whole just because a clearly C2 development (such as a care home) forms an element of the site.

Enhanced sheltered housing

“Enhanced sheltered housing” has been used as a term to define housing settings which may deliver additional services above what is typical for retirement/sheltered housing, but not to the extent of a housing with care model as defined by NPPG, the Housing LIN or by ARCO.

While such settings may have a value in presenting a housing option to older people, with lower cost considerations but a lower level of intensity of support available than extra care housing, they are unlikely to be recognised as C2 “residential institutions”. The [Elderly Accommodation Counsel](#) has the following definition for enhanced sheltered housing, which shows the limitation of the housing typology in meeting people’s changing housing and care needs:

“[A setting which] provides residents with the independence of having their own front door and self-contained flat whilst also having access to some on-site support service. Most developments will have scheme manager and alarm systems in the property, there may also be some personal care and home help services that can be arranged by the management.”

The Housing LIN categorised enhanced sheltered housing provision within “housing for older people”, describing it as a term “now used by very few social landlords” in its planning advice to [Hart District Council of June 2021](#). In addition, an appeal decision on 14 December 2023 (regarding [an outline planning application to Mole Valley District Council for an Integrated Retirement Community](#)) agreed with the planning authority that enhanced sheltered housing is a

sub-set of sheltered housing and it “should not, therefore, be included in any quantitative calculation of need for the proposed [Integrated Retirement Community].”

As a result of this, Surrey County Council will not agree with the analysis of needs assessments which factor enhanced sheltered housing needs calculations in with the equivalent for extra care housing/housing with care. This is particularly the case for planning applications seeking permission for a C2 use class development.

Establishing the future need for extra care housing

There have been various methodologies devised over the years to determine the future need for extra care housing, or housing with care.

In Commissioning Statements published in April 2019, Surrey County Council used an [approach taken by the Housing LIN](#). This methodology states that:

“...demand for extra care is likely to be required at 25 units per 1,000 population aged 75 plus [...]. The desired tenure mix will vary according to local and market factors.”

However, in reflecting on this approach, particularly in the context of market shifts in housing with care and various planning appeal decisions taken in the subsequent five years, an alternative methodology is now regarded as most suitable. This alternative has been referenced by the Housing LIN in its [Housing in Later Life](#) toolkit, as part of a wider approach to determining a variety of older people’s housing needs.

The methodology sets out the following broad prevalence levels as estimates of need, calculated as per 1,000 of the relevant 75+ population in an area:

- Sheltered housing – 180
- Enhanced sheltered housing – 20
- Extra care housing – 45

Of the total need figure for extra care housing of 45 per 1,000 of the relevant 75+ population, a further split (corresponding to the dynamics of the Surrey housing market) has been calculated based on whether provision is:

- “Affordable” (i.e. rental units fundable through housing benefit or shared ownership properties, with settings operated by a Housing Association regulated by the Regulator of Social Housing). This is determined as 10 per 1,000 of the relevant 75+ population.

or

- “Market” (i.e. private rental or leasehold units, with settings managed by private operators). This is determined as 35 per 1,000 of the relevant 75+ population.

The split of need figures into “affordable” and “market” is broadly based on the tenure split of home ownership in Surrey, as set out in the [2021 census](#), with an assumption that rates of home ownership are higher amongst older age groups.

Planning guidance for accommodation with care for older people

The resultant need figures are set out in individual profiles for each of the Borough and District areas of Surrey, alongside need figures for residential care and nursing care. The relevant 75+ population statistics for 2025, 2030 and 2035 are based on the [2022-based sub-national populations](#) published by the ONS on 24 June 2025.

Surrey County Council's Right Homes Right Support Strategy is highly ambitious in increasing the availability of affordable extra care housing. In consideration of this strategic shift, the affordable need figures for extra care housing in the Borough and District profiles should be regarded as conservative.

Residential and nursing care homes

While the residential care and nursing care home market is arguably as diverse as the one for extra care, defining these settings is made simpler by the fact that they are regulated as institutions by the Care Quality Commission (CQC) and their planning classification is C2.

CQC defines a care home in its [guidance for service types](#) as:

“...a place where personal care and accommodation are provided together. People may live in the service for short or long periods. For many people, it is their sole place of residence and so it becomes their home, although they do not legally own or rent it. Both the care that people receive and the premises are regulated.”

The key difference between residential care homes and nursing care homes is the 24 hour presence of nursing staff in the latter settings. Residential care homes are therefore referenced by CQC as “care homes without nursing” while nursing care homes are called “care homes with nursing” in their list of service types.

Establishing the future need for residential care home and nursing care home provision

Presenting clear need figures for residential care and nursing care in any area is problematic:

- There is no single, recognised methodology for identifying future residential and nursing care need
- Local need figures need to take into account Surrey County Council’s strategic direction to maximise the impact of preventative services, provide additional support to carers and to diversify the range of community support on offer, so that people are able to live in their own homes for longer.

These measures (including the implementation of the Right Homes Right Support Strategy) mean that a link between demographics and residential and nursing care provision should not be assumed.

- More granular assessments for future need on the basis of market “standard” accommodation (e.g. ensuite bathrooms) cannot prove that a new care home is absolutely necessary where the existing market is able to renovate or replace properties in response to market forces
- There is a concern amongst local NHS partners that, should nearby areas have relatively low levels of residential and nursing care, the building of more residential and nursing care homes in an area may lead to an “influx” of new patients from those nearby areas and create additional strain on the local health system.

On reflection of the above points, Surrey County Council presents a methodology which:

- Calculates the current provision of residential care homes and nursing care homes in the Surrey Borough and District areas on the basis of [CQC lists of regulated services](#) as at 1 April 2025, filtered for the provision of care to older people and people with dementia

- Compares the level of residential and nursing care capacity to the local 75+ population in the Surrey Borough and District areas. This comparison is set out as a ratio of beds per 1,000 of the 75+ population.
- The above ratio is then set alongside the equivalent ratio for England and to ratios for neighbouring authorities to Surrey's Borough and District areas, following the same process as above.
- Indicative forecasts of future needs for residential and nursing care, in Surrey's Borough and District areas and their neighbouring authorities, are then calculated with reference to achieving England's current ratio of care home beds in 2030 and 2035
- For residential care homes only, reduces the 2030 and 2035 need figures of Surrey's Borough and District areas as a result of the delivery of new affordable extra care housing. This is because Surrey County Council's focus will be on identifying and supporting older people who would benefit from affordable extra care through nominations processes to eliminate a need for future residential care as much as possible. The overall effect on Surrey's need for residential care is set out in [Item 16 of the Surrey County Council Cabinet report of July 2019](#). The Borough and District calculations have been made by pro-rating the average reduction on residential care home beds through the local gaps in need for affordable extra care housing.

The resultant need figures are set out alongside the needs statistics for extra care housing in individual profiles for each of the Borough and District areas of Surrey. The relevant 75+ population statistics for 2025, 2030 and 2035 are based on the [2022-based sub-national populations](#) published by the ONS on 24 June 2025.

The effect of care home closures and developments on need figures

Where an ongoing need for residential or nursing care is identified, it is desirable that released sites from any care home closures will be redeveloped with appropriate replacement care provision or with an alternative that clearly supports the strategic objectives of Surrey County Council's Right Homes Right Support Strategy. However, it is recognised that there may be instances where this may not be feasible or viable.

Planners should also, in overseeing the levels of specialist housing and care home provision in their authority areas, monitor any changes in their local care home and specialist housing provision with Surrey County Council and re-evaluate the need figures to respond to future planning applications.

Appendix

Selection of appeal decisions related to C2 planning use up to April 2025

Link and description	Decision date	Relevant outcomes
The Church of Jesus Christ of Latter Day Saints (GB) & Gladman Care Homes Ltd v North Somerset Council Former Portishead Primary School Site, Slade Road, Portishead, BS20 6BD	9/10/2012	<p>C2 planning use (“residential accommodation and care to people in need of care”, as per the Town and Country Planning (Use Classes) Order 1987 (as amended)) was determined on the basis of:</p> <ul style="list-style-type: none"> • The level of communal facilities, which would not be viable if they were not reasonably well used • “The cost of the care charge [which] would be likely to deter anyone from seeking to live there who did not need care.” <p>The potential of an apartment being occupied by a husband and wife, only one of whom might be in need of care, was not regarded as a challenge to the planning use. In the case of a person with care needs being survived by a spouse with no care needs “this would be likely to be a short-term and rare event which would not materially alter the overall character of the use.”</p>
PegasusLife v East Devon District Council The Knowle, Station Road, Sidmouth, Devon EX10 8HL	22/1/2018	<p>Determination of C2 planning use was based upon “the extent to which communal services are provided and the extent to which care is available to meet the needs of residents.”</p> <p>“Crucially, in this case, the development would be subject to a planning obligation which restricts occupation of the units so that the primary occupier must be 60 or over and in need of at least 2 hours of personal care per week, established by a health professional.”</p> <p>The level of service charge, which was necessarily high due to the associated facilities and care services, was also seen as a means of deterring prospective occupants who are not in need of such facilities.</p> <p>Finally, the Inspector’s decision was based upon the level of detail submitted by the Appellant and the merits of their case. The detail was higher than for other appeals, particularly in those where the ultimate operator was unknown.</p>

Link and description	Decision date	Relevant outcomes
<u>Retirement Villages Developments Ltd, Vortal Properties Ltd & Dr Harjot Bal v South Oxfordshire District Council</u> Land to the east of Reading Road, Lower Shiplake RG9 4BG	14/10/2019	The proposed C2 development, comprising of dwellings and associated communal facilities, could not be broken into its constituent parts. As a result, the proposals amount to a single development and not individual units for determining an affordable housing contribution. The Inspector took this decision based on the extent of communal facilities, s106 commitments and the resulting indivisibility between the facilities and the provision of dwellings.
<u>Rectory Homes v SSHCLG & SODC</u> (High Court ruling) The Elms, Upper High Street, Thame OX9 2DN	31/7/2020	Agreement that C2 is appropriate as the primary components of the proposal relate to both residential accommodation and care. Planning obligations are in place to ensure that the accommodation is occupied by people in need of care and that the provision of care is integral to their occupation. Affordable housing contributions can apply to C2 housing with care where development plan policies are clear where they apply to "dwellings" in the C2 use class as well as C3 use class.
<u>RV Developments Ltd and Notcutts Ltd v Mid Sussex District Council</u> Site of the former Hazeldens Nursery, London Road, Albourne, West Sussex BN6 9BL	11/9/2020	Although no position was taken on the methodology for identifying the need for C2 housing with care, substantial weight was given to the need for leasehold extra care housing due to fact that none was present in Mid Sussex at the time. Significant weight was also attached to the opportunity for the new development to free up family sized homes. Reference is made to the s106 agreement and a Unilateral Undertaking to ensure the proposed setting operates under a C2 planning class.
<u>Rainier Developments (Copthorne) Ltd v Mid Sussex District Council</u> Land East of Turners Hill Road Fellbridge, Crawley RH10 4HH	12/4/2022	Circumstances in terms of access to services and facilities differ between C2 and C3 housing. The appeal decision was taken with regard to a care home application, but the Inspector referenced care homes as being a subset of specialist housing for older people as per the NPPG.

Link and description	Decision date	Relevant outcomes
<u>Kingacre Estates Ltd v Mole Valley District Council</u> Land South of Headley Rd, Leatherhead KT22 8QE	14/12/2023	Enhanced sheltered housing should not be included in any quantitative calculation of need for extra care housing or housing with care. This is because it does not require the on-site provision of care, and as such it should be deemed as a subset of sheltered housing.
<u>Axis Land Partnerships Ltd and Bottisham Farming Ltd v East Cambridgeshire District Council</u> Land to the rear of 163 to 187 High Street and east of Rowan Close, Bottisham CB25 9BJ	13/2/2024	Extra care housing falls within the C2 use class and is “distinctly different from other forms of older people’s accommodation such as care homes and retirement housing”. Acknowledgement of significantly higher build costs of extra care housing in comparison to general needs housing. Identification of benefits in the application for extra care housing which can be considered as very special circumstances and justify development on the Green Belt.
<u>Beechcroft Developments Ltd v Buckinghamshire Council</u> Land at Wilton Park, Gorell Road, Beaconsfield, HP9 2RJ	14/2/2025	Affordable housing contributions do not apply to the proposed development, except for those units which are more akin to conventional housing. This was because the relevant development plan policies expressly stated that the requirements applied to C3 dwellings only.
<u>Swing Ltd v Welwyn Hatfield Council</u> Former Hook Estate and Kennels, Coopers Lane Road / Firs Wood Close, Northaw EN6 4BY	25/3/2025	Default application of affordable housing requirements where there is an absence of a pre-existing requirement on Green Belt land (as per paragraph 157 of <u>National Planning Policy Framework</u>) apply for the proposed C2 development. The Inspector decided this in the light of the Council’s evidence that, as there was no clear policy on affordable housing for C2 development, that this would be an appropriate approach to take. The Inspector recognises this is a departure from a colleague’s views as set out in Beechcroft Developments Ltd v Buckinghamshire Council (please see above), and stated that their decision was based on the evidence presented to them. The lack of existing C2 housing with care provision in the planning authority area was given substantial weight in the overall planning balance.

Appendix 3

Planning profile for accommodation with care for older people –
Tandridge (October 2025)

Planning profile for accommodation with care for older people

Tandridge District

Published October 2025



Extra care housing

Need for extra care housing in the Tandridge District area

Based on the [2022-based sub-national population projections](#) published by the ONS on 24 June 2025, the future need for extra care housing (as defined in Surrey County Council's Planning Guidance) is set out below for 2025, 2030 and 2035:

Year	75+ population projection	Affordable need (10 per 1,000 75+)	Market need (35 per 1,000 75+)	Total need (45 per 1,000 75+)
2025	10,380	104	363	467
2030	11,214	112	392	505
2035	12,095	121	423	544

As at 1 April 2025, the following extra care housing settings were either open or with full planning permission in the Tandridge District area to help meet this need:

Setting name	Status	Postcode	Tenure	No. of units
Audley Lingfield Grange	Planning approved	RH7 6PW	Market	150

Based on this level of recognised provision, the gap in meeting current and future needs for extra care housing are set out as follows:

Year	Affordable Projected (oversupply)/need for additional units	Market Projected (oversupply)/need for additional units	Total Projected oversupply)/need for additional units
2025	104	213	317
2030	112	242	354
2035	121	273	394

As stated in the Planning Guidance for Accommodation with Care for Older People, Surrey County Council's Right Homes Right Support Strategy is highly ambitious in increasing the availability of affordable extra care housing. In consideration of this strategic shift the affordable need figures should be regarded as conservative.

Residential and nursing care homes

Calculated need for residential care home provision in the Tandridge District area, up to 2035

As of 1 April 2025:

- The Tandridge District area had a supply of 319 residential care home beds against a 75+ population of 10,380. This provides a prevalence rate of 30.73 beds per 1,000 of the 75+ population.
- In comparison, England had a supply of 204,293 residential care home beds against a 75+ population of 5,573,643. This provides a prevalence rate of 36.65 beds per 1,000 of the 75+ population.

This means that the current amount of residential care provision in the Tandridge District area is relatively low in comparison to the England average.

The table below sets out the future local need for additional residential care home beds in 2030 and 2035, based on the operational provision in April 2025 and with adjustments for the future delivery of affordable extra care housing in Surrey:

Year	Tandridge 75+ population	No. of beds to reflect England ratio in 2025	Reduction due to delivery of new affordable extra care housing	Projected (oversupply) / need for additional beds in Tandridge
2030	11,214	411	(35)	57
2035	12,095	443	(35)	89

As illustrated by the following table, the Tandridge District area has a relatively high prevalence rate of residential care provision in comparison to neighbouring authorities (with the exception of Reigate & Banstead, Croydon and Mid Sussex). This suggests that future market-led development in this area is likely to lead to an influx of residents from other areas.

Neighbouring authority area	2025 prevalence rate	2030 Projected (oversupply) / need for additional beds	2035 Projected (oversupply) / need for additional beds
Reigate & Banstead	45.43	(112)	(52)
Bromley	15.44	710	788
Crawley	26.83	98	140
Croydon	35.05	124	243
Mid Sussex	34.10	112	178
Sevenoaks	29.59	144	182
Wealden	24.20	379	471

Calculated need for nursing care home provision in Tandridge District area, up to 2035

As of 1 April 2025:

- The Tandridge District area had a supply of 609 nursing care home beds against a 75+ population of 10,380. This provides a prevalence rate of 58.67 beds per 1,000 of the 75+ population.
- In comparison, England had a supply of 212,440 nursing care home beds against a 75+ population of 5,573,643. This provides a prevalence rate of 38.12 beds per 1,000 of the 75+ population.

This means that the current amount of nursing care home provision in the Tandridge District area is relatively high in comparison to the England average.

The table below sets out the future local need for additional nursing care home beds in 2030 and 2035, based on the operational provision in April 2025:

Year	Tandridge 75+ population	No. of beds to reflect England ratio in 2025	Projected (oversupply) / need for additional beds in Tandridge
2030	11,214	427	(182)
2035	12,095	461	(148)

As illustrated by the following table, the Tandridge District area has a relatively high prevalence rate of nursing care provision in comparison to neighbouring authorities, with the exception of Reigate & Banstead. This suggests that future market-led development in this area is likely to lead to an influx of residents from other areas, particularly those where there is a clear need for additional nursing care home beds.

Neighbouring authority area	2025 prevalence rate	2030 Projected (oversupply) / need for additional beds	2035 Projected (oversupply) / need for additional beds
Reigate & Banstead	73.04	(475)	(413)
Bromley	34.30	164	244
Crawley	11.63	225	269
Croydon	56.03	(398)	(273)
Mid Sussex	46.72	(88)	(19)
Sevenoaks	46.94	(91)	(52)
Wealden	52.28	(263)	(167)

Appendix 4

Older People's Residential and Nursing Care Market Positioning Statement: Update October 2024



Older People's Residential and Nursing Care

Market Positioning Statement:
Updated October 2024

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Surrey's key messages to providers

Responding to complex care needs: As people live longer, we want to work with providers and other partners to develop affordable and high quality residential and nursing care provision that can care for people with complex needs, including advanced dementia with behaviour that challenges.

Digitising care: We are committed to driving forward the digital transformation of the care sector. It is imperative for integrated, seamless care that all care homes have an NHS email and are working towards digital care planning and monitoring. Using technology to maximise and enhance qualified care staff time will improve experiences for both residents and staff.

Improving hospital discharge: Home First is a key priority and remains the overriding choice for those leaving health settings – facilitating people's rapid discharge from hospital, with recovery and reablement-based support in a community care setting or their own home is paramount - and we will continue to work with partners to develop this model of care.

Connecting with the community: We are keen to unlock the potential and opportunity of the Voluntary, Community and Social Enterprise (VCSE) in working with residential and nursing care providers to ensure care homes are at the heart of their local communities, supporting people's needs at the right time and linking to important community assets that increase their social value and environmental sustainability.

Future of residential care: As we continue to develop 725 units of Extra Care Housing and make greater use of Home-Based Care services, we no longer need to commission low level residential care for Older People to the same extent as the past as individuals can often be cared for in their own home. Any residential care placement will likely be for individuals with a higher level of mental health need or physical frailty.

Improving quality: We want to work with the market to support at least 85% of services commissioned to be rated Good or Outstanding by 2030. But also want to continue to get good feedback through more regular engagement with the market and residents, carers and families who use your services. We will help improve links with intermediate care and primary care to enhance support to homes that provides confidence when meeting resident's needs.

Informed decisions: We want to ensure residents in Surrey are making informed decisions about their own care and support, particularly if they want to move into a care home. This is to prevent common issues such as individuals entering care arrangements that are not right for their needs or that cannot be sustained financially in the longer term. This also extends to better information being shared with homes from health and social care that enable more informed decisions about the residents you can and cannot support.

How does SCC know what makes a good care home?

In developing the [Living Well in Later Life Older People's Commissioning Strategy \(2021 to 2030\)](#), a core project group was established, which shaped and led the work needed to create Surrey's strategy. We have been able to use this engagement work to better understand key priorities for Older People living in Surrey. We believe we have developed a commissioning strategy in line with [Surrey's Community Vision 2030](#) that will help us to ensure Surrey is a place where no one is left behind. When developing the strategy, we worked with different groups of Surrey residents of all ages, unpaid carers, providers, partners, and Surrey County Council staff over a period of seven months. Providing opportunities for online engagement enabled people to connect and input across Surrey more flexibly. We conducted surveys and workshops focused on what works well, what doesn't work well, what could be improved and what is important to our residents. We also connected and had conversations with residents via the phone and sought feedback regarding providers and their services from their service users and families.

Co-production sessions were held in partnership with the Surrey Coalition of Disabled People and with older residents and their families and carers in Surrey in the summer of 2021, as well as engagement with Healthwatch and Age UK Surrey. Surrey County Council also shared a survey with all residents living in care homes, their families, and their carers. This information informed the development of the Residential and Nursing Care contract, including the specification and market performance measures. The findings from these sessions have been recorded and are represented in the image below which summarises what makes a good care home. (see Image 1).

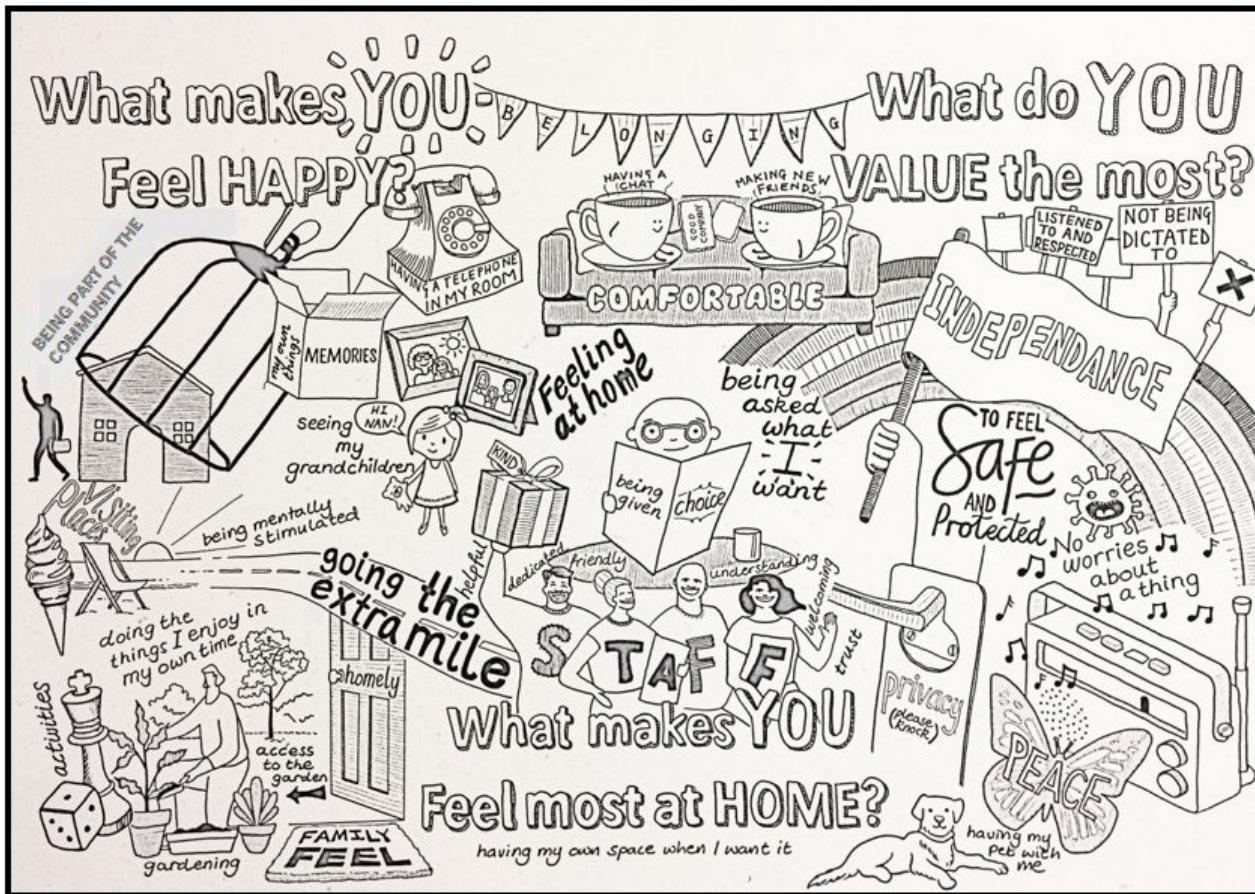


Image 1: What makes a good care home?

Building on this work, we have developed a resident engagement plan to ensure we are constantly working alongside Surrey residents, their carers and their families. This plan sets out the following outcomes:

- **Outcome 1:** Residents, families and carers lead the way in making care homes a great place to live.
- **Outcome 2:** Residents in care homes have the power to influence issues that affect them.
- **Outcome 3:** Activities to involve residents in care homes are focused and powerful.

To achieve this, we will:

- **Annual Care Home Survey:** We will work with residents, and homes, to design an annual Surrey care home survey to go to all the care homes on our Residential and Nursing Care contract and block contracted provision. Staff will be encouraged to support residents, their families, and their carers to feedback their views on what good looks like.
- **Drop-ins:** Surrey County Council staff will work with providers to organise opportunities to meet with residents in their care homes to talk about their day-to-day activities and their experiences of living in a care home.
- **Resident Panel:** We have used the Older People's Commissioning Strategy to reach out to the public and ask for people in Surrey to tell us if they would like to be part of a lived experience panel. We will go to the panel 3-4 times a year to ask them about key areas of work and practice or policy changes for them to share their views.

- **Task and finish groups:** Where appropriate, we will set up task and finish groups with residents to get their involvement from the start of a new project to shape the outcomes and related activity.

To make sure we reflect this in how we involve communities, we will do our best to make sure that all our activity:

- Has a clear purpose and that we are honest about what the limitations are.
- Involves people at the earliest opportunity to influence outcomes.
- Is accessible and inclusive, considering the levels of involvement of each of the protected characteristics identified in the Equalities Act (2010) as well as other characteristics.
- Allows people to easily see the effect their involvement has.
- Makes sure how and to what degree people are involved is in proportion to the size and resources of the service and the significance of the issue.

Where we can, we will establish this approach in services we commission and promote them as a standard for our partners to work with or towards.

About this Market Position Statement

What is a Market Position Statement (MPS)?

A Market Position Statement (MPS) is a vital part of what Surrey County Council must do to ensure that there is a choice of different types of service and support available to residents. This MPS focuses specifically on the Residential and Nursing Care Market for Older People (over 65)

The MPS outlines:

- The type of residential care (with or without nursing) that older residents need.
- The residential care (with or without nursing) available at present, and what is not available but needs to be.
- The residential care (with or without nursing) the council thinks will be needed in the future.
- An overview of how Surrey County Council needs to shape the market and work with providers to develop a viable and sustainable market for older residents.

The main aim of this MPS is to encourage commissioners, people who use services, carers and provider organisations to work together to explain what residential care (with or without nursing) is needed in each area and why. The test of a good MPS is how well it is used and regularly reviewed by providers and the Council once it has been produced.

How has this MPS been developed?

A provider focus group was held in July 2022 to discuss the structure and content of this statement. The feedback received was that the MPS needed to:

- Identify the commissioning intentions and therefore future business opportunities for care providers to enable providers to develop their own business plans.
- Signify ways to work collaboratively in partnership with the market and local partners to explore innovative ways of responding to increasingly complex needs.
- Uncover the challenges and a way forward for older residents with complex mental health needs or complex physical frailty to feed into the approaches the market is taking in response.
- Include information at local level, not just Surrey-wide, to help foster opportunities to build relationships and develop local partnerships.

Key objectives

In line with the Living Well in Later Life Older People's Commissioning Strategy (2021 to 2030), this Market Position Statement sets out the following key objectives:

- Ensure there is the right care home provision available for the changing needs of the increasing population.
- Increase the capacity for ASC (Adult Social Care) funded placements in the residential and nursing care market, including for complex mental health needs and complex physical frailty.
- Secure strong relationships with care home providers and identify strategic partners to shape the social care market.
- Gain a comprehensive picture of what people want their residential and nursing care provision to be in the future by working with residents, carers, families, and providers.
- Improve our offer of support to providers to improve quality and outcomes for all residents receiving care.

- Ensure there are open and transparent processes and communication channels in place to enable residents to make well-informed choices about their care, understand how to manage their finances and know what to expect if their capital runs out.
- To identify gaps in provision and how these can be addressed through innovation and differing approaches to commissioning care.

Working differently with providers

We do not want to have a static, transactional relationship with care home providers in Surrey. We can see the passion and hard work in the sector, and we want to work alongside you to ensure Surrey residents have access to the best quality care. We recognise and welcome your expertise, and we know you will almost certainly have ideas about how we could all do things differently that would deliver improved outcomes for Surrey residents.

- We are keen to explore new ideas with you about how we can stimulate the market.
- We want to work with you to look at opportunities for more innovative approaches to meet needs in a more timely, more effective way that helps us to respond to residents' need while still achieving value for money.
- We will hold regular forums with providers and local partners to share information and exchange knowledge and ideas.
- We will regularly update our Market Position Statement, and we welcome your suggestions and comments to help inform this.
- Through the Surrey Care Association, we will highlight any changes to the Market Position Statement, especially those relating to market opportunities, and the support offered to providers.
- We want to work collaboratively on shared issues such as workforce and growing the brand of CARE

If you would like to discuss how we can work with you as an existing or new care provider, please get in touch: residentialnursingcare@surreycc.gov.uk

Additionally, we are asking residents and partners to [register their interest](#) (via a surrey says form) in being involved in ongoing engagement on our [Living Well in Later Life strategy](#). This will enable them to be involved in the shaping of services throughout the lifetime of the strategy. Our current priority is sharing the strategy and encouraging residents and partners to register their interest in working with us.

- **Telephone:** 0300 200 1005
- **Email:** asc.infoandadvice@surreycc.gov.uk
- **Textphone (via Text Relay):** 18001 0300 200 1005
- **SMS:** 07527 182 861 (for the deaf or hard of hearing)
- **BSL:** [Sign Language Video Relay Service](#)



Changing Needs

Current population

According to the [Joint Strategic Needs Assessment \(JSNA\) for Surrey's Population](#), Surrey has an increasingly ageing population with a life expectancy above the national average for both men and women. 230,000 people in Surrey are over the age of 65 with an expected growth to 270,000 people by 2030, with the largest growth expected in the number of people who are 85+. Surrey is less ethnically diverse than England, just over 16% are non-white British compared to 21% in England. Despite the increase in older Surrey residents, permanent admissions to care homes for people over the age of 65 continue to slowly decline as people endeavour to remain in their own home for longer. According to the [JSNA](#) for Older People in Care Homes, the number of permanent admissions to residential and nursing care home per 100,000 people aged 65+ decreased by 17% from 558.0 in 2010 to 464.1 in 2020.

According to the [JSNA for Surrey's Population](#), approximately 60% of women and 63% of men over 65 are in good or very good health in Surrey with life expectancy for men at 82 and women at 85. [JSNA information on life expectancy](#) shows that cancer and circulatory diseases are the two leading causes of death in Surrey. Deaths from cancer affect men more than women, while deaths attributed to mental and behavioural disorders disproportionately affect women. However, although Surrey is one of the 20% least deprived counties/unitary authorities in England, there are pockets of deprivation with a ten-year gap between wards in Surrey for men and a 14-year gap for women. Healthy life expectancy is also much lower than life expectancy at 68 for men and 70 for women.

The [JSNA](#) also shows that there are also changes in the structure of our society which mean that increasingly older people are living alone with less family support. By 2030, the number of people aged 75+ predicted to be living alone will have increased by 27%. The 2011 Census data also shows that the number of unpaid carers 65 and over will increase by 17% from 2016 to 2025, and for unpaid carers aged 85 and over this was 31%.

Spotlight on mental health needs

Since 1st November 2022, approximately 350 ASC referrals for older people requiring a care home placement have had a primary mental health need. Their behaviour has included disinhibition, anxiety, physical or verbal aggression, resistance to care and wandering.

Our brokerage system, AOSS, has recorded that 57% of all Adult Social Care (ASC) referrals that take longer than 29 days are for residents with dementia. Table 1 gives an overview of this data by locality. These referrals are often declined by multiple care homes because of the resident's high level of mental health needs which then causes a delay in placing the resident in a suitable care home. The majority (22%) of referrals are declined by care home providers because of the individual's needs being too high, with 24% of this figure specifically due to challenging behaviour. This would indicate a gap in care homes able to support residents with mental health needs in Surrey.

Table 1: Percentage of all referrals that take longer than 29 days for residents with dementia

Locality	Percentage of all referrals that take longer than 29 days for residents with dementia ((between July 2022 and July 2023))
Tandridge	36%
Elmbridge	33%
Surrey Heath	32%
Mole Valley	31%
Guildford	26%
Waverley	27%
Spelthorne	43%
Reigate & Banstead	35%
Woking	37%
Runnymede	35%
Epsom & Ewell	22%

N.B. The figures in table 1 do not include referrals made by centralised teams which are not associated with individual D&Bs.

However, this rise in mental health need does not only effect ASC referrals but can be seen as an increase in need generally. In Surrey, [POPPi](#) data estimates that between 2020 and 2030 the overall number of people with dementia is forecast to increase by 21%, from 17,700 to 21,428. The [JSNA](#) data estimates that at least 40% of people with multimorbidity are estimated to have at least one mental health condition. Depression is up to seven times more likely in people with multimorbidity.

Feedback from workshops with providers and ASC/NHS operational teams suggests the following:

- Care homes in Surrey need relevant mental health training to ensure all staff, including nursing staff, can respond to the needs of this client group. Training should cover the skills and competencies required to support residents with behaviour that can sometimes be challenging.
- Care homes also need relevant support from primary care, GP practices and clinical services to support the needs of residents they care for.
- There is a need for care homes with built environments which are more conducive to supporting mental health (including dementia) needs in the individual rooms and communal spaces, both for nursing and residential.
- Despite clear NICE guidelines and new Behavioural and Psychological Symptoms of Dementia (BPSD) guidance, care home staff remain unclear about how responsibility and communication on medication should operate.

Spotlight on physical frailty

Multimorbidity (defined as the co-occurrence of two or more chronic conditions) and frailty (which commonly coexist) contribute to more complex care needs for residents. The [JSNA](#) data estimates that there are around 90,000 residents aged 65 and over with multiple morbidity and 22,000 with frailty. It is further estimated that those with frailty will increase to more than 27,000 by 2030. The largest number of patients with either frailty or pre frailty are estimated to be in NW Surrey and Surrey Downs, whereas the smallest number are expected in Surrey Heath.

These increasing numbers of residents with physical frailty and multimorbidity mean that a great number of care home admissions will be for residents who are at risk of falling. The [JSNA](#) data

estimates that in 2025, approximately 8,100 people over 65 are anticipated to have a fall leading to a hospital admission, increasing to nearly 9,000 in 2030. As a system ambition, health and social care partners are committed to reducing rate of See and Convey activity across Surrey (see table 2) and falls-related hospital admissions where possible. We are committed to working with care homes to ensure they have the risk management structures, right environment, staff training and community support in place to manage this risk and respond with the right level of escalation to any fall that happens.

Table 2: 999 activity 2021/22 and 2022/23

Place	% See and Convey out of all 999 contact
East Surrey	38%
Guildford and Waverley	33%
North West Surrey	29%
Surrey Downs	27%

Table 3: Non-Elective Acute Admissions following a fall 2021/22 and 2022/23

Locality	Number of Non-Elective Acute Admissions
East Surrey	179
Guildford and Waverley	300
North West Surrey	310
Surrey Downs	367

Future needs

In 2024, a significant amount of the social care budget for older people (as the primary need) was spent on residential and nursing care. However, to support people to maintain their independence and wellbeing for as long as possible, we need to review how we use our resources so that we can focus more on preventative services and not wait until an emergency develops before action is taken to support people. Our commissioning approach is to focus on preventative actions, to keep people living independently and well for longer, as well as ensuring there is high quality provision to meet those with more complex needs.

As we develop our extra care provision in Surrey and aim to implement a 'home-first' approach to hospital discharge, we anticipate supporting less and less residents in residential care that require low care and support. This means that those we do support in care homes will be more likely to have greater physical and mental health needs. The future intention is that care home placements will only be purchased by SCC and Surrey CHC for people who cannot live safely at home, and primarily for those with nursing and/or specialist needs, for example advanced dementia and high levels of physical frailty.

Current Market

Market overview

In January 2024, CQC data shows that there are currently 213 residential and nursing care homes registered (10468 beds) within Surrey who predominantly provide services for older people. Relative to population size aged 75+, Surrey has a larger older adult care home market compared to both regional and national benchmarks. The [JSNA](#) data highlights that there are approximately 12.2 beds per 100 people over the age of 75 as opposed to 9.4 which is the national average. Table 5 demonstrates the number of care homes in Surrey's market for older people offering residential or nursing care. However, not all capacity is available to the market as it may not be staffed or functional.

Table 5: Types of Care Home in Surrey

Type of care home	Number of homes	Number of beds
Nursing	129	6832
Residential	84	3636

There is a diverse market operating in Surrey with a range of providers from large, national providers with 11 plus homes across the country to small businesses operating only one care home in the Surrey market. Approximately 151 providers operate in Surrey, with 28 large national providers accounting for 35% of the market. Table 6 demonstrates the type of care home providers in Surrey – 1 to 5 (small provider); 6 to 11 homes (medium provider); and 11 plus care homes (large provider). 38% of the care homes in Surrey are run by a provider who only has care homes in the Surrey market. Depending on overhead costs, some providers can run more efficiently than others which are able to achieve the council's guide price. This was reflected in an SCC commissioned report by Care Analytics in April 2021.

Table 6: Size of care home providers in Surrey

Size of provider	Number of providers	Number of care homes
Large	28	76
Medium	29	34
Small	94	102

The care home market in Surrey remains vibrant despite the challenges with workforce and the impact of the COVID pandemic. Changes to overseas recruitment practice is already seeing 'new' workforce capacity supporting the development of Surrey care markets. Despite its large size, the Surrey care home market continues to grow, and any new build care homes are mainly aimed at the luxury market. 81% of care homes in Surrey are rated good or outstanding by CQC. Any home closures have usually resulted from poor CQC ratings or new homes opening in proximity but can also be the result of larger providers purchasing small care home businesses. Overall, occupancy levels in the sector have steadily increased between 2021 and 2023 as admittable vacancy levels have decreased (demonstrated in Table 7).

Table 7: Surrey market admissible vacancy levels taken from the NHS Capacity Tracker (30th January 2023)

Vacancy Type	Vacancies (Admittable) % (January 21)	Vacancies (Admittable) % (January 22)	Vacancies (Admittable) % (January 23)
General Residential	24%	19%	16%
Residential Enhanced	19%	17%	13%
General Nursing	20%	18%	14%
Nursing Enhanced	17%	13%	10%

ASC and CHC commissioned services

Approx. 65-70% of all placements made in Surrey care homes are by self-funders. However, SCC has contracts with approximately 90% of the care home market. As of January 2024, the council contracts with 180 residential care homes across all categories of care. They provide a range of care types categorised as:

- **Residential care for older people**
- **Residential care for older people with dementia**
- **Nursing care for older people**

Residential and nursing care represent 63% of the gross expenditure budget for ASC Older People's care packages at approximately £134m per annum. It is vital to manage the prices paid for residential and nursing care, whilst also ensuring the market is being paid a fair and sustainable price for their service costs in support of our obligation to maintain a healthy market offering a choice of high-quality services. Surrey Continuing Healthcare (CHC) has CHC contracts with approximately 45% of the care home market and FNC contracts with all nursing homes in Surrey.

Surrey County Council (SCC) and Surrey Continuing Healthcare (CHC) have a joint Residential and Nursing Care Contract, which went live on 1 July 2022. The contract is a Dynamic Purchasing System (DPS), which means new providers can be accepted to the contract throughout the full 6-year term of the contractual arrangements which started in July 2022, and there is the possibility to extend the contract to 10 years. The Residential and Nursing Care Contract enables commissioners to build relationships and communicate more effectively with providers. The contract also means that we have agreed pricing with care home providers, and we know exactly what capacity we have in the care home market. This provides greater clarity and transparency when dealing with issues such as inflationary uplifts, new financial opportunities for the sector, socio-economic challenges facing the market and of course responding to fluctuating demand such as winter and hospital discharge pressures.

There are several different lots included within the contract. Currently the following lots are open to providers:

- Lot 1 – ASC Residential Care with or without Nursing (Older People only)
- Lot 2 - CHC Nursing Care (Older People/End of Life fast track only)
- Lot 3 - Discharge to Recover and Assess (Older people only): This will be for the provision of placements with therapeutic input (with or without Funded Nursing Care

funding in place) for people over the age of 65 who are being discharged from hospital into a care home for a period up to four weeks

- Lot 6 – Older People residential care with or without nursing blocks (Older People only): This is for a variety of blocks for long- and short-term placements (without or with FNC funding in place) for people over the age of 65 with needs eligible for social care or CHC Nursing Care.

Providers who are successful in their application for Lots 3 and 6 will become an approved provider which means that commissioners with, and on behalf of social care teams and health partners, can arrange block placements through a mini competition based on suitability, quality, location, and price as examples. This enables us to work transparently and fairly with all approved providers in the market. Further lots will be developed in the future for services including Residential Care with or without Nursing for adults aged 18-65 years, and for Learning Disability client groups.

To ensure quality of services being delivered to residents and to provide adequate support from health and social care for our valued care providers, over the next 5 years, commissioners aim to only make placements with providers who have joined the contract. We want to harness good relationships with providers through consistent contract management, transparent processes, training opportunities, and a dedicated relationship manager. We will involve a comprehensive programme of engagement across all sectors of the residential and nursing care market to support an effective and sustainable market in future years. If care home providers wish to offer residential and nursing care for older people in Surrey, they can [apply through the contract](#) which went live in July 2022:

Alongside the DPS, SCC have had a long-standing block contract with Care UK since 2002. The block contract consists of 293 beds in 7 care homes across Surrey, with the total registered bed capacity for all the homes totalling 425 beds delivering residential enhanced care. The 293 block purchased beds total 2.73% of the overall beds in Surrey care home market. The care homes within the contract and the contracted bed capacity are Appleby House, Epsom (38 beds), Broadwater Lodge, Waverley (47 beds), Echelforde, Spelthorne (37 beds), Kingsleigh, Woking (47 beds), Stanecroft, Mole Valley (38 beds), Tiltwood, Elmbridge (45 beds) and Whitebourne, Surrey Heath (41 beds). The 25-year contract is due to end in January 2027.

Additionally, SCC had previously entered into a 20-year block contract with Anchor in March 1998, for the delivery of residential and day care services for older people in 17 care homes previously owned by the Council offering 425 block contract beds, this contract was extended for an additional year and ended in April 2019. As a result of the contract ending, 8 homes were brought back in house to SCC and subsequently following a paper approved by Cabinet in February 2022 the homes were all closed by August 2022. Orchard Court (Lingfield), Keswick (Bookham), Birchlands (Englefield Green) and Meadowside (Staines) were all closed by January 2023. With the remaining homes Chalkmead (Merstham), Heathside (Woking), Abbeywood (Ash Vale) and Barnfield (Horley).

The other 9 homes within in the Anchor block contract were rebuilt during the contract and remain under lease agreements with Anchor until March 2028. The homes are Eastlake (Waverley), Glendale (Elmbridge), Greenacres (Reigate and Banstead), Limegrove (Guildford), Linwood (Elmbridge), Oakleigh (Tandridge), Ridgemount (Reigate and Banstead), Thameside (Elmbridge) and The Beeches (Mole Valley).

Market Challenges

Rapid hospital discharges

The proportion of patients remaining in beds who no longer meet the criteria to reside remains high. Any delay in discharge, leading to longer stays in hospital, can potentially damage people's confidence to live independently as well as directly impact their health and wellbeing – particularly for older people where extended stays can also be associated with loss of muscle tone, increased likelihood of falls and rapid deterioration. This means not only poorer short and longer-term outcomes and a greater reliance on services for those patients involved, but it also results in fewer beds being available in that hospital for new admissions – emergency or elective. We need to work as an integrated and aligned system to continue to manage this challenge with the right models of care in the community, including step-down, reablement and rehabilitation where appropriate, to enable a good flow of patients out of hospital and into appropriate forms of care in the community as expediently and safely as possible.

Increasing prevalence of high frailty/dementia/complex comorbidity

Demand has particularly accelerated for services that can support extremely vulnerable people with multiple conditions. This has been driven predominantly by increased numbers of hospital discharges, by people growing older with multiple, complex needs, as well as a potential increase in informal caring arrangements coming to an end. There is limited capacity in the market for placements for people with complex frailty and behaviour that challenges, but there are also indications that the workforce is lacking skills/experience in personalised care and positive behaviour approaches needed to feel confident in caring for these individuals. There are also concerns that providers do not feel supported by the health and care services in the community to effectively manage risk for individual residents.

Workforce, quality, and resilience challenges

Structural workforce issues remain; recruitment and retention, pay and reward, support, training, and career progression. This increases the risk to services relating to ongoing or future challenges of maintaining quality standards and meeting care requirements that often require business continuity planning that safeguards people in receipt of care. It also means that reporting of capacity in the market may not actually be accurate as the provider is unable to staff beds in homes, as planned. We will continue to work together to shape a sustainable market that provides choice of high-quality provision by uplifting providers annually who join the Residential and Nursing Care contract, by sharing clarity of commissioning intent with providers to enable them to plan and by making information available about current and future demand modelling made available to providers.

Future Supply

In order to understand future demand for capacity within the care home market, work was completed in 2022 to develop four internal Area Reports for North West Surrey and Surrey Heath, East Surrey, South West and Surrey Downs as part of the [Living Well in Later Life, Older People's Commissioning Strategy 2021 – 2030](#).

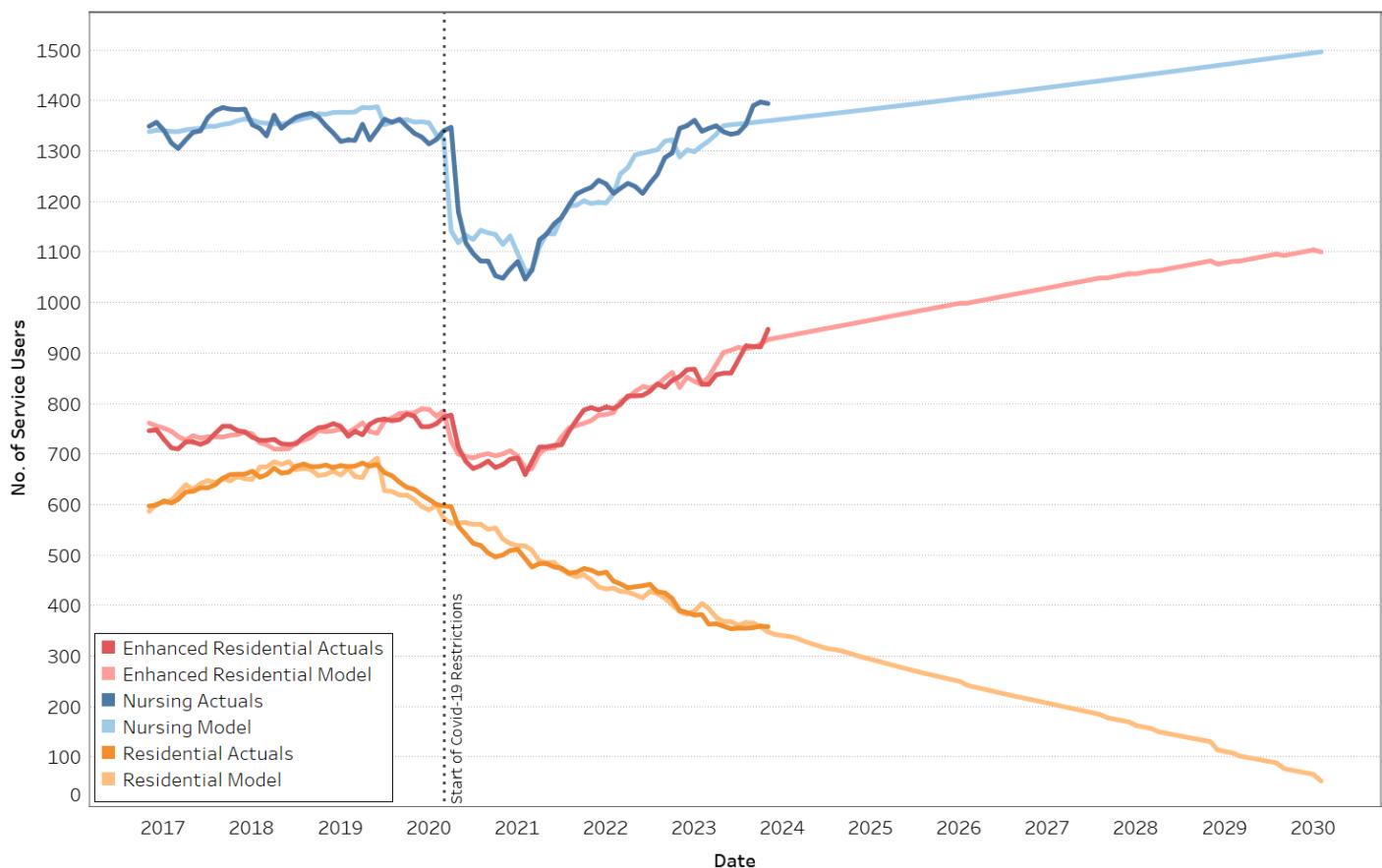
The Area Reports detail current providers, care homes and bed capacity within in the Surrey market, ASC utilisation within homes, placement and pricing trends for nursing, residential enhanced and residential, and reviews referrals, rejection, and additional placement data. This information has been distilled to demonstrate gaps in capacity across the county for both the residential and nursing care market and sets out specific challenges for each area.

Later in late 2023, a demand modelling project was carried out which has produced a forecast model of the number of SCC Older People funded placements in Residential and Nursing homes up to 2030. The chart below shows the forecast models produced and splits the service users into “Residential,” “Enhanced Residential” and “Nursing” subject categories. Also shown are the actual recorded numbers of each of the respective subject categories.

ASC Residential placements have fallen since 2016. Between 2016 and mid-2019 there was a rise of 79 service users, but from mid-2019 to December 2023 there was a continued decline, from 679 to 343 (49%). This is in direct contradiction to the rising older population and the start of this decline coincides with the push to helping older and disabled people live in their own homes independently for longer. This decline is predicted to continue to 2030, with circa 100 Residential service users left in Surrey by 2030 (a 70% decrease on December 2023 figures).

ASC Residential Enhanced placements (where the resident has a diagnosis of dementia) have seen the greatest percentage rise, with a 31% increase in placements between 2016 and 2023. The rate of increase has accelerated post covid, with 659 placements at the height of Covid restrictions, to 978 in December 2023 (48% increase). The model forecasts Residential Enhanced placements to reach 1130 by 2030 (a 15% increase on December 2023 figures).

Between October 2016 and December 2023, there has been a 3% increase in the number of ASC Nursing placements. The Covid-19 pandemic caused a 22% drop in the number of Nursing placements between March 2020 and January 2021, but since that time, there has been a rapid climb in the number of nursing placements (rising from 1046 in January 2021 to 1397 in September 2023) and numbers have recently reached pre-pandemic levels. By 2030 the number of service users is predicted to be approximately 1500 (an 8% increase on December 2023 figures).



The following tables divide the projections between each of the 11 district and boroughs to give more localised forecasts. To achieve this, the proportion of ASC clients in each D&B needed to be estimated. Proportions could be estimated from POPPI forecasts for each D&B, but this would ignore the inherent bias that arises from where care homes are currently placed (i.e. a greater number of care homes in Elmbridge that work with SCC will naturally result in a higher proportion of service users in Elmbridge, regardless of what population projections suggest). For this reason, the D&B proportions are based on the current division of ASC service users in each district, for each subject category.

Table 8: Future Capacity Needs – East Surrey

Localities in East Surrey	Service Category	No. of ASC Service Users in January 2024 (Actuals)	No of ASC Service Users in January 2030 (Forecast)
Reigate and Banstead	Residential	42	10
Reigate and Banstead	Residential Enhanced	115	132
Reigate and Banstead	Nursing	137	148
Tandridge	Residential	27	7
Tandridge	Residential Enhanced	72	83
Tandridge	Nursing	101	109

Table 9: Future Capacity Needs – Mid Surrey

Localities in Mid Surrey	Service Category	No. of ASC Service Users in January 2024 (Actuals)	No. of ASC Service Users in January 2030 (Forecast)
Mole Valley	Residential	33	8
Mole Valley	Residential Enhanced	70	81
Mole Valley	Nursing	136	147
Elmbridge	Residential	34	8
Elmbridge	Residential Enhanced	154	177
Elmbridge	Nursing	77	83
Epsom and Ewell	Residential	10	2
Epsom and Ewell	Residential Enhanced	37	43
Epsom and Ewell	Nursing	33	36

Table 10: Future Capacity Needs – North-West Surrey and Surrey Heath

Localities in North-West Surrey (and Surrey Heath)	Service Category	No. of ASC Service Users in January 2024 (Actuals)	No. of ASC Service Users in January 2030 (Forecast)
Runnymede	Residential	12	3
Runnymede	Residential Enhanced	34	39
Runnymede	Nursing	94	102
Spelthorne	Residential	16	4
Spelthorne	Residential Enhanced	44	51
Spelthorne	Nursing	110	119
Woking	Residential	28	7
Woking	Residential Enhanced	61	70
Woking	Nursing	70	76
Surrey Heath	Residential	20	5
Surrey Heath	Residential Enhanced	91	105
Surrey Heath	Nursing	123	133

Table 11: Future Capacity Needs – South-West Surrey

Localities in South-West Surrey	Service Category	No. of ASC Service Users in January 2024 (Actuals)	No. of ASC Services Users in January 2030 (Forecast)
Guildford	Residential	32	8
Guildford	Residential Enhanced	45	52
Guildford	Nursing	100	108
Waverley	Residential	43	11
Waverley	Residential Enhanced	160	184
Waverley	Nursing	165	179

Appendix 5

Personal care provision (<https://housingcre.org>)

Search: (11 facilities) Housing (none) or Home (care), Room (all types) in England, Surrey, Tandridge with Stay Type (all)

Ordered By: Facility Name.

View these results online at <https://housingcare.org>

Results...

BURNTWOOD LODGE

84 Burntwood Lane, Caterham, Surrey CR3 6TA. [View on a map](#)



Enquiries to: Mark Peter Fuller and Joy Carolyn Fuller

Telephone: 01883 818085

Email: care@burntwoodlodge.co.uk

Type(s): CARE HOME

Properties: This home accommodates 6 residents in 6 single rooms (1 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-148899-burntwood-lodge-caterham-england>

CHAMPIONS PLACE



Kent Hatch Road, Limpsfield, Oxted, Surrey RH8 0TA. [View on a map](#)

Enquiries to: R & G Sparkes Limited

Telephone: 01883 722006/ 732343

Email: sandrahayworth@btconnect.com

Type(s): CARE HOME

Properties: This home accommodates 14 residents.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-124663-champions-place-limpsfield-england>

CHARTERS COURT NURSING & RESIDENTIAL HOME

Charters Towers, Felcourt Road, East Grinstead, West Sussex RH19 2JG. [View on a map](#)



Enquiries to: HC-One

Telephone: 0333 999 8743

Email: carenquiries@hc-one.co.uk

Type(s): CARE HOME / CARE HOME WITH NURSING

Properties: This home accommodates 60 residents in 60 single rooms (60 en suite). It was purpose built in 2017 and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-161249-charters-court-nursing-residential-home-east-grinstead-england>

CHERRY LODGE REST HOME

75 Whyteleafe Road, Caterham, Surrey CR3 5EJ. [View on a map](#)



Enquiries to: Cherry Lodge Rest Home Limited

Telephone: 01883 341471

Email: enquiries@cherry-lodge.net

Type(s): CARE HOME

Properties: This home accommodates 19 residents in 13 single and 3 shared rooms (16 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-124666-cherry-lodge-rest-home-caterham-england>

DAVID GRESHAM HOUSE

2 Oak Close, Hurst Green, Oxted, Surrey RH8 0BA. [View on a map](#)



Enquiries to: Abbeyfield North Downs Society Ltd

Telephone: 01252 735 507

Email: marketing@awvs.org.uk

Type(s): CARE HOME

Properties: This home accommodates 29 residents in 29 single rooms (29 en suite). It was purpose built and has a garden. Facilities are available for family or friends to stay overnight.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-124634-david-gresham-house-hurst-green-england>

ELIZABETH COURT

Grenadier Place, Caterham, Surrey CR3 5YJ. [View on a map](#)



Enquiries to: Anchor

Telephone: 01883 331590

Email: care.enquiries@anchor.org.uk

Type(s): CARE HOME

Properties: This home accommodates 59 residents in 59 single rooms (59 en suite). It was purpose built and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-157321-elizabeth-court-caterham-england>

LONGMEAD HOUSE

1 Buxton Lane, Caterham, Surrey CR3 5HG. [View on a map](#)



Enquiries to: Bridget Catherina McAleese

Telephone: 01883 340686

Type(s): CARE HOME

Properties: This home accommodates 23 residents.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-124635-longmead-house-caterham-england>

OAKLEIGH

Evelyn Gardens, Godstone, Surrey RH9 8BD. [View on a map](#)



Enquiries to: Anchor

Telephone: 0800 085 4214

Email: care.enquiries@anchor.org.uk

Type(s): CARE HOME

Properties: This home accommodates 51 residents in 51 single rooms (51 en suite). It was purpose built in 2002 and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-155315-oakleigh-godstone-england>

RIDGEWAY MANOR

Barrow Green Road, Oxted, Surrey RH8 9HE. [View on a map](#)



Enquiries to: C.N.V. Limited

Telephone: 01883 717055

Email: janet.browne@cnvcare.co.uk

Type(s): CARE HOME

Properties: This home accommodates 43 residents in 43 single rooms (22 en suite).

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-124645-ridgeway-manor-oxted-england>

TANDRIDGE HEIGHTS MEMORIAL CARE HOME

Memorial Close, Oxted, Surrey RH8 0NH. [View on a map](#)



Enquiries to: Barchester Healthcare Ltd

Telephone: 01883 715 595

Email: tandridge@barchester.com

Type(s): CARE HOME / CARE HOME WITH NURSING

Properties: This home accommodates 75 residents in 75 single rooms (75 en suite). It was purpose built and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-157034-tandridge-heights-memorial-care-home-oxted-england>

WOLFE HOUSE CARE HOME

Wolf's Row, Limpsfield, Oxted, Surrey RH8 0EB. [View on a map](#)



Enquiries to: Wolfe House Limited

Telephone: 01883 716 627

Email: enquiries@wolfehouse.co.uk

Type(s): CARE HOME

Properties: This home accommodates 16 residents in 12 single and 1 shared rooms (3 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-124648-wolfe-house-care-home-limpsfield-england>

HousingCare

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Appendix 6

Nursing care provision (<https://housingcre.org>)

Search: (13 facilities) Housing (none) or Home (nursing), Room (all types) in England, Surrey, Tandridge with Stay Type (all)

Ordered By: Facility Name.

View these results online at <https://housingcare.org>

Results...

BUXTON LODGE CARE HOME

53 Buxton Lane, Caterham on the Hill, Surrey CR3 5HL. [View on a map](#)



Enquiries to: New Century Care Limited

Telephone: 01883 410 976

Email: buxtonlodge@newcenturycare.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 44 residents in 32 single and 3 shared rooms (18 en suite). It is a converted building with a garden. Overnight visitors can usually be accommodated.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136432-buxton-lodge-care-home-caterham-england>

CHARTERS COURT NURSING & RESIDENTIAL HOME

Charters Towers, Felcourt Road, East Grinstead, West Sussex RH19 2JG. [View on a map](#)



Enquiries to: HC-One

Telephone: 0333 999 8743

Email: carenquiries@hc-one.co.uk

Type(s): CARE HOME / CARE HOME WITH NURSING

Properties: This home accommodates 60 residents in 60 single rooms (60 en suite). It was purpose built in 2017 and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-161249-charters-court-nursing-residential-home-east-grinstead-england>

COLLEGE OF ST. BARNABAS

Blackberry Lane, Lingfield, Surrey RH7 6NJ. [View on a map](#)



Enquiries to: College of St Barnabas

Telephone: 01342 870 260

Email: enquiries@collegeofstbarnabas.com

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 28 residents in 9 single rooms. Facilities are available for family or friends to stay overnight.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136439-college-of-st-barnabas-lingfield-england>

COOMBE DINGLE

14 Queens Park Road, Caterham, Surrey CR3 5RB. [View on a map](#)



Enquiries to: Alpha Care (Caterham) Limited

Telephone: 01883 345993

Email: info@alphacareltd.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 35 residents in 28 single and 7 shared rooms (11 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136443-coombe-dingle-caterham-england>

CRANMER COURT

Farleigh Road, Farleigh Common, Warlingham, Surrey CR6 9PE. [View on a map](#)



Enquiries to: Aria Care

Telephone: 0808 223 5421

Email: ariahealthcare@trustedcare.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 62 residents in 56 single rooms (56 en suite). It was purpose built and has a garden. Overnight visitors can usually be accommodated.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136469-cranmer-court-warlingham-england>

GLEBE HOUSE

Church Lane, Chaldon, Caterham, Surrey CR3 5AL. [View on a map](#)



Enquiries to: Glebe Care Ltd

Telephone: 01883 344434

Email: info@glebe-house.com

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 43 residents in 33 single and 4 shared rooms (25 en suite). It is a converted building with a garden. Overnight visitors can usually be accommodated.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136458-glebe-house-chaldon-england>

GREATHELD MANOR NURSING HOME

Ford Manor Road, Dormansland, Lingfield, Surrey RH7 6PA. [View on a map](#)



Enquiries to: Pressbeau Ltd

Telephone: 01342 832577 - 01342 836 478

Email: greatheld@pressbeau.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 40 residents in 23 single rooms (23 en suite). It was purpose built in 2009 and has a garden. Facilities are available for family or friends to stay overnight.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-157999-greatheld-manor-nursing-home-dormansland-england>

HEATHERLEY CHESHIRE HOME

Effingham Lane, Copthorne, Crawley, Surrey RH10 3HS. [View on a map](#)



Enquiries to: Leonard Cheshire

Telephone: 01342 712 232

Email: info@leonardcheshire.org

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 39 residents in 40 single rooms (6 en suite). It is a converted building with a garden. Overnight visitors can usually be accommodated.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-146586-heatherley-cheshire-home-copthorne-england>

OAKHURST COURT NURSING HOME

Tilburstow Hill Road, South Godstone, Godstone, Surrey RH9 8JY. [View on a map](#)



Enquiries to: ADL plc

Telephone: 01342 893 043

Email: info@oakhurstcourt.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 57 residents in 47 single and 4 shared rooms (43 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136472-oakhurst-court-nursing-home-south-godstone-england>

TANDRIDGE HEIGHTS MEMORIAL CARE HOME

Memorial Close, Oxted, Surrey RH8 0NH. [View on a map](#)



Enquiries to: Barchester Healthcare Ltd

Telephone: 01883 715 595

Email: tandridge@barchester.com

Type(s): CARE HOME / CARE HOME WITH NURSING

Properties: This home accommodates 75 residents in 75 single rooms (75 en suite). It was purpose built and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-157034-tandridge-heights-memorial-care-home-oxted-england>

TUPWOOD GATE NURSING HOME

74 Tupwood Lane, Caterham, Surrey CR3 6YE. [View on a map](#)



Enquiries to: Cygnet Health Care plc

Telephone: 01883 342275

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 35 residents in 25 single and 4 shared rooms (24 en suite). Facilities are available for family or friends to stay overnight.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136556-tupwood-gate-nursing-home-caterham-england>

WINDMILL MANOR CARE HOME

2 Fairviews, Off Holland Road, Hurst Green, Oxted, Surrey RH8 9BD. [View on a map](#)



Enquiries to: Barchester Healthcare Ltd

Telephone: 01883 718 120

Email: windmillmanor@barchester.com

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 60 residents in 60 single rooms (60 en suite). It was purpose built in 2010 and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-158602-windmill-manor-care-home-oxted-england>

WOODSIDE VIEW

2 Highview, Caterham, Surrey CR3 6AY. [View on a map](#)



Enquiries to: Care Homes of Distinction Ltd

Telephone: 01883 346313

Email: info@carehomesofdistinction.com

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 26 residents in 20 single and 2 shared rooms (11 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136561-woodside-view-caterham-england>

HousingCare

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Appendix 7

Single occupancy en suite care bed provision
(<https://housingcre.org>)

Search: (20 facilities) Housing (none) or Home (care, nursing), Room () in England, Surrey, Tandridge with Stay Type (all)

Ordered By: Facility Name.

View these results online at <https://housingcare.org>

Results...

BURNTWOOD LODGE

84 Burntwood Lane, Caterham, Surrey CR3 6TA. [View on a map](#)



Enquiries to: Mark Peter Fuller and Joy Carolyn Fuller

Telephone: 01883 818085

Email: care@burntwoodlodge.co.uk

Type(s): CARE HOME

Properties: This home accommodates 6 residents in 6 single rooms (1 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-148899-burntwood-lodge-caterham-england>

BUXTON LODGE CARE HOME

53 Buxton Lane, Caterham on the Hill, Surrey CR3 5HL. [View on a map](#)



Enquiries to: New Century Care Limited

Telephone: 01883 410 976

Email: buxtonlodge@newcenturycare.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 44 residents in 32 single and 3 shared rooms (18 en suite). It is a converted building with a garden. Overnight visitors can usually be accommodated.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136432-buxton-lodge-care-home-caterham-england>

CHARTERS COURT NURSING & RESIDENTIAL HOME

Charters Towers, Felcourt Road, East Grinstead, West Sussex RH19 2JG. [View on a map](#)



Enquiries to: HC-One

Telephone: 0333 999 8743

Email: carenquiries@hc-one.co.uk

Type(s): CARE HOME / CARE HOME WITH NURSING

Properties: This home accommodates 60 residents in 60 single rooms (60 en suite). It was purpose built in 2017 and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-161249-charters-court-nursing-residential-home-east-grinstead-england>

CHERRY LODGE REST HOME

75 Whyteleafe Road, Caterham, Surrey CR3 5EJ. [View on a map](#)



Enquiries to: Cherry Lodge Rest Home Limited

Telephone: 01883 341471

Email: enquiries@cherry-lodge.net

Type(s): CARE HOME

Properties: This home accommodates 19 residents in 13 single and 3 shared rooms (16 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-124666-cherry-lodge-rest-home-caterham-england>

COLLEGE OF ST. BARNABAS

Blackberry Lane, Lingfield, Surrey RH7 6NJ. [View on a map](#)



Enquiries to: College of St Barnabas

Telephone: 01342 870 260

Email: enquiries@collegeofstbarnabas.com

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 28 residents in 9 single rooms. Facilities are available for family or friends to stay overnight.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136439-college-of-st-barnabas-lingfield-england>

COOMBE DINGLE

14 Queens Park Road, Caterham, Surrey CR3 5RB. [View on a map](#)



Enquiries to: Alpha Care (Caterham) Limited

Telephone: 01883 345993

Email: info@alphacareltd.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 35 residents in 28 single and 7 shared rooms (11 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136443-coombe-dingle-caterham-england>

CRANMER COURT

Farleigh Road, Farleigh Common, Warlingham, Surrey CR6 9PE. [View on a map](#)



Enquiries to: Aria Care

Telephone: 0808 223 5421

Email: ariahealthcare@trustedcare.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 62 residents in 56 single rooms (56 en suite). It was purpose built and has a garden. Overnight visitors can usually be accommodated.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136469-cranmer-court-warlingham-england>

DAVID GRESHAM HOUSE

2 Oak Close, Hurst Green, Oxted, Surrey RH8 0BA. [View on a map](#)



Enquiries to: Abbeyfield North Downs Society Ltd

Telephone: 01252 735 507

Email: marketing@awvs.org.uk

Type(s): CARE HOME

Properties: This home accommodates 29 residents in 29 single rooms (29 en suite). It was purpose built and has a garden. Facilities are available for family or friends to stay overnight.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-124634-david-gresham-house-hurst-green-england>

ELIZABETH COURT

Grenadier Place, Caterham, Surrey CR3 5YJ. [View on a map](#)



Enquiries to: Anchor

Telephone: 01883 331590

Email: care.enquiries@anchor.org.uk

Type(s): CARE HOME

Properties: This home accommodates 59 residents in 59 single rooms (59 en suite). It was purpose built and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-157321-elizabeth-court-caterham-england>

GLEBE HOUSE

Church Lane, Chaldon, Caterham, Surrey CR3 5AL. [View on a map](#)



Enquiries to: Glebe Care Ltd

Telephone: 01883 344434

Email: info@glebe-house.com

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 43 residents in 33 single and 4 shared rooms (25 en suite). It is a converted building with a garden. Overnight visitors can usually be accommodated.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136458-glebe-house-chaldon-england>

GREATHELD MANOR NURSING HOME

Ford Manor Road, Dormansland, Lingfield, Surrey RH7 6PA. [View on a map](#)



Enquiries to: Pressbeau Ltd

Telephone: 01342 832577 - 01342 836 478

Email: greatheld@pressbeau.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 40 residents in 23 single rooms (23 en suite). It was purpose built in 2009 and has a garden. Facilities are available for family or friends to stay overnight.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-157999-greatheld-manor-nursing-home-dormansland-england>

HEATHERLEY CHESHIRE HOME

Effingham Lane, Copthorne, Crawley, Surrey RH10 3HS. [View on a map](#)



Enquiries to: Leonard Cheshire

Telephone: 01342 712 232

Email: info@leonardcheshire.org

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 39 residents in 40 single rooms (6 en suite). It is a converted building with a garden. Overnight visitors can usually be accommodated.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-146586-heatherley-cheshire-home-copthorne-england>

OAKHURST COURT NURSING HOME

Tilburstow Hill Road, South Godstone, Godstone, Surrey RH9 8JY. [View on a map](#)



Enquiries to: ADL plc

Telephone: 01342 893 043

Email: info@oakhurstcourt.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 57 residents in 47 single and 4 shared rooms (43 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136472-oakhurst-court-nursing-home-south-godstone-england>

OAKLEIGH

Evelyn Gardens, Godstone, Surrey RH9 8BD. [View on a map](#)



Enquiries to: Anchor

Telephone: 0800 085 4214

Email: care.enquiries@anchor.org.uk

Type(s): CARE HOME

Properties: This home accommodates 51 residents in 51 single rooms (51 en suite). It was purpose built in 2002 and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-155315-oakleigh-godstone-england>

RIDGEWAY MANOR

Barrow Green Road, Oxted, Surrey RH8 9HE. [View on a map](#)



Enquiries to: C.N.V. Limited

Telephone: 01883 717055

Email: janet.browne@cnvcare.co.uk

Type(s): CARE HOME

Properties: This home accommodates 43 residents in 43 single rooms (22 en suite).

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-124645-ridgeway-manor-oxted-england>

TANDRIDGE HEIGHTS MEMORIAL CARE HOME

Memorial Close, Oxted, Surrey RH8 0NH. [View on a map](#)



Enquiries to: Barchester Healthcare Ltd

Telephone: 01883 715 595

Email: tandridge@barchester.com

Type(s): CARE HOME / CARE HOME WITH NURSING

Properties: This home accommodates 75 residents in 75 single rooms (75 en suite). It was purpose built and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-157034-tandridge-heights-memorial-care-home-oxted-england>

TUPWOOD GATE NURSING HOME

74 Tupwood Lane, Caterham, Surrey CR3 6YE. [View on a map](#)



Enquiries to: Cygnet Health Care plc

Telephone: 01883 342275

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 35 residents in 25 single and 4 shared rooms (24 en suite). Facilities are available for family or friends to stay overnight.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136556-tupwood-gate-nursing-home-caterham-england>

WINDMILL MANOR CARE HOME

2 Fairviews, Off Holland Road, Hurst Green, Oxted, Surrey RH8 9BD. [View on a map](#)



Enquiries to: Barchester Healthcare Ltd

Telephone: 01883 718 120

Email: windmillmanor@barchester.com

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 60 residents in 60 single rooms (60 en suite). It was purpose built in 2010 and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-158602-windmill-manor-care-home-oxted-england>

WOLFE HOUSE CARE HOME

Wolf's Row, Limpsfield, Oxted, Surrey RH8 0EB. [View on a map](#)



Enquiries to: Wolfe House Limited

Telephone: 01883 716 627

Email: enquiries@wolfehouse.co.uk

Type(s): CARE HOME

Properties: This home accommodates 16 residents in 12 single and 1 shared rooms (3 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-124648-wolfe-house-care-home-limpsfield-england>

WOODSIDE VIEW

2 Highview, Caterham, Surrey CR3 6AY. [View on a map](#)



Enquiries to: Care Homes of Distinction Ltd

Telephone: 01883 346313

Email: info@carehomesofdistinction.com

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 26 residents in 20 single and 2 shared rooms (11 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-136561-woodside-view-caterham-england>

HousingCare

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Appendix 8

Appeal Decision APP/D3830/W/21/3281350



Appeal Decision

Inquiry held on 25 - 28 January 2022

Site visit made on 31 January 2022

by Andrew Dawe BSc (Hons), MSc, MPhil, MRTPI

an Inspector appointed by the Secretary of State

Decision date: 12th April 2022

Appeal Ref: APP/D3830/W/21/3281350

Land East of Turners Hill Road, Fellbridge, Crawley, RH10 4HH

(grid ref. 5333519, 139402)

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Mr Grant Stevenson of Rainier Developments (Copthorne) Ltd against the decision of Mid Sussex District Council.
- The application Ref DM/20/3081, dated 18 August 2020, was refused by notice dated 7 July 2021.
- The development proposed is the development of a 64 bed care home (Class C2) and associated infrastructure, including a new access road, car park and landscaped gardens.

Decision

1. The appeal is allowed and planning permission is granted for the development of a 64 bed care home (Class C2) and associated infrastructure, including a new access road, car park and landscaped gardens at Land East of Turners Hill Road, Fellbridge, Crawley, RH10 4HH (grid ref. 5333519, 139402) in accordance with the terms of the application, Ref DM/20/3081, dated 18 August 2020, subject to the conditions set out in the attached Annex.

Application for costs

2. An application for costs was made by Mr Grant Stevenson of Rainier Developments (Copthorne) Ltd against Mid Sussex District Council. This application is the subject of a separate Decision.

Preliminary Matters

3. For clarity, the date of the application in the third bullet of the above header and in the decision is taken from the original planning application form, notwithstanding that it is stated as 19 August 2020 on the Appeal form.
4. The emerging Mid Sussex District Council Site Allocations Development Plan Document (the SADPD) remains to be adopted. However, it is at an advanced stage whereby consultation on the Inspector's Main Modifications (MMs) has recently taken place. Those MMs include under MM3 a proposed additional policy to those originally set out, policy SA39, relating to Specialist Accommodation for Older People and Care Homes. Given the advanced stage towards adoption of the SADPD, and the relevance of that emerging policy SA39 to this appeal, that policy attracts a significant degree of weight for the purposes of this appeal.

Main Issues

5. The main issues are:

- i) the effect of the proposed development on the landscape character and appearance of the site and surrounding area;
- ii) the effect of the proposed development in terms of the Council's spatial strategy with particular regard to sustainable travel, having regard to local and national policy;
- iii) the nature and scale of the need for housing of the type proposed to meet the needs of older people.

Reasons

Landscape character and appearance

- 6. The site is located outside of any defined built-up area boundaries, is not allocated in the development plan for the proposed use and is not contiguous with an existing built-up area of any settlement. As such it would not be supported by policy DP6 of the MSDP relating to settlement hierarchy, and in relation to this main issue is within the countryside. Furthermore, paragraph 174 of the National Planning Policy Framework (the Framework), states that planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other things, recognising the intrinsic character and beauty of the countryside.
- 7. Policy DP12 of the Mid Sussex District Plan (the MSDP) sets out the requirement for protection and enhancement of the countryside. It states that the countryside will be protected in recognition of its intrinsic character and beauty. It goes on to state that development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and it is necessary for the purposes of agriculture; or it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.
- 8. Policy DP26 of the MSDP relates to character and design and requires, amongst other things, that all development and surrounding spaces will be well designed and reflect the distinctive character of the towns and villages while being sensitive to the countryside. Furthermore, policy CDNP05 of the Crawley Down Neighbourhood Plan (the CDNP) states the planning permission will be granted for residential development subject to, amongst other things, the scale, height and form fitting unobtrusively with the surrounding buildings and the character of the area or street scene.
- 9. The Appellant conducted a Landscape and Visual Appraisal (LVA), which has been undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment third edition 2013 which is not disputed. I have taken account of the LVA in respect of this issue along with all other relevant evidence.
- 10. In respect of a Landscape Character Assessment for Mid Sussex 2005, the site is located within Landscape Character Area (LCA) 6 relating to High Weald

which occupies a large proportion of the District; and in respect of the Mid Sussex Landscape Capacity Study 2007, it is within LCA 01 – East Crawley – Copthorne Settled Woodland Matrix. The LVA finds that the site and surrounding area are broadly consistent with the descriptive analysis for both of these LCAs and I have no substantive basis to consider differently.

11. The site comprises mixed woodland comprising a variety of mature trees, mainly deciduous but also with some evergreen. The development in the close vicinity of the site, in terms of that fronting Turners Hill Road is limited to a small number of properties to the north, south and opposite the site, sporadically positioned. The proposed development would lessen the degree to which that partially sporadic nature of development in that vicinity of the site would remain. However, the sporadic nature and linear aspect of development along Turners Hill Road is not the sole characteristic of that immediate vicinity. In this respect there is also a more formal small housing estate opposite and to the south-west of the site and a small number of properties along Chapel Lane extending away from Turners Hill Road to the north and north-east of the site.
12. Notwithstanding the wooded, verdant and undeveloped nature of the site, it is therefore set within that context of existing built form in close proximity to the junction with the A264 to the south, known as the Dukes Head roundabout. It is really only beyond Mill Lane opposite the north-west corner of the site and the dwelling immediately to the north of the site on the opposite side of Chapel Lane, that the countryside character on both sides of the road becomes more generally open. This includes fields, woodland and a small number of properties spread out on the western side of the road, and the spacious grounds of the Effingham Park hotel on the eastern side.
13. The proposed development would therefore not encroach into that more widely open countryside environment. Furthermore, and in any case, it would still retain a significant verdant character with the retention of most of the existing mature roadside trees on the site. It would be a noticeably and distinctly larger building than those in that immediate vicinity and it would occupy a large area of the plot. However, other than in respect of the housing estate opposite, there is no uniformity in the scale of those existing buildings or their footprint to plot ratio. Furthermore, it would not be an unusual feature in the context of the slightly wider area where there are existing large buildings such as relating to the hotel in Effingham Park to the north or business units to the east alongside the A264.
14. In visual terms, the site has a distinctly wooded appearance which on the approaches along Turners Hill Road is dominated by the mature frontage trees. However, I saw that those trees further within the site's boundaries can also be seen to varying degrees, certainly in the winter, in the closer proximity either via the Rowan site or viewed directly through the frontage trees when in front of and very close to the site. That is a similar scenario on the approach to the site along Chapel Lane.
15. The proposed care home would therefore be visible to varying degrees from local public vantage points. However, it would be set back and softened by the intervening vegetation which would likely remain the dominant feature of the site, despite the gap that would be created by the site access and the loss of trees further within the site, particularly as seen on the approaches to the site along Turners Hill Road. The degree of prominence of the proposed building as

seen from outside of the site would also be reduced to some extent through its design and position on the site and some likely additional softening by proposed new trees, hedge and shrub planting. In this respect, as well as the varying degrees of set back from the site boundaries, the massing of the proposed building would be broken up with a single storey element separating the two main sections, and the building slab level would be generally slightly lower than Turners Hill Road.

16. Although there are those existing dwellings to the east and north of the site, they are not clearly visible from the road, such that beyond Rowan on that eastern side of Turners Hill Road, there is a distinctly verdant character to the streetscene. That would therefore be eroded to a degree but for the above reasons, not significantly. Furthermore, the proposed development would be seen in the context of an existing prominent dwelling positioned close to the road opposite the site on Turners Hill Road, as well as the immediately to the south. As such, the presence of the proposed additional built form within that existing context would not be seen as an isolated alien visual feature.
17. The proposed development of the currently undeveloped wooded site would inevitably change the character and appearance of the site and to some extent the immediate surroundings. As such, to a degree, it would detract from the intrinsic character and beauty of the countryside. However, for the above reasons, the extent of that harm, including localised visual effects, would be limited.
18. For the above reasons, I conclude on this issue that the proposed development, as well as not being supported by policy DP6 of the MSDP, would cause some harm to the landscape character and appearance of the site and surrounding area. As such, regardless of the disputed position as to whether or not the proposed development is supported by a specific policy reference, it would conflict with policies DP12 and DP26 of the MSDP and policy CDNP05 of the CDNP. However, also for the above reasons, the extent of that harm would be limited, and I will consider this further in the planning balance.

Sustainable travel

19. Policy DP21 of the MSDP states that decisions on development proposals will take account of whether, amongst other things, the scheme is sustainably located to minimise the need for travel; and appropriate opportunities to facilitate and promote the increased use of alternative means of transport to the private car, such as the provision of, and access to, safe and convenient routes for walking, cycling and public transport, including suitable facilities for secure and safe cycle parking, have been fully explored and taken up. It goes on to state that where practical and viable, developments should be located and designed to incorporate facilities for charging plug-in and other ultra-low emission vehicles.
20. Policy CDNP10 of the CDNP states that development that does not conflict with other policies will be permitted provided that it promotes sustainable transport within the Neighbourhood Area by, amongst other things, demonstrating that adequate sustainable transport links to the principal village facilities including the village centre, the primary school, Health Centre and recreation open space already exist or will be provided.

21. As established above, the proposed development would not be supported by policy DP6 of the MSDP in terms of its location within the countryside, outside of a defined settlement boundary and clearly separated from such defined settlements. Furthermore, policy SA39 of the emerging SADPD sets out certain criteria under which proposals for specialist accommodation for older people and care homes will be supported, comprising where the site is allocated, part of a strategic allocation, located within the defined Built-Up Area Boundary, or where outside of that boundary it is contiguous with it and the development is demonstrated to be sustainable, including by reference to the settlement hierarchy. The appeal site does not meet any of those criteria such that the proposed development would not be supported by that policy.
22. Section 9 of the Framework relates to promoting sustainable transport and in paragraph 105 states, amongst other things, that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
23. The nature of the proposed development would indicate that residents themselves would be unlikely to leave the site on their own in terms of accessing the wider area either on foot or by other means of transport, such as to local services and facilities such as shops. Nevertheless, there would be a number of staff and the likelihood of regular visiting by family and friends travelling to and from the site; and as referred to above the proposed development would be located outside of any settlements with defined District Plan boundaries, which would not be within easy walking distance of the site. There are a relatively small number of dwellings in the immediate vicinity of the site, notably including the small estate opposite the site. However, those would be unlikely to account for a significant number of people travelling to and from the site.
24. Furthermore, the speed of traffic along the A264 and B2028 and absence of dedicated cycle lanes in the close vicinity of the site would be likely to deter most cyclists. This is notwithstanding the presence of a solid white line to the side of and set away from the carriageway along most of the A264 between the Dukes Head roundabout and the main roundabout junction serving Copthorne towards its western end, which would be likely to provide some degree of separation from motorised traffic. Nevertheless, cycle usage to and from the site would be likely to be encouraged to some degree through the proposed planning obligations to enable works to be undertaken by the County Council relating to a scheme to manage traffic speeds on Turners Hill Road and improving pedestrian and cycle infrastructure and/or the Turners Hill Road cycle path, together with the proposed on-site cycle parking.
25. That District Plan defined built up area of Copthorne is relatively close, being in between Crawley and the site and would therefore involve relatively short travel distances, albeit still more likely to be by motorised transport than on foot or cycle, particularly from the more westerly parts of that settlement. Likewise, the low density housing north of Effingham Park would be in fairly close proximity, albeit again not within short walking distance and where I saw the intervening footway to be generally unlit.
26. The site is therefore by no means isolated from existing housing in the near and slightly wider vicinity from where vehicle trips would be quite short. Nevertheless, it remains the case that the more substantial wider populations,

such as in Crawley, East Grinstead and Crawley Down, from where most staff and visitors would be more likely to be drawn, would be at such distances as to involve the likelihood of significant use of and reliance on motorised transport to get to and from the site, albeit with easy access via the existing road network.

27. However, there are three bus stops within easy walking distance of the site serving bus routes east and westwards to Copthorne, Crawley and East Grinstead and southwards to Crawley Down, and to the nearest railway stations at Three Bridges and East Grinstead. Although not all local settlements are served by buses, a large number of people living in the wider area including relating to the above District Plan defined settlements would have such potential access to a bus service. There would inevitably be varying degrees of convenience for those coming to the site in terms of the proximity of bus stops to homes within those larger settlements. However, it remains the case that there are a number of services to different locations thereby increasing the likelihood of some degree of use.
28. A key factor in respect of likely bus usage would be the frequency of services to enable staff and visitors to get to and from the site at times to suit their requirements. The frequency relating to the three bus stops close to the site in each of the above directions varies, with the eastbound stop served by the least number; and in all cases Sunday services are noticeably less. Nevertheless, other than on Sundays, with a small number of exceptions there is generally at least one service an hour from early morning to late evening, serving each of those three local bus stops, and often more, ranging from one to four and in one case five per hour.
29. The bus services, particularly on Monday to Saturdays, therefore allow use throughout the day and at frequencies that would generally enable staff and visitors to utilise them at a variety of times. These may not fit in precisely with shift patterns or visiting times for all those potential users, necessitating varying degrees of planning around that or the inevitable use of private cars to some degree instead. However, the services are at a level likely to be sufficient to enable a good degree of usage should that be the chosen mode of transport. The more limited Sunday services are however only approximately two hourly and not to Crawley Down. That would still enable some degree of use, depending on where people are coming from, although it would be less likely to fit in with required timings.
30. The three bus stops concerned, and the pedestrian routes between them and the site, are well lit which would likely be a factor encouraging their use during hours of darkness. The proposals would also include the upgrading of the existing pathway between the site and the A264 junction to make it easier and safer to use for all pedestrians. In this respect, I note that the Local Highway Authority (LHA) is also satisfied that the proposed upgraded footway would provide a workable route for pedestrians to the nearest bus stops. The LHA also refers to all the bus stops being accessible along the existing footway network from Turners Hill Road, with informal dropped kerb crossing points provided over Turners Hill Road and Copthorne Common Road to provide access to the westbound bus stop. I have no substantive basis to consider differently.

31. The bus stops are however unsheltered which would be likely to make them less attractive for use in inclement weather, albeit that I have no substantive evidence to indicate the extent to which this would be likely to affect usage. Furthermore, their use would involve crossing the A264 and B2028 for at least one leg of any return journey. Whilst that could be a deterrent for some people using buses, I have not received any substantive evidence of this situation having caused any accidents to date involving pedestrians crossing the roads concerned, albeit that the proposed development would add to the potential numbers of people using those crossing points. Furthermore, the proposed development would include improvements to the Turners Hill Road crossing points, comprising dropped kerb tactile paving.
32. Walking alongside the A264, including for access to the bus stops, is in proximity to fast moving traffic. However, the road is wide and pedestrians are also protected to some degree by the separation provided by the solid white line on the road referred to previously. Whilst Turners Hill Road is narrower, the existing narrow and poor quality path alongside it is proposed to be widened and improved, and where approximately half of its length between the site and the Dukes Head roundabout is, and would be, set away from the roadside, separated by a grass verge. Furthermore, as referred to above, the planning obligations would secure the means to improve conditions for pedestrians and cyclists on Turners Hill Road.
33. I have had regard to another recent appeal decision relating to a proposed care home at Tilgate Forest Lodge in Pease Pottage¹ which was dismissed (the Tilgate decision). My colleague in making that decision, whilst citing benefits and applying associated weight to these, including in relation to meeting a need for older persons care accommodation, gave substantial weight to the development not being in an accessible location, albeit with some factors in its favour in this respect such as there being a pavement along the adjacent road, which also has nearby bus stops and is part of a National Cycle Route.
34. However, in that case, unlike for the current appeal, it was noted that the bus stops mainly rely on light spill from the adjacent A23 rather than on the road concerned, albeit in that case one of the stops has a shelter. My colleague also referred to deficiencies in terms of the convenience of the bus service in that case. However, I do not have the full details of the level of provision concerned, including the extent of locations served by buses linking to the site in that case. For these reasons, that other appeal cannot be clearly compared with the current appeal in respect of this main issue which I have considered on its own merits. Furthermore, the planning balance resulting in the dismissal in that other case importantly also included, amongst other things, great weight being afforded to harm to the character and appearance of an Area of Outstanding Natural Beauty, which is not a designation relating to this appeal site.
35. The proposed development would include provision for a Travel Plan and a staff minibus service to incentivise the use of travel modes other than the private car. I acknowledge that there is no comparative objective evidence to demonstrate the extent to which the measures concerned would be likely to be utilised, which is a similar point to one made by my colleague in the Tilgate decision. There is also limited specific detail provided as to the how the

¹ Appeal Ref. APP/D3830/W/20/3251365

proposed Travel Plan would operate in full at this stage, such as in relation to the proposed minibus service, albeit that this could be secured by a condition to ensure an appropriate level of provision. Nevertheless, despite figures submitted indicating that cycling and bus use in the wider area constitutes a low percentage of trips, the proposed Travel Plan would be likely to form a basis for encouraging the use of alternative modes of transport to the private car; and in respect of the minibus, a further means by which a choice of transport modes would be provided, albeit to an unknown extent.

36. I note that my colleague in the Tilgate decision refers to the proposed Travel Plan in that particular case as having a more limited practical effect, especially with regard to buses, albeit also referring to there being no compelling comparative objective evidence to suggest a likely take-up of staff car sharing. As referred to above I have insufficient evidence to indicate that the level of convenience of bus services to the current appeal site is comparable to that other case, and no mention was made in that decision of a minibus service as is proposed in this case.
37. The proposed development would also incorporate electric vehicle charging facilities. Whilst this would still relate to the use of individually owned private cars, it would nevertheless encourage the use of a more sustainable form of transport in terms of emissions.
38. I have also had regard to the extent to which staff and visitors would have access to local services and facilities such as shops, health and leisure provision. The extent of such a need to access facilities close to the workplace for staff as opposed to close to where they live is disputed by the parties. Nevertheless, the prime reason for the journey from home to the site for staff would be to work, albeit that it cannot be generally disregarded that people at or travelling to and from a place of work would not reasonably wish to combine this with other visits to services and facilities before or after work or during breaks. There would therefore be limited scope for this or for visitors to do so also within the close vicinity of the site.
39. A lot of mention was made at the Inquiry of the shop and takeaway provision at the nearby petrol filling station on the A264. I saw that this is fairly easily accessible from the site, albeit via the road crossing points in the vicinity of the Dukes Head roundabout and on a narrow path alongside moderately fast-moving traffic on the road. For reasons referred to previously relating to walking alongside the roads concerned, together with there being street lighting for much of the route, the shop concerned would be likely to comprise a useable and potential destination. However, the nature of the shop is such that it only offers a limited facility in terms of general shopping provision, with provision likely to cater more for small-scale top-up shopping, lunch or snacks for example.
40. Other than that shop and the public house located adjacent to the Dukes Head roundabout, there are little or no other services and facilities in the close vicinity of the site, accessible on foot. However, the proposed development would include on-site catering facilities, with provision for a café shown on the plans which would be likely to lessen reliance on outside food outlets to at least some degree in relation to meal provision for staff.
41. I have also had regard to whether the circumstances in terms of access to services and facilities would be similar to those relating to general purpose

Class C3 housing, having regard to other recent appeal decisions for housing developments in the vicinity of the site. These include proposed developments referred to by the Council at Land off Turners Hill Road, Crawley Down including 167 dwellings²; The Park Farm, Snow Hill, Crawley Down for two dwellings³; and at land rear of Star Place, Copthorne Common Road for either 2 or 3 dwellings⁴, all of which were dismissed. However, despite those decisions citing, amongst other things, matters relating to the locations not being sustainable in transport terms, that was in a different context to a care home proposal whereby the residents themselves would not be reliant on accessing outside services and facilities independently; and where staff and visitors would be likely to live elsewhere, thereby being less likely to be so reliant on there being services and facilities within close proximity of the site. Furthermore, even if there were to be more sequentially preferable sites in the local area to meet any local need, I have determined this appeal on its merits.

42. I have had regard to the planning permission recently granted for a change of use on the adjacent Rowan site from an existing dwelling and outbuildings to create a Class C2 care facility. The Council granted planning permission for that use and acknowledged factors such as proximity to bus routes and provision for electric vehicle charging. However, it was a balanced decision, taking account of need for the accommodation, referring to it not being in a sustainable location in relation to access to shops and other services and with a reliance on the private motor car. However, in that case the balance included the factor of the site already being developed and in existing residential use, unlike the current appeal site. This in itself is therefore a significant difference to the circumstances of the appeal proposal.
43. For the above reasons, together with not being supported by policy DP6 of the MSDP, or emerging SADPD policy SA39 in terms of not relating to an allocation and not being contiguous with the Built-Up Area Boundary, the proposed development would have some shortcomings in terms of the Council's spatial strategy with particular regard to sustainable travel, having regard to local and national policy. As such, it would also conflict with policy DP21 of the MSDP, policy CDNP10 of the CDNP and paragraph 105 of the Framework. However, also for the above reasons, including the likelihood that there would be some degree of choice of transport modes, the extent of any harm relating to this issue would be limited. I shall consider this further in the planning balance.

Need

44. The MSDP appropriately addresses the need and supports proposals for housing for older people through policies DP25 and DP30. The former states, amongst other things, that the provision of community facilities and local services that contribute to creating sustainable communities will be supported and that such facilities and services to meet local needs will be identified through Neighbourhood Plans or a Site Allocations Development Plan Document. Furthermore, policy DP30, relating to housing mix, states that to support sustainable communities, housing development will, amongst other things, meet the current and future needs of different groups in the community including older people. It goes on to state that if a shortfall is identified in the supply of specialist accommodation and care homes falling within Use Class C2

² Appeal Ref. APP/D3830/W/16/3142489

³ Appeal Ref. APP/D3830/W/17/3181272

⁴ Appeal Refs. APP/D3830/W/21/3268144 & 3268145

to meet demand in the District, the Council will consider allocating sites for such use through a Site Allocations Document.

45. It is not disputed that the proposed development would meet a need for registered care accommodation. However, the weight to be afforded to such a benefit is disputed, having regard to the existing and projected supply and demand. It is this that I will therefore consider in more detail.

46. In terms of the methodology used to assess the level of need for registered care beds, the Council undertook an assessment of housing need for older people, published as an addendum to the Housing and Economic Development Needs Assessment (HEDNA) in August 2016. The HEDNA Addendum forms part of the evidence base for the MSDP and the assessment was undertaken using the Strategic Housing for Older People Analysis tool (the SHOP@ tool). This tool has limitations, including that it is based on national population prevalence data rather than local, and is claimed by the Council to be out of date. Nevertheless, it is common ground between the Council and Appellant that it is the latest published assessment of older persons accommodation needs in the Mid Sussex Council Area. Furthermore, whilst reference has been made to the new Strategic Housing Market Assessment (the SHMA), the Council has confirmed that it does not rely on the evidence in the SHMA for the purposes of this appeal, and I have no substantive basis to consider otherwise.

47. A lot of time was taken up in the Inquiry with consideration of the level of need having regard to the HEDNA Addendum methodology, which after all is that which the Council saw fit to use as its evidence base for the adopted MSDP, as has been the case with other relatively recent Inquiry decisions relating to housing for older people including those at Albourne⁵ and Pease Pottage⁶, albeit that the former related to provision for extra care units as opposed to a care home.

48. It is also agreed by the Council and Appellant that another frequently used methodology within the sector is based upon care home occupancy by age based on prevalence rates researched by sector specialists LaingBuisson. This methodology is also referred to by the Appellant alongside the HEDNA Addendum/SHOP@ tool but is not relied upon in isolation. It is agreed by the parties that the level of demand shown by the LaingBuisson research indicates a significantly lower demand for care beds for the elderly than under HEDNA/SHOP@. However, as highlighted by the Appellant, the bed numbers concerned in relation to the application of LaingBuisson are a baseline as, amongst other things, the rate is based on occupation of bedspaces and is therefore suppressed due to those areas of the country where there are insufficient beds to meet demand. I have received no substantive rejection of that being the case from the Council. The Appellant has indicated that the true level of need is likely to fall at a point between the figures relating to the two methodologies. However, I have no substantive basis to support the extent to which that would be the case, especially given uncertainty around the extent to which the level of demand has been suppressed. Therefore, for the above reasons, it seems to me that, notwithstanding its limitations, the HEDNA Addendum is the most appropriate methodology to adopt for the purposes of this appeal.

⁵ Appeal Ref. APP/D3830/W/19/3241644

⁶ Appeal Ref. APP/D3830/W/20/3251365

49. Having regard to the HEDNA/SHOP@ methodology, in terms of need for registered care beds within the MSDP plan period up to 2031, on a purely quantitative basis, based on a demand for 2442 beds and supply of 1518 as of November 2021, this would amount to 924 beds. The corresponding immediate need as of November 2021, based on a demand for 1806 beds would be 288 beds. These figures in themselves represent significant shortfalls.
50. Furthermore, they do not take account of the significant number of rooms which are not single occupancy and are without any ensuite facilities, agreed by the Council and Appellant to now be a reasonable minimum expectation for registered care bedrooms for older people. On that basis, the need over the plan period would be for 1294 beds, with an immediate need, agreed to be the more important figure, of 658 beds based on a current supply of rooms with at least an ensuite toilet and/or bathroom of 1148 rooms. The Appellant considers that the timescale for completion of the proposed development would be by 2025 which I have no substantive basis to disagree with, especially as there is an operator involved subject to planning permission being granted. Based on a demand then for 2123 beds, there would be a need by that time of an additional 317 beds on top of the above immediate need figures.
51. On the Appellant's figures, in the absence of anything similar from the Council, only 11 of the 37 registered care homes in the District have any rooms with an ensuite facility including a wetroom, with an estimate of a small number more than 589 of the current 1518 supply of bedrooms having such a facility. I have no substantive basis to disagree with this analysis and acknowledge that such provision, as is proposed in this case, would prevent the need for sharing such facilities, both from a wellbeing perspective and to minimise the spread of infections. On that basis the need would be much greater than the consideration relating to provision of only the minimum ensuite facilities.
52. It is important to consider the extent to which the above need figures would be likely to be addressed through any proposed care homes in the pipeline and the facilitation of such development in the development plan, including any allocated sites for this purpose in the emerging SADPD. In terms of those in the pipeline in Mid Sussex, there are two proposals with planning permission and one, at the time of the Inquiry, awaiting a decision. I have not been informed that the two with permission (at Haywards Heath and Sayers Common for 67 and 70 bedrooms respectively) are under construction, albeit that could change at any time, notwithstanding the Appellant's claim that they currently have no associated operators.
53. Furthermore, the degree of uncertainty until a decision is made relating to the third proposal in Burgess Hill for 68 bedrooms, reduces the weight afforded to that additional potential supply. Nevertheless, even if permission were to be granted for that one and all three were to be constructed, providing a total of 205 bedrooms, it is uncertain as to when they would be completed. Not being in place now, and even with the minimum period necessary until completion, means that they do not address the immediate need referred to above. Even if built by 2025 those 205 bedrooms would still fall significantly short of even the additional need of 317 beds referred to above, on top of which there would remain the current immediate need figures.
54. I acknowledge that the relevant MSDP policies and emerging SADPD policy SA39 provide support for such proposals, that future proposals may come

forward, and that there will be likely to be some natural replacement of that existing provision without the minimum ensuite facilities. I also note that emerging policy SA39 was added to take account of the previously referred to Albourne appeal decision which underlines the importance of providing for older persons housing. This is with reference to what is now paragraph 62 of the Framework and the Planning Practice Guidance which stresses that the need to provide housing for older people is critical in view of the rising numbers in the overall population.

55. That emerging policy provides clear support for care homes and has been proposed in the context of an identified need. However, based on the evidence before me, there remains uncertainty as to the extent to which it will result in the significant unmet need identified above being addressed, in the shorter term and within the MSDP period, in terms of the scale and nature of that need, particularly when taking account of the qualitative factors, including ensuite provision, and given that there is only one site allocated in the SADPD for C2 use.
56. There is also an additional factor concerning attrition rates whereby it would not necessarily just be non-ensuite rooms lost if and when those homes close which have both ensuite and non-ensuite rooms. This would therefore add to the unmet need for suitable care home accommodation, albeit partially offset by recent new developments and acknowledging that there is no clear evidence as to ongoing attrition rates despite evidence of some closures over the last few years.
57. A further factor potentially impinging on the degree to which care home need will be met during the MSDP period relates to the undisputed evidence provided by the Appellant relating to viability and land value factors. This identifies that it is hard for such care home development to compete with general needs housebuilders on housing sites not specifically allocated for housing for older people, including care homes, but which could in theory be suitable for this.
58. The SADPD allocation referred to above includes, amongst other things, Class C2 Use for a minimum of 142 dwellings, relating to a site in East Grinstead, Ref SA20. That allocation is not specifically for a registered care home such that it could be developed for extra care, claimed by the Appellant to be more likely given the number of rooms the allocation relates to. However, even if that were built as a registered care home, it again does not change the immediate need and remains not having any planning permission in place, resulting in uncertainty as to if and when it would be constructed in order to meet the need within the MSDP period. Furthermore, in itself it would only address a relatively small proportion of the overall need during the plan period, whether relating this to supply generally or just that with at least the minimum ensuite facilities.
59. The Council highlights the extent to which there is increasing diversification within the care sector with less emphasis on registered care beds than expected as opposed to extra care in particular, albeit citing work carried out in Hampshire. The particular demand for extra care provision was a point made by my colleague in the previously referred to Albourne decision. However, that appeal related to proposed extra care units and so did not address, in the same way as in this case, the specific need for registered care. That is a clear difference between the two cases, whereby I have considered this proposal on

its own merits. Whilst I acknowledge the likelihood of increased diversification going forward, the extent to which that would affect an ongoing remaining need for registered care homes in Mid Sussex is unclear, particularly given the extent of the current and future need within the MSDP period referred to above.

60. The Council highlights that the Appellant did not previously identify qualitative aspects of need in representations to the SADPD, in the Statement of Case or in Mr Burden's proof of evidence. Although such qualitative analysis was introduced in and relates to Mr Newton Taylor's evidence, it is nevertheless somewhat puzzling as to why it was not otherwise previously introduced by the Appellant given the extent to which it is now relied upon. Despite that, it was a matter fully explored at the Inquiry, as a result of which I have found it to be an important issue for consideration.
61. For the above reasons, I conclude on this issue that there is a significant unmet need for registered care homes in Mid Sussex, more so in relation to provision for bedrooms that have at least the minimum ensuite facilities. In considering the extent of the shortfall in the context of the critical need for such accommodation nationally, I afford substantial weight to the benefit of adding to the local supply with the proposed care home. That benefit is strengthened by the circumstances whereby there is an operator committed to the proposal subject to gaining planning permission, indicating a likelihood of relatively short term implementation, and given the intended provision for full wetroom ensuite facilities, thereby exceeding what was agreed to be the minimum requirement.

Other Matters

62. Having regard to matters of highway safety, the Appellant has submitted a Transport Statement (TS) which forecasts that the proposed development would have no perceptible material impact on the local transport network. Furthermore, it is common ground between the Council and Appellant that the trip rates set out in the TS are appropriate for the proposed development and that the forecast trip generation would not exceed the traffic levels that were previously considered acceptable by the LHA for a previous application for residential development on the site. I have no substantive basis to consider otherwise.
63. In relation to the nearby Copthorne Preparatory School, whilst any increases in pupil numbers would potentially add to that existing level of traffic upon which the TS was based, evidence produced at the Inquiry suggested that such expansion of the school may not be going ahead. In any case, even if there were any expansion, that would need to be a matter for consideration at that time in terms of any related highways safety implications.
64. The LHA has raised no objections to the proposed development on highway safety grounds and I have no substantive basis to consider differently subject to appropriate conditions and planning obligations. Furthermore, the LHA is satisfied that there would be sufficient parking provision on the site for the level of usage likely with development of the nature proposed, and again I have no substantive basis to consider differently.
65. With regard to noise concerns, comings and goings in relation to the site and its vicinity would inevitably increase due to the existing undeveloped nature of the site. However, in the context of other traffic movements locally on the adjacent roads and in relation to existing residential development in the locality

this would be unlikely to cause significantly increased or unexpected levels of noise to surrounding occupiers. Furthermore, given the positioning of the proposed car parking areas, served by access directly onto Turners Hill Road, much of the vehicular activity would be generally focussed away from the quieter rear of the site. Other potential noise from construction activity and any plant and machinery within the proposed development could also be appropriately controlled through conditions. For future residents, measures to protect them from unacceptable levels of noise from the adjacent road, could be appropriately secured by condition in relation to the detailed design of the building concerned.

66. With regard to the ecology of the site, the Appellant has undertaken a Preliminary Ecological Appraisal, a Preliminary Bat Roost Assessment and analysis concerning Biodiversity Net Gain (the Ecological Report) which assesses the site as being of local ecological importance; and an Arboricultural Impact Assessment with associated Arboricultural Note, both of which I have taken into account. The proposals would involve the loss of a significant number of trees and associated understorey habitat and the ecological report highlights that there would be a net loss of biodiversity on the site as a result of the proposed development. However, the tree loss would mainly be in the central part of the site primarily comprising early successional species and young semi-mature trees. The generally higher quality mature boundary trees, protected by Tree Preservation Order (TPO), with varied understorey would generally be retained. In this respect, those proposed to be removed to make way for the proposed site access are classified in the ecology report as Category C trees as opposed to those either side being Category B and I have no substantive basis to disagree with such categorisation.
67. Furthermore, the Council's Tree Officer raises no objections on arboricultural grounds, subject to appropriate conditions, having regard to the position of the proposed access in terms of measures to mitigate its impact on two larger trees either side; that there would not otherwise be any excavation works within the root protection areas of trees retained at the site boundaries; and referring to appropriate proposed new tree planting on the site, subject to the need for the submission of a detailed planting plan which could be secured by condition.
68. The Ecology Report highlights that no trees with potential for bat roosting would be removed and that there would be a suitable buffer between the development and the trees concerned to prevent disturbance. Nevertheless, only one tree was found to possess moderate, as opposed to otherwise low, potential to support roosting bats. The report, amongst other things, also draws attention to the need to conduct sensitive vegetation removal including in respect of breeding birds, reptiles and hedgehogs. It also highlights that there are no records of badgers within two kilometres of the site in the past 20 years and that no signs of badgers were found on the site during the survey work undertaken. I have no substantive basis to consider otherwise.
69. In terms of those conditions suggested by the Council as being necessary in the event of the appeal being allowed, those that would relate to ecological mitigation would importantly include securing the protection of intended retained trees, and their associated understoreys and habitat value, during the construction phase. It is also likely that proposed new tree and hedge planting and other soft landscaping, further details of which could also be secured by

condition, would provide some degree of replacement or improved habitat. With such conditions, and for the above reasons, despite a net loss of biodiversity on the site, it is therefore likely that any harm to the ecological value of the site would be limited and not to an unacceptable level.

70. In respect of the potential effects on the amenities of surrounding residents relating to increased levels of lighting and pollution generated as a result of the proposed development, I have no substantive basis to consider that any such increases would cause significant additional harm. Furthermore, measures to control odours, any external lighting, and to ensure adequate air quality associated with the proposed development, could all be appropriately controlled by conditions.
71. Having regard to concerns over the impact of the proposed development on the local medical infrastructure, I have no substantive evidence to indicate that this would be likely to cause significant additional pressure on such provision, especially as the nature of the proposed development would involve a level of care within the home itself.
72. In terms of any additional strain that may be caused by the proposed development on local drainage infrastructure, I have received no substantive evidence to indicate that foul and surface water could not be adequately disposed of from the proposed developed site, subject to details that could be secured by condition. In this respect, I also note that the Council's Flood Risk and Drainage Team raises no objections in respect of drainage subject to further details being submitted through a condition.

Conditions and planning obligations

73. The Council has submitted 25 suggested conditions were I minded to allow the appeal. These follow the submission of an amended schedule where one new suggested condition has been added. These are generally agreed by the Appellant who has also confirmed agreement to the imposition of the pre-commencement conditions concerned. I have considered these in the light of advice in the National Planning Practice Guidance and have, in the interests of clarity and precision, amended some of the wording, combined two of the originally suggested conditions and added one. I have referred to the condition numbers, cross referenced to the attached annex, in brackets for clarity purposes.
74. For certainty, the standard time condition for commencement of the development (1), and a condition requiring the development to be carried out in accordance with the approved plans (2), would be necessary.
75. In the interests of highway safety conditions would be necessary to secure: the completion of the proposed off-site footway and tactile paving crossing points alongside Turners Hill Road, also so as to provide sustainable travel options (3); the submission and implementation of a Construction Management Plan, also to protect the amenities of surrounding residents and the area generally (6); the completion of the proposed site access (13). Also, to provide sustainable travel options, conditions would be necessary to secure details and the implementation of covered and secure cycle parking spaces on the site (14); the implementation of the proposed electric vehicle charging spaces (23); and the submission and implementation of a Travel Plan, including provision for a staff minibus (24).

76. So as to provide adequate drainage of the site, conditions would be necessary to secure the submission and implementation of details of foul and surface water drainage measures (4 & 5).
77. In the interests of tree protection, the character and appearance of the area, and the ecological value of the site, a condition would be necessary to secure the implementation of proposed arboricultural measures (7). Also in the interests of the character and appearance of the area conditions would be necessary to secure the submission and implementation of: samples of facing materials and finishes proposed to be used in the construction of the proposed development (8); further details of various architectural elements of the proposed development (9); hard and soft landscaping details (12), also in the interests of the site's ecological value; details of the proposed bin store, pumping station and sub-station (22).
78. To protect the living conditions of local residents, conditions would be necessary to: control the hours of construction and demolition works as well as the times for deliveries or collection of plant, equipment or materials during the construction phase (10); secure measures for controlling the emission of fumes and odour and noise from the proposed development (15 & 16), also in the interests of the living conditions of prospective residents; secure measures to mitigate any risks from landfill/ground gas, also in the interests of the living conditions of prospective residents (17); secure details prior to implementation of any external lighting (18); ensure adequate levels of air quality relating to the proposed development (19), also in the interests of the living conditions of prospective residents. In order to protect the amenities of residents of the proposed development in respect of noise generated by traffic or other external sources, a condition would be necessary to secure details and implementation of appropriate mitigation measures (20).
79. In order to protect the local environment and the safety of construction workers and future and existing residents, a condition would be necessary to secure provision during construction for the remediation of any contamination found at the site that had not been previously identified (11).
80. Having regard to the safe movement of aircraft and the operation of Gatwick Airport, a condition would be necessary to secure the submission and implementation of a Bird Hazard Management Plan so as to minimise the attractiveness of the proposed roof area to birds (21).
81. An additional condition (25) to require the implementation and retention of the proposed car parking spaces would also be necessary in the interests of ensuring provision for adequate parking and highway safety. Whilst this would be additional to those suggested and discussed at the Inquiry, I consider that the Appellant would not be prejudiced by this as it would not require anything not already proposed, as shown on the submitted plans; and would not be unexpected as it is a condition already suggested by the LHA in its consultation response to the application concerned.
82. Planning Obligations have been submitted within a Section 106 Agreement making provision for the following:
 - Appropriate financial contribution towards local library provision relating to additional stock that would be required at East Grinstead Library, including on the basis that the library service is proactive in its contact

with residents of care homes as a result of the benefit to stimulation and engagement that the services can provide. This would be in accordance with the Framework which, in paragraph 93 sets out that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should, amongst other things, plan positively for the provision and use of community facilities and other local services to enhance the sustainability of communities and residential environments; and the Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document (the SPD) which highlights, amongst other things, that where a library is unable to meet standards due to development, a reasonable contribution will be requested towards the service.

- Appropriate financial contribution relating to works undertaken by the County Council concerning a scheme to manage traffic speeds on Turners Hill Road and improving pedestrian and cycle infrastructure and/or the Turners Hill Road cycle path, so as to encourage less car dependency and the use of sustainable transport modes, particularly by staff and visitors. This would be in accordance with the Framework which in paragraph 104 states, amongst other things, that opportunities to promote walking, cycling and public transport use are identified and pursued; and with the SPD which in respect of this matter relates to ensuring provision of an efficient and sustainable transport network and highlights the MSDP policy DP19 aim to facilitate and promote the increased use of alternative means of transport to the private car.

83. The Council and West Sussex County Council have submitted a statement of compliance of the planning obligations with Regulation 122 of the Community Infrastructure Regulations 2010 (as amended) (CIL Regulations). Based on that evidence, policy DP20 of the MSDP relating to securing infrastructure, the relevant paragraphs of the Framework and the SPD, I am satisfied that the provisions, would meet the tests set out in paragraph 57 of the Framework and Regulation 122(2) of the CIL Regulations.

Planning balance

84. I have found that the proposed development, as well as not being supported by policy DP6 of the MSDP, would cause some harm to the landscape character and appearance of the site and surrounding area. However, for the reasons set out, the extent of that harm would be limited.

85. I have also found that, together with the proposed development not being supported by policy DP6 of the MSDP, or emerging SADPD policy SA39, it would have some shortcomings in terms of the Council's spatial strategy with particular regard to sustainable travel, having regard to local and national policy. However, again for the reasons set out, the extent of any harm would be limited.

86. The proposed development would however contribute towards what I have found to be a significant unmet need for registered care homes in Mid Sussex, more so in relation to provision for bedrooms that have at least the minimum ensuite facilities, causing me to afford substantial weight to the benefit of adding to the local supply with the proposed care home. I have also found that that benefit is strengthened by the circumstances whereby there is an operator committed to the proposal subject to gaining planning permission, indicating a

likelihood of relatively short term implementation, and given the intended provision for full wetroom ensuite facilities, thereby exceeding what was agreed to be the minimum requirement. There would also be the likelihood of added local economic benefits associated with the jobs generated by the proposed development, both during its construction in the shorter term and once operational in the longer term.

87. Notwithstanding my findings in relation to the first two main issues, I have found there to be no other matters that would cause unacceptable harm, subject to appropriate conditions and planning obligations where applicable.
88. Applications for planning permission must be determined in accordance with an up-to-date development plan unless material considerations in a particular case indicate that the plan should not be followed. Taking all of the above into account, the benefits of the proposed development, comprising material considerations, would outweigh the harm that I have identified and the conflict with development plan policies. As such, the material considerations in this case indicate that planning permission should be granted that is not in accordance with the development plan.
89. Some Inquiry time was taken up with the disputed matter of whether the policies which are most important for determining the appeal are out of date. Whilst I have considered the submissions on this matter, I have not dealt with this in detail in light of the above overall planning balance, which does not rely on whether or not the tilted balance relating to paragraph 11(d)(ii) of the Framework applies.

Conclusion

90. For the reasons given above I conclude that the appeal should be allowed.

Andrew Dawe

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Christopher Young QC, No5 Chambers

Instructed by Timothy Burden,
Turley Associates

He called:

Clare Brockhurst (for round table discussion
on landscape matters)

Director, Leyton Place Limited

Matthew Grist

Director and Head of Transport
Planning, Jubb

Nigel Newton Taylor

Director, HPC

Richard Garside

Director and Head of
Development Consultancy,
Newsteer

Timothy Burden

Director, Turley Associates

FOR THE LOCAL PLANNING AUTHORITY:

Jack Parker, Barrister Cornerstone Barristers

Instructed by Tom Clark, Mid
Sussex District Council

He called:

Christopher Tunnell

Director of Planning and Leader
of the London Planning Group,
Arup

Also participated in round table discussion on conditions:

Susan Dubberley

Mid Sussex District Council

INQUIRY DOCUMENTS (IDS):

1. Opening Statement made on behalf of the Appellant.
2. Opening Statement for Mid Sussex District Council.
3. PPG - Housing for older and disabled people.
4. Government response to the Second Report of Session 2017-19 of the Housing, Communities and Local Government Select Committee inquiry into Housing for Older People.
5. Suggested viewpoints and locations for site visit.
6. Suggested Conditions.
7. Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document.
8. Appellant's agreement to pre-commencement conditions.
9. Location plan prepared by Appellant for site relating to appeal
ref APP/D3830/W/20/3251365 – Tilgate Forest Lodge, Brighton Road, Pease Pottage.
10. Planning Statement and site plan supporting MSDC Planning Application:
DM/21/3385 – Land to the south of Kings Way, Burgess Hill, West Sussex.
11. Appellant's Costs Application.
12. Plan showing proposed off-site footpath and crossing works: dwg no. 006 Rev P1.
13. Amended suggested conditions.
14. Details of notifications carried out for Rowan planning application
Ref DM/21/0028.
15. Crawley Observer article 18 November 2021 concerning Copthorne Preparatory School.
16. Further amended suggested conditions 28 January 2022 and confirmation of the Appellant's agreement to those that would be pre-commencement conditions.
17. Council's response to Appellant's costs application.
18. Closing Statement for Mid Sussex District Council.
19. Closing Statement made on behalf of the Appellant.
20. Email dated 21 January 2022 from the Council to clarify its position with regard to evidence in the HEDNA Addendum 2016 and 2021 SHMA.

ANNEX - Conditions

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.
2. The development hereby permitted shall be carried out in accordance with the plans listed below:
 - Site Location Plan 100 Rev A
 - Site Roof Plan 176 106 Rev –
 - Cut and Fill Plan – Site Roof Plan 176 107 Rev-
 - Elevations 176 125 Rev A
 - Elevations 176 126 Rev A
 - Elevations 176 127 Rev A
 - Ground Floor Plan 176 114 Rev A
 - First Floor Plan 176 115 Rev A
 - Second Floor Plan 176 116 Rev A
 - Roof Plan 176 117 Rev A
 - Landscape Proposals RDL712 DRG01 P4
 - Landscape Sections and Entrance Details RDL712 DRG02 P5
 - 20191 001 Rev P1 Proposed Vehicular Access
 - 20191 006 Rev P1 – Proposed off site footpath and crossing works.
3. No part of the development shall be occupied until provision of the footway and tactile paving crossing points alongside Turners Hill Road has been constructed in accordance with plan: 20191 006 Rev P1.
4. No development shall take place unless and until details of the proposed foul water drainage and means of disposal have been submitted to and approved in writing by the Local Planning Authority. No building shall be occupied until all the drainage works concerned have been carried out in accordance with the approved details. Maintenance and management during the lifetime of the development shall be in accordance with the approved details.
5. No development shall take place unless and until details of the surface water drainage and have been submitted to and approved in writing by the Local Planning Authority. No building shall be occupied until all the drainage works concerned have been carried out in accordance with the approved details. Maintenance and management during the lifetime of the development shall be in accordance with the approved details.
6. No development shall take place, including any works of demolition, until a Construction Management Plan (CMP) has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved CMP shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate, but not necessarily restricted to, the following matters:
 - the anticipated number, frequency and types of vehicles used during construction;
 - the method of controlling surface water during construction;
 - the method of access and routing of vehicles during construction;
 - the parking of vehicles by site operatives and visitors;
 - the loading and unloading of plant, materials and waste;

- the storage of plant and materials used in construction of the development;
- the erection and maintenance of security hoarding;
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders, if required);
- details of public engagement both prior to and during construction works;
- measures to control noise affecting nearby residents;
- dust control measures;
- pollution incident control.

7. The development hereby permitted shall be carried out in accordance with the Arboricultural Impact Assessment (reference 12622_R01_A) dated 14th August 2020 and the Arboricultural Note (reference 13340-C001a_JP_270121) dated 27th January 2021, which shall be implemented and adhered to throughout the entire construction period.

8. No development shall be carried out above ground slab level until samples of materials and finishes to be used for all facing materials, including the external walls/roof/fenestration of the proposed buildings, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

9. No development shall be carried out above ground slab level until 1:20 scale section and elevations (vignettes) of:

- (a) the single storey frontage showing the entrance, green roof and columns;
- (b) a typical dormer window;
- (c) a chimney;
- (d) a first-floor terrace/balcony;

have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

10. Works of construction or demolition, including the use of plant and machinery, necessary for implementation of this consent, as well as deliveries or collection of plant, equipment or materials for use during the demolition/construction phase, shall be limited to the following times:

Monday – Friday: 08:00 - 18:00 Hours
Saturday: 09:00 - 13:00 Hours
Sundays and Bank/Public Holidays: None permitted

11. If during construction, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing by the Local Planning Authority), shall be carried out until a method statement identifying and assessing the risk and proposing remediation measures, together with a programme, has been submitted to and approved in writing by the Local Planning Authority. The remediation measures shall be carried out as approved and in accordance with the approved programme. If

no unexpected contamination is encountered during development works, on completion of works and prior to first occupation of the proposed development, a letter confirming this shall be submitted to the Local Planning Authority. If unexpected contamination is encountered during development works, on completion of works and prior to first occupation of the proposed development, the agreed information, results of investigation and details of any remediation undertaken shall be submitted to and approved in writing by the Local Planning Authority.

12. No development shall be carried out above ground slab level until full details of both hard and soft landscaping, which shall include indications of all existing trees and hedgerows on the land, and details of those to be retained, together with measures for their protection in the course of development, have been submitted to and approved in writing by the Local Planning Authority, which shall be carried out as approved.

Hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the first occupation of any part of the development, or in accordance with a programme which, prior to such occupation, shall first have been submitted to and approved in writing by the Local Planning Authority. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

13. No part of the proposed development shall be first occupied until such time as the vehicular access serving the development has been constructed in accordance with the submitted details shown on the drawing titled Proposed Vehicular Access 20191_001_P1.

14. No part of the development shall be first occupied until covered and secure cycle parking spaces have been provided in accordance with plans and details that shall first have been submitted to and approved in writing by the Local Planning Authority. The cycle parking spaces shall thereafter be maintained as such thereafter for the purpose of cycle parking.

15. The development hereby permitted shall not be brought into use until a scheme for the installation of equipment to control the emission of fumes and odour from the premises has been submitted to and approved in writing by the Local Planning Authority, and the scheme as approved has been implemented. The equipment concerned shall thereafter be maintained in accordance with the approved details. The submitted odour control scheme shall be in accordance with current best practice and shall include an odour risk assessment, as well as a maintenance and monitoring schedule for the odour control system, to ensure adequate control of odours, to align with the manufacturer's instructions.

16. The development hereby permitted shall not come into operation until a scheme has been submitted to and approved in writing by the Local Planning Authority demonstrating that the noise rating level (LAr,Tr) of plant and machinery within the development shall be at least 5dB below the background noise level (LA90,T) at the nearest residential facade. All measurements shall

be defined and derived in accordance with BS4142: 2014+A1:2019. The assessment shall be carried out with the plant/machinery operating at its maximum setting. The approved measures shall be implemented before the development is brought into first use and thereafter be maintained in accordance with the approved details.

17. Before the development hereby permitted commences, an investigation and risk assessment for landfill/ground gas to ascertain whether gas protection measures are required shall be undertaken. The investigation and risk assessment shall be undertaken by competent persons and a written report of the findings shall be submitted to, and approved in writing by, the Local Planning Authority. Where gas protection measures are required the details of these shall be submitted to, and approved in writing by, the Local Planning Authority. All required gas protection measures shall be installed before the development is occupied.
18. Prior to the installation of any external lighting to the site, details of light intensity, spread and any shielding and times of use together with a report to demonstrate its effect on nearby residential properties shall be submitted to and approved in writing by the Local Planning Authority. It is recommended that the information be provided in a format that demonstrates compliance with the ILP Guidance Notes for the Reduction of Obtrusive Light. Relevant information is available from the following site: <https://www.theilp.org.uk/documents/obtrusive-light>. The lighting concerned shall be implemented in accordance with the approved details and maintained as such thereafter.
19. Prior to the commencement of construction of any part of the development hereby permitted, the details of a scheme of mitigation measures to improve air quality relating to the development shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be in accordance with, and to a value derived in accordance with, the Air Quality and Emissions Mitigation Guidance for Sussex which is current at the time of the submission of the scheme to the Local Planning Authority. All works which form part of the approved scheme shall be completed before any part of the development is occupied and shall thereafter be maintained in accordance with the approved details.
20. No development shall take place until a scheme for protecting the proposed residential units from noise generated by traffic or other external sources, has been submitted to, and approved in writing by, the Local Planning Authority. All works that form part of the scheme shall be completed in accordance with the approved details before any part of the noise sensitive development is occupied. Unless otherwise agreed in writing, the submitted scheme shall demonstrate that the maximum internal noise levels in bedrooms post construction will be 30 dB LAeq T (where T is 23:00 - 07:00) and in bedrooms and living rooms will be 35 dB LAeq T (where T is 07:00 - 23:00). Noise from individual external events typical to the area shall not exceed 45 dB LMax when measured in bedrooms internally between 23:00 and 07:00, post construction. In the event that the required internal noise levels can only be achieved with windows closed, then the applicant shall submit details of an alternative means of ventilation with sufficient capacity to ensure thermal comfort of the occupants with the windows closed.

Unless agreed in writing, noise levels in gardens and outdoor living areas shall not exceed 55 dB LAeq 1 hr when measured at any period.

Details of post installation acoustic installation testing shall be submitted to and approved in writing by the Local Planning Authority upon request.

21. Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of: management of any flat/shallow pitched roofs on the proposed building which may be attractive to nesting, roosting and "loafing" birds. The Bird Hazard Management Plan shall be implemented as approved upon completion of the roof and shall remain in force for the life of the building. No subsequent alterations to the plan shall take place unless first submitted to and approved in writing by the Local Planning Authority.
22. No part of the development hereby permitted shall be first occupied until the proposed bin store, pumping station and sub-station have been implemented in accordance with drawings showing their details that shall firstly have been submitted to and approved in writing by the Local Planning Authority.
23. No part of the development hereby permitted shall be first occupied until the electric vehicle charging space(s) have been provided in accordance with plans and details which shall firstly have been submitted to and approved in writing by the Local Planning Authority.
24. Prior to the first occupation of the development hereby permitted, a Travel Plan including the provision of a staff minibus shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be implemented as approved unless otherwise agreed in writing by the Local Planning Authority.
25. No part of the development hereby permitted shall be first occupied until the car parking areas have been constructed and provided in accordance with the approved plans. The car parking spaces shall thereafter be retained at all times for their designated purpose.

Appendix 9

Appeal Decision APP/K3605/W/20/3257109



Appeal Decision

Site Visit made on 26 August 2021

by R J Jackson BA MPhil DMS MRTPI MCMI

an Inspector appointed by the Secretary of State

Decision date: 18 October 2021

Appeal Ref: APP/K3605/W/20/3257109

Royal Cambridge Home, 82-84 Hurst Road, East Molesey KT8 9AH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by ST Property Company Ltd & The Royal Cambridge Home against the decision of Elmbridge Borough Council.
- The application Ref 2019/1813, dated 1 July 2019, was refused by notice dated 14 February 2020.
- The development proposed is detached building varying in height from four-storey to one-storey to provide a 32 bed Care Home (C2) and 60 Extra Care Age Restricted Apartments (C3), new vehicle access, provision of 30 on-site car parking spaces, buggy and cycle stores with associated landscaping and ancillary works following demolition of the existing buildings.

Decision

1. The appeal is allowed and planning permission is granted for detached building varying in height from four-storey to one-storey to provide a 32 bed Care Home (C2) and 60 Extra Care Age Restricted Apartments (C3), new vehicle access, provision of 30 on-site car parking spaces, buggy and cycle stores with associated landscaping and ancillary works following demolition of the existing buildings at Royal Cambridge Home, 82-84 Hurst Road, East Molesey KT8 9AH in accordance with the terms of the application, Ref 2019/1813, dated 1 July 2019, subject to the conditions in the Schedule to this decision.

Preliminary Matters

2. Following a request for consideration by a third party, the Secretary of State has concluded, in line with the original conclusion of the Council, that the proposal would not represent EIA development within the meaning of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and thus an environmental statement is not required. I have no reason to disagree with the Secretary of State's conclusion on this matter.
3. The appeal was accompanied by two Planning Obligations by Unilateral Undertaking under Section 106 of the Town and Country Planning Act 1990 (as amended) both dated 20 April 2021, one to Elmbridge Borough Council (the Council) relating to affordable housing and provision of accessible units and the other to Surrey County Council relating to bus-stop works. I will discuss these below.
4. The Council refused the application for two reasons, with the second relating to the fact that provision for affordable housing had not been secured. The Council indicated that "it was involved in the preparation of the legal agreement to secure the affordable housing component of the scheme".

5. As the appeal site is within the East Molesey (Kent Town) Conservation Area (the Conservation Area) and lies within the setting of St Paul's Church, a Grade II listed building, I have had special regard to Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).
6. The proposal would involve the demolition of the existing buildings on site. The main buildings are noted as being "Significant Unlisted Buildings" in the East Molesey (Kent Town) Conservation Area Character Appraisal and Management Plan (the CAA). The Glossary to the National Planning Policy Framework (the Framework) defines heritage assets as including "assets identified by the local planning authority (including local listing)". The Council has not specifically indicated whether it has treated the existing buildings as non-designated heritage assets. The buildings, unlike some others identified in the CAA, are not categorised as "Locally Listed Buildings", but as the definition in the Framework is not exclusive, I have treated them as non-designated heritage assets. As this was the approach of the appellants, they would be not disadvantaged if I were to do so.
7. On 20 July 2021 a revised version of the Framework was published by the Government. The main parties were given the opportunity to make representations on this and I have taken the responses into account.

Main Issue

8. The main issues are:
 - the effect on the heritage assets, being the existing buildings on site, the Conservation Area and its setting, the setting of St Paul's Church, and the setting of the gate piers on Graburn Way; and
 - whether there are any other benefits of the proposal, including the housing land supply position, that would lead to a determination otherwise than in accordance with the terms of the development plan.

Reasons

Heritage assets

9. The appeal site lies in the northwestern corner of the Conservation Area, and fronts Hurst Road, although with a side boundary to Church Road. It consists of a series of buildings which have been joined together to allow their use as a care home with a capacity for up to 28 beds. These were originally two villa-style buildings with associated outbuildings but the two villas and the intervening outbuilding to No 82 were linked by a single storey building approved in 1963.
10. The landform rises gently from north to south, with Hurst Park opposite the site to the north. Hurst Park is an extensive area of open space leading down to the River Thames. To the northeast there is a former racecourse with gate piers (locally listed buildings) on Graburn Way.
11. The Framework defines the significance of a heritage asset as the value of a heritage asset to this and future generations because of its heritage interest.

The national Planning Practice Guidance also notes¹ that 'significance' derives not only from a heritage asset's physical presence, but also from its setting.

12. Paragraph 199 of the Framework indicates that great weight should be given to the conservation of a heritage asset and this is irrespective of the level of harm that may occur. It is also emphasised that the more important the asset, the greater the weight should be. Paragraph 200 of the Framework indicates that any harm to the significance of a heritage asset, or from development within its setting, should require clear and convincing justification.
13. The buildings and streets of what is now the Conservation Area were originally laid out in the mid-nineteenth century, principally for large houses. As part of the expansion of development in the area, a new church, St Paul's, was constructed, with a tower and spire added some thirty years later. The CAA notes that the grid pattern of streets clearly shows that the area was planned. The densities reflect the differences in statuses of the various areas of development, with the higher status being in the northern area. There is commercial development at the eastern end near Hampton Court Railway Station which lies in the Conservation Area.
14. The CAA has identified four areas within the Conservation Area with the appeal site lying in Area 1, Wolsey Road, Palace Road, Arnison Road and Church Road. The key views of St Paul's Church and the tree-lined roads and important historic walls have been identified. Notwithstanding the notation of the buildings as "Significant Unlisted Buildings" there is no specific reference in the CAA to the buildings on the appeal site other than them being in care home use.
15. The significance of the Conservation Area for this appeal lies from its formal grid pattern of tree-lined streets and the large, substantial buildings facing them. The building form is often from the villas that were constructed when the area was laid out, but there has clearly been some replacement and infilling. The scale of building is predominantly two storeys, but there are taller buildings, some with sub-basements. Due to the proximity of the buildings one with another, the grain of development in the area is quite tight, with little space around them. The importance of the church in providing a focal point to the Conservation Area forms part of the significance. Within the Conservation Area, which should be considered as a whole, are the commercial uses and open space, but these elements are of lesser significance for the purposes of this appeal.
16. St Paul's Church is built of Kentish ragstone rubble with a slate roof. In addition to the slightly later tower and spire a more modern 'parish room' extension was added on the north side in the 1970s. The significance of the church for the purposes of this appeal relates to the way that the building acts as a focal point at the end of the vistas of Church Road and Palace Road, with glimpses of the top of the spire above and between buildings in other views.
17. The four gate piers on the north side of Hurst Road mark the entrance to a former racecourse. They are joined by iron gates which are kept open to allow for the free flow of traffic. Their significance for the purposes of this appeal relate to their size and historic nature, even if to the lay-person unaccustomed

¹ Reference ID: 18a-006-20190723

to the history of the area, they do not seem to relate to any feature in the locality.

18. The buildings on the appeal site were constructed as villas with substantial outbuildings. The hierarchy of the two principal buildings and the two ancillary structures can clearly be seen, but the overall composition has been compromised by the various extensions and alterations that have taken place over the years, for example prominent and large downpipes to allow the use as a care home, and the single storey linking extension referred to above, as well as various other small-scale additions. Thus, the significance of the buildings as non-designated heritage assets for the purposes of this appeal lies in their external appearance which has been significantly compromised. From Hurst Road it is still possible to see vegetation in the rear gardens, particularly a prominent cedar tree, which means that there is a sense of space on the site. However, this sense of space is slightly out of keeping with the tighter grain of development on Church Road and Palace Road within the main area of the Conservation Area.

19. The demolition of the existing buildings, and thus their total loss, can only be described as resulting in substantial harm to these non-designated heritage assets. Paragraph 203 of the Framework indicates that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. I will consider this below.

20. Following the demolition of the buildings the proposal is to construct a single building which would be managed in two parts. The western part would provide a 32-bed care home, effectively re-providing the existing use on site, and on the eastern part would be 60 extra-care age-restricted residential apartments.

21. While there would be some single and two storey elements, particularly at the western and eastern sides, the majority of the building would be three and four storeys. The main northern façade would be articulated, with two main four storey elements, a wider eastern one and a slightly narrower western one. For the eastern element the fourth storey would be set back from the front façade to provide a terrace. The linking three storey elements would be roof terraces.

22. There would be three rear 'wings' to the building. The central one in the middle of the site would be four storeys, that on the eastern side facing Church Road would be mostly three storeys, although with a lower section to the rear (south), and the western wing next to No 86 would be single storey. The roof form, apart from the 'linking' terraces would be low pitched roofs, leading to a flat 'crown' roof for the main four storey elements.

23. The architectural style would involve a regular pattern of development of bays, but with the eastern and western front façades exhibiting different approaches. For the extra-care element there would be the provision of balconies on the front elevation and within the courtyard. Other elevations would include Juliet balconies. The building would be predominantly in buff brick, but some sections would contrast in brown brick. The roof would be in slate or similar material. In all cases the precise details would be agreed by condition.

24. The proposed building would be noticeably more massive than that currently on site. The architectural language, which utilises a regularity derived from Georgian and Classical styles, would be in contrast to the Victorian villas with

their Italianate and Arts and Crafts influences predominant in the Conservation Area.

25. Despite the articulation on the Hurst Road elevation, the proposal would appear as a single span of building. When viewed from Church Road the new building would result in the loss of views from the public domain into the space behind the existing building. There would also be the loss of glimpsed views out of the Conservation Area from the rear along Harrow Gardens from Palace Road. All of this would result in some limited harm to the immediate area.

26. Local residents have expressed concerns about the density of the development when compared to the local area and the overall density target of 40 dwellings per hectare set out in Policy CS17 of the Elmbridge Core Strategy (the Core Strategy). However, it seems to me that in the context of this proposal this would be a false comparison. Development which would consist of smaller units, here one-bedroom, will always be at a higher number of units per hectare than larger units. In the context of the Conservation Area, it seems to me that a more appropriate measure is how the overall mass of building relates to the character, appearance and significance rather than how many units might be in a hectare.

27. Taking all this together and remembering that substantial harm is a high test², I conclude that the proposal from its increased mass and scale would result in less than substantial harm to the character and appearance and thus the significance of the Conservation Area to which great weight and special attention should be given, although as the harm is to the Conservation Area as a whole this harm would only be limited. That being the case, paragraph 202 of the Framework indicates this harm should be weighed against the public benefits of the proposal. Again, I will do this below.

28. I have considered the effects on the setting of the Conservation Area, particularly to the north from Hurst Park. As the proposal would have some limited harm to the Conservation Area it would also have some limited harm to its setting. Again, this would represent limited less than substantial harm and will need to be balanced with the public benefits.

29. Turning to the effect on the setting of St Paul's Church, the proposal would have no effect on the main significance of the views along Church Road and Palace Road which would therefore be preserved. However, there would be some loss of glimpsed views above buildings from Hurst Road, which would be from outside the Conservation Area, and therefore I conclude that there would be some harm to the setting of the listed building and its significance but this would be very much less than substantial. This harm should also be weighed against the public benefits of the proposal.

30. In relation to the gate piers, while the site, and thus the proposed development, could be seen together with the gate piers in views from Hurst Park, due to the separation and the intrinsic nature of the asset set on either side of Graburn Way this would not affect the setting or significance of this non-designated heritage asset and thus its significance would be preserved.

31. Overall, the proposal would result in substantial harm to the non-designated heritage assets that are the existing buildings on site, and less than substantial

² See PPG Reference ID: 18a-018-20190723

harm to the Conservation Area and its setting and the setting of St Paul's Church. As such the proposal would be contrary to Policies CS7 and CS17 of the Core Strategy 2011 and Policies DM2 and DM12 of the Development Management Plan 2015 which require development to enhance the local character of the area with specific attention to the Conservation Area and to protect the heritage assets.

Benefits including land supply situation

32. It is not in dispute between the Council and the appellants that the existing buildings are no longer suitable for their current use; I agree. There is no level access from the street, and the buildings have a number of levels, with narrow corridors and a number of short staircases making them unsuited for those with mobility issues. Some of the rooms have en-suite facilities, but others do not and are therefore not to expected modern standards. Some of the bedrooms and bathrooms are sub-standard in size. The communal areas are also sub-standard and there are operational difficulties with the kitchens and the distance to some of the rooms.
33. The appellants have provided a report which indicates that refurbishing the buildings to modern standards would not be viable, and that there would still be issues from the nature of the building. It is also possible that the care home would have to close while the refurbishment took place with associated disruption to the residents, moving to another location and then returning. None of this is disputed by the Council and there is no evidence from local residents to the contrary. Rather some local residents support the redevelopment of the site, but object to the form of the replacement.
34. The provision of purpose designed care accommodation to modern standards is a significant public benefit and would ensure the long-term retention of the facilities. While residents would be required to move, by constructing the western care-home element first, this would only need to be undertaken once thereby keeping disruption to a minimum.
35. The Council seeks to show that there is little short- or medium-term need for older-persons accommodation as supply and demand are approximately in balance. This is based on evidence from its 2016 Strategic Housing Market Assessment. The Council goes on to point out that a 2020 Local Housing Market Assessment has identified a reduced overall need due to different population projections, and thus it argues there is lesser overall need.
36. However, Policy CS20 of the Core Strategy indicates that the Council will support the development of specialist accommodation for older people in suitable locations, and the Council has not sought to show that this policy should no longer apply nor has it been withdrawn. Both the care home and the extra-care accommodation would comply with this policy. I acknowledge that by only providing one-bedroom units in the extra-care accommodation this would not meet the policy requirement for at least 50% to be of two-bedrooms. The provision of an additional 60 extra-care apartments on the site would of itself be a public benefit as well as the improvement to the care home facilities. Paragraph 124 of the Framework indicates decisions should support development that makes efficient use of land and I consider that this would be the case. I give the benefit of providing specialist accommodation substantial weight.

37. Further, the extra-care accommodation would provide 50% of the units as affordable housing and this is secured in the Planning Obligation. This is above the 40% required in Policy CS21 of the Core Strategy and therefore should be given significant additional beneficial weight.
38. There are a number of other public benefits of the proposals in addition to those flowing from the type of the development. These include the closing of the existing access at the junction of Church Road and Hurst Road and its replacement further along Hurst Road, which would be a public benefit to highway safety. The proposal would also involve economic and social benefits from the construction and operation of the facilities. I give the construction benefits limited weight as they would only be temporary in nature, but I give the operational benefits significant weight.
39. The Council acknowledges that it cannot demonstrate a five year supply of land for housing, indicating a supply at just less than four years. The appellant does not dispute this figure. This is a significant, clear and demonstrable deficiency in supply. I will consider the implications of this below.

Other matters

40. Local residents have expressed their concerns about the effect of the proposal on the living conditions of those living on Church Road. Nobody is entitled to a private view and I am satisfied that there is sufficient separation between the proposed buildings and the existing dwellings so that the proposal would not give rise to unacceptable levels of overlooking nor would it result in an overbearing effect.
41. Concerns have also been expressed about the amount of parking provided. I can understand that parking may be an issue, particularly during peak usage of Hurst Gardens. However, I note that there are no parking restrictions in Church Road and that parking would be provided on site. Therefore, I am satisfied that there would be sufficient parking not to lead to an unacceptable impact on highway safety, which is the test set out in paragraph 111 of the Framework if development is to be prevented. The Planning Obligation to the County Council makes appropriate provision for the relocation of the nearby bus stop and is necessary, relates to the development and is proportionate; I am therefore able to take this into account and do so.
42. I am satisfied that, subject to conditions, the proposal would make appropriate provision to ensure the retention of appropriate trees and a comprehensive landscaping scheme.
43. It has been suggested that the proposal may result in contravention of the South Western Railway Act 1913 relating to the height of the proposal. However, this legislation does not form part of the planning system and anyone wishing to construct a proposal would need to ensure that they had all necessary consents in this regard.

Planning Balance

44. The proposal would comply with those elements of the development plan relating to supporting accommodation for the older population and would surpass the policy requirement for affordable housing. However, it would be contrary to those parts of the development plan relating to the design of buildings and their effects on the character and appearance of an area and

their effect on heritage assets. Overall, I conclude that the proposal would not comply with the development plan taken as a whole.

45. While the proposal would result in substantial harm to the non-designated heritage assets of the existing buildings, I am satisfied that due to the nature of the existing accommodation and the unsympathetic extensions that its replacement by the proposals would be acceptable as the public benefits would significantly outweigh that harm. I am also able to conclude that the public benefits 'left over' from this balance would also outweigh the less than substantial harm to the Conservation Area and its setting and the setting of St Paul's Church as identified above even giving those harms great weight and special attention. These benefits provide clear and convincing reasons for harm to the significance of all the heritage assets.

46. That being the case, the lack of a five year supply of housing land means that the tilted balance set out in paragraph 11 d) of the Framework applies. This means that the proposal should be granted unless, the application of policies in the Framework to protect assets of particular importance provides a clear reason for refusing the development proposals or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. For the reasons set out above, the harm to the heritage assets would not represent a clear reason, nor would there be any significant or demonstrable adverse impacts of granting permission.

47. I therefore conclude that while contrary to the terms of the development plan as a whole, there are material considerations that indicate that the appeal should be determined otherwise to its provisions and thus the appeal allowed and planning permission granted.

Conditions

48. I have considered the conditions put forward by the Council against the requirements of the national Planning Practice Guidance and the Framework. The numbers given in brackets (X) refer to the condition being imposed, with the order being prescribed by the time when the condition needs to be complied with. A significant number of the suggested conditions were drafted on the basis that the development would be constructed in two phases, the care home and the extra-care accommodation, identified by a plan. However, that plan was not submitted and does not form part of the application, and consequently I have drafted the conditions on the basis of a single phase of development. I have tried to ensure in dealing with the conditions relating to first occupancy that this would not prevent the development being constructed in two phases should that be how the development is to take place.

49. In addition to the standard timescale condition (1), I have imposed a condition specifying the relevant drawings as this provides certainty (2).

50. In order to ensure that development does not have an adverse effect on highway safety and the free-flow of traffic and in the interests of the amenities of those living in the vicinity of the site, I have imposed a condition requiring approval of details of a construction management plan. This includes matters such as operating hours, but a requirement relating to repair of damage to the public highway during construction falls outside planning powers (3). Due to the location of the site in Flood Zones 2 and 3 I have imposed a condition

relating to the surface water drainage of the site in order to minimise the risk of flooding and to ensure safe access (4). I have also imposed conditions relating to tree protection (5, 6, 7) to ensure the retention, health and longevity of trees on site. In order to ensure that any archaeology is recorded a scheme for this is required (8). All these conditions are required to be pre-commencement conditions in order to ensure that the relevant matters are dealt with either before or throughout the construction period. These have been agreed by the appellants.

51. Reports relating to flood risk mitigation and ecology, including bats, were submitted with the application. These reports included various mitigation measures to be implemented if permission were granted. Conditions are required to ensure that these mitigations take place to mitigate flood risk and adverse effects on bats respectively (9, 10). Where reference is made to climate change, I have ensured that all conditions relate to a 40% exceedance as this represents current best practice.
52. In order to ensure that the materials, landscaping and lighting are in keeping with the character and appearance of the Conservation Area I have imposed conditions requiring relevant details to be submitted and approved (11, 12, 13).
53. In order to protect the living conditions of neighbouring residents and future occupiers in relation to noise and smells, I have imposed conditions requiring details of noise mitigation from fixed plant, kitchen extract systems and internal construction be submitted and approved (14, 15, 16), and the provision of refuse and recycling storage areas shown on the relevant plan (17).
54. To protect the living conditions of the occupiers of adjoining properties, I have imposed conditions relating to obscure glazing in identified locations (18). However, I consider such conditions are unnecessary in respect of balcony screens due to the distances involved.
55. I have imposed a condition requiring a verification report relating to the surface water scheme to be submitted so that the local lead flood authority has the necessary information to ensure the surface water scheme is properly maintained (19) to minimise flood risk in the future.
56. In the interests of highway safety, I have imposed conditions relating to the provision of the new access to Hurst Road and the closing of the existing access immediately thereafter (20) and the delivery of the parking and turning arrangements (21). To facilitate use of non-car modes and electric vehicles, I have imposed conditions requiring the delivery of cycle parking and electric vehicle charging points (22, 23). In similar vein, I have imposed a condition relating to a Travel Plan in the interests of sustainability (24), although reviewing this upon every new occupation would not be practical. I have therefore reworded this condition to requiring an on-going obligation to follow it.
57. In light of the Planning Obligation relating to the bus stop I see no need for a condition relating to this matter.
58. Where necessary and in the interests of clarity and precision I have altered the conditions to better reflect the relevant guidance.

Conclusion

59. For the reasons given above I conclude that the appeal should be allowed.

RJ Jackson

INSPECTOR

SCHEDULE OF CONDITIONS

- 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans:

AA6351-2000 Rev -	Existing Site Location Plan
AA6351-2001 Rev D	Site Plan
AA6351-2002 Rev D	Ground Floor GA Plan
AA6351-2003 Rev B	First Floor GA Plan
AA6351-2004 Rev A	Second Floor GA Plan
AA6351-2005 rev C	Third Floor GA Plan
AA6351-2006 rev C	Roof Plan
AA6351-2007 rev B	Coloured Elevations – North and South
AA6351-2008 rev D	Coloured Elevations – East and West
AA6351-2009 rev C	Elevations – North and South
AA6351-2010 rev E	Elevations – East and West
AA6351-2011 rev C	Site Sections
AA6351-2012 rev C	Shephard's Trust Site Sections
AA6351-2016 Rev C	Proposed Block Plan
AA6351-2017 rev B	Building Elevations behind boundary
AA6351-2018 Rev B	Proposed Outbuildings
31075/AC/004 Rev F	Proposed site access arrangement - 'New' main access
31075/AC/005 Rev F	Proposed site access arrangement - Existing secondary access

- 3) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to and approved in writing by the local planning authority. The Statement shall provide for:
 - i) the parking of vehicles of site operatives and visitors;
 - ii) loading and unloading of plant and materials;
 - iii) storage of plant and materials used in constructing the development;
 - iv) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing;
 - v) wheel washing facilities;
 - vi) measures to control the emission of dust and dirt during construction; and
 - vii) delivery, demolition and construction working hours.

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

- 4) No development shall commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the local planning authority. The design must satisfy the Sustainable Drainage Systems (SuDS) Hierarchy. The required drainage details shall include:
 - i) evidence that the proposed solution will effectively manage the 1 in 30 and 1 in 100 (+ 40% allowance for climate change (CC)) storm events, during all stages of the development (Pre, Post and during), associated discharge rates and storages volumes shall be provided using a maximum staged discharge rate of 0.6 l/s for the 1 in 1 year rainfall event and 2.2 l/s for the 1 in 100 year (+ CC) rainfall event;
 - ii) detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.);
 - iii) a plan showing exceedance flows (for example, during rainfall greater than design events or during blockage) and how property on and off site will be protected;
 - iv) details of drainage management responsibilities and maintenance regimes for the drainage system; and
 - v) details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the site will be managed before the drainage system is operational.
- 5) No development including groundworks and demolition shall take place and no other equipment, machinery or materials brought onto site until the approved tree protection measures have been installed in accordance with the approved tree protection plan(s) ACS (Trees) Consulting Royal Cambridge House Hurst Road East Molesey Tree Protection Plan Drawing No. TPP19_RCH Rev D June 2019. The tree protection measures shall be maintained for the course of the development and development shall thereafter be implemented in strict accordance with the approved details and method statements contained in ACS (Trees) Consulting Arboricultural Report Planning and Development Arboricultural Appraisal and Implications Assessment reference ha/aiams4/19/RCH.
- 6) No development including groundworks and demolition shall take place until all supporting arboricultural information has been submitted to and approved in writing by the local planning authority. This shall include details of:
 - i) the location and installation of services/utilities/drainage, including services to automated gates;
 - ii) the methods of demolition within root protection areas of retained trees;
 - iii) the construction and installations including methodologies within a root protection area or that may impact on retained trees;
 - iv) the full specification for the construction of any roads, parking areas, driveways, hard surfacing, including details of no dig specification and extent of the areas to be constructed using no dig surfacing;
 - v) the detailed levels and cross sections to show that the raised levels of surfacing, where the installation on no dig surfacing within root protection area is proposed, demonstrating that they can be accommodated; and

- vi) all arboricultural site monitoring and supervision required for the duration of the development.

The development thereafter shall be implemented in strict accordance with the approved details.

- 7) All existing trees, hedges or hedgerows shall be retained, unless shown as being removed on the approved drawings including any plans approved pursuant to conditions hereby imposed. Paragraphs i) and ii) below shall have effect until the expiration of 5 years from the first occupation of the proposed development.
 - i) No retained tree, hedge or hedgerow shall be cut down, uprooted or destroyed, nor shall any retained tree be pruned other than in accordance with the approved plans and particulars;
 - ii) if any retained tree, hedge or hedgerow is removed, uprooted or destroyed or dies, another tree, hedge or hedgerow of similar size and species shall be planted at the same place, in the next available planting season.

- 8) No development with the exception of demolition shall take place on the application site until the implementation of a programme of archaeological work has been secured in accordance with a written scheme of investigation which has been submitted and approved in writing by the local planning authority. The works shall be undertaken in accordance with the approved details.

Following approval of the written scheme of investigation the results of any subsequent field work and assessment report required shall be submitted to and approved in writing by the local planning authority.

- 9) The development shall be carried out in accordance with the submitted flood risk assessment (Flood Risk Assessment and Drainage Strategy (no. FRA002, project no. 70044416, rev. 4), compiled by WSP (dated August 2019)) and the following mitigation measures it details:
 - i) finished floor levels shall be set no lower than 9.39 metres above Ordnance Datum (mAOD);
 - ii) level for level flood compensation will be provided up to the 1 in 100 year flood level, plus 40% climate change extent (8.92 mAOD);
 - iii) there will be no land raising in new landscaped or car parking areas within the 1 in 100 year flood level, plus 40% climate change extent;
 - iv) soffit levels for the proposed void openings will be set at a minimum height of 8.99 mAOD;
 - v) voids openings will be designed so they are at least 1 metre wide and set every 5 metres.

These mitigation measures shall be fully implemented prior to occupation and subsequently provided in accordance with the scheme's timing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

- 10) The development shall be carried out in accordance with the conclusions and recommendations in Section 7 of the Preliminary Ecological Appraisal (ref RT-MME-128886-01) and Sections 6 and 7 of the Bat Surveys and Mitigation Strategy (ref RT-MME-128886-02).

- 11) No development above existing ground level shall take place until samples of the materials to be used on the external surfaces of the building have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details.
- 12) No development above slab level shall take place until full details of both hard and soft landscaping works have been submitted to and approved in writing by the local planning authority. This scheme shall include provision of all hard surfaces, walls, fences, access features, the existing trees and hedges to be retained, together with the new planting to be carried out.

All hard and soft landscaping works shall be carried out in accordance with the approved details. Arboricultural work to existing trees shall be carried out prior to any development above slab level. All hard landscaping shall be completed prior to the occupation of the development. All soft landscaping, that is planting, seeding or turfing, shall be carried out in the first planting and seeding seasons following the occupation of the building.

Any trees or plants, which within a period of five years of the first occupation of the development die, are removed, or become seriously damaged or diseased, shall be replaced as soon as practicable with others of similar size and species.
- 13) No development above slab level shall take place until an external lighting scheme for the development has been submitted to and approved in writing by the local planning authority. The scheme shall be implemented before any of the external lighting is brought into use and thereafter the lighting shall be operated in accordance with the approved scheme and maintained as operational. The scheme shall include the following:
 - i) details of pillar and pole lighting; and
 - ii) the proposed hours of operation of the luminaires.
- 14) No development above slab level shall take place until a detailed scheme for the control of noise from any plant and equipment (including ventilation, refrigeration, air conditioning and air handling units) to be used including a timetable for implementation has been submitted to and approved in writing by the local planning authority. This shall then be installed in accordance with the approved scheme and shall be retained and operated in compliance with the approved scheme.
- 15) No development above slab level shall take place until a detailed scheme setting out how and when the commercial kitchen extraction systems are to be constructed so as to control odours has been submitted to and approved in writing by the local planning authority. The approved scheme shall be fully implemented in accordance with the approved details and shall thereafter be retained in compliance with the approved details.
- 16) No construction above slab level shall take place until details of sound insulation measures within the building has been submitted to and approved in writing by the local planning authority. The approved scheme shall be fully implemented.
- 17) Prior to the first occupation, details of the refuse storage area shown on drawing ref AA6351 2001 Rev D must be submitted along with a timetable for its implementation. The approved details shall be constructed and thereafter retained.

- 18) Prior to the first occupation of the extra-care accommodation, the south-facing windows at the southern-most ends of the extra-care accommodation hereby permitted must be glazed with obscure glass that accords with level three obscurity as shown on the Pilkington textured glass privacy levels (other glass suppliers are available) and only openable above a height of 1.7m above the internal floor level of the room to which it is to serve. The windows shall be permanently retained in that condition.
- 19) Prior to the first occupation of the development, a verification report relating to the surface water drainage system shall be submitted to and approved by the local planning authority. This must demonstrate that the drainage system has been constructed in accordance with the agreed scheme, provide the details of management arrangements and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls). Where the development is constructed in phases, such a report may be provided in accordance with those phases.
- 20) Prior to the first occupation of the extra care development, the new accesses to Hurst Road must have been constructed and provided with visibility splays in accordance with the approved plans. Thereafter the visibility splays shall be kept permanently clear of any obstruction over 1.05 m high. Following the opening of the new accesses the existing access from the site to the Hurst Road/Church Road junction shall be permanently closed in accordance with a scheme submitted to and approved in writing by the local planning authority.
- 21) Prior to the first occupation of the development, space must be laid out within the site in accordance with a scheme to be submitted to and approved in writing by the local planning authority for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in a forward gear. Thereafter the parking/turning areas shall be retained and maintained for their designated purposes only.
- 22) Prior to the first occupation of the development, secure and lit cycle parking spaces must be provided in accordance with a scheme submitted to and approved in writing by the local planning authority. Thereafter the approved facilities shall be retained and maintained.
- 23) Prior to the first occupation of the development at least two of the available parking spaces must be provided with a fast charge Electric Vehicle socket, and a further 20% of the available parking spaces must be provided with the power supply to provide additional fast charge sockets in future, in accordance with details submitted to and approved in writing by the local planning authority. Thereafter the said approved facilities shall be retained and maintained.
- 24) The submitted Travel Plan Statement (by TPP dated June 2019 ref 30175/D003c) shall be implemented upon first occupation and thereafter maintained.

END OF SCHEDULE

Appendix IW2

Population Profile Tandridge (October 2025)

Planning profile for accommodation with care for older people

Tandridge District

Published October 2025



Extra care housing

Need for extra care housing in the Tandridge District area

Based on the [2022-based sub-national population projections](#) published by the ONS on 24 June 2025, the future need for extra care housing (as defined in Surrey County Council's Planning Guidance) is set out below for 2025, 2030 and 2035:

Year	75+ population projection	Affordable need (10 per 1,000 75+)	Market need (35 per 1,000 75+)	Total need (45 per 1,000 75+)
2025	10,380	104	363	467
2030	11,214	112	392	505
2035	12,095	121	423	544

As at 1 April 2025, the following extra care housing settings were either open or with full planning permission in the Tandridge District area to help meet this need:

Setting name	Status	Postcode	Tenure	No. of units
Audley Lingfield Grange	Planning approved	RH7 6PW	Market	150

Based on this level of recognised provision, the gap in meeting current and future needs for extra care housing are set out as follows:

Year	Affordable Projected (oversupply)/ need for additional units	Market Projected (oversupply)/ need for additional units	Total Projected oversupply)/ need for additional units
2025	104	213	317
2030	112	242	354
2035	121	273	394

As stated in the Planning Guidance for Accommodation with Care for Older People, Surrey County Council's Right Homes Right Support Strategy is highly ambitious in increasing the availability of affordable extra care housing. In consideration of this strategic shift the affordable need figures should be regarded as conservative.

Residential and nursing care homes

Calculated need for residential care home provision in the Tandridge District area, up to 2035

As of 1 April 2025:

- The Tandridge District area had a supply of 319 residential care home beds against a 75+ population of 10,380. This provides a prevalence rate of 30.73 beds per 1,000 of the 75+ population.
- In comparison, England had a supply of 204,293 residential care home beds against a 75+ population of 5,573,643. This provides a prevalence rate of 36.65 beds per 1,000 of the 75+ population.

This means that the current amount of residential care provision in the Tandridge District area is relatively low in comparison to the England average.

The table below sets out the future local need for additional residential care home beds in 2030 and 2035, based on the operational provision in April 2025 and with adjustments for the future delivery of affordable extra care housing in Surrey:

Year	Tandridge 75+ population	No. of beds to reflect England ratio in 2025	Reduction due to delivery of new affordable extra care housing	Projected (oversupply) / need for additional beds in Tandridge
2030	11,214	411	(35)	57
2035	12,095	443	(35)	89

As illustrated by the following table, the Tandridge District area has a relatively high prevalence rate of residential care provision in comparison to neighbouring authorities (with the exception of Reigate & Banstead, Croydon and Mid Sussex). This suggests that future market-led development in this area is likely to lead to an influx of residents from other areas.

Neighbouring authority area	2025 prevalence rate	2030 Projected (oversupply) / need for additional beds	2035 Projected (oversupply) / need for additional beds
Reigate & Banstead	45.43	(112)	(52)
Bromley	15.44	710	788
Crawley	26.83	98	140
Croydon	35.05	124	243
Mid Sussex	34.10	112	178
Sevenoaks	29.59	144	182
Wealden	24.20	379	471

Calculated need for nursing care home provision in Tandridge District area, up to 2035

As of 1 April 2025:

- The Tandridge District area had a supply of 609 nursing care home beds against a 75+ population of 10,380. This provides a prevalence rate of 58.67 beds per 1,000 of the 75+ population.
- In comparison, England had a supply of 212,440 nursing care home beds against a 75+ population of 5,573,643. This provides a prevalence rate of 38.12 beds per 1,000 of the 75+ population.

This means that the current amount of nursing care home provision in the Tandridge District area is relatively high in comparison to the England average.

The table below sets out the future local need for additional nursing care home beds in 2030 and 2035, based on the operational provision in April 2025:

Year	Tandridge 75+ population	No. of beds to reflect England ratio in 2025	Projected (oversupply) / need for additional beds in Tandridge
2030	11,214	427	(182)
2035	12,095	461	(148)

As illustrated by the following table, the Tandridge District area has a relatively high prevalence rate of nursing care provision in comparison to neighbouring authorities, with the exception of Reigate & Banstead. This suggests that future market-led development in this area is likely to lead to an influx of residents from other areas, particularly those where there is a clear need for additional nursing care home beds.

Neighbouring authority area	2025 prevalence rate	2030 Projected (oversupply) / need for additional beds	2035 Projected (oversupply) / need for additional beds
Reigate & Banstead	73.04	(475)	(413)
Bromley	34.30	164	244
Crawley	11.63	225	269
Croydon	56.03	(398)	(273)
Mid Sussex	46.72	(88)	(19)
Sevenoaks	46.94	(91)	(52)
Wealden	52.28	(263)	(167)

Appendix IW3

Appeal decision APP/M3645/W/25/3359711



Appeal Decision

Site visit made on 11 July 2025

by **B Pattison BA (Hons) MSc MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 09 September 2025

Appeal Ref: APP/M3645/W/25/3359711

The Grasshopper Inn, Westerham Road, Westerham, Surrey TN16 2EU

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
- The appeal is made by Kicking Horse 3 Ltd against the decision of Tandridge District Council.
- The application Ref is TA/2023/938.
- The development proposed is Demolition of the existing building and erection of a new 63 bedroom care home.

Decision

1. The appeal is dismissed.

Preliminary Matters

2. I have used the description of development from the Council's decision notice rather than the planning application as this more accurately describes the proposal.
3. The main parties agree that the proposal would not be inappropriate development within the Green Belt. From the submitted evidence and my observations on site I have no reason to disagree with this conclusion, and I have determined the appeal on this basis.
4. A completed Unilateral Undertaking (the UU) was submitted during the appeal. It includes an obligation towards provision and/or enhancement of primary healthcare services within the primary care network. The Council has had an opportunity to comment on the UU, and I have taken account of this here.
5. The appellant has also submitted updated drawings (within Appendix 7 of their Statement of Case) which detail alternative facing materials on the proposal's elevations. Paragraph 16.1 of the Procedural Guide: Planning appeals – England (June 2025) is clear that the appeal process should not be used to evolve a scheme and there are no provisions within the Rules for amendments to be submitted. It is important that what is considered by the Inspector at appeal is essentially the same scheme that was considered by the Council and by interested parties at the application stage. For this reason, I have not accepted the amended drawings for consideration as part of this appeal.

Main Issues

6. The main issues are:

- the effect of the proposal on the character and appearance of the area, including the Surrey Hills National Landscape; and

- the effect of the proposal on the character and appearance of the local area as a result of the demolition of a non-designated heritage asset and bearing in mind the special attention that should be paid to the desirability of preserving the setting of the nearby Grade II listed buildings.

Reasons

Character and appearance, including National Landscape

7. The appeal site is located within a valley adjacent to Westerham Road. It contains a large faux Tudor-style 1950's roadhouse pub and restaurant building. It is vacant and in a state of disrepair, and a previous historic western wing of the building has been demolished. To the east of the building is a large car park area. The building has a striking design which utilises vernacular features creatively, whilst reflecting nearby rural character through its use of historic materials. Opposite the site on raised ground is a small cluster of buildings forming the hamlet of Moorhouse.
8. The site is located within the Surrey Hills National Landscape (NL). The statutory purpose of National Landscapes is conserving and enhancing the natural beauty of the area of outstanding natural beauty. Section 245 of the Levelling Up and Regeneration Act 2023 (the LURA) amended the duty in the Countryside and Rights of Way Act 2000 in relation to NLs to require relevant authorities, in exercising or performing any functions in relation to, or so as to affect, land in a NL to seek to further the purpose of conserving and enhancing the natural beauty of it.
9. Paragraph 189 of the National Planning Policy Framework (the Framework) also states that great weight should be given to conserving and enhancing landscape and scenic beauty in NLs which have the highest status of protection in relation to these issues. In this case, the National Landscape covers a large area. The Surrey Hills Management Plan (2020 – 2025) sets out that the NL is a diverse landscape characterised by areas of woodland, hills and valleys, traditional mixed farming, a patchwork of chalk grassland and heathland, sunken lanes, picturesque villages, and market towns.
10. In so far as it is relevant to the appeal, I consider the character of the landscape is, in part, derived from rolling hills either side of Westerham Road which are surrounded by areas of woodland and which form a valley which the appeal site sits within. The varied Tudor style form of the appeal building and the small, raised grouping of vernacular buildings within Moorhouse are also positive features within the landscape. Whilst currently in a state of disrepair, the site makes a locally important, positive contribution to the landscape and scenic beauty of the NL.
11. Whilst the proposal's roof form would feature variation in its design, it would largely be dominated by a crown roof with expansive areas of flat roof. I acknowledge that the roof design enables a suitable internal layout for the proposal. However, the crown roof would appear as a large, heavy and somewhat unrelenting mass. It would be highly visible in views along Westerham Road in both directions and in elevated positions on Moorhouse Road. My attention has not been drawn to other local examples of crown roofs, and this factor would exacerbate its prominence as an uncharacteristic feature.
12. Some articulation to the roof form is proposed through a series of mock gable features fronting Westerham Road. These features would be particularly prominent in views in both directions along this straight section of the public highway. From

these viewpoints, and due to their uncharacteristic design, the largely flat gable features would appear as surprising and incongruous elements.

13. Notwithstanding the Council's findings in relation to its effect on the openness of the Green Belt, the proposal would have a large footprint which would spread across much of the width of the site. A range of features would be employed to visually break the mass of the building. These include the gable features, a 'dog leg' building line, variation of materials, and a central element of the building which would be taller than the two side wings. Despite these features the proposal would appear as a sprawling and unrelenting feature. This would contrast negatively to the varied and visually interesting form of the existing building on site.
14. The appellant refers to the National Design Guide and National Model Design Code. However, given my findings above, the proposal would not satisfactorily respond to local character and distinctiveness, which both documents encourage.
15. The appellant indicates that proposed facing materials would include red brick, local stone, timber boarding, render and clay tiles. Examples of these materials can be found within vernacular buildings locally. However, the impact of the development, when viewed in its context, due to its incongruous roof form and unrelenting facade, would cause harm to the rural character and appearance of the area.
16. The changing ground levels within the valley means that visibility of the site is generally limited to the local area. As a result, the visual effects of the proposal would be fairly well contained. However, the visual harm of the proposal would, in my judgement, not conserve or enhance the landscape and scenic beauty, or further the purpose of conserving and enhancing the natural beauty of the NL. Despite the appeal building's disrepair, the site does not currently detract from the NL whereas, for the reasons outlined above, the proposal would be harmful development.
17. The proposal would, therefore, be contrary to Policies CSP18, CSP20 and CSP21 of the Tandridge District Core Strategy (2008) (TCS), Policy DP7 of the Tandridge District Local Plan Part 2: Detailed Policies (2014) (TDLP) and Policy TNP04A of the Tatsfield Neighbourhood Plan (2024). Collectively these policies seek to ensure high quality design which contributes to local distinctiveness, and requires development within the NL to conserve and enhance the special landscape character, whilst outlining that particular attention will be paid to impacts on public views.
18. I also find conflict with paragraph 189 of the Framework, the aims of which are outlined above. The Surrey Hills Management Plan (2020-2025) does not form part of the development plan but is a material consideration for planning purposes. For the same reasons, the proposal would conflict with Policies P1, P2 and P3 which require development to conserve and enhance the character and qualities of the NL.

Designated and non-designated heritage assets

19. The Council's assessment of the appeal building identifies it as a prominent 1950's faux-Tudor roadhouse which was previously attached to a seventeenth century building which has since been demolished. Partial reconstruction works at this end

of the building, as part of a recent planning permission, have commenced but appear to have stopped.

20. The Council indicate that the building features on the Tandridge District Council Buildings of Character List (2013). Furthermore, a Tandridge local list is currently under review, and a draft of the document has been prepared, albeit it has not been consulted on. Regardless, I have no compelling evidence that the building will not appear on the final adopted list, which is supported by a draft assessment of the significance of the building. As a consequence, on the evidence before me I am satisfied that the building has a sufficient degree of significance, because of its heritage interest, to be given due regard as a non-designated heritage asset (NDHA).
21. The proposal would result in the complete loss of the NDHA. Whilst the property is not statutorily listed, paragraph 216 of the Framework states that the effect of an application on the significance of a NDHA should be taken into account in determining the application. In weighing applications that affect directly or indirectly NDHA, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
22. The appellant, within the Heritage Statement, contends that the appeal building has a low level of significance. Whilst it may be a later example of a roadhouse, it still remains a notable example of a roadhouse building which has historic interest through its role as a former landmark for travellers in the mid-20th century. Indeed, it seems to me, factors such as its rarity as a late example of a roadhouse augment the significance of the building.
23. The appellant indicates that the architectural quality of the building is low and that later additions to the building have compromised its original form. However, whilst the building may have been extended a number of times, the additions are generally sympathetic and employ traditional materials and forms. In my view, these have not eroded the building's key features which reveal its architectural interest, including its steeply pitched roofs, asymmetrical form, mix of gables and half hipped roof forms and small-scale dormer windows.
24. The appellant indicates that compared to other examples of this type of building, the appeal building does not match the architectural quality or cohesive design of other examples provided within the Heritage Statement. Regardless, this does not mean that the appeal building is not architecturally significant in its own right as a NDHA.
25. I acknowledge that much of the interior decorative scheme and associated fixtures have been removed. The appellant also points to the previous demolition of the original seventeenth century section of the building which means that no part of the structure dates from pre-1949. Taking these factors into account, I agree with the Council that the building has moderate local significance. Its demolition would result in a complete loss of significance. I therefore conclude that the proposed development would result in unacceptable harm through the total loss of the NDHA. Given my findings in relation to the replacement building, the loss of the building would cause harm to the character and appearance of the area.
26. The appellant indicates that the building is in a poor state of repair. It is not in dispute that extensive remedial works would be required to bring the building back into use. There is also compelling evidence before me that demonstrates that the

building is no longer suitable for continued public house use, and it is unlikely to be possible to bring it back into an economically viable entertainment venue use. However, the submitted evidence does not assess the potential to convert the building into an alternative use, and it has therefore not been demonstrated that it is not possible to bring it back into an economically viable alternative use.

27. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) require me, in determining this appeal, to have special regard to the desirability of preserving listed buildings, or their setting, or any features of special architectural or historic interest which they possess.
28. There are Grade II listed buildings (LBs) at 1 and 2 Moorhouse Cottages and 7 and 8 Moorhouse Cottages/Moorhouse Farmhouse. The List description confirms that 1 and 2 Moorhouse Cottages date from the sixteenth century with nineteenth century alterations. They are two storeys in height and timber framed on rubblestone and render plinth, with brick quoins and dressings below, and tile hung above.
29. The List description describes 7 and 8 Moorhouse Cottages/Moorhouse Farmhouse as a house with cottages dating from the sixteenth century with nineteenth century alterations. The main farmhouse is two storeys with basement below, whilst the cottages are two storeys and positioned at a right angle to the farmhouse.
30. From my observations on the site visit and the evidence before me, the significance of the LBs is derived mostly from their age, architectural quality and their contribution to the rural character of the area as part of a small grouping of historic agricultural properties.
31. There is limited historic associative link between the appeal building and the cluster of buildings forming Moorhouse. During my site visit, the trees between the appeal building and Moorhouse were in full leaf. However, the appeal building remained clearly in sight in raised views of the LBs from Moorhouse Road and the small lane adjoining 7 and 8 Moorhouse Cottages. This visibility is likely to be heightened during periods of the year when the trees are not in full leaf. The Farmhouse is also particularly visible in direct views from the appeal site, at the junction of Moorhouse Road with Westerham Road. Overall, I consider that the appeal site forms part of the setting of the LBs.
32. Due to the distance and woodland screening, the appeal building is not a prominent feature in the setting of the LBs. As a result of its vernacular style and use of traditional materials it is a sensitive feature within the valley which, in my view, does not detract from the wider setting of the LBs. In direct contrast, and as a result of its uncharacteristic roof form and unrelenting front façade, the proposal would appear as a significantly more prominent and ungainly feature within the rural setting of the LBs. For this reason, it would have a harmful effect on the significance of the designated heritage assets, namely the Grade II listed buildings at 1 and 2 Moorhouse Cottages and 7 and 8 Moorhouse Cottages/Moorhouse Farmhouse.
33. Therefore, in this respect, the proposal would be contrary to Policy DP20 of the TDLP which requires that assets are conserved or enhanced and that heritage assets, including NDHA, are retained, where possible. I also find conflict with the principles of the Framework which for applications affecting non-designated

heritage assets, require a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.

- Heritage Balance

34. Taking account of the separation and screening provided by the intervening trees, the harm to the designated heritage assets would be less than substantial. Nevertheless, I have attached considerable importance and weight to the desirability of avoiding such harm, in accordance with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
35. In failing to preserve the setting of the LBs, I find that the proposal would, in the words of the Framework, result in less than substantial harm to the significance of the designated heritage assets. In such circumstances, the Framework requires that the less than substantial harm should be weighed against the public benefits. The proposal would provide benefits such as making an efficient use of the site and contributing to local housing supply. The development would have temporary economic benefits through the creation of construction jobs during the construction phase. The proposal's visitors and employees would provide economic benefits through expenditure in local shops and services. Whilst limited due to the size of the proposal, these also weigh in favour of the development. The appellant also indicates that planning conditions could ensure the retention of identified features of interest which could be retained in any future building. In addition, the appellant has reached agreement with the Brooking Museum, for a number of architectural items which could be made available to the museum, in the event that the appeal building is demolished. These matters weigh in favour of the development
36. That being the case, while I have had regard to the benefits of the development, in the particular circumstances of this case, the public benefits do not outweigh the considerable weight attached to the harm to designated heritage assets. In addition, the proposal would result in harm to the significance of the NDHA, which would result from its total loss.

Other Matters

37. The Framework seeks to significantly boost the supply of homes. Paragraph 73(d) supports the development of windfall sites. The proposal would involve the re-use of the appeal site and paragraph 124 supports the effective use of land.
38. The proposal would provide 63 residential care home beds for older people, providing both general purpose and dementia care, with 24-hour care and supervision for residents aged 65+ years. The proposal would also provide generous, good quality internal and external amenity areas which could be utilised by residents.
39. The appellant's Planning Need Assessment identifies an estimated under-supply of 87 additional standard wetroom care home beds within a five mile market catchment area. The shortfall is anticipated to increase to 148 by 2032. It is outlined that the proposal would address nearly 75% of the shortfall up to 2027.
40. The need to provide housing for older people nationally is critical as set out in the National Planning Practice Guidance (PPG). There is no doubt that there is a clear need for this type of development in Tandridge. Consequently, the cumulative

benefits associated with the provision of a care home providing general needs and dementia care are afforded substantial weight.

41. The proposal would create employment, and would also give rise to some economic benefits during the construction phase and would provide support to local services. Therefore, the economic benefits are afforded moderate weight. The appellant has referred to environmental benefits, however as these have not been quantified I have afforded them limited weight.
42. The appellant indicates that weight should be afforded to the donation of existing building fabric to the Brooking Museum and retention of some architectural materials in the new building, However, given the heritage harm that I have identified, this factor is afforded limited weight.
43. Compliance with the development plan in relation to issues such as landscaping and amenity of neighbouring occupiers are expectations for all development. These weigh neither for nor against the proposal and are therefore considered neutral in the planning balance.

Planning Balance and Conclusion

44. The proposal would cause harm to designated and non-designated heritage assets and the character of the area including the NL. The TCS and TDLP are both older than five years. However, the weight to be attached does not hinge on their age. Paragraph 232 of the Framework makes it clear that due weight should be given to existing policies according to their degree of consistency with the Framework.
45. According to the Framework the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. The Framework also requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Landscapes, and great weight should also be given to heritage assets' conservation.
46. Therefore, the conflict between the proposal and Policies DP7 and DP20 of the TDLP and Policies CSP18, CSP20 and CSP21 of the TCS should be given significant weight in this appeal.
47. The proposal would provide 63 care beds, addressing a need for this type of residential accommodation in the Tandridge area. The appellant states that the Council's Housing Land Supply is 1.57 years. This suggested figure has not been challenged by the Council and is a notable shortfall against the five year housing land supply sought by the Framework.
48. In these circumstances Paragraph 11(d) of the Framework is relevant. However, for the reasons set out above, the application of policies in the Framework that protect National Landscapes and heritage assets provide a strong reason for refusing the development proposed. Consequently, the presumption in favour of sustainable development, as set out in paragraph 11(d) of the Framework is disengaged and the scheme should be considered under a normal planning balance and on that basis, I find that the harm clearly outweighs the benefits.
49. The proposal would be contrary to the development plan and the Framework taken as a whole. There are no other material considerations which indicate that the decision should be determined other than in accordance with the development

plan. Therefore, for the reasons given above, I conclude that the appeal should be dismissed.

B Pattison

INSPECTOR

Appendix IW4

Relevant appeal case summaries

Appeal Ref: APP/P1425/W/23/3326282

Date: 11 January 2024

Address: Florence House, Southdown Road, Seaford BN25 4JS

Proposal: New care home

26. Spatial Policy 2 of the LPP1 confirms a requirement for a minimum of 185 dwellings to be delivered in Seaford, and the main parties agreed that the proposal would deliver the equivalent of 33 new homes towards the Council's HLS. However, while I acknowledge the general need for modern, energy efficient and appropriate accommodation for the older population generally as set out in Policy CP2 (2) of the LPP1, and that national Planning Policy Guidance says that housing for older people is 'critical', I heard that there is no policy basis proposed within the Council's emerging local plan that would relate to specifically to care homes. Therefore, while there may well be need for care homes in the wider area, such as Eastbourne, Polegate, Willingdon and Hailsham, including for people with dementia, I am not persuaded that care home accommodation is a priority for the Council or that, given the stated 'medium luxury' standard of the scheme, it would be attractive or affordable to local people to enable them to free up general needs housing in the nearby area. Therefore, while mindful of Paragraph 63 of the Framework, I can only afford this benefit moderate weight.

27. Economic benefits arising from the proposal would include employment opportunities connected to the construction of new homes, as well as employment opportunities related to the operation of the care home. There would also be potential cost savings to the NHS through the provision of bedspaces. I afford these benefits minimal weight as some of the employment opportunities are likely to be short-term, and the number of bedspaces provided would be relatively small when balanced against NHS provision as a whole.

28. Social benefits of the development would include the well-being of residents in a communal setting with an outside space. The scheme would also be located in a settlement boundary with public transport links to enable friends and relatives to visit. I attribute this some limited weight.

Appeal Ref: APP/Z3635/W/22/3312221

Date: 15 January 2024

Address: 280, 282 and 284 Staines Road East, Sunbury-on-Thames TW16 5AX

Proposal: 47 bed care home

25. Set against the harm identified there would be some limited social and economic benefits associated with the proposal. In particular through the creation of jobs during construction and operation, I also note that the appeal scheme would result in the redevelopment of the currently unsightly property, no.280. I saw at the site visit that the site is considerably overgrown and the building vacant and deteriorating. I also saw evidence of what I took to be antisocial behaviour around the property.

26. I note that it is not at dispute between the parties that there is a need for homes for elderly people in the borough. The appeal scheme would result in the provision of a 47-bedroom care home on an urban site that is accessible to local services, cycle routes and public transport and would result in a more efficient use of urban land. The scheme would make a little difference to the overall supply of housing in the borough both through the creation of additional accommodation in itself and in allowing elderly residents to vacate their current housing for accommodation that would presumably better meet their current needs.

27. These are material considerations that weigh in favour of the appeal scheme, and I afford them some weight.

29. The appeal scheme would also provide a much-needed care facility that would contribute to the choice of accommodation available to prospective occupiers, delivering housing to meet the needs of an aging population.

30. As such, the proposed 47 units, for the loss of three dwellings, would contribute to addressing the recognised shortfall. I accept, although it has not been quantified or qualified in evidence before me, that there would also likely be a consequential freeing-up of existing, potentially under-occupied,

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housing to the general market as older people move into the redeveloped site. These considerations weigh in favour of the scheme and I afford them significant weight.

31. The evidence provided by the appellant indicates that the proposal would make a contribution to the local economy during construction, but there is little substantive evidence in this regard and the benefits would be primarily short term. The operation of the care home would result in approximately 47 full time jobs, with some part-time jobs. These matters are afforded some weight and weigh in favour of the scheme.

Appeal Ref: APP/Y0435/W/23/3321221

Date: 17 January 2024

Address: Linford Lakes, Wolverton Road, Milton Keynes MK14 5AH

Proposal: 70 bed care home plus extra care, retirement bungalows and residential.

47. Extra care housing is considered as a component of general housing need for the purposes of the Local Plan. While the number of extra care units built is currently less than the need forecast in the most recent Strategic Housing Market Assessment, I was also presented with evidence that there are vacancies in extra care schemes that have recently been completed and are available for occupation. It is ultimately a matter for the market to determine whether there is demand for such schemes and to deliver them. There is no dispute that the Council is able to demonstrate a five-year housing land supply. One of the purposes of having a five-year housing supply is to ensure that there is sufficient deliverable and developable land to enable the housing market to operate effectively and respond to demand as required. I am therefore satisfied that the need for extra-care housing can be met within the land identified for development in the Local Plan.

48. For nursing home accommodation, the Local Plan sets a separate target to that for general housing. On the Council's evidence, current supply meets some 55% of the need identified in the SHMA, and as the Local Plan is approximately halfway through its plan period this demonstrates that need is being met for nursing home space. The calculated supply does not distinguish between nursing home spaces aimed at the elderly as opposed to other specialist care, does not include closures of existing nursing homes, and includes permissions that have not yet been implemented. However, the element of bed spaces aimed at non-elderly specialist care would appear to be relatively small, and I consider it reasonable to include permitted but not yet built schemes, since if there is demand for such schemes it is likely that they will be built in due course. In addition, further nursing home accommodation is likely to come forward as part of strategic housing allocations elsewhere in Milton Keynes which have yet to be started. Taking all those matters together, I consider that supply is largely meeting the forecast demand for nursing home accommodation, and that the housing land supply in the Local Plan provides adequate opportunity to meet demand over the remaining plan period.

64. There would not be an overconcentration of residential institutional development, either on the site or within the context of the wider area. Neither is there an undersupply of such specialist housing in the Milton Keynes area. On balance, there would be adequate accessibility to services and facilities subject to the transport improvements included in the scheme being implemented. There is no need for additional visitor car parking. All these matters are of neutral weight in the planning balance.

65. Set against the harm are the benefits that would accrue from the scheme. Although the Council is able to demonstrate a five-year housing land supply, the provision of a large amount of residential development would nevertheless be beneficial in helping to meet the need for housing, including specialist housing for the elderly. The same applies to the affordable housing, which would help meet the needs of those who are unable to secure housing in the open market. Given that there is a five-year housing land supply, I give these benefits moderate weight.

66. There would be economic benefits arising from construction activity in the short term, and the spending power of future occupants in the longer term. There would also be economic benefit arising from employment opportunities associated with the nursing home, extra-care units, and management of the linear park. I give these benefits moderate weight too.

Appeal Ref: APP/V1505/W/23/3326612

Date: 23 January 2024

Address: 41, 65 and land adjacent Potash Road, Billericay, Essex CM11 1DL

Proposal: 50 bed care home and 150 dwellings

49. The 2022 SEHNA assessed the need for *specialist housing for older people* (acronym: SHOP) over the period 2020-2040. This was based on 2011 Census prevalence rate of Basildon residents living in communal establishments and the projected increase in that age cohort. This produced a future prevalence rate of 34 per 1000 population requiring care home accommodation and an additional need of 380 bedspaces over the period 2020-2040 (19 per annum).

50. The appellant did not dispute the older population growth-rate. However, a projection based on stable care home occupancy rates was considered to risk perpetuating an under-supply in SHOP provision and frustrate an objective to lift this relative to an ageing population. The appellant provided prevalence rates derived from the PPG-endorsed SHOP@ tool and a 2017 Greater Cambridge Study. The Council's prevalence rate of 34 is very low compared to 110 in 1,000 people aged 75+ expected to live in residential care and nursing home accommodation, as derived from the SHOP@ tool. From this, the appellant derives a current need figure in Basildon of 970 care bedspaces, rising to 1,845 by 2043.

51. The proposed care home would meet a growing demand from self-funded occupiers, linked to the increased nursing and specialist dementia care requirements of an aging population and not fully offset by advances helping people live at home longer. Although ECC believes current care home provision in Basildon to be under-used, it recognises that the appeal scheme is aimed at this self-funded market and is responding to commercial demand. The appellant's evidence would support this, both through the Care Home Survey and significant differences in the demographic and socio-economic character of the Billericay catchment area, compared to Basildon as a whole.

53. Given the appellant's evidence of need, market demand and consented supply, there is no question in my mind that the benefits of the 50-bed care home should be given relative weight equivalent to the market and affordable dwellings proposed. In the light of the housing evidence discussed above, a 50-bed care home, along with the 150 dwellings, including the 47 to be delivered as affordable, would amount to social benefits that attract very substantial positive weight in the ensuing balance.

Appeal Ref: APP/M1520/W/23/3320925

Date: 14 February 2024

Address: Garden World Plants Ltd, Canvey Road, Canvey Island, Essex SS8 0QD

Proposal: 55 bed care home

24. The appellant's evidence identifies a significant shortfall in the Council's supply of housing land, standing well below the five years required in the Framework. I have not been presented with any evidence to the contrary. However, the appeal proposal would deliver slightly fewer bedspaces than the fallback scheme. This would translate into a slightly smaller contribution to housing supply, in terms of the equivalent number of homes released in the housing market. On that basis, having concluded that the fallback scheme is likely to be implemented, the reduced scale of the proposal is a disadvantage in terms of housing supply. However, the difference would be marginal, and I have accordingly given this disbenefit limited weight.

25. While the appeal proposal would provide slightly fewer bedspaces, it would provide a range of enhanced features for future occupiers, compared to the fallback scheme. These would include an enhanced range of social and communal spaces, improved circulation space, additional rooms adaptable for occupation by couples, and some with kitchenettes to support more independent occupation. A higher proportion of the ground floor rooms would have direct access to the patio. The proposal would also support an improved range of care provision, including accommodation suitable for people with dementia and/or milder physical disabilities.

26. The Framework is supportive of boosting the supply of homes, including housing for different groups in the community. Paragraph 63 makes clear that policies for the delivery of housing should cater for older people and the December 2023 revision to the Framework expanded its wording to specifically mention specialist accommodation, including care homes. Evidence from both parties highlights

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Census data identifying a significant increase in the number of older residents locally between 2011 and 2021, and a related increase in demand for specialist housing. In that context, the fact that the appeal proposal would provide enhanced accommodation, catering for a wider range of needs than the fallback scheme, is a benefit to which I have given moderate weight.

37. There is furthermore persuasive evidence of a fallback position comprising implementation of an extant planning permission for a 60-bed nursing home. The fallback scheme would have a slightly greater effect on openness. With that in mind, I have given the fallback position very substantial weight.

38. The appeal proposal would also deliver enhanced accommodation compared to the fallback scheme, including specialist accommodation suitable for a wider range of occupiers. To that extent, it responds well to the increasing local demand for specialist care accommodation. It would provide a better environment and range of facilities for future occupiers. These qualitative advantages outweigh the proposal's marginally smaller contribution to housing land supply, and I have accordingly given them moderate positive weight.

Appeal Ref: APP/V1505/W/23/3328758

Date: 16 February 2024

Address: Land east of Ilfracombe Avenue, Bowers Gifford SS13 2DT

Proposal: 70 bed care home plus assisted living and retirement living

27. It is common ground that the Council can only demonstrate a housing land supply of 1.85 years. There would be 125 units (Use Class C2) arising from the proposed development. The National Planning Practice Guidance (PPG) outlines that for residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data.

28. The appellant has provided evidence to indicate that the Census shows that there are an average of 1.23 older people for each house in the Borough. Notwithstanding this, the guidance contained within the PPG does not precisely indicate the means by which this figure can be used to extrapolate the number of dwellings which would be released/vacated (and therefore contribute to HLS) as a result of the proposed development. Indeed, it stands to reason that an understanding of the proportion of single occupancy households comprising older adults would need to be established in order to determine the precise likely number of dwellings released as a result of the proposal. This evidence is not before me.

29. Notwithstanding this, there would plainly be a significant proportion of dwellings released to the market as a result of older adults moving to the care home or assisted living units. Indeed, the appellant points to a recent appeal decision where it was acknowledged that an 80 bed care home contributed an equivalent of 44 units to the Council's HLS. Given the number of units proposed under this proposal, it is reasonable to conclude that it would make at least a similar contribution to the Council's HLS.

30. On that basis, I consider that the proposed development would result in a significant contribution to addressing the Council's housing land supply shortfall. 'Significant', not least because of the severe extent of the shortfall. This is therefore a social and economic benefit of the development which can be afforded substantial weight.

31. The appellant presented a wide variety of evidence asserting a need for assisted living and care home provision within the Borough. Notwithstanding this, even the Council's evidence indicates a need for additional care home bedspaces and specialist housing between 2020 and 2040. Based on the Council's assessment of the South Essex Housing Needs Assessment (SHMA) dated June 2022, there is a need for 19 care home bed spaces per annum and 65 units per annum of specialist accommodation over the period up to 2040.

32. The Council has cited a number of recent planning permissions granted for care homes in the Borough. However, all of these permissions are factored into Table 2 of the Appellant's Statement of Case, which shows that even taking them (and other permissions) into account, since 2018 there has been a net increase of just five care home bedspaces. Over the plan period referred to in the SHMA there has been a net increase of just 45, which is still short of the 57 bedspaces which should have been provided over that period based on the SHMA.

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33. Table 1 of the appellant's statement of case, which is based on data from the Council's own Annual Monitoring Reports, demonstrates that just 4 units of specialist accommodation for older people were completed between 2014 and 2022.

34. It is not clear whether or not the SHMA has factored in the past under-delivery described above in reaching figures for annual need. However, looking forward, despite the Council's assertion that schemes like this are best dealt with through the plan-making process, the new Local Plan is not scheduled to be adopted until 2027. On that basis alone and taking into account the significant amount of land in the Borough which is within the Green Belt, it is very difficult to see how the Council will meet the aforementioned need as expressed within the SHMA up until 2027.

35. There is some suggestion that there are high vacancy rates in existing care homes, however, there could be numerous reasons for this and it is not clear what a normal vacancy rate would constitute. In any case, the proposed care home would provide market-standard accommodation (with wet rooms) which the evidence indicates is lacking. Indeed, the planning permissions highlighted indicate that many care homes are undergoing demolition and replacement to bring them up to market standards, in many cases resulting in a reduction in the number of bedspaces despite the increase in the standard of accommodation. Clearly the proposal will provide a significant benefit in providing a significant quantum of market-standard accommodation.

36. The Council has also queried the catchment area used in Knight Frank's Planning Needs Assessment (2023). However, demand for housing for older people would not likely be constrained by administrative boundaries and therefore this is not a factor which weighs against the findings of the assessment. In any case, as outlined above - even putting the findings of the appellant's assessment to one side - based on the Council's own data and estimates of demand/need there clearly remains a significant unmet need for housing for older adults in the Borough. The proposed development would make significant inroads into meeting existing and future need in this regard. The social benefits can therefore be afforded substantial weight within this context.

38. The development would also comprise health and wellbeing benefits. In particular, it would combat loneliness, provide a basis for older people to maintain their independence and facilitate better access to healthcare. There would also be social benefits arising from the provision of a car park for parents collecting children from the nearby St Mary's C of E Primary School. Indeed, local residents have highlighted that there is significant disruption caused by on-street parking of vehicles during drop-off and pick-up times.

39. There would be economic benefits associated with permanent employment. With 95 to 120 jobs proposed. In addition, there would be more limited economic benefits associated with support for employment during the temporary construction period.

43. There would however be extensive and wide-ranging benefits as a result of the proposed development. These benefits are primarily derived from the contribution of the proposal to freeing up existing housing (within the context of a severe housing land supply shortfall) and the contribution of the proposal to meeting the existing and future need for specialist accommodation for older people. There would be several other social, economic and environmental benefits as I have identified in this report. Collectively, these benefits can be afforded even greater weight than that which I have afforded to the harm to the Green Belt. Indeed, in this instance, the extent of the harm I have identified would be clearly outweighed by other considerations. Therefore, the very special circumstances necessary to justify the development exist.

Appeal Ref: APP/H1515/W/23/3324416

Date: 22 March 2024

Address: Heron Court, 198 Brentwood Road, Herongate, Essex CM13 3PN

Proposal: Extension to existing care home (22 extra beds)

14. The proposed extension would increase the footprint of the building by 140% and the overall bulk and mass by more. This would result in a clearly disproportionate extension to the original building and would have a greater impact on openness of the Green Belt than as existing. The proposal would

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therefore be inappropriate development in the Green Belt by reason of inappropriateness and the effect on openness.

15. However, the current accommodation in Heron Court is sub-standard. The proposal would result in a more efficient and higher quality layout with better facilities. It would also create a larger care home that meets the critical mass to provide high quality care facilities in this location. The need for additional care home beds within the catchment area of Heron Court has been demonstrated. As set out above, there would be an enhancement to the character and appearance of the locally listed building, the Herongate CA, and the wider area. The Council consider these other considerations clearly outweigh the harm to the Green Belt and therefore that 'very special circumstances' exist. I agree with this assessment and the proposal therefore complies with Paragraph 153 of the Framework.

Appeal Ref: APP/B1550/W/22/3313730 & APP/B1550/W/23/3324879

Date: 12 April 2024

270 Eastwood Road, Rochford, Essex, SS6 7LS

Proposal: New care home and later living dwellings

23. There is a dispute between the parties as to the level of need for future care home provision but I have been provided with details of a number of other care home sites that are under construction, having been granted planning permission over the past 5 years. These new care homes will go some way to both meeting current need for care home beds and addressing any previous undersupply.

24. This approach was accepted by the Inspector in APP/B1550/W/20/3251565, where it was stated that much of the district's needs would be likely addressed by the development at Rocheway and/or other care homes. That appeal permitted a care village with a range of different accommodation types, including a 93 bed care home, further adding to the Council's supply.

25. This shows that the lack of a local policy specifically for specialist housing for older people is not preventing the provision of this type of accommodation. Furthermore, the appellant confirmed at the hearing that the market homes included in the appeal scheme are not intended to meet the definitions of age restricted general market housing, retirement living or sheltered housing or extra care housing or housing with care. This limits the weight that can be given to this part of the scheme.

26. Even if I were to accept the appellant's case that in that appeal the Inspector may not have had the same level of evidence before them and that the evidence before me demonstrates there is a significant unmet need for care homes in the Rochford District, the timetable for the Local Plan indicates the new plan will be adopted by Q2 of 2026, so within two years time.

27. The new Local Plan would be able to identify sites for any future needs identified through the South Essex Housing Needs Assessment (SEHNA). It is important that a strategic approach to delivery of all types of housing is properly planned for. This ensures future provision is allowed to be considered on the basis of a proper evidence base, tested as part of the Local Plan examinations. I am therefore satisfied that the District Council will be able to respond to any levels of higher need as identified by the appellant, through the Local Plan process.

28. Furthermore, evidence provided by the consultation response of Essex County Council indicates that current care home provision in Rochford is under used, with average occupancy levels of 75% and on this basis they have not identified Rochford as a current area for growth in the sector.

29. However, I accept that the planning practice guidance sets out that the need to provide housing for older people is identified as being critical and that this proposal would go some way to meeting future need within the District. As such I have given the need for the development significant weight.

Appeal Ref: APP/Q3820/W/23/3332033

Date: 10 May 2024

Address: 1066 Balcombe Road, Crawley RH10 3NL

Proposal: 64 bed care home

59. The 2019 SHMA sets out that there was a shortfall of 437 Older Persons' Care Bedspaces in 2019 and that this would increase to 1,029 by 2039. Other than the closure of Penn Court, thereby reducing

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the supply, I have not been made aware of any new facilities having subsequently opened. The Council consider the favoured approach is to retain people in their own homes for as long as possible and provide extra care facilities but no clear figures for this or evidence contrary to the 2019 SHMA have been put before me.

60. Several permissions and applications for forms of care provision were highlighted in the Council's appeal statement. Notwithstanding this, from the evidence provided at the Hearing, the nature of the provision in many of those are not directly comparable to the care home provision the appeal scheme proposes. There was also uncertainty over whether some of these permissions are still extant and no confirmation as to any having commenced. Consequently, unlike the appeal scheme, they would not quantitatively address the current or future shortfall.

61. The presence of a 5-year supply of housing land has not been disputed. A need for affordable units in general and that the Borough has population characteristics that could influence the type of overall care and older person provision is not questioned. However, there is still an identified need and shortfall for the type of provision the appeal scheme would provide.

62. That there are allocations in the adopted and emerging Plans that could potentially come forward in the future, does not alter that at present, this has not been reflected in implemented planning permissions. A letter from Oculus, provided at the Hearing, indicates that there is a developer in place to deliver the appeal scheme.

63. While most of the existing care bed rooms in the area have en-suite facilities, not all do. There is also said to be some variation in the amount and quality of on-site facilities at the existing care homes in the area. The indicative plans indicate the provision of several communal facilities. In addition, en-suite bedrooms are proposed, and a condition imposed to ensure these are provided. Qualitatively the proposal would also be beneficial.

64. Given that the supply has only reduced from the 312 stated in the 2019 SHMA, a 64-bed care home would represent a sizeable increase. The provision of a modern facility would also aid in enhancing the quality of the accommodation. Extra provision would assist in reducing the need for occupiers to remain in hospital and therefore free up bed spaces. In light of the above factors, I give the contribution towards care home provision substantial weight.

65. The appeal site is located in a residential area, designated for development with reasonable access to public transport, services and facilities. The proposal would align with local and national policy aims to make efficient use of land and maximise densities. It would bring social and economic benefits to the area associated with the construction, operation and occupation of the proposal. This includes to employment. Due to the scale of the scheme, I give these factors moderate weight.

66. In terms of harm, I give minor weight to the harm to the character and appearance of the area. The lack of appropriate living conditions for future occupiers attracts moderate weight. There are conditions imposed and further details that would be provided as part of reserved matters submissions that would relate to these issues and could be assessed at that stage. The proposal would be contrary to the development plan as a whole. Notwithstanding this, in favour of the scheme there is substantial weight for care home provision and moderate weight for the other benefits of the scheme.

67. In this instance, the proposed development would conflict with the development plan, but material considerations indicate that a decision should be made other than in accordance with it.

Appeal Ref: APP/X1355/W/24/3339936

Date: 22 May 2024

Address: Land South of South College, The Drive, Durham DH1 3LD

Proposal: 74 bed care home

7. It is suggested that there is an oversupply of residential and nursing care home bedspaces, and the Council's Adult and Health Services question the need for the proposal. My attention has been drawn to a Market Sustainability Plan (MSP). While there is not any detailed statistical evidence within it the plan states that there is around 85% under occupancy in the older peoples care homes market and it is

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indicated that care home operators have highlighted concerns regarding a lack of placements. There are said to be no significant issues with quality or capacity in existing care homes, and two care homes have recently closed owing to under occupancy. In addition, two new care homes previously granted permission have been constructed.

8. Nonetheless, the minutes from the meeting of the planning committee suggest that one of the closures was in a different area of County Durham to the appeal site and the new care homes are similarly in different parts of the county. Moreover, I have not been presented with any details regarding the type of provision at these establishments and as such I am unable to determine whether or not they are comparable to the appeal scheme. The appellant's position is that there is a need for care home beds in the local area.

9. Notwithstanding that there is no policy requirement for an assessment of need to be undertaken to justify proposals for specialist housing for older people, even if I were to accept the Council's view that there is currently an oversupply of bedspaces there is no clear evidence that the proposal is of such a scale that it would result in a significant over provision of specialist older peoples housing, to the extent that it would be detrimental to the local business needs of existing providers.

10. In coming to this conclusion, I have taken into account that the MSP states that it is not anticipated the current under occupancy would cause significant or overall market failure. Furthermore, I share the view of the Inspector in their decision relating to a care home for older people in Cheltenham that it is not the role of the planning system to manage the care home market.

11. The supporting text to Policy 15 of the CDP indicates that in considering future housing needs other forms of specialist accommodation may be more appropriate than conventional sheltered housing to rent. The MSP sets out the Council's and wider care partnership's strategic direction of travel for the provision of older people's services which is a preventative and 'home first' approach to reduce the need for care home placements, in line with national best practice. I also acknowledge the responsibilities of the Council under The Care Act (2014).

12. Nevertheless, the definition of older people for planning purposes in the Framework recognises the diverse range of needs that exist. The Planning Practice Guidance (PPG) states that the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.

13. The Council's home first approach is a county wide strategy and there will no doubt be variations in the needs of older people at the local level given the complexities of the differing health needs and lifestyles of older people. In meeting older peoples' housing needs it is therefore my view that there is a role for specialist care home facilities such as the proposal to operate alongside interventions and packages to enable a home first approach. The proposal would contribute to the choice of accommodation to suit older people's changing needs and there is no substantive evidence that in doing so it would undermine wider opportunities for development, including the Council's efforts to implement alternative models of service delivery on a strategic level or diminish the ability of businesses to invest, expand and adapt.

14. To conclude, the proposal would not have a harmful effect on existing older peoples housing provision or providers, with regard to supporting economic growth and local business needs and wider opportunities for development. The proposal therefore accords with Paragraph 85 of the Framework which states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Appeal Ref: APP/P5870/W/23/3330511

Date: 14 June 2024

Address: Land at Woodcote Green Garden Centre, Woodmansterne Lane, Wallington SM6 0SU

Proposal: 70 bed specialist neurological nursing home

38. The scheme proposes a 70-bed care home comprising accommodation designed to support the needs of those with neurological conditions. It would cater for patients of all ages who are unable to be discharged into a home environment due to their profound and complex conditions.

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39. The appellant's Neurological Care Need Statement indicates that nationally 1 in 6 people are living with at least one neurological condition. There is an under provision of dedicated specialist neurological care facilities across the country with the vast majority of patients inappropriately placed in care homes that cater for the elderly.

40. At borough level the appellant contends that Sutton has some of the highest prevalence rates of long-term neurological conditions in London. The appellant indicates that between 2012 and 2016 there were around 100 admissions per year to local specialist neurological wards. The appellant cites academic research which indicates that between 12% and 20% of individuals are discharged to specialist nursing homes following a hospital visit. Taking 16% as the midpoint of those needing specialist care and based on hospital admissions the appellant contends that there is a minimum need for 16 specialist neurological bedspaces per year. This equates to a minimum need for 256 specialist neurological bed spaces over the whole plan period.

41. In addition, the appellant has produced a Supplementary Need Assessment which analyses the demand and supply for specialist dementia care home spaces within a 5-mile catchment area of the site. The assessment indicates a current undersupply of bedspaces of at least 417 worsening to 566 by 2025.

47. Throughout the appeal proceedings the Council have questioned the need for a specialist neurological care home highlighting SLP Policy 11 which indicates that there is an oversupply of bedspaces. Whilst there may be an oversupply currently, the policy does not set a moratorium in respect of developments for care homes or specialist facilities and indicates that by 2026 there will be an undersupply of bedspaces in care homes. In any event, the proposal would meet a specific need for which there is no specialist facility in the area rather than adding to the pool of elderly care home bedspaces.

48. Having regard to the information before me there is no compelling evidence to suggest the appellant presented the proposed development on the basis that it would only serve the needs of the residents of Sutton, despite the Council's assertions. The appellant's reports in respect of need clearly set out the national context and highlight local need. The appellant's approach to establishing need based on the geographical location of the appeal site and the administrative area of the local planning authority seems a sensible and reasonable one to me. Given its specialist nature it is reasonable to assume that it would draw patients from a wider area.

52. It is evident that the key concern of the ASC is the affordability of spaces. However, the nuances of the care market and the affordability of bedspaces are matters that fall outside of the planning regime and in turn what I can consider as part of my assessment of a Section 78 appeal.

53. I have no reason to dispute the quality of care provided in existing care homes. However, in my view, it would be reasonable to assume that individuals would benefit from being placed in a specialist environment that caters for their specific needs rather than pepper potted in non-specialist care homes.

54. I acknowledge that predicting with certainty the precise need figure is not an exact science. However, the appellant's assessment of need for specialist bedspaces including those suffering from dementia does not appear to be unrealistic based on the evidence base and methodology presented. Whereas I have significant concerns about the data provided by the Council. As such, I find the appellant's evidence more reliable in terms of demonstrating need.

55. To sum up I find that the proposed development would provide a specialist care facility for which there appears to be a need currently and in the future. An uplift in the number of bedspaces would assist in addressing any shortfall generally and the scheme would result in improved health facilities for individuals with specialist neurological conditions irrespective of their financial status or age.

Care Home appeals summary

Appeal Ref: APP/Y3615/W/23/3326567

Date: 1 July 2024

Address: Springfield Manor Nursing Home, Hogs Back, Puttenham, Surrey GU3 1AQ

Proposal: Extensions and alterations to existing care home

29. The PPG sets out that the need to provide housing for older people is identified as being critical. The development would contribute 20 additional bed spaces to the identified local need for care home rooms; albeit this is not considered to be urgent by the Council, nor is the contribution to overall need significant.

30. However, while I note that the existing provision meets with Quality Care Commission (QCC) requirements, following my site inspection, I do not doubt that the proposal would provide an uptick to the fabric, internal layout and the general facilities of Springfield Manor nursing home. Moreover, the provision is currently well-used by Surrey County Council residents. The proposed development would also enable a range of more specialist care and up to date staff facilities. As such, I afford the development considerable weight.

31. In addition, I give the short-term economic benefits and increased employment opportunities associated with the construction of the scheme some moderate weight. There would also be some increased but limited social benefits for new residents and their visitors. Minimal environmental benefits related to new landscaping and tree planting are also given weight.

Appeal Ref: APP/Z0116/W/24/3342055

Date: 19 August 2024

Address: 8-10 Station Road, Shirehampton, Bristol BS11 9TT

Proposal: New care home

21. The appeal scheme would see a derelict site within an accessible location put to productive use, providing 56 specialist units of care home accommodation, and in turn releasing 22.76 dwellings onto the market. The linked social and economic benefits would be amplified by a pronounced unmet local need for specialist homes, and the Council's shortfall in deliverable housing sites, the demonstrable supply of which currently stands at 3.75-years. These benefits would however be directly compromised by the scheme's failure to provide acceptable living conditions for some of its occupants, and its adverse effect on those of neighbours. That being so I attach only limited weight to the otherwise modest social and economic benefits of the scheme.

Appeal Ref: APP/A1530/W/24/3339756

Date: 24 September 2024

Address: Land West of Stanway Western Bypass and South of Church Lane, Stanway, Colchester, Essex, CO3 8WD

Proposal: 72 bed care home

23. The Planning Practice Guidance (PPG) states that the need to provide housing for older people is critical¹, as people are living longer and the proportion of older people in the population is increasing. Essex County Council (ECC) is the relevant local authority for the commissioning of adult social care, including care home provision, and was represented at the hearing.

24. The appellant's UNA is set within the context of the increasing numbers of people over 65 in Essex, which is predicted to rise from 21% at present, to 25% by 2040. The UNA is based on a 5 mile catchment area from the appeal site, and on the Colchester Borough administrative area. To 2027, there is an excess of 304 market standard care home beds in the catchment area and 81 in the local authority area, but in relation to dementia care beds, a shortfall of 8 in the catchment and 103 in the local authority areas respectively.

25. When assessed against the benchmark of full market standard bedrooms which incorporate ensuite wetrooms, levels of need rise to 413 for the catchment and 691 for the local authority area to 2027, the earliest date on which the scheme could be operational.

Care Home appeals summary

26. ECC's Market Shaping Strategy (MSS) places greater emphasis on supporting people at home and increasing extra care housing for older people, with fewer residential care placements. Whilst not disputing the levels of need set out in the UNA, the Council's position is that there is an oversupply of C2 residential care in Colchester. In support of that view, the Council points to the fact that average occupancy in Colchester stands at 88%, whereas for long term viability, occupancy needs to be around 95%. The Council also takes issue with the use of market standard bedrooms as a factor in assessing levels of need.

27. ECC's latest Market Position Statement does, however, acknowledge that there is a need to increase the number of nursing care homes across Essex to ensure that there is capacity for short periods of intervention for those with complex needs, within the overall context of keeping people in their community for as long as possible. The immediate short term need is for dementia care beds, and whilst no breakdown of the appeal proposal between general care and dementia care has been given, that will be informed at the reserved matters stage by the operator's commercial decision and any updated evidence of need.

28. The Council's position is that care homes are expected to be delivered on the sites allocated in the development plan and that a Local Plan review is underway through which sites may also be identified for such provision. A site at Wivenhoe came forward through the Neighbourhood Plan for supported living accommodation, and other accommodation may come forward on sites identified through the Plan review. In the interim, there is nothing in the evidence to indicate that the appeal proposal would result in a significant excess in the provision of care home and dementia beds in the area, or that it would undermine the 'home first' approach in the MSS.

29. The Framework and the PPG recognise that a diverse range of housing is needed to meet the needs of older people. There is clearly a level of uncertainty about future levels of need post pandemic, and as older people's needs become more complex. The proposal would contribute to the choice of accommodation in the catchment and the local authority area, and there is nothing to suggest that it would undermine the development of allocated sites that may be identified for C2 use in the future through a Plan led approach.

30. Overall, a quantitative need for dementia beds in the short term and a need for care beds in the longer term is identified in the appellant's evidence. A qualitative need has also been demonstrated. The provision of LPS2 Policy DM10 to demonstrate a proven need for specialist housing is satisfied.

Appeal Ref: APP/X0360/W/23/3336000

Date: 26 September 2024

Address: Oak Dale, Lower Wokingham Road, Crowthorne, Wokingham RG45 6BX

Proposal: New care home

123. Policy CP 2 of the Core Strategy requires development to contributes to the provision of sustainable and inclusive communities to meet long term needs, and states permission will be granted for proposals that address the requirements of, amongst other matters, an ageing population. This aim is carried through in Policy TB09 of the Local Plan which indicates an in principle support of proposals for accommodation to provide for peoples' needs over a lifetime, which includes, extra care homes, dementia extra care units, enhanced sheltered schemes and proposals that allow the elderly and those with disabilities to remain in their own homes or purpose built accommodation.

124. In this respect the current development plan generally reflects the provisions of the Framework that the needs of groups with specific housing requirements are addressed and also the Planning Practice Guidance (PPG), which says strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people.

125. The proposal would provide a residential care home capable of providing a high level of care, that could support future residents with dementia. There is dispute between the main parties as to the extent of need for this type of accommodation in the borough.

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126. In this regard, the Council draws attention to the updated Local Housing Need Assessment. The Council contends that residential placements is not increasing in the area, and asserts, in respect of projected need for care homes in the borough, that Standard Methods produce results that are unfeasibly high. It is highlighted that local demographic factors permit residents to stay in their homes longer in this borough, and that this preference for individuals to remain in their homes in older age mitigates the identified need for care home spaces in the borough.

127. In respect of existing residential care home provision, Appendix 7 of the Council's appeal statement shows, in March 2024, that from 22 locations there was a combined availability of 114 beds vacant in the borough. This Appendix was updated during the appeal process and showed, in July 2024, the locations increased to 23 while the number of vacant beds decreased slightly to 103. In any event, while lower than the 90% occupancy rate prior to the pandemic, the most up to date data indicates that the occupancy rate is only just short of that figure, being at 88% in July of this year.

128. This aside, the Council's evidence indicates, for the period 2021-2040, there would be a need for an additional 464 care home bedspaces in the borough. The Council advances, in light of the above available capacity, local factors and trends, that caution is required when planning for accommodation for older people. It is contended that demand for care home services has fluctuated in the borough. However, while the evidence for the past four years shows some fluctuation over this period, it does not show a significant decline in the demand for residential and nursing home care placements over the period March 2022 to June 2024.

129. National guidance indicates there may be exceptional circumstances, including the particular demographic characteristics of an area, which justify an alternative approach to assessing housing need. Also, the Council draws my attention to the recently approved care home provision in the borough. Be this as it may, even if I accept the Council's criticisms about the appellant's planning need assessment, the evidence advanced in this case shows that there will be a total need of 1062 care beds in 2035; this equates to a shortfall in bedspaces of 158 over the current available beds in existing care homes in the borough.

130. Moreover, while there may be a local preference for people to receive care in their own homes, I find no compelling evidence that this would be a reasonable and practicable option for all older people in the borough. Indeed, as clarified in the Framework's Glossary, housing for older people can encompass a diverse range of need. Reflective of this, even adopting the Council's conservative assumptions of population growth and taking account of local factors, evidence shows, assuming a 95% occupancy rate, that there will be the need for a new large care home around 2026, 2030 and 2034 in the borough.

131. Crowthorne and the appeal property are close to the administrative boundary of the borough, and concerns are raised that there would be no certainty that provision at the appeal property would address the borough's need. This may be so, but this would likely be the case for residential care homes in neighbouring Council areas and need could extend across boundaries such that this would not be a justification for failing to address the identified need for this type of accommodation in Wokingham borough. In any event, this does not change the factor that there is a current local need and identified future need for residential care home provision in the borough.

132. This proposal would contribute to the local need for residential care home accommodation. As a 60 bedroom care home, the development would significantly work towards addressing this local need and would in turn support the aims of Policy CP2 of the Core Strategy and Policy TB09 of the Local Plan.

139. The proposal would result in a net gain of residential units, and this would positively contribute to the Government's objective to significantly boost the supply of much needed homes in this area. Moreover, catering for older people, this development would address an identified local housing need for different groups in the community. This amounts to considerable benefit, and in turn I attach considerable weight to these benefits in this appeal.

140. As a windfall site the development could be built relatively quickly. There would be economic benefit through the construction phase. The development would result in employment opportunity. The Council

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states that this would not be unique to this scheme. Be this as it may, the evidence advanced indicates that there would be 48 direct jobs created. While some of these would be parttime positions, this is still not an inconsequential contribution to local employment opportunities.

Appeal Ref: APP/V4250/W/24/3342859

Date: 1 October 2024

Address: Kings Park Christian Centre, Leigh Road, Leigh WN7 1UB

Proposal: 66 bed care home

22. The proposal would be a purpose-built care home with 66 beds in single rooms with ensuite wet rooms. Generous communal space would include gardens, cinema room, hairdressers, café and library. It would provide a high standard of care and quality of life for its self-funded residents, anticipated to be at least 70 years old and in need of 24/7 supervision. The proposal would provide for roughly equal amounts of general residential and residential dementia care.

23. The Framework and the Planning Practice Guidance (the PPG) stress the importance of addressing the requirements of groups with specific housing needs, including older people. There is a critical need for older people's housing due to the increasingly ageing population and a requirement for a better choice of accommodation to suit people's changing needs.

24. The PfE sets out the significant predicted population growth across Greater Manchester, and particularly Wigan, in those aged 65 and over. It identifies the need for a diverse range of new provision to meet the needs of older people. In this regard, Wigan Borough Supported and Specialist Housing Prospectus December 2021 notes that there will be an increasing number of people living with dementia requiring specialist residential and/or nursing care provision.

25. The Carterwood Planning Need Assessment (April 2023) estimates that, at the earliest the care home could be available, there will be a significant net need for minimum market standard care home beds and dedicated dementia beds in the catchment and the local authority area. The numbers are expected to rise over time, reflecting the sustained and escalating nature of need. Moreover, those moving into care homes in future are increasingly likely to require high dependency nursing and dementia care provision.

26. Carterwood report that the need for care homes may be reduced by alternative forms of care, such as underpin the Council's specialist housing strategy. This aims to support people in their own homes or in Extra Care accommodation until their needs can no longer be met by home-based care and support. At that point, the greatest need for additional C2 residential care provision is for nursing and residential homes, particularly those with nursing dementia capacity. On the basis that the Council's strategy is working well, it is expected to continue to reduce the demand for general care home beds in this area.

27. The proposal would not provide high dependency nursing or dementia care. It would cater for people manageable in the care home setting, whose needs were compatible with existing residents and the business. The care home would aim to be a home for life for existing residents, but those with increasingly complex needs would be likely to move on to more specialist care. The complex health issues and challenging behaviours that cannot be managed at home would not be met by the proposal. The proposal would contribute quantitatively to the supply of older people's housing, but it would not contribute to meeting the identified significant and increasing demand for higher dependency care.

28. Irrespective of the economics of the different types of care, there are clear benefits in terms of health outcomes and quality of life associated with supporting people in their homes or in Extra Care housing. Moreover, the Council's strategy appears to reflect the wishes of elderly people as reported by household surveys where the majority of those aged 65 and over want to stay in their homes with support, while less than 10% would consider entering a residential care home. This tallies with the evidence that most people enter care homes not through choice but because their needs can no longer be met at home. I have no reason to think this would vary between those requiring affordable beds or those self-funding their care.

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29. The appellant points out that comparable care homes in the area are full and have waiting lists, evidencing a demand for private care beds. The PfE acknowledges that there are some prosperous housing areas and that private provision plays an important role in the supply of housing. Nevertheless, there are over 70000 people on local authority housing waiting lists across the region and there is a need for a major boost in the supply of affordable housing.

30. The Council's capacity tracker does indicate that current care bed places are effectively at full capacity, but this is apparently due to the repatriation of elderly people previously placed outside the area and the Council is not aware of people in this area waiting to move into care. Moreover, only around 12% of care beds are occupied by self-funders, which is apparently representative of the local socio-economic demographic. While I do not dispute that similar private care homes may have waiting lists, there is little substantive evidence of any significant local demand for self-funded, lower dependency care beds.

31. That being said, I acknowledge that there will likely remain some demand for more general residential and self-funded care beds, as part of the overall increased need due to the rapidly growing elderly population. Nevertheless, taking into account the particular circumstances including the Council's strategy, future trends and socio-economics, the proposal would occupy a limited niche between the choice of supported independent living and the need for higher dependency nursing and dementia care. Moreover, it would be targeted towards, and affordable by, only a small proportion of the population.

32. LNT is a well-established developer and operator of care homes, confident that the proposal would be commercially viable as are its other care homes. Moreover, the business could be flexible, or it could close, if the proposed private residential care provision proved unviable. However, I must take into account what is proposed rather than what theoretically could happen in future. On the basis that the proposal would not contribute to meeting the significant identified demand for affordable, higher dependency nursing and dementia care, the proposed care beds carry modest weight in favour of the scheme.

33. The proposed beds would equate to around 35 dwellings, which would contribute to the government's objective of significantly boosting the supply of homes. As such, while the Council can demonstrate over a 5 year supply of deliverable housing sites (5YHLS), this does weigh in favour of the proposal.

34. The operation of the care home would create 50 to 60 new employment opportunities, the majority of which would be filled by people living locally. Staff would be employed at above minimum wage and offered training and opportunities for career progression. A Training and Employment Management Plan, to promote training and employment opportunities for local people, could be secured by planning condition.

35. There would be economic benefits both short-term during construction and during the operation of the care home. There would be limited additional spend from care home residents, visitors and staff who already live locally, but future occupiers of the equivalent 35 dwellings would provide additional support to the local economy. Collectively the employment and economic benefits weigh to a moderate degree in favour of the scheme.

Appeal Ref: APP/N4720/W/24/3343107

Date: 22 November 2024

Address: Mercure Hotel, Wetherby Road, WETHERBY, LS22 5HE

Proposal: New care home with senior living homes and foodstore

4. The scheme would include 84 dementia care home units and 8 independent senior living homes and would play an important role in helping to meet the growing need for older persons' housing in the area. The 2017 SHMA predicted a 75% increase in the requirement for older persons' specialist accommodation and a particular need to increase the provision of enhanced sheltered housing and extra care support. The latest SHMA of 2024 expects a need for around an additional 8,800 units of accommodation by 2040 to cater for the elderly population. The City Council recognises that there is an undersupply of nursing dementia and nursing beds in Leeds and, to a lesser extent, residential

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dementia care. There is currently a heavy reliance on homes converted from alternative uses, and on ageing purpose-built accommodation, and 26 homes have closed over the last 10 years. Leeds City Council's most recent monitoring report states that only 58 and 66 older persons' housing units were completed in 2019/20 and 2020/21 respectively. In this context the scheme would appear much needed. It would be aligned with the National Planning Policy Framework and Policy H4 of the Core Strategy, which recognise the need to provide homes for older persons, and Policies HG2-20 and HG4 of the Leeds Site Allocations Plan, which indicate that the appeal site is suitable for older persons' housing and independent living.

8. In conclusion, the scheme would not materially harm the housing land supply position in Leeds and would have a very positive effect on the delivery of homes to meet the growing need for housing for older people, in accordance with the objectives of Core Strategy Policies H4, Site Allocations Plan Policies HG2 and HG2-20 and the National Planning Policy Framework. It would not impair the ability to deliver the housing requirement set out in Core Strategy Policy SP6 or the distribution of housing in Policy SP7. It would make the best use of brownfield land within the urban area in accordance with Core Strategy Policy SP1.

Appeal Ref: APP/Z3635/W/24/3342657

Date: 22 November 2024

Address: Land East of Vicarage Road, Sunbury-on-Thames TW16 7LB

Proposal: 60 bed care home and 164 extra care

32. There are benefits in favour of the appeal. Most significant of these is the provision of 'housing with care' and a care home. The Council agree there is a significant level of need for 'housing with care' in the Borough. There is also an agreed need for care home bedspaces. It is also of note that there are currently no other such developments in the pipeline nor any proposed allocations in the emerging plan for this type of development. It is further agreed that the need figures for both will continue to rise in the future.

33. The need to provide housing for older people nationally is critical as set out in Planning Practice Guidance. There is no doubt that there is a clear and pressing need for this type of development in Spelthorne. In my view agreeing absolute figures for need in this case is purely academic, as even using the Council's more conservative figures, the proposed development would still leave a significant deficit in the provision of both types of housing in the borough. I therefore afford the provision of housing with care and a care home in this case very substantial weight.

Appeal Ref: APP/W1525/W/24/3345164

Date: 22 November 2024

Address: Field North of Montpelier Farm, Main Road, Little Waltham CM3 3PA

Proposal: 58 bed care home, 45 care suits and 100 care apartments

75. The parties agree that there will be an ongoing need to provide new SRA for the elderly and that there is a growing awareness of the benefits of extra care housing of the type that has been proposed. The estimates derived from three different models were not disputed and the Council notes that its own estimates do not differ greatly as to the broad quantum of need in the future, as agreed by the appellant's witness.

76. The SHNA indicates that by 2041 there would be an estimated need for 1,520 additional dwellings with support or care across the plan area, with a need for 886 additional nursing and residential care bed spaces. Using a standard multiplier of 1.8 bed spaces per dwelling for older persons accommodation, it equates this to around 492 dwellings. It consequently forecasts a total need for around 2,012 units up to 2041 or 106 per annum.

77. The appellant forecasts a total need of 1,803 units by 2042 which is not dissimilar but takes issue with the existing supply of 189 beds because only one private extra care scheme has been identified comprising just 58 beds. Using the Council's own analysis, the existing shortfall for housing with care consequently rises to 441 units according to the appellant. This broadly aligns with its own use of the SHOP model which demonstrates a shortfall of around 345 private extra care units.

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78. The appellant also highlights supply pipeline issues which are informed by a comparative table that was submitted by the Council during the course of the Inquiry. Again, there is no great difference between the parties on this matter and the Council accepts that the current pipeline comprises 211 beds. The appellant estimates that by 2029 there would be an unmet need for 202 care beds and 846 private extra care units if no care bed closures are assumed. The basis for this calculation is undisputed and the Council was unable to identify any other schemes likely to come forward in this timeframe when questioned, despite a number of pre-application discussions having taken place. The predicted need, according to the appellant, is equivalent to three to four new 60-bed care homes and seven new 120-unit retirement schemes by 2029.

79. In terms of past delivery, the appellant points out that the Council has only consented 80 care beds and 60 private extra care units in the last 5 years. The Council highlights the fact that the implementation of the LP is still at an early stage, having been adopted less than five years ago. Consequently, it suggests that it is too early to determine whether policy DM1 of the LP is working. It points out that the major allocations upon which it relies for SRA, through policy DM1, are yet to be delivered. I also note that the Council is considering whether it would be appropriate to identify a percentage of the housing allocation to meet a range of older persons accommodation types on new site allocations in a preferred option topic paper on housing.

80. The current position, as well as the one likely to be present in 2029, can only be described as a sustained market and policy failure in relation to the provision of SRA for older people despite the relatively young age of the LP. Irrespective of the differences between the parties, the SHNA identifies a current shortfall of 310 market housing with care units and 289 care beds. Set within the context of the persistent under delivery of SRA over the last five years, this alone demonstrates the failure. It is also telling that the Council is considering setting numerical targets to remedy this situation as well as its acknowledgement that not all of the allocated sites would be suitable for the delivery of such housing which introduces further uncertainty regarding the timely delivery of SRA to meet the identified need.

82. It is clear that the proposal would meet an immediate SRA need in terms of providing private care bed and extra care facilities. This is an urgent and pressing need that the Council does not dispute. The scheme would make a substantial contribution to the supply pipeline over the next five years. For those reasons, I give this benefit significant weight.

Appeal Ref: APP/C1435/W/24/3339112

Date: 26 November 2024

Address: Land at Coopers Green Road, Ringle Cross, Uckfield TN22 3AA

Proposal: New care home

31. There is an acute need for care home accommodation, based on both the Council's and appellant's evidence and there is a high proportion of elderly residents in the district. The appellant claims there to be a need for 121 en-suite bed spaces now, rising to 189 by 2025. The Council presents no solution to this, with the Council's own Housing Needs Assessment concluding there was, at that time, likely to be a shortfall of 993 residential and nursing care bed spaces by 2039.

32. The proposal would provide 50 bed spaces for older people and would also provide an element of specialist dementia care, making a valuable contribution to an acute national need for such accommodation. This weighs substantially in favour of the scheme.

33. Furthermore, the proposal would free up larger family sized homes for rent or sale by older persons moving to the care home. Given the Council's lack of a 5 year housing land supply, this weighs significantly in favour. It is also undisputed that the scheme would provide a high standard of care and support for older peoples, in a purpose built environment that includes communal facilities, logically laid out spaces, wheelchair accessibility and safety measures. This has the potential to reduce costs to health and social services (including local GP practices) by providing specialist and dedicated in-house care and support; and reducing the need for residents (who might have previously lived alone) to call in existing local services. This weighs moderately in favour.

Appeal Ref: APP/V4630/W/24/3343105

Date: 2 December 2024

Address: Pelsall Villa Football Club, Walsall Road, Pelsall, WS3 4BP

Proposal: 66 bed care home

35. The Planning Practise Guidance states that the need to provide housing for older people is critical. Furthermore, The Council's development plan acknowledges that the demographic of Walsall is ageing and the large increase in the number of very elderly people will require some degree of care or specialist housing. The Council's SAD considers such developments should be "directed to locations that enjoy good access to public transport and services such as shops." The provision of the proposal would provide a facility for which there is acknowledged need and demand in an accessible location. It would also enable the release of about 47 houses back into the housing market at a time when the Council is unable to demonstrate a five year housing land supply. These figures are not disputed by the Council. These are significant social objectives of the Framework.

36. The proposal would deliver economic benefits in the form of construction jobs and from 50-60 new full time and part time jobs for the running of the care home.

Appeal Ref: APP/P0240/W/24/3347529

Date: 24 December 2024

Address: Land South of Leighton Road, Stanbridge, Bedfordshire LU7 9HW

Proposal: 66 bed care home, 99 extra care units, 43 affordable homes

32. With regard to extra care, the appellant's Need Assessment took an average from a variety of methodologies to estimate the likely need for extra care dwellings over the next decade, accounting for existing and planned supply. It suggests that there is currently an undersupply of just over 1000 units and that by 2034 this would be a little under 1500 units, based on revised figures given at the hearing. The Council's corresponding figures are that there would be an undersupply in 2035 of around 450 extra care units. The difference between the two would appear, at least in part, to be a result of the Council's figures assessing the need from people over 75 years of age only, whereas two of the three methodologies used by the appellant includes people over 65.

33. With respect to care home bed spaces, the appellant's Need Assessment suggests that whilst there is no immediate need, by 2034 there would be a need for about 700 en-suite bed spaces. The Council's corresponding figure is around 450 bed spaces in 2035.

34. All these figures relate to the whole of the central Bedfordshire district. The appeal site is in the far southwest of the district and so it is reasonable to consider that the development would not be likely to meet the demand from persons living in the far eastern side of the district. Indeed from the information provided by the Council, which is broken down into 4 sub areas, the shortfalls in both extra care and care home spaces were less in the Leighton Buzzard (within which the appeal site is located) and Chiltern Vale sub areas, than in the other two sub areas which stretch to the east. That said, it is also reasonable to consider that the development could meet demand from beyond the district, given it is only a few miles to the neighbouring authority.

35. Overall, with regard to extra care, I consider that the Council's figures are limiting based on the age profile used. Even accounting for the fact that the demand in Leighton Buzzard is only likely to be a small proportion of the demand over the whole district, the need is considerable and the proposed 99 extra care units would therefore make a significant contribution to meeting the local need. With respect to care home spaces, even if I were to accept the appellant's figure for central Bedfordshire, the proportion of the demand local to the site is not great and may well be exceeded by the proposed 60 bed care home. However these need figures should not be ceilings, and clearly the development could meet demand from neighbouring areas within, and beyond, central Bedfordshire. Taken together, I afford moderate weight to the provision of extra care and care home spaces.

38. The development would generate a significant number of jobs both during the temporary period of its construction, and in the long term at the care home and the other ancillary facilities. This carries moderate weight.

Appeal Ref: APP/N5090/W/24/3345445

Date: 15 January 2025

Address: Heathside High Preparatory School, 84 West Heath Road, Barnet, London, NW3 7UJ

Proposal: 3 storey care home

41. The benefits of the proposed development would include making effective use of a previously developed site in C2 use within a borough with limited land and resources. Furthermore, it would assist in achieving the Government's aim of significantly boosting the supply of housing. In particular, there is a shortage of suitable housing for our ageing population and the proposed development would provide accommodation for over 60 elderly residents.

42. The Knight Frank Assessment (May 2024) considers current care home supply within a 2.5 mile catchment area and finds a need for 1,555 bedspaces in modern purpose-built care homes within that catchment to 2033, 1,310 of which are needed prior to 2028. Given existing and future planned supply, there is demand for 954 additional bedspaces to 2033, 709 of which are required before 2028. A similar exercise has been undertaken for dementia care with a demand of 749 bedspaces in the same area, and an expected undersupply of 137 bedspaces to 2028 which would increase to 253 bedspaces to 2033.

43. Where care homes are provided, this frees up houses within the local market, including larger houses suitable for families. Furthermore, care home provision can save on adaptation of unsuitable housing and can assist in reducing pressure on in-home care provision. Care home residency can also be positive in reducing social isolation for older people. Additionally, the proposed development would provide local employment...

45. Taken together, the proposed development's benefits have substantial weight.

Appeal Ref: APP/L3245/W/24/3351748

Date: 05 February 2025

Address: Former Phoenix Garage, Paul Atkins Farm Services, Great Hales Street, Market, Drayton, Shropshire TF9 1JW

Proposal: 60 bed care home

32. The appeal scheme would address a need for this type of residential accommodation in the Market Drayton area. The provision of a care home would have wider benefits including improved quality of life for most future residents and reduced pressure on, and associated cost savings for, health and social care services. The proposal would contribute to the overall supply of housing in the area within a location that is highly accessible by public transport and to a wide range of services and facilities. The scheme would utilise a brownfield site and make efficient use of land. It would also provide employment and contribute to the local economy during construction and in subsequent occupation directly and indirectly. In these regards, I note the Framework supports the development of small and medium sized sites in sustainable locations to make efficient use of previously developed land and significantly boost the supply of a mix of homes. Due to the scale of the scheme, I give these factors moderate cumulative weight in favour of the proposal.

Appeal Ref: APP/P1560/W/24/3344547

Date: 12 February 2025

Address: The Oaks, Clacton Road, Weeley, Essex, CO16 9EF

Proposal: 2 storey 66 bed care home

26. The proposal would provide 66 residential care home beds for older people, providing both general purpose and dementia care. The average age of future residents of the care home would be 80+ years and each would be assessed as being in need of 24-hour care and supervision.

27. I also note that the care home would be compliant with necessary modern standards, and would provide amenity areas and services including a cinema and hairdressers. The appellant would apply for Care Quality Commission (CQC) registration, and it is stated that all of the appellant's other care facilities are highly rated by the CQC. The proposal would also provide generous, high quality external amenity areas which could be utilised by both residents and staff.

Care Home appeals summary

28. The appellant's Planning Need Assessment identifies a 'demonstrable need' for 489 additional standard wetroom care home beds within the market catchment area and 698 within the local authority catchment area. These shortfalls are anticipated to increase by 2036.

29. Furthermore, the appellant indicates that no sites are specifically allocated for the provision of care homes within the local plan. Suitable sites are increasingly difficult to find due to competition and demand from residential developers who, it is indicated, are able to pay higher land values. Where care homes are provided, this frees up houses within the local market, including larger houses suitable for families. Furthermore, care home provision can save on adaptation of unsuitable housing and can assist in reducing pressure on in-home care provision. Care home residency can also be positive in reducing social isolation for older people. The proposed care home will contribute to the mix of housing within the immediate area and contribute to a socially inclusive community.

30. The need to provide housing for older people nationally is critical as set out in the National Planning Practice Guidance (PPG). There is no doubt that there is a clear and pressing need for this type of development in Tendring District. Consequently, the cumulative benefits associated with the provision of a care home providing general needs and dementia care are afforded substantial weight.

Appeal Ref: APP/N0410/W/24/3348677

Date: 14 February 2025

Address: Land at Wilton Park, Gorell Road, Beaconsfield, HP9 2RJ

Proposal 75 bed care home and assisted living units

60. Evidence also demonstrates that there are shortfalls in the wider Buckinghamshire area. There is also an acknowledged need for homes suitable for older people, currently amounting to 707 sheltered or retirement homes in South Bucks alone, with a forecast need for 1,270 homes by 2040.

61. The current Local Plan runs until 2026 and the emerging local plan is at a very early stage. Even if the Council were to submit the emerging plan for examination in 2026, the examination process and the other requirements of the planning process would result in a considerable time lag before site allocations could start to deliver homes. Until then, there will be no means of redressing the housing land supply position through the plan-making process.

62. Against this background, the scheme would deliver a substantial number of new homes for older people in need of care. Evidence suggests that this would release some 134 under-occupied homes on to the market. The scheme would therefore have the important double benefit of providing specialist housing for those in need of care and improving the availability of homes on the general market.

67. The scheme would deliver urgently needed new dwellings consisting of specialist housing for older people and would help to release homes, including under occupied dwellings, on to the general market...

Appeal Ref: APP/J2210/W/24/3351458

Date: 06 March 2025

Address: Land adjacent to Old Thanet Way, Whitstable CT5 3EH

Proposal: New build Care home

16. The appellant has set out a compelling case in respect of registered care accommodation need in both the entire district and the more immediate locality. A Care Home Need Assessment has been submitted, produced by Healthcare Property Consultants (HPC).

17. This document sets out a district-wide need, at the time of the assessment, of 274 ensuite bedrooms. This is broken down as 151 in the locality. In both cases, this is set to increase this year with an aging population. It is noteworthy that the district has a population of over 85s that is 19% above the national average, and increasing. The appellant's consultant from HPC confirmed at the hearing that, in his view, the need for older people's accommodation in the district is critical.

18. From the evidence before me, current facilities are clearly not sufficient to deal with the need now, and arising, in this housing category. Moreover, I note that a proportion of the existing care homes within the district are not purpose-built accommodation.

Care Home appeals summary

19. The Council argues that a good level of care accommodation is being provided and, in the pipeline, as acknowledged in HPC's assessment. The Council also sets out that from 2020/21 to 2023/24 there have been 167 bedspace completions, with extant planning permission for a further 245 spaces. I accept that there is evidence of positive planning activity providing consent for this type of accommodation. However, it is reasonable to conclude that there is no certainty that all, or any, of these schemes will be implemented. Moreover, those that are implemented would, in part, replace bedrooms that have already been lost in recent years.

20. Overall, the district is in a gloomy position in respect of registered care provision. From the evidence before me, this is set to continue, with only limited provision completed or in the pipeline. Accordingly, I am satisfied that demonstrable need for the proposed development has been adequately provided, and that this outweighs the harm that arises from the loss of the existing open space. The proposed development would therefore be in accordance with the relevant provisions of criterion c) of LP Policy OS9.

31. I have set out above some of the social benefits of the proposed development. In particular, that the proposed development would contribute to providing desperately needed care accommodation in the district. I give this public benefit substantial weight. Moreover, the Planning Practice Guidance sets out that the provision of 1.8 care beds is equivalent to a single dwelling. This means that the proposed development would provide the equivalent of 42 dwellings towards the Council's housing shortfall. I give this public benefit substantial weight. Additionally, there would be other benefits, including through employment during construction and following completion of the development. I give this public benefit moderate weight.

Appeal Ref: APP/V1260/W/24/3350004

Date: 14 May 2025

Address: Long Close Rest Home, 23 Forest Road, Poole BH13 6DQ

Proposal: Replacement care home

54. The Council is unable to demonstrate a 5 year supply of housing. The proposed 15 additional care home bedroom spaces would contribute towards the Council's housing delivery targets by 8 additional units³. This would attract significant weight.

55. The proposal would also deliver 15 additional care home bed spaces, which would go towards meeting an identified housing need, despite the Council submitting that 'there is currently a good supply of beds in residential care homes similar to those provided at this care home across BCP'. This would also attract significant weight.

56. There would also be economic benefits contributing to building a stronger, responsive, and competitive economy, supporting growth with construction and post-construction benefits. This would include investment of the site, job creation during construction and the support of facilities and services within the local area by new residents. There would be social benefits through the provision of improved care home facilities and an increase in care home bed spaces within the borough.

Appeal Ref: APP/C3620/W/24/3351839

Date: 21 May 2025

Address: Murreys Court, 10 Agates Lane, Ashtead, Surrey, KT21 2NF

Proposal: Care home and assisted living

59. Paragraphs 4.35-4.37 of the LP set out the demographic changes in the district that are likely to result in a considerable need for more housing for older people in the coming years⁹. As a result, Policy H6 of the LP supports the provision of accommodation for older people but does not set a target. The examining Inspector was content with this approach. In addition, the need must also be considered through the prism of the Public Sector Equalities Duty and in this respect Policy EN5(6) of the LP requires appropriate weight to be given to meeting the needs of those with a protected characteristic, which in this case would include age and potentially disability. In this context, the appellants suggest substantial weight be given to the delivery of housing for older people.

Care Home appeals summary

60. Following discussions at the hearing the Council did not want to be as definitive as the appellants. The Council took a more nuanced position and suggested that there was a need for extra care accommodation, including residential care homes, but not for nursing homes. Consequently, it provided a range from moderate to substantial weight depending on how much nursing care would be provided (the weight reducing as the level of nursing care increases). Evidence provided by Surrey County Council¹⁰ supports the Council position by demonstrating that local nursing care bed provision is relatively high compared to the national average.

61. The appellants have not finalised details of the level of care that would be provided but its submissions confirm that the care home would function as both a residential and nursing home. It would not be practical to impose a condition prohibiting the provision of nursing accommodation because residents may move from residential to nursing care. Moreover, the provision of nursing care is still a benefit of the scheme. The local over provision just tempers the benefit a little. Overall, I afford the provision of accommodation for older people significant weight as a benefit.

62. In addition to this, the provision of accommodation for older people will free up existing homes, including sheltered/retirement and unoccupied homes, as residents move into the appeal scheme. The Council advised at the hearing that under occupation of housing was an issue in the district. The examining Inspector also recognised this at Paragraph 118 of their report. Accordingly, this would be another significant benefit.

Appeal Ref: APP/W1905/W/24/3354867

Date: 20 June 2025

Address: 303 Ware Road, Hoddesdon, Hertfordshire SG13 7PG

Proposal: 75 bed care home

13. A number of reports have been submitted which provide advice on the supply and demand and general need for care home provision in the local area, across Broxbourne Borough and Hertfordshire. These include a Market Analysis by Carterwood, Catchment Report by Cushman and Wakefield, two recent monitoring reports by Broxbourne Borough Council and Older Persons and Adult Disability Care Housing Need Model by Iceni for Hertfordshire County Council.

14. Whilst these reports and studies each deliver slightly different results and have varying scopes and extent of geographical areas, there are a number of themes and this includes a general indication of there being a present surplus of residential care home provision in the local area. Indeed, this is reflected in the comments of the County Council in their response to the planning committee where it is identified (in line with the Iceni Report) that there are projected to be a surplus of residential care spaces by 2042 in the order of 193 bed spaces. Whilst the time frames differ in the Carterwood Report, the results are not entirely inconsistent as this shows a shorter-term surplus of en-suite accommodation within a 5-mile radius of the site albeit that there is a much more substantial shortfall in bed spaces with wet room provision.

15. These results do focus on residential care however, as opposed to the more specialist care which is proposed to be operated within much of the proposed facility. The appellant has indicated that residential care would be provided on the ground floor with the memory care/dementia care on the first floor and nursing care on top floor. This represents a broad split of one third for each type of care with the opportunity for residents to enter at any level and/or progress through these as required in the same location.

16. The requirement for specialist care, which includes memory care/dementia and nursing care remains high and the varying reports broadly indicate that there is a present shortfall and this is likely to increase in the period to 2042. The County Council's response does reflect this, and it indicates that it did not support the provision of residential care. The County Council was nevertheless supportive of the other forms of care which represent two thirds of the proposed facility.

17. I am mindful here that the operating model for this facility is one that allows for an evolution of care in-situ depending on the needs of the individual resident. The residential care and specialist care are therefore somewhat inalienable in this context.

Care Home appeals summary

18. Therefore, whilst it has not been shown that there is demonstrable unmet need for residential care, I am satisfied that there is a clear and demonstrable unmet need for specialist care. Given that the two are inextricably linked in this instance, and that the latter makes up the majority of the care home offering, I am satisfied that this meets the test of paragraph 155 b of the Framework.

Appeal Ref: APP/A1720/W/24/3347627

Date: 8 July 2025

Address: Land South of Longfield Avenue, Fareham

Proposal: 80 bed care home plus up to 1200 new homes, primary school etc

Secretary of State Decision

36. The Secretary of State agrees with the Inspector at IR11.164 that the proposal would provide considerable economic environmental and social benefits including the delivery of affordable housing, extra care accommodation and market housing.

48. Weighing in favour of the proposal are housing (market housing, affordable housing, self and custom build housing and specialist housing);

Appeal Ref: APP/P0240/W/24/3357260

Date: 16 July 2025

Address: 91 London Road, Sandy, Bedfordshire, SG19 1DH

Proposal: 80 bed care home

47. It is common ground between the parties that the appeal proposal would equate to the release of 42 homes back into the housing market. This figure has been calculated on a 1:1.9 ratio as adopted by the Council in response to the Housing Delivery Test Measurement Rule Book, and I have no reason to disagree with it. However, as the extant planning permission¹ for housing on the site would not be deliverable should the appeal proposal come forward, and having regard to the loss of the current dwelling on the appeal site, the net increase to the overall supply would be reduced to 34 dwellings. Nevertheless, this represents a moderate contribution to the level of overall supply, and being mindful of the Government's stated desire to significantly boost the supply of housing set out at paragraph 61 of the Framework, this is a benefit of the proposal.

48. The Council's most recent evidence indicates that there are currently 576 nursing and care home spaces for older people in the area, with demand rising to 641 over the period to 2030. The appellant's Care Home Needs Assessment identifies that there would be a shortfall of 146 care home bedspaces by 2030.

49. While there is some difference in the extent of the expected shortfall, the parties agree that there is a significant need for additional care home bed spaces in the area, and the 80 care home spaces which the appeal proposal would provide would represent a significant contribution towards addressing any shortfall. This is a further benefit of the proposal.

50. Additionally, the proposal would deliver short term economic benefits during construction, and longer-term benefits following occupation in terms of servicing needs and employment.

51. Therefore, even if I were to find that the Council cannot demonstrate an adequate five-year supply of housing land, there are no adverse effects which would significantly and demonstrably outweigh the benefits of granting planning permission in this instance.

Appeal Ref: APP/M3645/W/25/3359711

Date: 09 September 2025

Address: The Grasshopper Inn, Westerham Road, Westerham, Surrey TN16 2EU

Proposal: 63 bed care home

38. The proposal would provide 63 residential care home beds for older people, providing both general purpose and dementia care, with 24-hour care and supervision for residents aged 65+ years. The proposal would also provide generous, good quality internal and external amenity areas which could be utilised by residents.

Care Home appeals summary

39. The appellant's Planning Need Assessment identifies an estimated under-supply of 87 additional standard wetroom care home beds within a five mile market catchment area. The shortfall is anticipated to increase to 148 by 2032. It is outlined that the proposal would address nearly 75% of the shortfall up to 2027.

40. The need to provide housing for older people nationally is critical as set out in the National Planning Practice Guidance (PPG). There is no doubt that there is a clear need for this type of development in Tandridge. Consequently, the cumulative benefits associated with the provision of a care home providing general needs and dementia care are afforded substantial weight.

41. The proposal would create employment, and would also give rise to some economic benefits during the construction phase and would provide support to local services. Therefore, the economic benefits are afforded moderate weight. The appellant has referred to environmental benefits, however as these have not been quantified I have afforded them limited weight.

47. The proposal would provide 63 care beds, addressing a need for this type of residential accommodation in the Tandridge area. The appellant states that the Council's Housing Land Supply is 1.57 years. This suggested figure has not been challenged by the Council and is a notable shortfall against the five year housing land supply sought by the Framework.

Appeal Ref: APP/U1430/W/24/3354261

Date: 29 September 2025

Address: Moorhurst, Main Road, Westfield TN35 4SL

Proposal: 64 bed care home

11. Set against this windfall approach to care home provision is the established need for care homes in the district. The Council's planning committee report indicated that including figures up to the end of 2023, there were planning permissions for 154 care home bed spaces within the market catchment area/local authority area and even if these permissions were all completed, there would still be a need for more care beds. This is supported by paragraph 4.52 of the DASA which states that the East Sussex Bedded Care Strategy and Integrated Estates Strategy 2018 estimates a net need of 250 beds for residential/nursing care to 2027. The appellant also refers to the Housing and Economic Development Need Assessment (updated in 2024) which identifies a need for all types of housing for older people, including an expected need for a further 961 care bed spaces by 2040. The appellant's own Planning Need Assessment is based on the local authority area and a 'market catchment area' based on completed and planned care homes, concludes that there would be a need for additional care beds within the area. I have no substantive evidence before me to the contrary.

39. It has been established that there is a need for additional care-home beds within the district. Framework paragraph 63 states that in the context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. The groups identified include older people, with specific reference to care homes, amongst other forms of accommodation.

40. In accordance with the ratio in the housing delivery test rulebook referred to by the main parties, the scheme would provide the equivalent of 36 dwellings. This would make a meaningful contribution to the Council's housing land supply and would be in line with the Government's objective of significantly boosting the supply of housing and supporting the use of previously developed land. The proposed accommodation would respond to an established need and would expand the choice of specialist accommodation available in the area. It would provide high quality accommodation in excess of Care Quality Commission standards. It would release underoccupied properties for re-occupation and would relieve pressure on publicly funded care homes and care services. Taken together, these benefits attract significant weight in the overall planning balance.

41. There would be moderate economic benefits through the provision of up to 65 FTE jobs directly and indirectly from the proposed development through nursing, care, maintenance and administration. There would be additional temporary economic benefits through the construction process. I attribute this moderate weight in the planning balance.

Appeal Ref: APP/M1520/W/25/3363353

Date: 03 October 2025

Address: 186 Canvey Road, Canvey Island, Essex SS8 0QP

Proposal: New Nursing home

44. The Castle Point Local Housing Needs Assessment 2023 (LHNA) indicates that there were 46 units of older persons housing for every 1,000 older persons in the district aged 75 years or more. This is one of the lowest levels in the country, significantly less than the national average of 120 units per 1,000 people aged 75 or older. The LHNA outlines that there will be a significant increase in the number of people in the district in this age group by 2043, calculating a need for 423 units of dedicated older persons accommodation when applying a rate of 120 units per 1,000 older people. Another care home has recently been built on a former garden centre site nearby, but the proposed nursing care home would provide a further 20 bedrooms, contributing towards the provision of older persons accommodation in an area where there is substantial need. I accord this benefit significant weight.

46. There would also be some economic benefits during the construction phase and once occupied when the development would create jobs and opportunities for local businesses. Given the scale of the scheme relative to the wider borough economy, this benefit carries little weight.

47. I have found that the delivery of nursing care home accommodation carries significant weight in favour of the proposal. There would be more modest benefits in terms of its contribution to housing land supply and limited benefits to the local economy. On the other hand, I have found that the proposal would cause harm to the significance of the grade II listed Dutch Cottage and recognise that this must be given great weight. However, the effect would be limited. In terms of the balance required by paragraph 215 of the Framework, I consider that the public benefits would outweigh the less than substantial harm to the heritage asset.

Appeal Ref: APP/T3725/W/25/3362421

Date: 10 October 2025

Address: Land to the south of Birmingham Road, Hatton Park, Warwick, Warwickshire, CV35 7DZ

Proposal: 75 bed care home

29. Within the district, the appellant's Dementia Care Home Statement (DCHS) details a substantial shortfall of extra care beds of between 506 and 781 bed spaces for 2020. With an aging population, this shortfall will increase to between 1,341 and 1,616 bed spaces by 2040. Within north Warwickshire, there is no extra care home facilities and for 2020, a shortfall of some 179 spaces is projected. The recent Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) estimates a lower requirement of 243 beds by 2032. It takes a different approach in predicting future bed space requirements by assuming a greater focus on providing care within homes. The appellant's DCHS review considers the HEDNA prevalence rate used (people needing beds with nursing) and the assumptions about a higher rate of delivery, for housing with care, to be lacking evidence based justification. Critically, it is unclear how dementia care needs have been assessed which contrasts with DCHS, that utilises specific evidence from Dementia UK. On this later point, it is therefore of greater weight in assessing need for the proposed care home, with its focus on dementia.

30. An Alternative Site Assessment (ASA)9, analyses alternative sites but concludes none are suitable and available for development. In the absence of contrary evidence, the ASA further reinforces the need justification for the proposal. The proposal for 75 care beds would make a positive contribution towards meeting need for specialist housing for older people as an identified in the Council's Strategic Housing Market Assessment 2012 under WDLP Policy H5. Planning Practice Guidance (PPG) indicates that the need for elderly persons housing is critical. The proposal would address needs of groups with specific housing requirements under Framework paragraph 61. Taking into account the DCHS evidence, significant weight is attached to the provision of 75 care beds in contributing to need.

32. The care home would reduce the demand on the use of publicly funded hospitals, GP services, publicly funded care homes, social services and health authorities. Residents would benefit from improvements in their health which would reduce service demand and time spent in hospital. Based on

Care Home appeals summary

research, the provision of 75 bed care home could result in Council care budget savings of £225k per annum and NHS savings £500k per annum. Such a benefit would attract moderate weight.

34. Construction and care home jobs on a range of salaries and scales would be created. Such jobs, along with servicing requirements for the home and its residents, would result in financial spend within the local economy. Given the extent of development, this economic benefit would attract moderate weight.

39. Set against this, there would be significant weight attached to the number of care home beds being created. The proposal would boost housing supply attracting moderate weight and the reduced demand on social and health services and associated cost savings would attract moderate weight. Similar weight would be attached to the economic benefit of the proposal...

40. Therefore, whilst the benefits of the proposal would cumulatively be great and weigh heavily in favour of the proposal, they would not outweigh the heritage harm for each of the balances for the Conservation Area and listed building...

44. The provision of care home beds would attract significant weight. The benefits of housing, economy, reduced demand on social and medical services and associated cost savings would each attract moderate weight. The benefits on people wellbeing and the creation of a footpath would each attract small weight.

47. The benefits of the provision of care home beds, housing, economy, reduced demand on social and medical services with associated cost savings, people wellbeing and the creation of a footpath would weigh heavily in favour of the proposal. Limited weight would be given to the proposal not conflicting with Green Belt purposes a and b. However, in addition to the harm to the Green Belt, there is 'less than substantial harm' to the Conservation Area and the setting of a listed building which individually attract considerable weight.

Appeal Ref: APP/W3520/W/25/3364061

Date: 15 October 2025

Address: Land at School Road, Elmswell IP30 9NL

Proposal: 66 bed care home and extra care

28. The development would provide such benefits through the provision of a range of specialist elderly housing, some of which would be affordable, which would meet an identified and critical need. I appreciate the difficulties in delivering this type of housing and the Inquiry was told this is the only pending application of its type currently in the District. This development would also result in wider public benefits of better health and wellbeing and freeing up family housing. A minibus service, communal facilities and a healthcare facility could also be secured for the use of future residents. Such benefits carry significant weight having regard to the scale of development proposed.

30. There would be economic benefits stemming from the development through job creation, both short-term and long-term, and from additional spending to the local economy. The scheme could also secure a high level of environmental benefits through a secured biodiversity net gain. New hedgerows, as a heritage benefit, however, as discussed above, I give limited weight for the reasons already given.