

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

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

Section 78 Appeal

Former Laporte Works Site, Nutfield Road, Nutfield

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Appeal against refusal of Outline planning permission for the development of the site for new homes (Use Class C3) and Integrated Retirement Community (Use Classes C2, E(e), F2), creation of new access, landscaping and associated works to facilitate the development, in phases which are severable (Outline with all matters reserved, except for Access)

Former Laporte Works Site, Nutfield Road, Nutfield
Nutfield Park Developments Limited (LTD)

February 2026

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Contents

Section 1	Introduction	1
Section 2	Key Findings	2
Section 3	Assessment of Need	3
Section 4	Benefits of Provision	5
Section 5	Weight to be Afforded	6
Section 6	Conclusion	7

Introduction

Section 1

- 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.
- 1.4 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/25/3374913 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."
- 1.5 This Proof of Evidence deals specifically with older persons housing and the weight to be afforded to it in the planning balance in light of the evidence of need in the Tandridge District Council area.
- 1.6 Outline planning permission is sought for new homes (Use Class C3) and Integrated Retirement Community (Use Classes C2, E(e), F2) together with supporting infrastructure, open space etc.
- 1.7 The IRC elements consist of an extra care scheme of up to 41 units together with a care home to provide up to 70 beds.
- 1.8 The extra care and care home provision will be secured via the section 106 agreement.

Key Findings

Section 2

- 2.1 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. The same policy is now also deemed dated for the purpose of extra care provision given the failure to 1) deliver the identified need, and 2) failure to provide a definitive new need figure for future requirements beyond 2016.
- 2.2 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).
- 2.3 The District Council have no up-to-date assessment of need for specialist retirement 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.
- 2.4 Furthermore, assumptions on future care beds need are also predicated on a marked increase in the provision of affordable extra care accommodation as an alternative.
- 2.5 I set out in Section 7 of my proof why I consider that the extra care element correctly falls within a Class C2 category having regard to relevant appeal decisions and indeed determination by the council on a similar recent planning application. I also set out what the correct meaning of an Integrated Retirement Community is and how that is relevant to the appeal proposals.

Assessment of Need

Section 3

3.1 Our assessment of need has identified that as of 2025 there is additional need for all forms of extra care accommodation and personal care beds, albeit a small oversupply of nursing care beds when assessed solely on a quantitative 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.

Extra Care

3.2 When considering the future requirements for extra care accommodation, we have identified the need for a further **482.5 units over the longer term** (that being through to 2045) or **326.5 units in the short term** (through to 2029).

3.3 We have also modelled the long term implications if adopting more ambitious provision rates as a means of providing positive choice for housing needs as people age. Under those alternative scenarios (those set out in tables 8.1 to 8.3 of the assessment) future needs in the market sector would **range from 486 to 1,138 extra care units**.

3.4 The Council's position, having regard to the evidence from Surrey County Council, is a future need of 467 units as of 2025, increasing to 544 units by 2035. Those figures have adopted a lower provision rate for affordable accommodation (10 per 1,000 over 75s as opposed to our rate of 15 per 1,000 over 75s) whilst adopting a higher rate for market provision of 35 per 1,000 over 75s.

3.5 Whilst our provision rates are therefore different, under either assessment there is a clear need for future provision within both tenure types.

Care beds

3.6 When moving on to consider the future for care beds we identify an overall requirement **of 731 beds over the longer term** (through to 2045) or **357 beds in the short term** (that being through to 2029) covering personal and nursing beds. Again, those figures are based solely on the **quantitative assessment**.

3.7 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**.

- 3.8 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.**
- 3.9 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.
- 3.10 The Council's position, having regard to the evidence from Surrey County Council, is a future need of 57 residential/personal care beds as of 2030 and then 89 beds as of 2035. In respect of nursing care the figures are an oversupply 182 beds in 2030 and then reducing to 148 beds in 2035.
- 3.11 As explained, the County Council have adopted lower provision rates for current and future provision than otherwise used in more typical modelling assessments. Irrespective, a recent appeal decision (reference APP/M3645/W/25/3359711) set out that there is a clear need for further care bed provision in Tandridge, which has not been met given the appeal was dismissed.
- 3.12 It is therefore my clear conclusion that there is a clear demonstrable need for both the extra care and care home bed provision.

Benefits of Provision

Section 4

4.1 Separate to the matter of need for additional specialist older persons accommodation in either the long or short term I also consider the following benefits to be associated with the increased 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 during construction and operation.

Weight to be Afforded

Section 5

5.1 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 similar proposals. The key summaries identify the following trends:

- Meeting a clearly identified need is afforded significant to substantial weight.
- Contribution towards overall housing supply afforded substantial weight.
- Provision of extra care accommodation to alleviate pressures on the NHS afforded significant weight with minimal weight from the care bed provision
- 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 the IRC and care home afforded moderate weight.
- Release of under occupied family housing is afforded significant weight.

Conclusion

Section 6

- 6.1 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 up to 41 extra care units together with 70 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 **substantial weight** in the overall determination of this appeal.