

# Older Persons Housing Proof of Evidence of Iain Warner BSc (Hons) DipTP MRTPI

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Town and Country Planning Act 1990 Planning and Compulsory Purchase  
Act 2004

Section 78 Appeal

Land South of Barrow Green Road, Oxted

# Older Persons Housing Proof of Evidence of Iain Warner BSc (Hons) DipTP MRTPI

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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: 1101.02.RPT

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# Executive Summary

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- i. This Proof of Evidence deals specifically with older persons housing and the weight to be afforded to it in the planning decision in light of the evidence of need in the Tandridge District Council area.
- ii. Outline planning permission is sought for up to 190 dwellings, as well as an 80 bed care home.
- iii. The care home provision will be secured via the section 106 agreement.

## Key Findings

- iv. The adopted Core Strategy is silent in relation to the support for delivery of new care homes, save for when co-located with new extra care provision, and has no policy that seeks to identify future requirements for provision.
- v. The withdrawn Local Plan was similarly silent in respect of future care home provision despite recognition in the PPG of the critical need to provide housing choice for older people (Paragraph: 001 Reference ID: 63-001-20190626).
- vi. The District Council have no up-to-date assessment of need for care home provision and are reliant on the County Council, who provide the information via commissioning statements, market position statements and Planning profile for accommodation with care for older people. Such statements are primarily focussed on meeting the needs for those provided accommodation via the Adult Social Care model and not reflecting private paying users. Furthermore, assumptions on future need are also predicated on a marked increase in the provision of extra care accommodation as an alternative.

## Assessment of need

- vii. Our assessment of need has identified that as of 2025 there is additional need for personal care beds with a small oversupply of nursing care beds when assessed solely on a qualitative needs approach. If a qualitative assessment were used instead, by which only those schemes delivering single occupancy beds with en-suite facilities are considered, there then identified deficits in both forms of care provision.
- viii. When moving on to consider the future we identify an overall requirement **of 741 beds over the longer term** (through to 2045) or **357 beds in the short term** (that being

though to 2029). Again, those figures are based solely on the **quantitative assessment**.

- ix. If the **qualitative assessment** were used instead then the respective figures we have identified are **1,002 beds in the longer term and 628 beds in the short term**.
- x. Under either approach for future requirements the dementia need is expressed separately, adding a further need for **87 beds over the longer term and 66.6 beds in the short term**.
- xi. Our assessment has also considered alternative approaches to modelling demand, which continues to demonstrate that in the longer term there will be a **shortfall of at least 314 beds** without further supply.

### **Benefits of provision**

- xii. Separate to the matter of need for additional provision of care beds in either the long or short term I also consider the following benefits to be associated with the provision:
  - Reduced pressures on the adult social care budget through increased provision;
  - Contribution to overall housing supply through freeing up of under-occupied housing; and
  - Employment generation.

### **Weight to be afforded**

- xiii. I have then gone on to review similar appeal cases over the last two years to identify the key conclusions that other inspectors have arrived at when considering schemes that include provision of care homes. The key summaries identify the following trends:
  - Meeting a clearly identified need for future bed spaces is afforded significant to substantial weight.
  - Contribution towards overall housing supply afforded substantial weight.
  - Delivery of new, purpose built care homes meeting modern requirements (single occupancy en-suite) afforded moderate weight.
  - Economic benefits aligned with the construction and operation of care homes are afforded moderate weight.
  - Provision of bed spaces to alleviate pressures on the NHS afforded minimal weight.

### **Conclusion**

- xiv. On the basis of the evidence of need that has been indicated in support of the proposals, combined with the clear benefits, the provision of 80 additional care beds

from these proposals with make a meaningful contribution to the future needs. Accordingly, I consider that the contribution ought to be afforded no less than **substantial weight** in the overall determination of this appeal.

# Introduction

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## Section 1

### **Qualifications**

- 1.1 My name is Iain Warner, I am a Senior Director at Tetlow King Planning.
- 1.2 I hold a BSC Honours Degree in Town and Country Planning (2000) and a Diploma in City and Regional Planning (2002) from the University of Wales, Cardiff.
- 1.3 I have been a Member of the Royal Town Planning Institute (RTPI) since 2003.

### **Introduction**

- 1.4 I have over 24 years' professional experience in the field of town planning within local authorities and for the last 18 years within the private sector. Throughout these 18 years I have been active within the retirement and care planning sector. This commenced during my employment with Barton Willmore (now Stantec), followed by employment within AKA Planning (now part of BNP Paribas) which was a specialist small scale planning consultancy specialising almost exclusively in the retirement and care sector.
- 1.5 In my current role with Tetlow King Planning, a consultancy leading in the field of retirement and care planning, I head up the later living sector and, in this role, I have attended and presented at specialist retirement and care conferences.
- 1.6 Tetlow King Planning (TKP), founded in 1985, is a town planning and development consultancy, inter alia offering specialist professional advice on accommodation and care for older persons across the public and private sectors.
- 1.7 TKP has extensive portfolio of clients including many of the largest housing developers and leading care/retirement providers. TKP has extensive UK wide experience of advising such clients on a diversity of new later living schemes, including establishing the market and need for such provision and the concomitant planning benefits.
- 1.8 TKP are also affiliate members of ARCO in recognition of the continued work within the sector, and provide support to ARCO in terms of planning updates both online and at seminars when requested.



- 1.9 During the course of my career, I have presented evidence at numerous Section 78 appeal inquiries and hearings.

### **Declaration**

- 1.10 In accordance with the Planning Inspectorate's Procedural Guidance, I hereby declare that:

*"The evidence which I have prepared and provide for this appeal reference APP/M3645/W/25/3372747 in this statement is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions."*

### **Scope of Evidence**

- 1.11 The scope of my evidence covers assessing the needs for specialist accommodation for older people within Tandridge, assessing the benefits that derive from such specialist provision with reference to relevant appeal decisions and my own relevant experience within the sector, and ascribing the weight that ought to be afforded to this provision in the overall planning balance.

- 1.12 For clarity, the weightings I apply are as follows:

- very limited;
- limited;
- moderate;
- significant;
- very significant;
- substantial; and
- very substantial

- 1.13 This statement should be read alongside the following Proofs of Evidence:

- The Planning Proof of Evidence
- Housing Land Supply Proof of Evidence

- 1.14 This proof of evidence comprises the following seven sections:

- Section 2 summarises the appeal proposals;
- Section 3 summarises the development plan;
- Section 4 summarises other relevant material considerations;
- Section 5 summarises the overall assessment of need;
- Section 6 sets out the Council's and Rule 6's assessment of the scheme;

- Section 7 identifies the benefits of the proposed care home provision; and
- Section 8 considers the weight to be afforded to the proposed care home provision.

### **Statements of Common Ground**

- 1.15 An overarching Planning Statement of Common Ground (SoCG) [CD10.1] has been prepared and advanced between the Appellant and the Council.
- 1.16 Separate SoCGs have also been prepared in respect of the following matters:
- 5 year Housing Land Supply
  - Affordable Housing
  - Older Persons Needs
  - Heritage
  - Landscape
  - Ecology
  - Hydrology/drainage/ecology
  - Highways
- 1.17 Although drafts have been provided of each of these at the time of finalising the evidence no responses have been provided from the Council.

# The Appeal Proposals

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## Section 2

- 2.1 The appeal site is well described in both the original Design and Access Statement in support of the application [CD1.6 and CD2.1] and the delegated officer report [CD3.1] and is not therefore repeated again here.
  
- 2.2 The only thing to note is that despite the description of development referring to the delivery of an 80-bed extra care element the scheme was in fact delivering an 80 bed care home. This has been properly considered by all parties in the determination of the application despite the different term used in the description of development. Extra care accommodation is self-contained accommodation with care and support provided for residents, as opposed to care homes which provide communal living with residents only occupying an en-suite bedroom with all other living facilities provided communally.

# Adopted Development Plan

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## Section 3

### Introduction

- 3.1 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].

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

- 3.2 The Core Strategy sets out the Council's strategic policies and proposals for the development and use of land within the District.
- 3.3 Policy CSP8 sets out the council's approach to the provision of older persons housing. 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.”*

- 3.4 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]**

- 3.5 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.
- 3.6 The Part 2 plan contains no relevant policies relating to the provision of specialist accommodation for older people.

### **Withdrawn Tandridge Local Plan**

- 3.7 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. That approach was broadly in line with the previous CSP8 and limited reference to the provision of new care homes.

- 3.8 The Local Plan 2023 was found unsound in the Planning Inspectors report [CD4.25] and was subsequently formally withdrawn on 18 April 2024 by the Full Council of Tandridge.
- 3.9 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.

# Other Material Considerations

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## Section 4

### **National Planning Policy Framework [CD5.1]**

4.1 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.

4.2 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].*

4.3 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.”*

4.4 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 Policy Framework Consultation**

- 4.5 On 16 December 2025 the government published the consultation version of the new NPPF with the consultation period running until 10 March 2026 thus it is unlikely to be in a position for adoption prior to the determination of this appeal despite the final week of evidence due to close on 27 March 2026.
- 4.6 The consultation draft moves away from the previous approach of paragraph numbering and instead adoption of various relevant policy headlines with the supporting text.
- 4.7 Chapter 6 of the consultation includes the foreword as follows:
- “The objective of the policies in this chapter is to support the delivery of a substantial increase in the supply of homes and traveller sites, by ensuring that a sufficient amount and variety of land can come forward where needed. This includes planning for an appropriate mix of accommodation for the local community, and ensuring that land with permission is developed without unnecessary delay.”*
- 4.8 Under policy HO1 it notes at paragraph 2 that:
- “At the most appropriate level, development plans should also take into account an assessment of the size, type and tenure of housing or other accommodation needed for different groups. These groups include, but are not limited to:*
- ...
- b. Older people (including those who require retirement housing, housing-with-care and care homes); ”*
- 4.9 One of the specific questions set out in the supporting consultation document sets out:
- “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.**
- a) If so, what elements should this guidance cover?”*
- 4.10 This question specifically picks up the thrust from the older people’s housing taskforce addressed below.
- 4.11 Under policy HO4 it notes at paragraph 2 that:

*“Local plans should identify specific sites, infrastructure and other site-specific requirements for large-scale development, including:*

*...*

*c. Supporting delivery by setting expectations for an appropriate mix of tenures which would meet the needs of different groups. This 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 for custom or self-build.”*

4.12 Under policy HO5 it notes at paragraph 1 c) that:

*“Identifying sites, or setting requirements for parts of allocated sites, which can provide specific types of housing where there is an identified need, including (but not limited to):*

*i specialist housing for older people;*

*...”*

4.13 The supporting consultation document explains that the proposed approach to revising what is currently enshrined by paragraphs 63, 65, and 67 through:

*“Requiring authorities to identify sites, or set requirements for parts of allocated sites, which can provide specific types of housing such as older persons housing, purpose-built accommodation for students, plots for self and custom build, and traveller sites.” (my emphasis added)*

4.14 Policy HO7 is also relevant in that it notes:

*“In applying the policies in this Framework, substantial weight should be given to the benefits of providing accommodation that will contribute towards meeting the evidenced needs of the local community, taking into account any up-to-date local housing need assessment, and other relevant evidence (including the extent to which there is a five year supply of deliverable housing and traveller sites, and performance against the Housing Delivery Test).”*

4.15 Policy HO9 is specific to the delivery of specialist forms of accommodation and notes at paragraph 1 that:

*“Development proposals to address specialist housing needs should provide living conditions and access to services which are appropriate to the needs of their residents and users. This includes:*



a) *Housing for older people:*

- i. *being located where residents will be able to access frequently-used services easily and safely by walking, wheeling (including mobility scooters) and public transport; including through on-site provision where applicable; and*
- ii. *being delivered to M4(2) or M4(3) accessibility standards.”*

**National Planning Practice Guidance [CD5.2]**

4.16 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.

4.17 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].*

4.18 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].*

4.19 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).

- 4.20 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).

- 4.21 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).

4.22 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).

4.23 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]**

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

- 4.25 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.”*

- 4.26 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.”*

- 4.27 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.)”*

- 4.28 The WMS specifically notes:

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

- 4.29 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.”*

4.30 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.”*

# Assessment of Need

## Section 5

- 5.1 The planning application was supported with an Older Persons Needs Assessment dated December 2024 that considered need in the longer term (that being the period 2023 to 2040) and the short term (that being 2023 to 2027).
- 5.2 That assessment has been updated to reflect the most recent population projections such that it now looks ahead to 2045 for the long term outlook, whilst the short term period is 2025 to 2029. The updated assessment is included as [Appendix IW1](#) to this Proof of Evidence.
- 5.3 It is to be noted that the over 75s population within Tandridge is forecast to grow from 10,300 in 2025 to 11,100 in 2029, and then to 14,500 by 2045. This represents a 7.77% growth by 2029 and 40.78% by 2045. By comparison the national and regional growths over the same period are shown below:

**Table 5.1: Comparative Growth levels regionally and nationally for 2029 and 2045**

	<b>Tandridge</b>	<b>Surrey</b>	<b>Nationally</b>
<b>2025 Population</b>	10,300	128,500	5,573,700
<b>2029 Population</b>	11,100	136,600	5,960,400
Growth (000s)	800	8,100	386,700
Growth (%)	7.77%	6.3%	6.94%
<b>2045 Population</b>	14,500	179,900	8,110,100
Growth (000s)	4,200	51,400	2,536,400
Growth (%)	40.78%	40%	45.51%

- 5.4 The above shows that Tandridge is forecast to have a faster growing older population aged 75 and over by 2029 compared to either the regional or national average, whilst by 2045 it is only the national growth will exceed that of Tandridge.
- 5.5 This therefore provides an indication of the comparative challenges ahead relating to an ageing population.

### **Quantitative assessment**

- 5.6 Adopting a purely quantitative assessment to need, the future outlook for Tandridge in respect of care home beds through to 2045 is shown at Table 6.4 of the assessment with dementia provision included at table 6.6 to result in the below:

**Table 5.2: 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
Dementia beds	+61.8	+25.2	+87
<b>Total Care beds</b>	<b>+279</b>	<b>+462</b>	<b>+741</b>

5.7 Alternatively, the outlook through to 2029 is shown at table 5.3 below:

**Table 5.3 Cumulative Projected Levels of Need up to 2029, for Tandridge.**

	2025 requirement	2025 to 2029 requirement	Total number required up to 2029
Personal Care	+330.5	+52	+382.5
Nursing Care	-61.5	+36	-25.5
Dementia beds	61.8	4.8	66.6
<b>Total Care beds</b>	<b>+279</b>	<b>+88</b>	<b>+357</b>

### Qualitative assessment

5.8 Separate to the quantitative assessment, we have also undertaken a qualitative assessment whereby we have only considered provision of single occupancy rooms with en-suite facilities in meeting the highest level of accommodation possible. This approach is considered more appropriate to reflect provision of the highest quality of standard of accommodation as opposed to the potential for shared rooms or lack of en-suite provision to bedrooms. The reasoning for this approach is set out within [Appendix IW1](#).

5.9 Adopting such an approach results in the following level of need to 2045 shown at table 5.4:

**Table 5.4: 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
Dementia beds	+61.8	+25.2	+87
<b>Total Care beds</b>	<b>+601.8</b>	<b>+487.2</b>	<b>+1,08</b>

5.10 The same approach adopted through to 2029 is shown at table 5.5 below:

**Table 5.5: 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
Dementia beds	61.8	4.8	66.6
<b>Total Care beds</b>	<b>+601.8</b>	<b>+92.8</b>	<b>+694.6</b>

## **Summary and Conclusions**

- 5.11 The evidence is therefore clear that there is a quantitative need for additional care beds both by 2029 and moreover by 2045 to meet the increasing needs of an ageing population. The need for additional nursing beds is not shown quantitatively as of 2029, however by 2045 there is a need for all forms of specialist care beds.
- 5.12 Conversely, adopting the qualitative assessment there is a clear need by 2029 for additional beds across all forms, increasing considerably by 2045.
- 5.13 The appeal proposals, in whatever form the care beds are provided, will therefore meet the identified future needs.



# Council's Assessment of the Scheme

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## Section 6

### Introduction

- 6.1 This section of the evidence considers the Council's Assessment of the appeal proposals during the course of the application and the appeal process as well as also covering the position of Oxted & Limpsfield Residents Group and Oxted Parish Council as the Rule 6 party.

### Officer Report

- 6.2 It is to be noted that the delegated report [CD3.1] provides little in the way of a definitive position from the council on the matter of need. The main information being set out at paragraphs 37 and 38 which are repeated below:

*“37. Recent information from Surrey County Council made available to the Council with respect to another planning application (Lingfield House, application reference TA/2024/1079) is:*

*“As of January 2024, Tandridge had 328 residential care home beds, with a projected need of 436 by 2035 - indicating a shortfall of 66 beds. Similarly, the demand for nursing care home beds is also expected to increase, leading to an additional shortfall by 2035. These figures highlight a sustained need for more residential and nursing care home beds in the area. However, as highlighted in the Older People Residential and Nursing Care - Market Positioning Statement, there is further emphasises on the growing demand for complex care in Surrey due to an aging population and rising cases of advanced dementia, physical frailty, and multimorbidity.*

*Addressing this need requires not only specialised care home development but also experienced care providers capable of effectively supporting residents with complex conditions. However, the planning application documents do not indicate a designated care provider with proven expertise in delivering this level of care, nor does it go into detail as to how it would meet the needs within a specialist environment. In summary, while there is a clear need to expand capacity in Tandridge to meet future demand, it is essential to ensure that the*

*right type of provision is developed alongside a qualified care provider and suitable environment.”*

*38. The planning application does not indicate a designated care provider with proven expertise in delivering the level of complex care identified by Surrey County Council, nor does it explicitly go into detail as to how it would meet these needs within a specialist environment. The challenges facing the care sector, including viability as businesses and recruitment of staff, are well documented nationally. The lack of information with the application, and particularly whether the extra care facility would meet the needs identified by Surrey County Council, detracts significantly from the weight that might otherwise be afforded to this specialist housing aspect of the proposed development. Your officers consider, given the limited information in the planning application on this aspect of the development, that limited weight should be afforded to the provision of an extra care facility in the overall planning balance.”*

- 6.3 It is notable that no specific comments were thus seemingly provided by the County Council on this application, instead comments from another case were relied upon. That application, which was refused and is the subject of an appeal under reference APP/M3645/W/25/3371917, did not in fact propose any care home beds but instead relates to 107 units of extra care in the form of an Integrated Retirement Community. It is unclear why no scheme specific comments were received on this application despite receiving comments from them on other similar specialist older persons housing schemes live at a similar time.
- 6.4 The officer report is entirely silent on the interpretation of policy CSP8 in the context of the proposed development, merely repeating at paragraph 35 what the policy states without providing an assessment in the context of the proposed development.
- 6.5 The officer report fails to provide any clarification on the wider benefits that delivery of specialist care homes contribute, either in support of that element or the overall case in terms of green belt matters.
- 6.6 It is therefore my opinion that the delegated report has failed to properly understand the nature of the development, relevance in the context of adopted development plan policy, and the wider benefits and therefore weight that should be attributed to such proposals.

### **Statement of Case**

- 6.7 In their Statement of Case [CD7.1] the council note at paragraph 8.8 the following:

*“With respect to the extra care housing that is proposed, the LPA’s evidence will refer to advice it has received from Surrey County Council. The appeal application does not indicate a designated care provider with proven expertise in delivering the level of complex care identified by Surrey County Council, nor does it explicitly go into detail as to how it would meet these needs within a specialist environment. The challenges facing the care sector, including viability as businesses and recruitment of staff, are well documented nationally. The lack of information with the application, and particularly whether the extra care facility would meet the needs identified by Surrey County Council, detracts significantly from the weight that might otherwise be afforded to this specialist housing aspect of the proposed development. The LPA considers, given the limited information in the planning application on this aspect of the development, that limited weight should be afforded to the provision of an extra care facility in the overall planning balance.”*

- 6.8 No additional advice from the County Council has been provided to date with their Statement, beyond reliance on non-case specific commentary referenced in the delegated report.
- 6.9 It is noted that the County Council’s population profile prepared for Tandridge has been updated since the submission of the original application (included as [Appendix IW2](#)), indicating revised figures. The original population profile from January 2024 noted that there was provision of 328 residential care beds and 644 nursing care beds.
- 6.10 As of October 2025, those provisions had changed such that there had been a loss of 9 residential care beds and 35 nursing beds. On the basis that the County Council’s assessment is solely based on existing prevalence rates for provision the reduction in future population combined with a reduced provision of care beds has meant that the future requirements has been reduced. That is not a true assessment for need as it only forward models current provision, furthermore the profile document states that the assumptions for future residential care beds is based on future delivery rates of extra care housing, which have not materialised over the years since the adoption of policy CSP8.
- 6.11 The Council’s case therefore is not one of a lack of need, given the acknowledgment of a shortfall in provision through to 2035 as per the County Council’s own assessment, but more the lack of detail about the type of provider involved. The position on need is understandable given the finding of an earlier appeal in 2025 in Tandridge relating to a 63 bed care home (APP/M3645/W/25/3359711 included as [Appendix IW3](#)), where the Inspector noted at paragraph 40 that:

*“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.”*

6.12 That appeal was dismissed such that the scheme does not contribute towards a pipeline supply to meet the future need that was clearly established.

6.13 There is nothing to note at present what the Council’s case therefore is relating to failure to meet the County Council’s specific needs or what specific information is necessary at an outline stage to determine the type of provision considered.

6.14 Reference is made to the County Council’s market position as defining the complex care needs that are seemingly not being met, however that document does not provide any evidence of future needs or capacity that correlate with any failure in the needs assessment work provided with the application or since updated for the appeal. The market statement defines the response to meeting complex care needs as follows:

*“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.”*

6.15 It then only refers to complex care once more in the document at page 10 where it notes:

*“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.”*

6.16 It is incorrect therefore to assert that the market position statement identifies a specific quantum of need for dealing with complex care needs, or for that matter demonstrates that there is no need for further residential or nursing care beds in the future to meet demand.

6.17 The proposals specify a maximum floorspace provision/bedroom capacity for a care home thereby providing flexibility for provision across all forms of specialist accommodation whether that be residential care, nursing care, or specialist dementia care.

- 6.18 The Council do not have a clear approach to the need for future care home beds and have no policy basis within the adopted Core Strategy, nor did they have one in the withdrawn local plan either as that approach followed the current one of supporting the delivery of Extra Care housing only save for the co-location of a care home with new schemes.

### **Rule 6 Statement of Case**

- 6.19 It is to be noted that the Rule 6 party have adopted the same basis as the Council in respect of the care home provision, as set out at paragraph 79 of their statement of case [CD8.1] repeated below:

*“79. Benefits of the extra care facility. The R6 consider that the weight given to the provision of this facility should be neutral because there are no details in the application of the model for the proposed care home and no care provider is identified. For example, does the proposal accord with CSP8 (Tandridge District Core Strategy) by meeting the need identified by Surrey County Council which is for provision to address complex care needs such as dementia, physical frailty and multimorbidity? More information is required before any weight can be given to this in the planning balance.”*

- 6.20 This is an incorrect approach to considering the balancing exercise and also ignores that this is an outline application with no specification on the type of care home that would be delivered at this stage.
- 6.21 Policy CSP8 was written to ensure delivery of extra care housing to meet an identified need as opposed to the delivery of care homes. The full wording of that policy is set out below to provide the context:

#### *Policy CSP8 Extra Care Housing*

*The Council will, through the allocation of sites and/ or granting of planning consents, provide for the development of at least 162 units of Extra Care Housing in the period up to 2016 and additional units in the period 2017-2026 following an updated assessment of need. In identifying sites and/ or determining planning applications, regard will be had to:*

- *The need for each site to accommodate at least 50 Extra Care Housing units;*
- *The Extra Care Housing Model in the East Surrey Extra Care Housing Strategy in respect of the provision of services and facilities (and any further guidance received from Surrey County Council);*

- *Sustainability—sites should be sustainable by virtue of their location and there will be a preference for sites within defined settlements, but where such sites are not available regard will be had to the potential for development to be self-contained to reduce travel requirements and the availability of public transport;*
- *The priority will be for the re-use of previously developed land, greenfield sites will only be acceptable following allocation in the LDF; and*
- *The potential to co-locate a nursing/ residential care home on the site where there is an acknowledged need.*

*The Council will also work with its partners, Surrey County Council, Reigate & Banstead Borough Council, Surrey Supporting People and the Primary Care Trust in identifying suitable sites and securing the provision of schemes.*

*The Council will support suitable proposals notwithstanding that such developments may result in or exacerbate an excess of housing development against South East Plan requirements.*

- 6.22 The policy only references care homes in the context of co-location of these with extra care developments (that being the 5<sup>th</sup> bullet point within the policy text), that is to say that care homes are only expressly addressed in the context of a scheme that also delivers extra care housing, which this appeal does not seek to provide. None of the supporting text to the policy relates to care home delivery either.
- 6.23 It is therefore incorrect to consider that policy CSP8 in any way seeks to require care homes only to meet the identified care needs of the County Council to be compliant with the policy.
- 6.24 The Rule 6 Statement of Case therefore provides no further assistance to the matter of how to properly consider the matter of provision of the proposed specialist care home beds.

### **Summary and Conclusion**

- 6.25 I do not consider that the Council have properly assessed the matter of delivery of specialist older persons accommodation in the form of a care home.
- 6.26 No specific comments were received from Surrey County Council as the adult social care provider for this case, the officer report effectively quotes from comments received on an entirely separate application which was for the provision of extra care housing albeit comments on need related to care home beds.

- 6.27 The only available evidence provided by Surrey County Council in the form of the district profiles, updated to October 2025, provides respective figures for residential care and nursing care. There is no further evidence to demonstrate “*the needs identified by Surrey County Council*” for which the council seek to reduce weight.
- 6.28 In my opinion, the Council has accepted that there is a need for additional beds, reflecting the recent appeal determination, but have sought to reduce the weight to be afforded to further delivery on grounds that have no relevance to this case. It is my opinion that the provision of the proposed care home should be afforded **substantial weight** in the determination of this appeal. This level of weighting reflects the direction of travel set out from the recently published NPPF consultation and specifically what it sets out at policy HO7 where it states that schemes providing accommodation that will contribute to the evidenced needs should be afforded substantial weight. Given that the council have not argued against the specific needs for additional beds I consider that the increased level of weight should be applied.



# Benefits of the Proposed Care Home

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## Section 7

- 7.1 The Government have set out within the PPG that there is a critical need for delivering more older persons accommodation (Paragraph: 001 Reference ID: 63-001-20190626) in the context of generally significantly boosting the supply of housing (paragraph 61 of the NPPF).
- 7.2 The appeal proposals would deliver an 80-bed care on site to meet identified need and secure a range of social and economic benefits,
- 7.3 The following factors are all considered to be specific benefits that are secured through the delivery of specialist accommodation for older people.
- 7.4 The matter of identified need, although set out within [Appendix IW1](#), has already been considered in the context of the appeal decision at The Grasshopper Inn, Westerham included as [Appendix IW2](#)), from September 2025 where the Inspector noted at paragraph 40 that:
- “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.”*
- 7.5 Allied with the clear need for future provision of care home beds is the fact that at present the council lack a clear development plan policy relating to the delivery of additional care home beds, save for the single line in Policy CSP8 in the context of delivery of new extra care schemes. Furthermore, the most recent plan that was ultimately found unsound followed an identical policy approach to the present Core Strategy in that its sole focus was on provision of additional extra care housing.
- 7.6 There is therefore a complete policy vacuum at present relating to the delivery of additional care home beds. Allied to that is the lack of any specific allocations for new developments to meet an identified need.
- 7.7 There is also an abundance of evidence of the beneficial impact on public budgets and residents themselves.



- 7.8 Investment in on-site care and support services can help to relieve pressures on publicly funded hospital and social care services in the locality. In a period of financial constraint, the potential cost savings to the public purse cannot be ignored.
- 7.9 The Planning Practice Guidance notes that plan-making authorities will need to count housing provided for older people against their housing requirement. This has been assessed as demonstrating 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 44 dwellings towards the Council's housing shortfall.
- 7.10 The construction and operation of the care home would also generate job creation in the short and long term, as well as providing support to local services in the operational stage. Such economic benefits are capable of being afforded moderate weight in support of the appeal proposals. Such an approach is consistent with the Grasshopper Inn, Westerham appeal decision (see [Appendix IW2](#) paragraph 41).

### **Summary and Conclusion**

- 7.11 I do not consider that the Council have properly assessed the benefits that would be associated with the provision of a care home.
- 7.12 It is my opinion that the benefits associated with the provision of the proposed care home are such that it should be afforded **significant weight** in the determination of this appeal.

# The Weight to be afforded to Care Home Provision

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## Section 8

8.1 The NPPF is clear at paragraph 32 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and considers relevant market signals.

8.2 Paragraph 62 requires that:

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.”*

8.3 The NPPF requires local authorities at paragraph 63 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups including:

*“older people (including those who require retirement housing, housing-with-care and care homes)”.*

8.4 The PPG also specifically notes at Paragraph: 001 Reference ID: 63-001-20190626 that:

*“The need to provide housing for older people is critical.”*

8.5 Given the current position relating to provision of suitable care home beds within the district and the lack of a clear development plan policy approach to support future delivery, together with an absence of any up-to-date assessment of need, there should be no doubt that the provision of an 80 bed care home should be afforded substantial weight in the determination of this appeal.

### **Relevant appeal decisions**

8.6 The importance of specialist older persons housing as a material consideration has been reflected in numerous appeal decisions.

8.7 Many decisions recognise this form of housing as an individual benefit with its own weight in the planning balance. Importantly, the provision of care home beds can also contribute to overall housing land supply and afforded additional weight there in the context of the consideration of 5-year housing land supply matters.

8.8 A summary of relevant care home decisions is set out in [Appendix IW4](#) but the key points from these examples are highlighted below:

- Meeting a clearly identified need for future bed spaces is afforded significant to substantial weight.
- Contribution towards overall housing supply afforded substantial weight.
- Delivery of new, purpose built care homes meeting modern requirements (single occupancy en-suite) afforded moderate weight.
- Economic benefits aligned with the construction and operation of care homes are afforded moderate weight.
- Provision of bed spaces to alleviate pressures on the NHS afforded minimal weight.

### **Summary and conclusion**

8.9 The PPG is clear that there is a critical need for the provision of additional specialist accommodation for older people, which has been reflected in the findings of the Older People's Housing Taskforce report in November 2024. This need has been reflected in numerous appeal decisions as summarised above.

8.10 The population profile information issued by Surrey County Council for Tandridge also specifically notes that between January 2024 and October 2025 9 residential care beds have been lost (a 2.7% reduction) and 35 nursing beds (a 5.4% reduction). This shows a decline in provision from older operational schemes, further supporting the need to deliver modern, purpose-built homes to deliver additional bedspaces to the highest standards.

8.11 It is therefore evident that in the context of an ageing population and a critical need for increased delivery of specialist older persons accommodation it is imperative that there is a need to significantly boost provision.

8.12 On the basis of the evidence of need that has been indicated in support of the proposals, combined with the clear benefits, the provision of 80 additional care beds from these proposals will make a meaningful contribution to the future needs. Accordingly, I consider that the contribution ought to be afforded no less than **substantial weight** in the overall determination of this appeal.