

Appendix 1

Other material considerations



Appendix 1

Top of the Ladder (September 2013)

- 1.1 This report from DEMOS¹ was published to highlight what was considered as a chronic undersupply of appropriate housing for older people. The report highlighted the challenges facing older people in homes that were too big or ill- suited to their needs but with a lack of suitable alternatives.
- 1.2 The report set out to highlight the planning complications restricting supply against the overwhelming evidence of the growing need and lack of supply, with the wider implications on the housing market set out clearly.
- 1.3 As with other reports on this issue, the report highlighted the wider benefits for housing provision, social care etc as a result of delivering increased levels of specialist housing for older people.
- 1.4 The report specifically noted that:

“Without fully appreciating the benefits of retirement housing to individuals, the housing market and the wider economy, encouraging policy statements are made without adequate follow-through. The Government’s strategies and guidance on the need for more retirement housing remain unclear, and several bodies have made similar suggestions of ways to address this.”
- 1.5 This report therefore highlighted the disconnect between policy statements and delivery advocating a radical shift in approach to ensure physical delivery to meet the acknowledged needs. It set out the need for a clear national strategy to underline the importance of delivering an improved housing offer for older people, with an expectation that this would:

“trickle down to local level, where retirement housing schemes encounter most problems.”
- 1.6 In seeking to amend the planning system the report advocated prioritising older people’s housing as part of the overall housing market with quotas for local provision and allocating land specifically for retirement housing schemes.

¹ DEMOS refers to a cross-party think tank founded in 1993.

Building companionship: how better design can combat loneliness in later life (April 2016)

1.7 This report was prepared by DEMOS in collaboration with McCarthy & Stone to:

“better understand how loneliness can be tackled and what factors of retirement housing contribute to older people feeling less lonely and building better social networks.”

1.8 The report ultimately came up with a series of recommendations as follows:

- *“Apply a ‘city for all ages’ approach to neighbourhood planning and Local Plans, including sufficient age-appropriate housing, communal space and transport to enable older people to remain socially, physically and mentally active;*
- *Create older people’s “social agents” to encourage active citizenship among older people to encourage people to socialise and engage in activities;*
- *Recognise the health and care costs associated with loneliness and isolation in Joint Health and Wellbeing Strategies and develop commissioning strategies which might tackle this social issue as a public health challenge;*
- *Bring local businesses on board to create opportunities for older people to meet and socialise – in particular retail, hospitality and leisure;*
- *Ensure the Digital Inclusion Strategy and local schemes recognise the internet as a social vehicle and gateway;*
- *Encourage local authorities and housing schemes to develop a social media presence for older people to develop social networks;*
- *Help ensure demand for retirement housing is met – by helping older people to access retirement housing, loneliness and isolation might also be reduced; and*
- *Ensure retirement housing developments have the right design and ethos to create sociable communities, based on the evidence of good practice.”*

Housing White Paper: Fixing Our Broken Housing Market (February 2017)

1.9 The Government’s Housing White Paper in February 2017, entitled ‘Fixing our broken housing market’, also provides relevant material in relation to the direction of travel that the government considered necessary for the planning system and housing delivery.

1.10 The early chapters of the White Paper seek to address matters of certainty and delivery speed for housing, however it is Chapter 4 that is of relevance to the consideration of

this specific appeal and in particular paragraphs 4.42 to 4.44 that relate specifically to the issue of providing a better choice of accommodation for older people. The full text is copied below with emphasis.

“4.42. Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people. Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services. It will also set a clear expectation that all planning authorities should set policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. In addition, we will explore ways to stimulate the market to deliver new homes for older people.

Helping older people to move at the right time and in the right way could also help their quality of life at the same time as freeing up more homes for other buyers. However, there are many barriers to people moving out of family homes that they may have lived in for decades. There are costs, such as fees, and the moving process can be difficult. And they may have a strong emotional attachment to their home which means that where they are moving to needs to be very attractive to them and suitable for their needs over a twenty to thirty year period. There is also often a desire to be close to friends and family, so the issues are not straightforward.

The Government is committed to exploring these issues further and finding sustainable solutions to any problems that come to light. To do this we will draw on the expertise of a wide range of stakeholders including housebuilders (both specialist and mainstream); mortgage lenders; clinical commissioning groups; housing associations and local authorities; and most importantly older people and the groups that represent them. We want to build on the evidence that already exists to help deliver outcomes that are best for older people. This conversation will generate a range of ideas for incentives and other innovations for the

Government to consider: improved information and advice for older people about housing choices, including advice on adaptations; supporting custom build for older people; looking at how community living could work; as well as innovative models of housing with support available. These will sit alongside the Government commitments to fund and develop supported housing, including sheltered, step down and extra care housing, ensuring that the new supported housing funding model continues to provide the means for older people to live independently for longer while relieving pressure on the adult social care system.”

Demonstrating the Health and Social Cost-Benefits of Lifestyle Housing for Older People (October 2017)

- 1.11 This report published by Keepmoat Regeneration focussed solely on the social and health benefits arising from the delivery of specialist housing for older people.
- 1.12 The demand and supply issues identified in the report were as a result of previous research, the figures of which have been well documented in various supporting publications.
- 1.13 The report largely focussed on the benefits of such schemes in tackling loneliness and isolation as a way of promoting wellbeing of residents through living as part of a likeminded community. The supporting evidence also demonstrates that this results in reduced demand for care and dependency.
- 1.14 Similarly, the evidence provided highlights the cost savings through care efficiencies and the reduced prevalence for institutional care as a direct consequence of receiving care and support within the individuals own home.
- 1.15 The report also specifically recognises the costs savings in social care revenue and NHS funding through reduced length of stay in hospital and routine GP visits.

Unlocking the Market (November 2017)

- 1.16 This report published by DEMOS focussed on the challenges to delivering more specialist housing for older people to address the broken housing market referred to in the February 2017 housing white paper. The report set out a series of recommendations for the Government and the industry to address delivery.
- 1.17 In considering how to improve the supply the report noted that:

“There are two main barriers to supply in the current market: lack of recognition of the housing needs of older people in local plans and a planning charges regime

that renders retirement developments inherently uncompetitive against general needs housing and retail developments. The result is that retirement developers are often out-bid for land for their sites or spend excessive amounts of time and money negotiating and appealing planning decisions and/or affordable housing contributions.”

- 1.18 The report also summarises the wider benefits to the housing chain. Referring to other evidence, the report stated:

“More recent analysis of McCarthy & Stone developments by the Housing LIN (Learning and Improvement Network) found that a typical 41 unit development generated an additional 92 housing sales in the local market – showing a clear housing ‘chain effect’. When investigating a sample of 19 housing chains generated by moves into a development, the Housing LIN found 11 of the 19 generated opportunities for first time buyers, while eight generated opportunities for families with children.”²

- 1.19 The report also outlined the specific financial benefits for older people as well as wider improvements to health, social care and wellbeing as well as the associated costs savings arising from these benefits.

Housing for Older People (February 2018)

- 1.20 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.

- 1.21 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 improve the policy on housing for older people...”

- 1.22 Other key recommendations within the report were:

² The positive impact on the housing chain of moving into retirement housing in later life’, published by Housing LIN, 2017

“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.”

Transforming later lives (2018)

- 1.23 This report was prepared by Centre for Ageing Better with the strategy outlined in the introduction as follows:

“Our vision is a society where everyone enjoys their later life. By 2040, we want more people in later life to be in good health, financially secure, to have social connections and feel their lives are meaningful and purposeful. We know that people who experience all or some of these have happier later lives. We will measure and track progress on these aims to be sure that actions are making a real difference to people’s lives. Sadly, today too many people are missing out on a good later life. We believe poverty, preventable ill health and disability, loneliness and feeling undervalued must not be inevitably associated with later life. We must act today to secure a better future for present and future generations.”

- 1.24 The identified goals to be realised by 2040 were set out as to:

- *“Live healthier, more active lives, reducing the risk of poor health, delaying onset, progression and impact of disease and disability;*
- *Be in good quality work for longer, boosting savings and delaying drawing pensions;*
- *Live in safe, accessible and adaptable homes, remaining independent and active for longer; and*
- *Live in communities where social relationships flourish, making it easier to build and maintain close connections as well as wider everyday contact.”*

Government response to the Housing for Older People report (September 2018)

- 1.25 In September 2018, the Government published its response to the Communities and Local Government Select Committee report of February 2018.
- 1.26 The report confirms under the 'Housing Options' heading that the Government remain committed to the promotion of the supply and investment in extra care as a means of promoting the ability of older people to remain living safely without the need for more intrusive interventions within care homes for example.
- 1.27 The report also set to assert that the revised NPPF has been strengthened to reflect the importance of housing for older people, with the requirement that local authorities are expected to have clear policies to address the housing needs of older people amongst various groups.
- 1.28 Whilst not supportive of the view of redefining the use class order, the response reaffirmed the Government's commitment to making sure the housing market works for all parts of the community including older people. This message reaffirms the 2017 Housing White Paper.

Rightsizing: Reframing the housing offer for older people (October 2019)

- 1.29 This report published in collaboration with Manchester School of Architecture, Greater Manchester Combined Authority and Greater Manchester Ageing Hub was based on research undertaken by Manchester School of Architecture.
- 1.30 The report highlighted that:
- Just 3.4% of older people (50+) move home every year in the UK. This is half as many moves compared to the rest of the population.
 - This is despite just 7% of properties having the most basic accessible features that might enable an older person to age in place.
 - Only a small minority of moves made by older people are into specialist accommodation, even in the 70+ age cohort.

Tackling intergenerational unfairness (April 2019)

- 1.31 This report published by the Select Committee on Intergenerational Fairness and Provision was commissioned by the House of Lords to consider wider social implications of policy changes.
- 1.32 The report acknowledged written evidence from the Associated Retirement Community Operators (ARCO) that stated

“The cost of providing lower level social care in a Retirement Community has been found to be £1,222 (17.8 per cent) less per person per year than providing the same level of care in the wider community. The cost of providing higher level social care has been found to be £4,556 (26 per cent) less per person per year. NHS costs reduce by 38 per cent for those moving into Retirement Communities, an average saving of £1,114.94 per person per year. This relates to GP visits, nurse visits, and hospital visits.”

- 1.33 The report also recognised that the inconsistency of planning use class for retirement developments was considered to be a barrier to greater delivery. The report advised that the Government should issue guidance clarifying that extra care retirement communities fall within the C2 use class as they are capable of delivering high levels of care to older people and so should be treated as the same planning use class as care homes.

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

- 1.34 This report was published by the All-Party Parliamentary Group (APPG) with the aim of understanding:

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

- 1.35 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.”

- 1.36 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.”

- 1.37 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.”

- 1.38 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”³

- 1.39 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.”

A Home For The Ages: Planning for the Future with Age Friendly Design (July 2019)

- 1.40 This report was published by the Royal Institute of British Architects and Centre for Towns. The foreword sets the tone of the report stating that:

“This [is] a problem for those who face growing old in a house that is not suited to how they want to live. Moreover, people staying put for longer in unsuitable family-size homes has contributed to a supply-driven housing crisis that has excluded millions from the stability of home ownership or secure tenancy. We can no longer go on building more of the same we need to recognise the changing circumstances we face and act accordingly by mainstreaming age-friendly design considerations in our homes and the planning system.”

- 1.41 The executive summary goes on to state that:

“The data produced for this report illustrate that focussing on delivering homes for the underserved older market has the potential to free up a substantial amount of family-sized housing in this country, as well as restore some much-needed variety to a largely homogenous housing market. Older people should not feel pressured to move home if they do not want to. Nevertheless ‘rightsizing’ – encouraging people to move to a home better suited for their needs – should be supported, with a better offer of accommodation at the right size in the right location, well connected to public transport and social amenities.”

- 1.42 The report sets out a series of recommendations for both the planning and architecture systems to ensure meeting the challenge of delivering appropriate older persons housing. One of the recommendations states that:

³ <https://www.theplanner.co.uk/news/10-of-uk-councils-havehousing-policy-for-the-elderly-%E2%80%93-research>

“...the development of age-friendly housing should be incentivised through the planning system and barriers should be removed. Local authorities also have a crucial role to play in ensuring that local plans include policies specific to housing older people, alongside allocating sites for the varying types of age-friendly homes required.”

1.43 The report goes on to state that:

“The current cost to the NHS of inappropriate housing for people over 55 is estimated to be £624million per year in treatment alone. This does not account for the long-term impact that an accident in the home can have, with the likely long-term ramifications of an accident becoming more significant the older the person involved. Projecting out over the next twenty years, this cost is likely to rise significantly to nearly £1billion per year by 2041.”

1.44 The report then highlights that:

“The inadequate provision of age-friendly housing is also being felt by a new generation of younger families that cannot access adequate family-sized homes. Our survey data revealed large swathes of family sized homes would be freed up if there was a more attractive offer to potential downsizers.”

1.45 When considering the planning barriers, the report specifically states that:

“Ultimately, assessments of policies specifically concerned with older people in local plans in England revealed the continued inadequacy of planning for and monitoring the amount of age-friendly housing being built. The government needs to recognise this and remove the barriers that are currently impacting on greater delivery.”

Healthier and Happier: An analysis of the fiscal and wellbeing benefits of building more homes for later living (September 2019)

1.46 This was a report by WPI Strategy for Homes for Later Living. The executive summary notes from the research that:

- *“Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.*
- *Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.*

- *On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.”*

Planning for Retirement: How Retirement Communities can help meet the needs of our ageing population (June 2020)

1.47 This report was jointly commissioned by the County Councils Network and ARCO to look at ways to incentivise and accelerate the development of retirement communities.

1.48 The report opens with the comment that:

“People are living longer – 10.2 million people aged over 65 currently live in England, and the number of people aged over 75 is projected to double in the next 30 years. The country faces a rising tide of need, as people live longer but spend more of those years in ill-health, often with multiple conditions which impacts on their independence and quality of life.”

1.49 The foreword states:

“The proportion of households where the oldest person is 85 or over will grow faster than for any other age group – by 2037 there are projected to be 1.42 million more such households in England.”

1.50 The report considered how the provision of retirement communities across the UK compares to similar countries internationally and noted that:

“Currently only 0.6% of over 65s in the UK live in Retirement Communities offering care and support, about a tenth of the level on offer in similar countries, with New Zealand and Australia being closer to 6%.”

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

1.51 This report was prepared by CASS Business School and the Centre for the Study of Financial Innovation in conjunction with ARCO. The foreword to the report noted that:

“High-quality retirement housing has a crucial role to play in tackling the urgent housing, health and social care challenges facing us” and “Retirement communities cut GP visits, reduce time in hospital and save billions for health and social care services.”

1.52 The preface states that:

“Despite the demographic imperative – adding 180,000 65+ households each year – the building of homes for the retirement market peaked before 1990 and has fallen precipitously since then. In the past decade, little more than 7,000 units have been built each year, on average, and the stock of 750,000 is well under 3% of the UK total. The shortfall is shocking.”

- 1.53 The report considers the impacts of under occupation amongst the over 65 age group, with it noting that:

“The research identifies an almost doubling in the number of surplus bedrooms in the older population from 6.6m to 12.8m between 2000 and 2040.”

- 1.54 When looking at the value of retirement communities the report notes:

“We are seeing an increase in choice of occupancy – including ownership, part ownership and leasing – among people who have housing or other wealth to spend...Even so, a big expansion in housing better suited to older people is long overdue and the progress made in recent years has barely scratched the surface.”

- 1.55 The report then continues, noting that:

“Age-related housing still accounts for only a small fraction of total house building. UK-wide, 3.3m new homes have been completed since 2000, of which retirement housing only makes up about 2%. Given the pace of growth in the older population and the increasing under-occupation of homes, this highlights the gap in supply. Clearly, much more needs to be done.”

- 1.56 In considering how to make a difference the report sets out that:

“Significant changes are needed in the type of housing available. Greater access to care will be a priority for the growing ageing population, which could imply a shift towards more collective living with integrated services and access to healthcare and shops.”

- 1.57 Within the conclusions it is notable that the report states that:

“The dangers of doing nothing are highlighted by two examples. The first is the increasing logistical problem of delivering health and social care to scattered elderly populations living in unsuitable accommodation. Over the next 20 years, the population aged 65+ is forecast to rise by 41% to 17.7m; of these about 3.2m will be aged 85+, of whom 1.9m are likely to live alone. If more people lived in

retirement communities, there would be a boost to health and wellbeing, as well as savings in the cost of health and social care.”

Chain Reaction – The positive impact of retirement housing on generational divide and first-time buyers (August 2020)

- 1.58 This is a report prepared by WPI Strategy on behalf of Homes for Later Living. In the foreword by Damian Green MP, he notes that:

“For older people, specialist developments can be the key to a happy and healthy retirement. During the pandemic, specialist retirement housing kept many older people safe, with residents better protected against COVID-19 than in wider society. And with residents less likely to be admitted to hospital and require further care than people in mainstream housing, we have seen how this type of accommodation can generate fiscal savings to the NHS and social care services.”

- 1.59 He then went on further to comment that:

“A significant number of people over the age of 65 would like to downsize into more suitable accommodation, yet they are unable to do so. This causes a bottleneck in the housing market that ripples down to first time buyers who are prevented from becoming part of the property-owning democracy. Without action now, with an ageing society, the problem is only set to get more acute across the UK...By incentivising the building of more new retirement properties, we can take a step towards unblocking the housing market and ultimately help first-time buyers onto the ladder. At the same time, we would make progress towards ensuring that more vulnerable older people are happier, healthier and better protected against future pandemics. As we emerge from the shadow of coronavirus, that would be a much-needed win-win for both baby boomers and millennials.”

- 1.60 Most telling in the report are the conclusions that are reached. One of these being that:

“The Government should set an explicit target of completing 30,000 retirement properties a year to meet the demand for this kind of housing. But a focus on development should not be the full extent of any policy response to the issues we have raised. Rather, any meaningful political action needs to knock down the barriers holding the older generation back from downsizing and ensure that moving home in old age is encouraged.”

- 1.61 This outlines the scale of the need and the challenge, noting that this would correlate to 10% of the annual housing delivery target set by the Government to address the housing crisis.

Ageing: Science, Technology and Healthy Living (January 2021)

- 1.62 This report, published by the House of Lords Science and Technology Select Committee, had a far-reaching remit to consider the implications of an ageing population and how science and technology can contribute towards healthy living.

- 1.63 The report recognised at paragraph 33 noting that:

“The most common mental health conditions in England are depression and anxiety, with nearly half of adults over the age of 55 saying they have experienced depression, and a similar number for anxiety.” The report referenced work by Dr Chris Blackmore and states that “living alone, which is more prevalent for older people, seems to double your chance of experiencing a common mental health issue.”

- 1.64 The issue of loneliness had been addressed by the Centre for Ageing Better, the NHS and Age UK recognising that:

“Older people may be particularly vulnerable to loneliness, due to factors such as increased frailty, disability, and the deaths of spouses and friends.”

- 1.65 This is a factor that has been considered at government level through the publication of the Loneliness Strategy in 2018.

What we want: Future-proofing retirement housing in England (February 2021)

- 1.66 This report, published by the ILC in partnership with various specialist providers in the sector, provides an insight into the future need position as well as considering matters of affordability and a move towards promoting the benefits of moving into specialist accommodation for older people.

- 1.67 Within the executive summary it sets out that:

“The retirement community sector will need substantial growth over the next 20 years just to keep up with age-related growth; with respect to those aged 65+ in England, this means a boost of 37.3% by 2040. Progress should also be urgently made, with an 8.8% increase by 2025 to keep up with trends” (my emphasis).

- 1.68 This echoes the comments in the PPG where it refers to the provision as being critical.

1.69 It then goes on to note that:

“There will need to be a nearly 10% increase in most English regions in the next five years alone. London will see the largest growth over the next 20 years, requiring one additional property for every two just to keep up.”

1.70 This was set out within the main report at table 8 as represented below:

	2020	2025	2030	2035	2040
North East	360,260	8.3%	18.1%	25.1%	27.8%
North West	928,276	7.7%	17.6%	25.8%	30.4%
Yorkshire & Humber	689,253	8.0%	18.0%	26.6%	31.6%
East Midlands	622,809	9.3%	20.9%	30.9%	37.3%
West Midlands	731,158	7.1%	16.5%	25.2%	30.9%
East of England	819,034	9.0%	20.7%	31.5%	39.5%
London	723,222	10.9%	25.3%	40.0%	53.2%
South East	1,178,729	9.6%	22.0%	33.1%	41.5%
South West	825,775	9.4%	21%	31%	37.4%

Source: Table 8 of the ILC report (February 2021)

1.71 This demonstrates the extent to which the sector needs to grow over the next 5 and 20 years.

1.72 The report draws on previous research undertaken by ProMatura International on behalf of ARCO, which has been summarised to include the following:

- The average age of residents was nearly 83 years old, and 83% of residents were aged 75+.
- Around 69% of residents were female.
- Around 68% of residents lived alone.

1.73 Importantly in regard to demand modelling, the report states that:

“It is undeniable that planning for future specialist housing is a complex exercise, so such existing tools to help in this process are invaluable. At the same time, all modelling faces specific challenges and limitations, some of which can be improved and adjusted through further refinement. Yet no model can be 100% accurate, and all kinds of forecasting have been severely disrupted by the impact of the coronavirus pandemic.”

1.74 The report therefore highlights that prior to the coronavirus pandemic there is no accurate single method to modelling demand, with a specific recognition that the effects of the coronavirus pandemic will make such modelling more complex moving forward.

- 1.75 The report goes on to confirm that the rate of growth in retirement housing is significant over a 20-year period, broken down by specific age groups.

	ProMatura Rates	2025	2030	2035	2040
65-69	5.2%	0.5%	1.0%	1.6%	1.9%
70-74	11.3%	1.0%	2.3%	3.4%	4.2%
75-79	18.6%	1.6%	3.7%	5.6%	6.9%
80-84	24.7%	2.2%	5.0%	7.5%	9.2%
85-89	24.7%	2.2%	5.0%	7.5%	9.2%
90+	15.5%	1.4%	3.1%	4.7%	5.8%
Total	100.0%	8.8%	20.2%	30.3%	37.3%

Source: Table 3 of the ILC report (February 2021)

- 1.76 In the final chapter of the report, it considers three potential scenarios for the provision of specialist housing for older people, which are:

- Scenario 1: Steady as she goes – Demand like before;
- Scenario 2: Winding down – Demand declines; and
- Scenario 3: Boom times – Demand accelerates.

- 1.77 In all scenarios the report has considered the implications of the approach and then factored in separately the impacts of coronavirus given the likely impacts in the short term at least.

Future options for housing and care: Improving housing that facilitates care and support for older people (February 2021)

- 1.78 This report by Social Care Institute for Excellence is the first in the series for the Commission on the Role of Housing in the Future of Care and Support launched in October 2020.

- 1.79 The foreword states that:

“The primary focus of this Commission will be on how we develop alternative models (including innovative models in relation to care homes); some of which already exist, but others may need to be developed. The Commission will concentrate on the needs of people over the age of 65...”

- 1.80 It includes a quote from the British Property Federation from 2020 which noted that:

“Our ageing population will increase demand for specialist housing. Construction rates will need to be five- or six-times current rates to ensure the UK makes adequate improvements in penetration rates for housing with care.”

- 1.81 This of course links in with the message from the recent ILC reported quoted above.

1.82 The report identifies the key features that will have a bearing on the future demand discussions, which include:

- Providing accommodation in the right place;
- Promoting independence;
- Promoting person-centred and relationship-centred schemes;
- Designing schemes based on individual strengths not limitations; and
- Enabling choice and control for housing options.

1.83 The report goes on to outline the requirements to ensure that the vision is realised, including:

- Dramatically increasing the supply of housing that facilitates care and support provision;
- Increasing the range of housing that facilitates care and support options;
- Ensuring suitable housing that facilitates care and support options for all;
- Encouraging innovative and successful models to grow;
- Putting the power into the hands of the consumer; and
- Enabling providers to seek out, explore and innovate.

1.84 What is key to note is that this report recognises that if the ARCO aim to ensure that 250,000 people can be accommodated within retirement communities this can deliver:

“A turnover of £70 billion and release over 562,500 bedrooms into the general housing market.”

Silver saviours for the high street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing (February 2021)

1.85 This was a report by WPI Strategy for Homes for Later Living. The executive summary notes that:

- *“For just one retirement development of roughly 45 units, a local authority could expect to see benefits of 85 construction jobs for the duration of the build, as well as six permanent jobs and £13m in GVA over the lifetime of the development, as opposed to not developing a site.*
- *These benefits mean that retirement properties create more local economic value and more local jobs than any other type of residential development.*
- *People living in each retirement development generate £550,000 of spending per year, £347,000 of which is spent on the local high street. Some £225,000*

of this is new spending in the local authority, directly contributing to keeping local shops open.

- *From these figures, we estimate that a typical retirement housing development has the potential to support more than three local retail jobs. Over the lifetime of the development, a typical development would contribute £2.25m of GVA to the high street.”*

1.86 It then went on to note that if building 30,000 such retirement properties annual it would mean

- *“£2bn of additional economic activity every year would be created across the country. This is £20bn over 10 years, roughly equivalent to 1% of current UK GDP over 10 years, focussed where it is most needed, on our high streets.*
- *15,000 additional construction jobs would be created nationally and sustained over the period of construction. A further 700 jobs a year would come from management and renovation of properties freed up.*
- *Greenfield land across the UK could be preserved as the vast majority of these developments are on brownfield sites, effectively and sustainably regenerating previously developed land.”*

Unlocking the retirement opportunity in a post-pandemic world (April 2021)

1.87 This report was prepared by Octopus Real Estate to review the current provision and opportunities for the delivery of retirement communities. In the foreword it states:

“At present, fewer than 1% of UK retirees live in retirement communities. This compares with around 6% of populations living in retirement communities in the US and Australasia...If we can replicate the growth of more mature markets, as I believe we will, the UK’s retirement community sector has the potential to be a significant market, delivering benefits to millions of retirees while providing social and economic gains.”

1.88 The research undertaken in this report notes that:

“More than one in four of homeowners aged over 65 surveyed would “definitely or maybe [be] likely to move to a retirement community”, after being shown the lifestyle and facilities on offer – based on the latest population numbers for over-65s, this already equates to more than 2.5 million people potentially wanting a retirement community home.”

House of Commons debate: Covid-19: Effect on Retirement Communities (July 2021)

- 1.89 This debate focussed on the impacts of Covid-19 across the retirement sector. Jim Shannon MP stated:

“There is clearly a shortage of specialist housing for older people. Again, this is not the Minister’s responsibility but that of her colleague. However, the Library briefing outlined three things needed for specialist housing for older people: sector-specific legislation, which we need to see in place; clarity in the planning system, because it is not about building houses all over the place but about having the right kind of housing in the planning system; and funding options for affordable housing-with-care provision. We need to get those things right, and there is a reason for doing so. It is quite simple: the UK’s population is ageing, and people are living longer.”

- 1.90 Karen Bradley MP followed by stating that:

“There is a real opportunity to use this kind of facility [housing with care] to assist with the housing crisis and bring it into the debate about the housing crisis. One of the operators told me that every night there are 20 million spare bedrooms in homes of elderly people who are living in the old family home but have not yet downsized. Twenty million spare bedrooms a night goes a long way to tackling affordable housing needs in certain parts of the country. That has to be part of the agenda and discussion.”

- 1.91 Liz Kendall MP then noted that:

“Around 75,000 people live in such communities in the UK. Around 40% of residents are under 80 years old; almost half are between 80 and 90; and 15% are over 90.”

- 1.92 She went on to state that:

“The benefits for the health of people living in retirement communities have been known about for quite a while. We know that older people in housing with care have higher exercise levels and fewer falls, and are less likely overall to suffer from anxiety and depression. That benefits not just them as individuals but the rest of the health and care system. Research has shown that those living in retirement communities are less likely to go into hospital and have fewer GP and nurse visits than comparable age groups. Indeed, some evidence suggests that the overall use of the NHS is about 30% to 40% less. That is really important not just because

the people living there have better health but because there is a better use of taxpayer money. The health benefits of retirement communities are just one of many reasons why Labour is calling for an expansion of housing with care options in the future as part of our wider proposals to transform social care.”

1.93 Finally, she noted that:

“If we are to expand the options, three things need to happen. First, we need a clearly defined category of housing with care in the planning system, as the Housing, Communities and Local Government Committee, and the sector itself, have recommended. It is currently much harder to build housing with care properties than care homes due to a lack of definition in the planning system. It was a real missed opportunity when the Government did not include that specific definition in their “Planning for the Future” White Paper and the legislation. They need to think again... Secondly, we need—the sector itself is calling for this—sector-specific legislation and regulation for housing with care...Thirdly, the Government need to seriously look at how we ensure that housing with care is an option for all older people, regardless of their means or housing wealth...”

1.94 The Minister for Care, Helen Whately MP, replied:

“Sheltered retirement extra care housing provides a home to hundreds of thousands of—often vulnerable—older people across the country. Having the right housing options helps older people stay independent for longer, continuing to live as part of a wider community in their own home, with the care they need close at hand when needed, but still—as so many of us want for as long as we possibly can—living behind their own front door...with their own furniture, for instance. These things make a difference to someone’s quality of life.”

1.95 She went on stating:

“We know that living in a home that is safe, so that it allows someone to keep living independently, not only improves someone’s quality of life but helps to prevent them from having an early admission to hospital and helps them to be transferred back out of hospital to go home. For many people, it can mean that they may never need to move into a residential care home setting, or at least delay it. However, we should all be clear that care homes and nursing homes are an important part of the mix of accommodation, and there is absolutely a time and a place when that setting is the right thing for people.”

1.96 She concluded noting that:

“I think that we are in agreement in this debate that we need to do more and we need to increase the supply of retirement housing and extra care housing and have a broad range of the kind of housing that helps people to live with their own front door—in their own home—for longer. Therefore, I am working with MHCLG Ministers, and my officials are working with those officials, on how we can best achieve that. We are working across Government and also working with stakeholders, with the sector, on how we can achieve it.”

The Housing with Care Grey Paper (2021)

1.97 This report brings together ideas and recommendations for government policy relating to housing and care for older people. It reflects the views of politicians, the housing with care sector, and individual experts in the field on a range of topics.

1.98 All of the responses acknowledge the ageing population, the particular challenges that have been brought about by Covid-19 and the real need for a change in rhetoric to see greater delivery rather than just words.

Putting the ‘care’ in Housing-with-Care (November 2021)

1.99 This report was produced by ARCO to:

“Analyse the quality, efficiency and benefits of social care provided by Integrated Retirement Community operators in the UK.”

1.100 The report looked at how IRCs deliver care effectively reducing the number of care hours needed whilst also delivering significant improvements to health and wellbeing for residents.

An IRC in Every Town (2023)

1.101 This document was prepared by ARCO as a manifesto to seek greater delivery of IRCs, identifying the three key areas (affordability, planning, and consumer confidence) that they felt necessary to tackle to address increased provision.

1.102 When considering the benefits of such schemes the report noted:

“The benefits of community to older people have been understood for centuries. For example, alms-houses have existed in the UK for over 500 years and a recent study once again underlined their success in boosting longevity among those from poorer backgrounds.”

1.103 The conclusion noted:

- *“IRCs are a proven way to transform – and reimagine – late old age.*
- *Other countries have grasped the opportunity of IRCs, but the UK has not and it is older people themselves who have paid the cost.*
- *Everyone should have the option of living in an IRC and securing the benefits of improved wellbeing, reduced loneliness and reduced need for health and social care services.”*

1.104 This was then followed up by ‘An IRC in Every Borough’ In February 2024 with a very similar message.

Creating homes we want to grow old in: A 15-point plan from the Housing and Ageing Alliance (March 2024)

1.105 This report was a manifesto for the government elections in 2024 establishing what the Housing and Ageing Alliance wanted to see to ensure increased delivery of age-appropriate housing. The 15 points were:

- “A national older people's housing strategy should be developed by central government.*
- Older people should have access to independent information, advice and advocacy around housing and care options in later life.*
- Government should establish a Cabinet-level Minister for older people and ageing.*
- An Older People and Ageing Commissioner should be appointed.*
- Local authorities should develop older people's housing strategies that map existing housing for older people across all types and tenures, its availability and condition, and where there are notable gaps.*
- All older people should have the right to access practical, affordable housing repair and adaptation services.*
- Government should stimulate a greater range of financial products and develop a strategy to encourage homeowners and landlords to invest in improving, maintaining and adapting homes.*
- There should be a radical improvement in the speed and efficiency of Disabled Facilities Grant delivery and government should consult on the means test, upper limit and funding allocation.*

- ix. *Local and national planning guidance should increase the supply of housing for older people, including a requirement to assess and then plan for specialist housing for older people across all types and tenures in Local Plans, and encourage delivery.*
- x. *The National Planning Policy Framework should have stronger direction on older people's housing, including affordable housing, and age-friendly communities.*
- xi. *Government should implement without delay its commitment to increase accessibility standards of new homes.*
- xii. *Homes England investment in all supported housing should expand, with a minimum of 10% of its grant programme to be for older people's housing.*
- xiii. *Planning for specialist homes should encourage common spaces in new-build developments, tackling isolation.*
- xiv. *Research is needed to tackle the issues and barriers to extending shared ownership for older people in mainstream and specialist homes.*
- xv. *Government and local authorities should engage with the recommendations of the TAPPI Inquiry and Smarter Homes for Independent Living to increase access to technological solutions."*

Appendix 2

Elderly Persons Needs Assessment



Elderly Persons Needs Assessment

Secondary title

Elderly Persons Needs Assessment

Appeal against refusal of outline planning permission (access to be considered, all other matters reserved) – erection of care village comprising 66 bedroom care home (c2 use), 37 no. Extra care bungalows (c2 use), 3 no. Almshouses (c3), management office (e(g)(i) use), club house, community growing area, orchard, community bee hives and open space provision

Land at School Road, Elmswell, IP30 9NL

CHRISTCHURCH LAND & ESTATES (ELMSWELL SOUTH) LIMITED

August 2025

PINS REF: APP/W3520/W/25/3364061

LPA REF: DC/21/05651

OUR REF: 0210.02.RPT

TETLOW KING PLANNING
FIRST FLOOR, 32 HIGH STREET, WEST MALLING, KENT ME19 6QR
Tel: 01732 870988 Email: info@tetlow-king.co.uk

www.tetlow-king.co.uk

Contents

Section 1	Local Assessment	1
Section 2	Review of Methodologies	3
Section 3	Existing Specialist Provision	14
Section 4	Needs Assessment	18
Section 5	Alternative Growth Scenarios	25
Section 6	Conclusion on Need	28

Appendices

Appendix 1	POPPI data
Appendix 2	Close and Extra care provision
Appendix 3	Personal care provision
Appendix 4	Nursing care provision

Tables

Table 2.1	Summary of alternative needs modelling (per 1,000 population aged 75+).
Table 3.1	Current Supply of Extra Care and Close Care units
Table 3.2	Current Supply of Personal Care and Nursing Care beds
Table 3.3	Pipeline Supply of Care beds
Table 4.1	Percentage of Population Aged 65+ by Tenure for Mid Suffolk.
Table 4.2	Population Aged 65+ between 2023 and 2035.
Table 4.3	Population Aged 65+ between 2020 and 2040 as real growth and % change.
Table 4.4	Population Aged 65+ between 2023 and 2027.
Table 4.5	Indicative Levels of Extra Care Housing for Older People, for Mid Suffolk.
Table 4.6	Projected Levels of Provision of Extra Care Housing for Older People 2023-2040, for Mid Suffolk.
Table 4.7	Cumulative Projected Levels of Need up to 2040, for Mid Suffolk.
Table 4.8	Cumulative Projected Levels of Need up to 2027, for Mid Suffolk.
Table 4.9	Projected Levels of Provision of Leasehold Extra Care for Older People 65-74 between 2023-2040, for Mid Suffolk.
Table 4.10	Projected Levels of Provision of Leasehold Extra Care for Older People 65-74 between 2020-2040 by tenure, for Mid Suffolk.
Table 4.11	Cumulative Projected Levels of Need up to 2040, for Mid Suffolk.
Table 4.12	Cumulative Projected Levels of Need up to 2027, for Mid Suffolk.
Table 4.13	Indicative Levels of Care Bed provision, for Mid Suffolk.
Table 4.14	Projected Levels of Provision of Various Forms of Accommodation for Older People 2023-2040, for Mid Suffolk.
Table 4.15	Cumulative Projected Levels of Need up to 2040, for Mid Suffolk.
Table 4.16	Cumulative Projected Levels of Need up to 2027, for Mid Suffolk.
Table 5.1	Cumulative Projected Levels of Need for leasehold extra care up to 2040, for Mid Suffolk adopting a ratio of 45 per 1,000 over 75.

Table 5.2	Cumulative Projected Levels of Need for leasehold extra care up to 2040, for Mid Suffolk adopting a ratio of 60 per 1,000 over 75.
Table 5.3	Cumulative Projected Levels of Need for leasehold extra care up to 2040, for Mid Suffolk adopting a ratio of 90 per 1,000 over 75.
Table 5.4	Care home bed demand.
Table 6.1	Overall demand for specialist accommodation between 2023 and 2040 for Mid Suffolk
Table 6.2	Overall demand for specialist accommodation between 2023 and 2027 for Mid Suffolk.

Figures

Figure 4.1	Population Change between 2023 and 2040.
Figure 4.2	Population Change between 2023 and 2027.

Local Assessment

Section 1

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

Strategic Housing Market Assessment (2017)

- 1.3 Chapter 6 of the 2017 assessment (Volume 2) [[CD 7/2](#)] considered the need of different housing groups with Housing for Older People, although it is Appendix 6 where the individual requirements are noted. Table 6.2e provides the details for specialist housing accommodation (excluding care homes) through to 2036 as replicated below:

Type of specialist accommodation	Current profile	Profile 2036	Additional units required
Sheltered housing	874	1,629	755
Enhanced sheltered housing	29	102	73
Extracare housing	68.0	244	176
Total	971	1,976	1,005

(Source: Table 6.2e, Appendix 6, SHMA 2017 Volume 2)

- 1.4 The supporting text to justify the future requirements notes:

“The actual numbers and type of specialist accommodation needed may depend on changes in patterns of demand and expectations and it is also recognised that Suffolk County Council are developing further accommodation typologies to best respond to future care needs, however it is suitable to plan towards this target currently with the acknowledgement that the form of accommodation delivered should not be too prescriptive.”

- 1.5 In respect of care home provision, it notes:

“As well as the need for specialist housing for older people there will also be an additional requirement for Registered Care (nursing and residential care homes). According to the Strategic Housing for Older People tool there are around 666 spaces in nursing and residential care homes Mid Suffolk currently. Presuming the occupation rate proposed by the County Council is continued forward, the data

indicates there will be a requirement from 1,670 people in Mid Suffolk in 2036, suggesting an additional 1,004 spaces will be required over the next 22 years. This additional accommodation is required to meet the future institutional population and therefore does not form part of the new housing to meet the Objectively Assessed Need.”

- 1.6 Whilst the SHMA was updated in 2019 no further figures were provided relating to Housing for Older People.

Review of Methodologies

Section 2

National Approach

- 2.1 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)

- 2.2 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.
- 2.3 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...*”
- 2.4 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)

2.5 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.

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

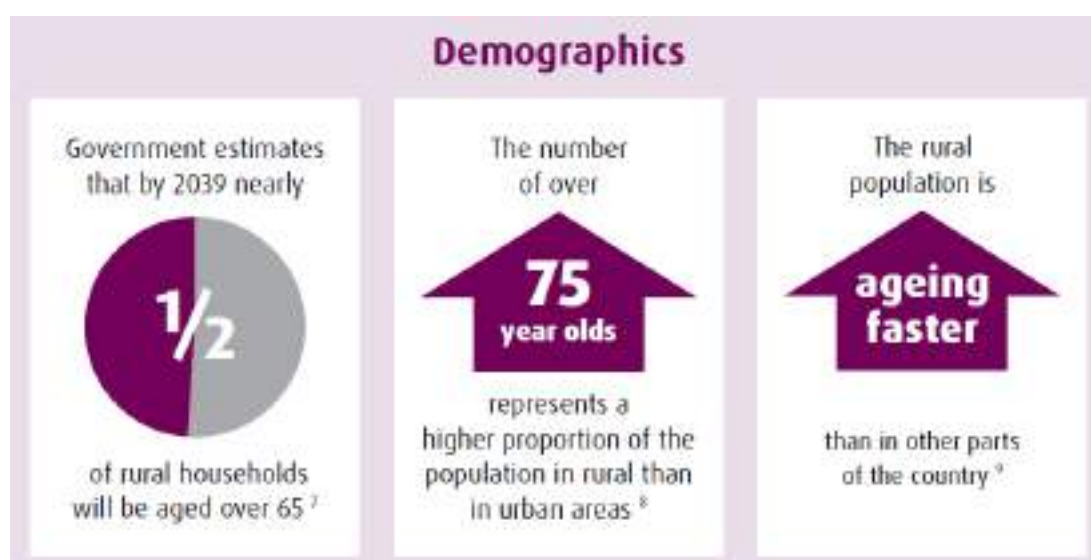
“Our underlying concern is with the growing numbers of older people in rural communities who will face a huge challenge to their independence and wellbeing if their homes are no longer suitable... Our recommendations, therefore, seek to remove the barriers to more and better homes for the ageing population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

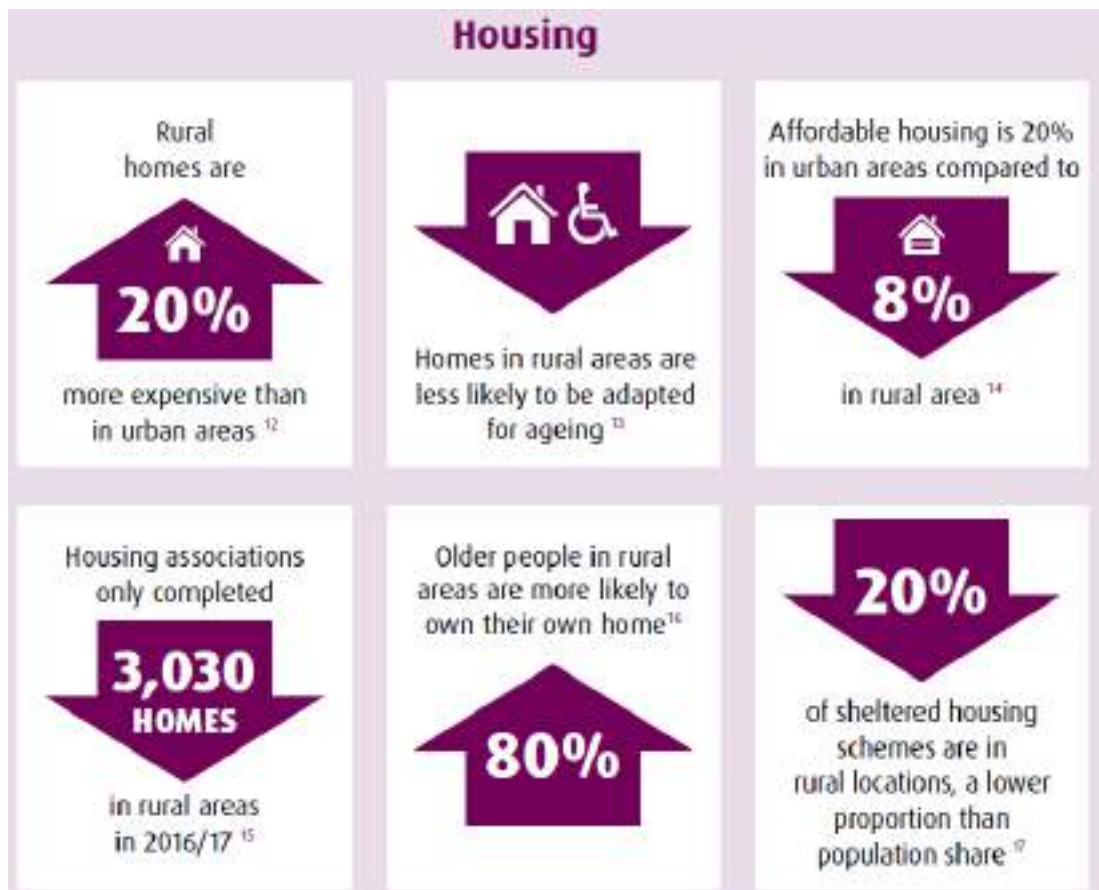
2.7 The 2018 report reflected on the previous report ‘Housing our Ageing Population: Positive Ideas’ from 2016, noting that:

“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.”

2.8 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.”





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

2.10 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.”*

2.11 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)

2.12 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.”

2.13 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.”

2.14 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.”

2.15 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.”

2.16 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.”

- 2.17 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)

- 2.18 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.
- 2.19 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).
- 2.20 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.
- 2.21 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

- 2.22 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.
- 2.23 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.”

2.24 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 year¹. 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.”

2.25 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.”

2.26 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.”

2.27 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.

2.28 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:

¹ 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.”

- 2.29 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.”

- 2.30 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.”

2.31 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.”

2.32 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.

Local Level

2.33 At present there is no standardised methodology used to calculate future demand for extra 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.

- 2.34 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.
- 2.35 The other factor to consider is the role of extra care housing within the older persons housing market. This is still a relatively new form of specialist provision and sits between the traditional sheltered housing and care home options. The level of provision can therefore be varied depending on whether the aim is purely to meet a specific need, or if it is to consider providing a choice away from either of the more traditional forms of specialist housing.
- 2.36 The final factor locally to consider is any accommodation that no longer meets the industry standard, that being single level fully accessible units as opposed to any studio accommodation, maisonettes or units lacking wet room provision and the ability to retreat to ground floor living alone.
- 2.37 Historically provision of extra care accommodation has favoured the social housing sector and has failed to keep pace with the tenure preferences of older persons, with local planning authorities reliant on market position statements prepared by the commissioning authorities who only have a statutory requirement to meet social housing demands and therefore provide limited support or evidence for private sector provision.

Alternative Methodologies

- 2.38 As outlined previously, 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.
- 2.39 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.
- 2.40 Housing in Later Life places a greater emphasis on the need to provide for Extra Care housing than its predecessor, More Choice Greater Voice, as such Housing in Later

Life sets a benchmark for the provision of Extra Care units, equating to a prevalence rate of 45 units per 1,000 people aged 75+ (or 4.5% of that age cohort). This compares with a prevalence rate of 25 units per 1,000 people within More Choice Greater Voice as well as the revised @SHOP toolkit in 2013.

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

Table 2.1: 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

- 2.42 The matter of choosing the appropriate provision rates for extra care accommodation was debated at length in the context of a recent section 78 planning appeal for a continuing care retirement community care village of up to 133 units². In that appeal the Inspector noted the following key paragraphs:

“38. Mr Appleton sets out a provision rate for private extra care of 30 per 1,000 of the 75 and over population in the District based on a total provision of 45 extra care units per 1,000 (4.5%) across both the affordable and private sectors, but split on a ratio of one third for social rented and two thirds for sale. This takes into consideration the research in “More Choice: Greater Voice” and revisions in “Housing in Later Life”. I note that the 45 units per 1,000 is to be divided as suggested in order to bring supply into closer alignment with tenure choice among older people.”

“40. In my view, there is a strong case that Mr Appleton’s 45 per 1,000 overall, with 30 per 1,000 to market extra care, should be far more ambitious given not only the true tenure split in the District but also what it could mean for the ability to contribute towards addressing the housing crisis. Mrs Smith conceded that the figure of 30 per 1,000 was hardly ambitious and, if anything, was underplaying the scale of the potential need.”

“44. But the fact is it [@SHOP tool] only provides a figure based on existing prevalence and then seeks to project that forward with a proportion increase based on the increase in the 75+ age group in the District. This is not a measure of need.”

² APP/Q3115/W/20/3265861

2.43 This same topic has also been discussed in the context of a previous appeal for a development of 222 units of care accommodation³. In that appeal the Inspector noted at paragraph 76 that:

“The prevalence rates for extra care and enhanced sheltered together, as defined by the Council are as follows:

- *SHOP@ 45 per 1000 people over 75; and*
- *Housing in Later Life/SHOP: 65 per 1000 people over 75”*

2.44 The Inspector then noted at paragraph 77 that:

“This is a significant difference which makes a considerable variation to the overall assessment of need.”

2.45 Moreover, in this appeal it is also notable that the inspector then went on to state at paragraph 77 that:

“I am conscious that these prevalence rates do not take into account that there may be those in the age cohort 65-74 years of age who also require Housing with Care. In my view it would be unsafe to assume that those in that age bracket would not need appropriate housing for their care needs.”

2.46 This approach to including the need for those aged 65-74 was subsequently endorsed by the Inspector in the Epsom General Hospital decision⁴ at paragraph 104, where he considered the Walton-on-Thames decision and stated that he shared the same view on need.

2.47 These appeals therefore illustrate that there is a significant range in need identified through the various approaches but that even the higher figures should be more ambitious.

2.48 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.

³ APP/K3605/W/20/3263347

⁴ APP/P3610/W/21/3272074

Existing Specialist Provision

Section 3

Supply of Extra Care Accommodation

- 3.1 A search of the Elderly Accommodation Counsel's website (<https://housingcare.org/>) has been carried out to establish the accommodation currently available for older people within Mid Suffolk.
- 3.2 For the purposes of this assessment, we have only considered those schemes classified as extra care or close care have and not sought to include those listed as sheltered or retirement housing as they provide different levels of on-site care and support. Any scheme defined as close care has been included due to the similarities in provision.

Table 3.1: Current Supply of Extra Care and Close Care units

Location	Accommodation size	Tenure
Extra Care		
MERE VIEW COURT	32 flats	Shared Ownership
MICHAELMAS COURT	54 flats and bungalows	Social Rent & Shared Ownership
STEEPLE VIEW	36 flats	Social Rent
Close Care		
FINBOROUGH COURT	28 flats and bungalows	Social Rent
UVEDALE COURT	20 flats	Leasehold

(Source: <https://housingcare.org/>)

- 3.3 Across the 5 schemes there are a total of 122 extra care units and 48 close care units (the full details of the sites are included as [Appendix 2](#)).
- 3.4 All but 1 of the schemes operates in the social rent or shared ownership sector, meaning at present there are only 20 units available through leasehold.
- 3.5 Mid Suffolk council's online planning register enables you to search for planning applications by specific word reference. Using the terms 'extra care', 'close care' 'retirement village,' and 'integrated retirement community' no additional schemes have been identified.

Supply of Care Home bed spaces

- 3.6 A search of the EAC website was also used to identify the provision of care homes within Mid Suffolk, either with or without nursing care.

- 3.7 For the purposes of this assessment, any registered care homes providing services to under 65s as registered with the CQC have been excluded from the identified supply due to conflict with the purposes of the assessment.

Table 3.2: Current Supply of Personal Care and Nursing Care beds

Care Scheme	Max. no of rooms	Single rooms	No. of en-suites
Personal Care			
BARHAM CARE CENTRE*	22	21	16
CEDRUS HOUSE*	35	35	35
CHILTON COURT RESIDENTIAL HOME	47	47	47
FINBOROUGH COURT	22	20	20
HARTISMERE PLACE*	30	30	30
HILLCROFT HOUSE	43	43	43
THE LIMES RETIREMENT HOME	26	22	24
THURLESTON RESIDENTIAL HOME	37	37	13
UVEDALE HALL RESIDENTIAL HOME	29	18	29
WESTHORPE HALL	21	15	9
WOODFIELD COURT RESIDENTIAL HOME	29	29	29
YAXLEY HOUSE RESIDENTIAL HOME	34	32	32
Nursing Care			
BARHAM CARE CENTRE*	21	21	16
BARKING HALL NURSING HOME	49	41	41
BAYLHAM CARE CENTRE	55	55	55
CEDRUS HOUSE*	35	35	35
CHILTON MEADOWS CARE HOME	120	120	
DEPPERHAUGH, THE	30	12	21
HARTISMERE PLACE*	30	30	30
STOWLANGTOFT HALL NURSING HOME	44	28	

(Source: <https://housingcare.org/>)

- 3.8 There are 3 care homes (those in red in the above table) operating as both personal and nursing care such that the beds have been assumed as a 50:50 split for the purposes of this assessment as no clarity is available as to the actual split that would be available. Theoretically they could operate entirely for personal care or nursing care, hence adopting an even split appears to be the most appropriate means of assessing provision.
- 3.9 Across the 17 care homes there are a total of 759 care home beds, 375 beds provided for personal care and 384 provided as nursing care (the full details of the sites are included as [Appendix 3](#) and [4](#)).
- 3.10 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. The provision of en-suite single occupancy bedrooms was set out as an industry standard in the 2002 National Minimum Standards for Care Homes for Older People published by the Department of Health, albeit that these standards are no longer in place.

- 3.11 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.
- 3.12 When only considering the supply of single occupancy en-suite accommodation the supply is reduced to 327 beds for personal care and 346 for nursing care.
- 3.13 As with the extra care assessment, the council's online planning register has been used to review pipeline supply for schemes with a review assessing applications submitted or approved within the last 5 years to allow for determination and implementation up to the present day. The pipeline supply only considers care homes providing accommodation for older people and therefore excludes children's care homes and those providing accommodation for residents with mild learning disabilities.
- 3.14 A search of the register has identified a total of 6 care home applications over the last 5 years that have been considered, or subject of current applications.

Table 3.3: Pipeline Supply of Care beds

Location	Accommodation type	Application ref
Truckeast Limited Violet Hill Road Stowmarket Suffolk IP14 1NN	66 beds	DC/25/01542 – current application
Gregory Mills Weavers Lane Sudbury Suffolk CO10 1BB	72 beds	DC/25/00917 – current application
Hillside Retirement Home 20 Kings Hill Great Cornard Sudbury Suffolk CO10 0EH	75 beds	DC/25/00086 – current application
Land On The North Side Of Church Field Road Chilton Industrial Estate Chilton Suffolk	60 beds	DC/20/01094 – refused 0/11/2022
Belstead House Sprites Lane Pinewood Ipswich Suffolk IP8 3NA	65 beds	DC/19/01666 – approved 06/11/2020
Land To The East And West Of Prentice Road Stowmarket Suffolk	75 beds	DC/19/01482 – approved 25/07/2020

(Source: Mid Suffolk online planning register)

- 3.15 In respect of the current application ref: DC/25/01542 it should be noted that Strategic Housing Team commented 22 April 2025 that they supported the proposals on the basis that:

“2.2 The SHMA recognises that there is a need for the provision of older people's accommodation including an additional requirement for registered care (nursing and residential care homes). The SHMA identifies a requirement for an additional 1004 registered care spaces over the plan period until 2036. This proposal for a 66-bed residential care facility would contribute to meeting overall housing needs.”

- 3.16 In respect of the current application ref: DC/25/00917 it should be noted that Strategic Housing Team commented 22 April 2025 that they supported the proposals for nursing care on the basis that:

“2.1 The SHMA recognises that there is an increasing need for the provision of older people accommodation including additional requirement for registered care (nursing and residential care homes). The SHMA identifies a requirement for an additional 572 registered care accommodation over the plan period until 2036.”

- 3.17 It should be noted that the comments on this application mirror those of the Strategic Housing Team dated 3 February 2025 in relation to application ref: DC/25/00086.
- 3.18 Although reserved matters were approved for DC/19/01666 in November 2020 no works appear to have commenced in which case the permission would have lapsed by now and therefore the scheme does not form part of any future pipeline.
- 3.19 The scheme approved under DC/19/01482 has been completed now and therefore adds to the pipeline supply having not been noted in the current supply assessed pursuant to table 6.14 above. As such the pipeline supply amounts to 75 beds on the basis that the live applications referenced have not been determined at the time of this assessment. The care provided includes both personal and nursing care such that, adopting the same approach to current supply as noted in paragraph 6.20 above, we have assumed a 50:50 split for provision.

Needs Assessment

Section 4

- 4.1 The needs assessment is based on the entire area of Mid Suffolk as opposed to any defined catchment area as can sometime be referenced within assessments.
- 4.2 Home ownership data for Mid Suffolk for those aged 65 and over provided by POPPI indicates the following:

Table 4.1: Percentage of Population Aged 65+ by Tenure for Mid Suffolk

	People Aged 65-74	People Aged 75-84	People Aged 85+
Owned	83.98%	77.49%	67.08%
Rented from Council	8.16%	12.54%	17.98%
Other Social Rented	1.92%	3.42%	5.34%
Private Rented or Living Rent Free	5.94%	6.55%	9.59%

(Source: POPPI)

- 4.3 Similarly, population projections for the over 65 age group within Mid Suffolk are also provided by POPPI as below:

Table 4.2: Population Aged 65+ between 2023 and 2040

	2023	2025	2030	2035	2040
People aged 65-69	7,100	7,300	8,600	9,000	8,300
People aged 70-74	6,800	6,700	7,200	8,400	8,800
People aged 75-79	6,500	6,800	6,200	6,700	7,900
People aged 80-84	3,800	4,300	5,600	5,200	5,700
People aged 85-89	2,300	2,400	3,100	4,100	3,800
People aged 90+	1,300	1,400	1,600	2,000	2,700
Total population 65+	27,800	28,900	32,300	35,400	37,200
Total population 75+	13,900	14,900	16,500	18,000	20,100

(Source: POPPI)

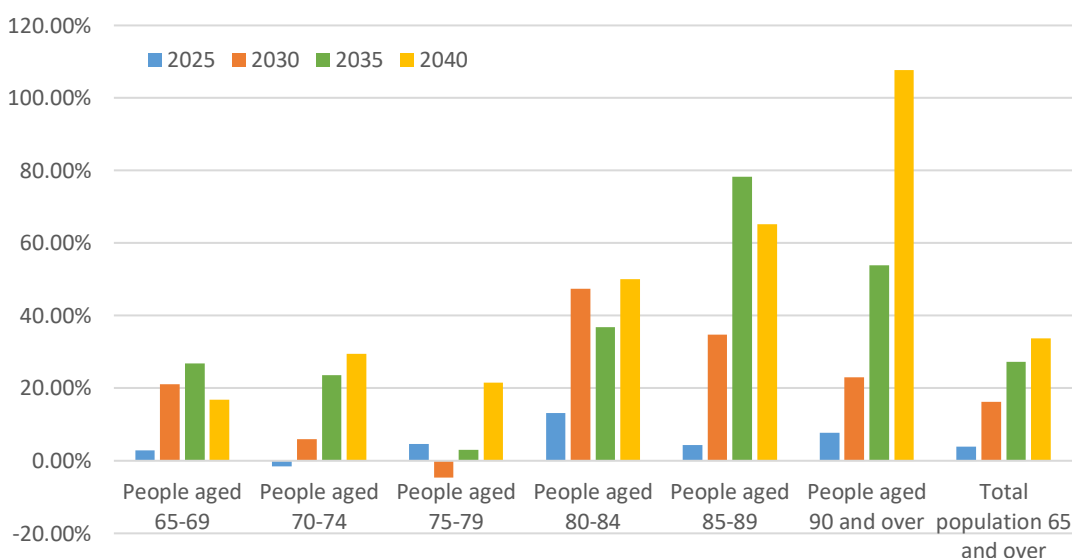
- 4.4 The total population of Mid Suffolk over 65 years of age is projected to increase by 9,400 between now and 2040. The equivalent over 75 years of age is projected to increase by 6,200 between now and 2040. The largest increase in absolute terms between 2023 and 2040 is in the 70 to 74 age range with 2,000 additional people in the age group. The smallest increase in absolute terms being within the 65 to 69 age range with 1,200 additional people. Percentage wise however the largest growth is in the over 90s age range where numbers are projected to increase by almost 108% over the same period.
- 4.5 The growth is represented as below:

Table 4.3: Population Aged 65+ between 2020 and 2040 as real growth and % change

	2025		2030		2035		2040	
	Change	%	Change	%	Change	%	Change	%
People aged 65-69	200	2.82%	1,500	21.13%	1,900	26.76%	1,200	16.90%
People aged 70-74	-100	-1.47%	400	5.88%	1,600	23.53%	2,000	29.41%
People aged 75-79	300	4.62%	-300	-4.62%	200	3.08%	1,400	21.54%
People aged 80-84	500	13.16%	1,800	47.37%	1,400	36.84%	1,900	50.00%
People aged 85-89	100	4.35%	800	34.78%	1,800	78.26%	1,500	65.22%
People aged 90+	100	7.69%	300	23.08%	700	53.85%	1,400	107.69%
Total pop 65+	1,100	3.96%	4,500	16.19%	7,600	27.34%	9,400	33.81%

(Source: POPPI)

Figure 4.1: Population Change between 2023 and 2040



- 4.6 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 2023 to 2027 are therefore reflected below.

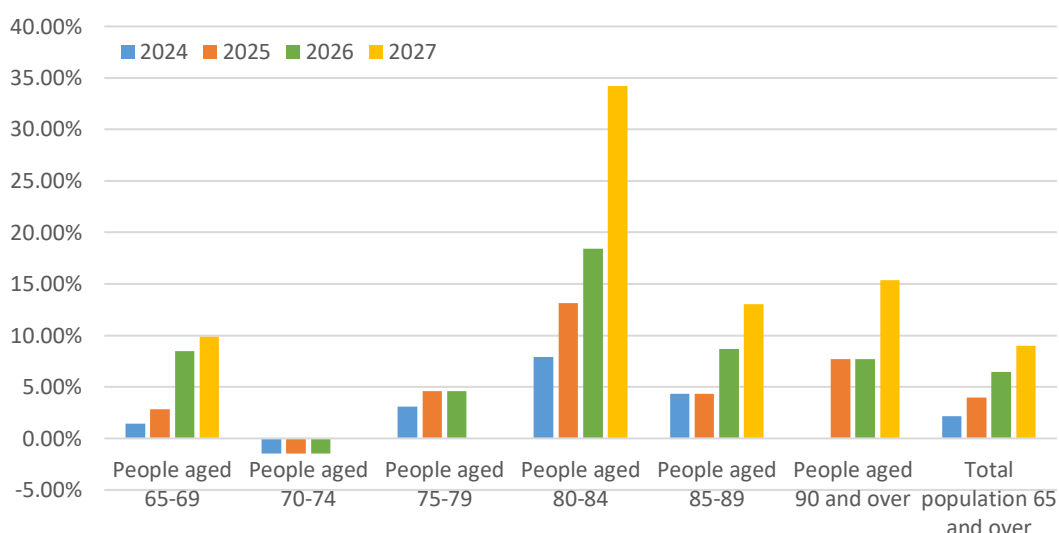
Table 4.4: Population Aged 65+ between 2023 and 2027

	2023	2024	2025	2026	2027
People aged 65-69	7,100	7,200	7,300	7,700	7,800
People aged 70-74	6,800	6,700	6,700	6,700	6,800
People aged 75-79	6,500	6,700	6,800	6,800	6,500
People aged 80-84	3,800	4,100	4,300	4,500	5,100
People aged 85-89	2,300	2,400	2,400	2,500	2,600
People aged 90+	1,300	1,300	1,400	1,400	1,500
Total population 65+	27,800	28,400	28,900	29,600	30,300
Total population 75+	13,900	14,500	14,900	15,200	15,700

(Source: POPPI)

- 4.7 This 5-year figure shows that the population aged 75 and over will increase by 1,800 residents.

Figure 4.2: Population Change between 2023 and 2027



Supply of Extra Care Accommodation

- 4.8 At present across Mid Suffolk the provision of specialist extra care accommodation is summarised in table 4.5, with the full list of relevant schemes included at [Appendix 2](#). This list includes those schemes operating under the definition of close care as well as extra care.

Table 4.5: Indicative Levels of Extra Care Housing for Older People, for Mid Suffolk.

	Number of Units/ Places	Current Provision Per 1,000 of Aged 75 Years and Over 13,900) ⁵	Housing in Later Life Benchmarks	Increase in Units Required to Meet Housing in Later Life Benchmarks (2023)
Extra Care Housing to rent ⁶	150	10.79	15	+58.5
Extra Care Housing for leasehold	20	1.44	30	+397

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

- 4.9 Table 4.5 also includes the benchmark rates of provision set out within *Housing in Later Life* for extra care housing, alongside an estimate of existing under provision.
- 4.10 Having identified the current position, it is relevant to project the need through to 2040 which as per table 4.2 identified a further 6,200 people.

⁵ This figure is taken from table 7.2 above.

⁶ This includes those provided as Shared Ownership

Table 4.6: Projected Levels of Provision of Extra Care Housing for Older People 2023-2040, for Mid Suffolk.

	Housing in Later Life Benchmarks	Increase in Units Required to Meet Housing in Later Life Benchmarks (2023-2040)
Extra Care Housing to rent	15	+93
Extra Care Housing for leasehold	30	+186

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

- 4.11 The total need for 2023 to 2040 therefore must include the current unmet need as set out in table 4.5 and the future requirement from table 4.6. This is set out in table 4.7 below. This demonstrates that up to 2040 there would be a need to provide a further 583 units of extra care leasehold accommodation.

Table 4.7: Cumulative Projected Levels of Need up to 2040, for Mid Suffolk.

	2023 requirement	2023 to 2040 requirement	Total number required up to 2040
Extra Care Housing to rent	+58.5	+93	+151.5
Extra Care Housing for leasehold	+397	+186	+583

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

- 4.12 As set out above as well in table 4.4, there is also the requirement to consider provision over the immediate 5-year period to address the additional 1,800 over 75s in Mid Suffolk. This demonstrates that up to 2027 there would be a significant need to provide extra care leasehold accommodation, whilst there is still a healthy requirement within the rental sector.

Table 4.8: Cumulative Projected Levels of Need up to 2027, for Mid Suffolk.

	2023 requirement	2023 to 2027 requirement	Total number required up to 2027
Extra Care Housing to rent	+58.5	+27	+85.5
Extra Care Housing for leasehold	+397	+54	+451

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

65-74 Age Group implications

- 4.13 It is important to note the limitations in the picture of need for specialist housing for older people. The level of need excludes the 65-74 age group entirely from the equation and therefore significantly reduces the overall demand for this form of specialist housing accommodation. This was a matter that the Inspector in considering the 222 units in Elmbridge⁷ was aware of having noted at his paragraph 77 that:

⁷ APP/K3605/W/20/3263347

“I am conscious that these prevalence rates do not take into account that there may be those in the age cohort 65-74 years of age who also require Housing with Care. In my view it would be unsafe to assume that those in that age bracket would not need appropriate housing for their care needs.”

- 4.14 Evidence gathered by Carterwood on behalf of ARCO in 2014 identified that as much as 20% of residents within the retirement communities fell within the age range of 65-74, therefore accounting for a significant level of the need within this sector. When looked at in the context of leasehold extra care accommodation the percentage of residents aged 65-74 was 24.9%. It is therefore reasonable to assume that even a modest 1% allowance for those people aged 65-74 being in need of extra care accommodation is appropriate for the purposes of demonstrating current and future need. Table 4.9 considers the additional level of need for those residents aged 65-74 within Mid Suffolk that may be in need of extra care provision.

Table 4.9: Projected Levels of Provision of Leasehold Extra Care for Older People 65-74 between 2023-2040, for Mid Suffolk.

	2023	2025	2030	2035	2040
Total population 65–74 years ⁸	13,900	14,000	15,800	17,400	17,100
Estimated need 65–74 years (1.0%)	139	140	158	174	171

- 4.15 If the same ratio for leasehold and rent for extra care accommodation were applied to the 65-75 age group, then the future requirements would be as set out in table 4.10 below.

Table 4.10: Projected Levels of Provision of Leasehold Extra Care for Older People 65-74 between 2020-2040 by tenure, for Mid Suffolk

	2023	2025	2030	2035	2040
Extra Care Housing to rent	+46	+1	+6	+12	+11
Extra Care Housing for leasehold	+93	0	+13	+23	+21

- 4.16 When the additional need from the 65-74 age group is then added to the need for the 75+ age group (that set out in table 7.8) then the full picture of need as of 2023 and projected forward to 2040 becomes even more apparent as set out in table 4.11 below.

Table 4.11: Cumulative Projected Levels of Need up to 2040, for Mid Suffolk.

	2023 requirement	2023 to 2040 requirement	Total number required up to 2040
Extra Care Housing to rent	+104.5 (58.5 +46)	+104 (93 +11)	+208.5
Extra Care Housing for leasehold	+490 (397 +93)	+207 (186 +21)	+697

- 4.17 The above information shows that even when factoring in the 65-74 demand for extra care to rent the supply by 2040 will still outweigh the modelled demand due to the

⁸ Data taken from Table 4.2 above.

current over supply as of 2023. However, the demand for additional provision within the leasehold sector is clear across both age ranges and both at present and by 2040.

- 4.18 Again, the immediate 5-year period from 2023 to 2027 is relevant also to considering the impact of the 65-74 age group, which is therefore considered below at table 4.12.

Table 4.12: Cumulative Projected Levels of Need up to 2027, for Mid Suffolk.

	2023 requirement	2023 to 2027 requirement	Total number required up to 2027
Extra Care Housing to rent	+104.5 (58.5 +46)	+29 (27 + 2)	+133.5
Extra Care Housing for leasehold	+490 (397 +93)	+59 (54 + 5)	+549

Supply of Care Home bed spaces

- 4.19 At present across Mid Suffolk the provision of specialist care home accommodation is summarised in table 4.13, with the full list of relevant schemes included at [Appendix 3 \(personal care\)](#) and 4 ([nursing care](#)).

Table 4.13: Indicative Levels of Care Bed provision, for Mid Suffolk

	Number of Units/ Places	Current Provision Per 1,000 of Aged 75 Years and Over 13,900) ⁹	Housing in Later Life Benchmarks	Increase in Units Required to Meet Housing in Later Life Benchmarks (2023)
Personal Care	375	26.98	65	+528.5
Nursing Care	384	27.63	45	+241.5

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

- 4.20 Table 4.13 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.
- 4.21 Having identified the current position, it is relevant to project the need through to 2040 which as per table 4.2 identified a further 6,200 people.

Table 4.14: Projected Levels of Provision of Various Forms of Accommodation for Older People 2023-2040, for Mid Suffolk.

	Housing in Later Life Benchmarks	Increase in Units Required to Meet Housing in Later Life Benchmarks (2023-2040)
Personal Care	65	+365
Nursing Care	45	+242

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

⁹ This figure is taken from table 4.2 above.

- 4.22 The total need for 2023 to 2040 therefore must include the current unmet need as set out in table 4.13 and the future requirement from table 4.14¹⁰. This is set out in table 4.15 below. This demonstrates that over the 17-year period there would be a need to provide a further 1,377 beds with the split of 893.5 personal care and 483.5 for nursing care.

Table 4.15: Cumulative Projected Levels of Need up to 2040, for Mid Suffolk.

	2023 requirement	2023 to 2040 requirement	Total number required up to 2040
Personal Care	+528.5	+365	+893.5
Nursing Care	+241.5	+242	+483.5

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

- 4.23 As set out above as well in table 4.4, there is also the requirement to consider provision over the immediate 5-year period to address the additional 1,800 over 75s in Mid Suffolk. This demonstrates that up to 2027 there would be a need to provide a further 893 care beds.

Table 4.16: Cumulative Projected Levels of Need up to 2027, for Mid Suffolk.

	2023 requirement	2023 to 2027 requirement ¹¹	Total number required up to 2027
Personal Care	+528.5	+79	+607.5
Nursing Care	+241.5	+44	+285.5

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

- 4.24 A

¹⁰ These figures reflect the pipeline supply identified in table 3.3

¹¹ These figures reflect the pipeline supply identified in table 3.3

Alternative Growth Scenarios

Section 5

- 5.1 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 appeals¹².

Extra Care accommodation (leasehold only)

- 5.2 The Housing in Later Life publication adopted a ratio of 30 units per 1,000 over 75 for the leasehold market at a time when the sector was still relatively new. This section therefore explores alternative ratios of 45, 60 and 90 per 1,000 to consider the implications of adopting a more ambitious strategy for delivering extra care development in order to realise the acknowledged benefits. These higher ratios assume that extra care becomes more prevalent and therefore becomes the preferred choice compared to sheltered, enhanced sheltered and care home provision.

Table 5.1 Cumulative Projected Levels of Need for leasehold extra care up to 2040, for Mid Suffolk adopting a ratio of 45 per 1,000 over 75.

	Existing provision	Current Provision Per 1,000 ¹³	New ratio	Increase in units required for 2023	Increase in units required by 2040 ¹⁴	Total new provision required
Extra Care Housing (75+)	20	1.44	45	+605	+279	+884
Extra Care Housing (65-74) ¹⁵	-	-	-	+93	+21	+114
Grand total up to 2040						+998

¹² APP/Q3115/W/20/3265861

¹³ This figure is taken from table 6.2 above.

¹⁴ This figure taken from table 6.2 above for the over 75 increase between 2023 and 2040.

¹⁵ This figure is taken from table 7.10 above.

Table 5.2 Cumulative Projected Levels of Need for leasehold extra care up to 2040, for Mid Suffolk adopting a ratio of 60 per 1,000 over 75.

	Existing provision	Current Provision Per 1,000	New ratio	Increase in units required for 2023	Increase in units required by 2040	Total new provision required
Extra Care Housing (75+)	20	1.44	60	+814	+372	+1,186
Extra Care Housing (65-74)	-	-	-	+93	+21	+114
Grand total up to 2040						+1,300

Table 5.3 Cumulative Projected Levels of Need for leasehold extra care up to 2040, for Mid Suffolk adopting a ratio of 90 per 1,000 over 75.

	Existing provision	Current Provision Per 1,000	New ratio	Increase in units required for 2023	Increase in units required by 2040	Total new provision required
Extra Care Housing (75+)	20	1.44	90	+1,231	+558	+1,789
Extra Care Housing (65-74)	-	-	-	+93	+21	+114
Grand total up to 2040						+1,903

- 5.3 These alternative growth scenarios demonstrate that through adopting more ambitious targets for delivery of specialist extra care accommodation the level of choice in the market for older persons will increase significantly and with it achieve the realisation of greater benefits not only for those residents but the wider community as a whole.
- 5.4 The increased growth is demonstrated even with a remaining constant of just 1% of the 65 to 74 age group being considered for extra care accommodation. If that figure were to be increased as well then, the impacts on future provision would only increase, however that is not considered necessary or justified on the basis that evidence from operators indicates that the majority of residents on moving into extra care schemes are in their 70s.
- 5.5 Whilst these alternative growth scenarios are considered useful, particularly in light of the suggestions from the Mayhew Review proposing the delivery of up to 50,000 units of such specialist accommodation per year they are not used for the basis of the needs assessment as that relies on the figures derived from Housing in Later Life given its provenance on appeal.

Care home provision

- 5.6 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.

5.7 If the LaingBuisson approach were therefore used instead then the assessment would be as follows, based on the population figures included in table 6.2:

Table 5.4: Care home bed demand

	2023	2040
People aged 65-74	79	97
People aged 75-84	371	490
People aged 85+	529	956
TOTAL	979	1,543

- 5.8 These figures demonstrate a lower level of demand than using the Housing in Later Life (1,529 total in 2023 based on the 2023 population of 13,900); and 2,211 in 2040. Moreover, this model does not seek to differentiate the level of provision between those for personal or nursing care and only provides for the global figure of need.
- 5.9 Even using the lower modelling as provided by the LaingBuisson methodology, as of 2023 there is an undersupply of 220 beds against the modelled demand, with an increased shortfall of 709 beds by 2040 when modelled against current and pipeline supply.
- 5.10 This does not however take into account the inclusion of double occupancy rooms or non en-suite accommodation within the existing supply. When only considering the en-suite, single occupancy rooms the overall care home bed provision reduces to 673 beds. This therefore represents an under supply of modern standard care home accommodation when assessed against either methodology considered in this assessment.
- 5.11 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.

Conclusion on Need

Section 6

6.1 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.

6.2 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)

6.3 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.

6.4 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)

6.5 The assessment has demonstrated a significant level of unmet need for the delivery of specialist housing for older people in Mid Suffolk, even when using the lowest prevalence rates adopted for such assessments and excluding those aged 65 to 74 despite appeal inspectors making clear that such needs must also be factored in.

6.6 Given the evidence, and approach from previous inspectors, we therefore consider that the assessment of need ought to begin from 65 and over and as such the cumulative position on need is reflected below for both periods up to 2040 (longer term picture) and 2027 (immediate need). That is only reflected in the position for extra care housing as the standard approach for specialist nursing beds relies on the 75 and over age group.

Table 6.1: Overall demand for specialist accommodation between 2023 and 2040 for Mid Suffolk

	2023 requirement	2040 requirement	Total requirement (2023-2040)
Extra Care Housing (rent) 65-74	46	11	57
Extra Care Housing (rent) 75+	58.5	93	151.5
Extra Care Housing (Leasehold) 65-74	93	21	114
Extra Care Housing (Leasehold) 75+	397	186	583
Personal Care beds	528.5	365	893.5
Nursing Care beds	241.5	242	483.5
TOTAL	1,364.5	918	2,282.5

Table 6.2: Overall demand for specialist accommodation between 2023 and 2027 for Mid Suffolk

	2023 requirement	2027 requirement	Total requirement (2023-2027)
Extra Care Housing (rent) 65-74	46	2	48
Extra Care Housing (rent) 75+	58.5	27	85.5
Extra Care Housing (Leasehold) 65-74	93	5	98
Extra Care Housing (Leasehold) 75+	397	54	451
Personal Care beds	528.5	79	607.5
Nursing Care beds	241.5	44	285.5
TOTAL	1,364.5	211	1,575.5

6.7 In this assessment a clear need has been identified, even if only assessing the needs of those aged 75 and over when using existing prevalence rates.

6.8 The Council accept the matter of need, as evidenced by the SHMA (see paragraph 4.3 and 4.5 of this Proof) [CD 7/2] as well as previous comments on other applications (see paragraphs 6.16 and 6.17 of this Proof) and also implied within the committee report where the planning policy team acknowledge need but only object to the proposals on the basis of location per se. Even in the Statement of Case [CD 1/4] the only position is that set out at paragraph 5.28 that:

“The Council will evidence how the need for such accommodation is to be met under the local plan policies SP03 and LP06 and show evidence of provision of similar developments within the district which address this need in more sustainable locations and which avoid the identified heritage and landscape harms associated with this site.”

6.9 Matters raised by Suffolk County Council in their submission of 12 June 2025 do not touch on the matter of need, other than stating that the application submission had not provided appropriate analysis of the local need. This has of course been addressed by

means of this Proof of Evidence. The only remaining points relate to affordability which is a matter for consideration should the appeal be allowed. SCC are rightly focussed more on meeting the needs of the social rent sector as private payers for such accommodation do not typically fall within their remit for provision. This assessment has clearly demonstrated a need for both forms of specialist extra care accommodation, with a greater identified requirement in the private sector (be that for purchase or market rent) given the very limited supply to date.

Appendix 1

POPPI data



POPPI Data for Mid Suffolk

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 (2023 to 2040) and the immediate term (2023 to 2027)

2023 to 2040

1. Care home occupancy

These figures show an expected increase of 489 additional residents to be living within some form of care home accommodation by 2040 against the 2023 baseline data, representing a 64% increase.

	2023	2025	2030	2035	2040
People aged 65-74 living in a LA care home with or without nursing	4	4	4	5	5
People aged 75-84 living in a LA care home with or without nursing	26	28	30	30	35
People aged 85 and over living in a LA care home with or without nursing	33	35	43	56	61
People aged 65-74 living in a non LA care home with or without nursing	40	40	45	50	49
People aged 75-84 living in a non LA care home with or without nursing	211	227	242	244	278
People aged 85 and over living in a non LA care home with or without nursing	450	475	588	763	825
Total population aged 65 and over living in a care home with or without nursing	764	810	952	1,147	1,253

2. Dementia

These figures show an increase of some 1,148 additional people expected to suffer from dementia by 2040 when measured against the current baseline, which is a 59.8% increase on current levels.

	2023	2025	2030	2035	2040
People aged 65-69 predicted to have dementia	117	121	143	149	137
People aged 70-74 predicted to have dementia	204	204	220	259	268
People aged 75-79 predicted to have dementia	387	406	370	399	471
People aged 80-84 predicted to have dementia	419	474	619	563	629

People aged 85-89 predicted to have dementia	414	434	555	736	701
People aged 90 and over predicted to have dementia	377	436	495	648	860
Total Population Aged 65 and Over Predicted to have Dementia	1,919	2,074	2,402	2,755	3,067

3. Living alone

These figures show an increase of 2,491 people aged 75 and over to be living alone by 2040, otherwise expressed as a 44.4% increase on current levels. If considering the wider 65 and over figures there is an increase of 3,295 residents which is equivalent to a 36.6% increase.

	2023	2025	2030	2035	2040
Males aged 65-74 predicted to live alone	1,360	1,380	1,600	1,760	1,700
Males aged 75 and over predicted to live alone	1,856	2,001	2,175	2,378	2,697
Females aged 65-74 predicted to live alone	2,030	2,059	2,291	2,523	2,494
Females aged 75 and over predicted to live alone	3,750	4,000	4,450	4,850	5,400
Total population aged 65-74 predicted to live alone	3,390	3,439	3,891	4,283	4,194
Total population aged 75 and over predicted to live alone	5,606	6,001	6,625	7,228	8,097

4. Hospital admissions from falls

These figures show an increase of 454 people likely to require hospital admission as a result of falls by 2040, which is a 51.2% increase.

	2023	2025	2030	2035	2040
People aged 65-69 predicted numbers of hospital admissions due to falls	58	60	71	74	68
People aged 70-74 predicted numbers of hospital admissions due to falls	92	91	98	114	119
People aged 75-79 predicted numbers of hospital admissions due to falls	160	168	153	165	195
People aged 80 and over predicted numbers of hospital admissions due to falls	576	631	802	880	958
Total population aged 65 and over predicted numbers of hospital admissions due to falls	887	950	1,124	1,233	1,341

5. Mobility tasks

These figures show that there are likely to be a further 2,310 residents aged 65 and over unable to undertake on basic task themselves due to mobility issues by 2040, representing an increase of 45.8%. 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

	2023	2025	2030	2035	2040
People aged 65-69 unable to manage at least one activity on their own	604	621	739	765	706
People aged 70-74 unable to manage at least one activity on their own	874	874	936	1,102	1,144
People aged 75-79 unable to manage at least one activity on their own	1,077	1,131	1,032	1,110	1,308
People aged 80-84 unable to manage at least one activity on their own	904	1,016	1,338	1,215	1,356
People aged 85 and over unable to manage at least one activity on their own	1,590	1,675	2,015	2,675	2,845
Total Population aged 65+ Unable to Manage at Least One Activity on Their Own	5,049	5,317	6,060	6,867	7,359

6. Self-care activity

These figures show that that by 2040 an additional 3,142 people aged 65 and over will need help with at least one self-care activity, representing a growth of 39.8%. 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.

	2023	2025	2030	2035	2040
Males aged 65-69 who need help with at least one self-care activity	560	576	704	720	656
Males aged 70-74 who need help with at least one self-care activity	693	693	756	903	924
Males aged 75-79 who need help with at least one self-care activity	896	924	840	924	1,092
Males aged 80+ who need help with at least one self-care activity	1,120	1,260	1,575	1,715	1,890

Females aged 65-69 who need help with at least one self-care activity	792	814	946	990	924
Females aged 70-74 who need help with at least one self-care activity	816	816	864	1,008	1,056
Females aged 75-79 who need help with at least one self-care activity	957	1,015	928	986	1,160
Females aged 80+ who need help with at least one self-care activity	2,058	2,205	2,793	3,087	3,332
Total Population Aged 65+ who need help with at least one self-care activity	7,892	8,303	9,406	10,333	11,034

7. Domestic tasks

These figures show that that by 2040 an additional 3,226 people aged 65 and over will need help with at least one domestic task, representing a growth of 40.5%. 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

	2023	2025	2030	2035	2040
Males aged 65-69 who need help with at least one domestic task	525	540	660	675	615
Males aged 70-74 who need help with at least one domestic task	627	627	684	817	836
Males aged 75-79 who need help with at least one domestic task	864	891	810	891	1,053
Males aged 80+ who need help with at least one domestic task	1,056	1,188	1,485	1,617	1,782
Females aged 65-69 who need help with at least one domestic task	684	703	817	855	798
Females aged 70-74 who need help with at least one domestic task	782	782	828	966	1,012
Females aged 75-79 who need help with at least one domestic task	1,122	1,190	1,088	1,156	1,360
Females aged 80+ who need help with at least one domestic task	2,310	2,475	3,135	3,465	3,740
Total Population Aged 65+ who Need Help with at Least One Domestic Task	7,970	8,396	9,507	10,442	11,196

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 2,574 for those affected slightly (a 35.3% change), compared with 2,310 for those affected a lot (a 44.2% change).

	2023	2025	2030	2035	2040
People aged 65-74 whose day-to-day activities are limited a little	2,891	2,911	3,286	3,619	3,556
People aged 75-84 whose day-to-day activities are limited a little	3,437	3,704	3,937	3,970	4,538
People aged 85 and over whose day-to-day activities are limited a little	969	1,023	1,265	1,642	1,777
Total Population Aged 65+ with a Limiting Long-Term Illness whose Day-To-Day Activities are Limited a Little	7,297	7,638	8,488	9,231	9,871
People aged 65-74 whose day-to-day activities are limited a lot	1,413	1,423	1,606	1,769	1,739
People aged 75-84 whose day-to-day activities are limited a lot	2,318	2,498	2,656	2,678	3,061
People aged 85 and over whose day-to-day activities are limited a lot	1,490	1,573	1,945	2,524	2,731
Total Population Aged 65+ with a Limiting Long-Term Illness whose Day-To-Day Activities are Limited a Lot	5,221	5,494	6,207	6,972	7,531

2023-2027

9. Care home occupancy

These figures show an expected increase of 99 additional residents to be living within some form of care home accommodation by 2027 against the 2023 baseline data, representing a 13% increase.

	2023	2024	2025	2026	2027
People aged 65-74 living in a LA care home with or without nursing	4	4	4	4	4
People aged 75-84 living in a LA care home with or without nursing	26	27	28	29	29
People aged 85 and over living in a LA care home with or without nursing	33	34	35	36	38
People aged 65-74 living in a non LA care home with or without nursing	40	40	40	41	42
People aged 75-84 living in a non LA care home with or without nursing	211	221	227	231	238
People aged 85 and over living in a non LA care home with or without nursing	450	463	475	488	513
Total population aged 65 and over living in a care home with or without nursing	764	789	810	829	863

10. Dementia

These figures show an increase of some 276 additional people expected to suffer from dementia by 2027 when measured against the current baseline, which is a 14.4% increase on current levels.

	2023	2024	2025	2026	2027
People aged 65-69 predicted to have dementia	117	117	121	125	130
People aged 70-74 predicted to have dementia	204	204	204	204	207
People aged 75-79 predicted to have dementia	387	399	406	406	389
People aged 80-84 predicted to have dementia	419	441	474	507	563
People aged 85-89 predicted to have dementia	414	434	434	434	469
People aged 90 and over predicted to have dementia	377	436	436	436	436
Total Population Aged 65 and Over Predicted to have Dementia	1,919	2,032	2,074	2,113	2,195

11. Living alone

These figures show an increase of 703 people aged 75 and over to be living alone by 2027, otherwise expressed as a 12.5% increase on current levels. If considering the wider 65 and over figures there is an increase of 910 residents which is equivalent to a 10.1% increase.

	2023	2024	2025	2026	2027
Males aged 65-74 predicted to live alone	1,360	1,360	1,380	1,420	1,480
Males aged 75 and over predicted to live alone	1,856	1,943	2,001	2,059	2,059
Females aged 65-74 predicted to live alone	2,030	2,030	2,059	2,088	2,117
Females aged 75 and over predicted to live alone	3,750	3,900	4,000	4,150	4,250
Total population aged 65-74 predicted to live alone	3,390	3,390	3,439	3,508	3,597
Total population aged 75 and over predicted to live alone	5,606	5,843	6,001	6,209	6,309

12. Hospital admissions from falls

These figures show an increase of 146 people likely to require hospital admission as a result of falls by 2027, representing a 16.5% increase.

	2023	2024	2025	2026	2027
People aged 65-69 predicted numbers of hospital admissions due to falls	58	59	60	63	64
People aged 70-74 predicted numbers of hospital admissions due to falls	92	91	91	91	92
People aged 75-79 predicted numbers of hospital admissions due to falls	160	165	168	168	160
People aged 80 and over predicted numbers of hospital admissions due to falls	576	608	631	654	717
Total population aged 65 and over predicted numbers of hospital admissions due to falls	887	923	950	976	1,033

13. Mobility tasks

These figures show that there are likely to be a further 567 residents aged 65 and over unable to undertake on basic task themselves due to mobility issues by 2027, representing an increase of 11.2%. 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

	2023	2024	2025	2026	2027
People aged 65-69 unable to manage at least one activity on their own	604	604	621	646	671
People aged 70-74 unable to manage at least one activity on their own	874	874	874	874	884
People aged 75-79 unable to manage at least one activity on their own	1,077	1,110	1,131	1,131	1,086
People aged 80-84 unable to manage at least one activity on their own	904	951	1,016	1,092	1,215
People aged 85 and over unable to manage at least one activity on their own	1,590	1,675	1,675	1,760	1,760
Total Population aged 65+ Unable to Manage at Least One Activity on Their Own	5,049	5,214	5,317	5,503	5,616

14. Self-care activity

These figures show that that by 2027 an additional 895 people aged 65 and over will need help with at least one self-care activity, representing a growth of 11.3%. 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.

	2023	2024	2025	2026	2027
Males aged 65-69 who need help with at least one self-care activity	560	560	576	608	640
Males aged 70-74 who need help with at least one self-care activity	693	693	693	693	714
Males aged 75-79 who need help with at least one self-care activity	896	924	924	924	868
Males aged 80+ who need help with at least one self-care activity	1,120	1,190	1,260	1,330	1,400
Females aged 65-69 who need help with at least one self-care activity	792	792	814	836	858
Females aged 70-74 who need help with at least one self-care activity	816	816	816	816	816
Females aged 75-79 who need help with at least one self-care activity	957	986	1,015	1,015	986
Females aged 80+ who need help with at least one self-care activity	2,058	2,156	2,205	2,352	2,499

Total Population Aged 65+ who need help with at least one self-care activity	7,892	8,117	8,303	8,574	8,781
---	--------------	--------------	--------------	--------------	--------------

15. Domestic tasks

These figures show that that by 2027 an additional 917 people aged 65 and over will need help with at least one domestic task, representing a growth of 11.5%. 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

	2023	2024	2025	2026	2027
Males aged 65-69 who need help with at least one domestic task	525	525	540	570	600
Males aged 70-74 who need help with at least one domestic task	627	627	627	627	646
Males aged 75-79 who need help with at least one domestic task	864	891	891	891	837
Males aged 80+ who need help with at least one domestic task	1,056	1,122	1,188	1,254	1,320
Females aged 65-69 who need help with at least one domestic task	684	684	703	722	741
Females aged 70-74 who need help with at least one domestic task	782	782	782	782	782
Females aged 75-79 who need help with at least one domestic task	1,122	1,156	1,190	1,190	1,156
Females aged 80+ who need help with at least one domestic task	2,310	2,420	2,475	2,640	2,805
Total Population Aged 65+ who Need Help with at Least One Domestic Task	7,970	8,207	8,396	8,676	8,887

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 713 for those affected slightly (a 9.8% change), compared with 571 for those affected a lot (a 10.9% change).

	2023	2024	2025	2026	2027
People aged 65-74 whose day-to-day activities are limited a little	2,891	2,891	2,911	2,995	3,036
People aged 75-84 whose day-to-day activities are limited a little	3,437	3,603	3,704	3,770	3,870
People aged 85 and over whose day-to-day activities are limited a little	969	996	1,023	1,050	1,104

Total Population Aged 65+ with a Limiting Long-Term Illness whose Day-To-Day Activities are Limited a Little	7,297	7,490	7,638	7,815	8,010
People aged 65-74 whose day-to-day activities are limited a lot	1,413	1,413	1,423	1,464	1,484
People aged 75-84 whose day-to-day activities are limited a lot	2,318	2,431	2,498	2,543	2,611
People aged 85 and over whose day-to-day activities are limited a lot	1,490	1,531	1,573	1,614	1,697
Total Population Aged 65+ with a Limiting Long-Term Illness whose Day-To-Day Activities are Limited a Lot	5,221	5,375	5,494	5,621	5,792

Appendix 2

Close and Extra care provision



Search: (5 facilities) Housing (extra, close), Building (all types, all sizes, all tenures) or Home (none) in England, Suffolk, Mid Suffolk with Stay Type (all)

Ordered By: Facility Name.

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

Results...

FINBOROUGH COURT

Pilgrims Way, Great Finborough, Stowmarket, Suffolk, IP14 3AY. [View on a map](#)



Enquiries to: Pilgrims' Friend Society

Telephone: 0300 303 1400

Email: info@pilgrimsfriend.org.uk

Type(s): HOUSING-WITH-CARE / CLOSE CARE HOUSING

Properties: 28 flats, bungalows. Built in 1994. Sizes 1 bedroom. Includes mobility and wheelchair standard properties.

Tenure: Tenure(s): Rent (social landlord)

Facilities: Lift, Lounge, Dining room, Laundry, Guest facilities

Web link: <https://housingcare.org/housing-care/facility-info-84033-finborough-court-great-finborough-england>

MERE VIEW COURT

Thompson Close, Haughley, Stowmarket, Mid Suffolk, IP14 3GQ. [View on a map](#)



Enquiries to: Housing 21

Telephone: 0370 192 4081

Email: sales@housing21.org.uk

Type(s): EXTRA CARE HOUSING

Properties: 32 flats. Built in 2006. Sizes 1 bedroom, 2 bedroom. Includes mobility and wheelchair standard properties.

Tenure: Tenure(s): Shared Ownership

Facilities: Lift, Lounge, Dining room, Restaurant open to the public, Laundry, Guest facilities, Garden, Conservatory, Cafe/bistro, Hairdressing salon, Assisted bathing facility

Web link: <https://housingcare.org/housing-care/facility-info-88159-mere-view-court-haughley-england>

MICHAELMAS COURT

Heath Road, Thurston, Bury St Edmunds, Suffolk, IP31 3XB. [View on a map](#)



Enquiries to: Housing 21

Telephone: 0345 606 6363 (lettings), 0345 608 4021 (sales)

Email: enquiries@housing21.org.uk

Type(s): EXTRA CARE HOUSING

Properties: 54 flats, bungalows. Built in 2025. Sizes 1 bedroom, 2 bedroom.

Tenure: Tenure(s): Rent (social landlord) and Shared Ownership (OPSO)

Facilities: Lift, Lounge, Restaurant open to the public, Laundry, Guest facilities, Garden, Hobby room, Activities room, Cafe/bistro, Hairdressing salon, Assisted bathing facility, IT room, Meeting room

Web link: <https://housingcare.org/housing-care/facility-info-165159-michaelmas-court-thurston-england>

STEEPLE VIEW

Reeds Way, Stowupland, Stowmarket, Suffolk, IP14 4BW. [View on a map](#)



Enquiries to: Orwell Housing Association Ltd

Telephone: 0345 60 100 30

Email: info@orwell-housing.co.uk

Type(s): EXTRA CARE HOUSING

Properties: 36 flats. Built in 2007. Sizes 1 bedroom, 2 bedroom.

Tenure: Tenure(s): Rent (social landlord)

Facilities: Lift, Lounge, Dining room, Laundry, Guest facilities, Garden, Activities room, Hairdressing salon, Library, Assisted bathing facility, computer/IT facilities in Library, games room

Web link: <https://housingcare.org/housing-care/facility-info-116045-steeple-view-stowupland-england>

UVEDALE COURT

Coddenham Road, Needham Market, Ipswich, Suffolk, IP6 8AX. [View on a map](#)



Enquiries to: Healthcare Homes Group Ltd

Telephone: 01206 987440

Email: admin@healthcarehomes.co.uk

Type(s): AGE EXCLUSIVE HOUSING / CLOSE CARE HOUSING

Properties: 20 flats. Built in 1990. Sizes 1 bedroom, 2 bedroom.

Tenure: Tenure(s): Leasehold

Web link: <https://housingcare.org/housing-care/facility-info-17290-uedale-court-needham-market-england>

HousingCare

A service provided by EAC

Appendix 3

Personal Care provision



Search: (12 facilities) Housing (none) or Home (care), Room (all types) in England, Suffolk, Mid Suffolk with Stay Type (all)

Ordered By: Facility Name.

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

Results...

BARHAM CARE CENTRE

Church Lane, Barham, Ipswich, Suffolk IP6 0PS. [View on a map](#)



Enquiries to: Optima HCI Limited

Telephone: 01473 830 247

Email: barhamcarecentre@optimacare.co.uk

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

Properties: This home accommodates 43 residents in 42 single and 1 shared rooms (32 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-133080-barham-care-centre-barham-england>

CEDRUS HOUSE

Creeping Road East, Stowmarket, Suffolk IP14 5GD. [View on a map](#)



Enquiries to: Care UK

Telephone: 0333 321 1987

Email: enquiries@careuk.com

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

Properties: This home accommodates 70 residents in 70 single rooms (70 en suite). It was purpose built in 2015 and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-160768-cedrus-house-stowmarket-england>

CHILTON COURT RESIDENTIAL HOME

Gainsborough Road, Stowmarket, Suffolk IP14 1LL. [View on a map](#)



Enquiries to: Stowcare Limited

Telephone: 01449 675426

Email: info@stowcare.co.uk

Type(s): CARE HOME

Properties: This home accommodates 47 residents in rooms (47 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-125526-chilton-court-residential-home-stowmarket-england>

FINBOROUGH COURT

Pilgrims Way, Great Finborough, Stowmarket, Suffolk IP14 3AY. [View on a map](#)



Enquiries to: Pilgrims' Friend Society

Telephone: 0300 303 1450

Email: finborough@pilgrimsfriend.org.uk

Type(s): CARE HOME

Properties: This home accommodates 22 residents in 20 single rooms (20 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-143213-finborough-court-great-finborough-england>

HARTISMERE PLACE

Castleton Way, Eye, Suffolk IP23 7DD. [View on a map](#)



Enquiries to: Care UK

Telephone: 01728 885413

Email: enquiries@careuk.com

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 2015 and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-161258-hartismere-place-eye-england>

HILLCROFT HOUSE

Finborough Road, Stowmarket, Suffolk IP14 1PW. [View on a map](#)



Enquiries to: Healthcare Homes Group Ltd

Telephone: 01449 774633

Email: admin@hillcrofthouse.healthcarehomes.co.uk

Type(s): CARE HOME

Properties: This home accommodates 43 residents in 43 single rooms (43 en suite). It is a converted building

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-159100-hillcroft-house-stowmarket-england>

THE LIMES RETIREMENT HOME

Earlsford Road, Mellis, Eye, Suffolk IP23 8DY. [View on a map](#)



Enquiries to: The Limes Retirement Home Ltd

Telephone: 01379 788114

Email: kathy@thelimesltd.co.uk

Type(s): CARE HOME

Properties: This home accommodates 26 residents in 22 single and 2 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-125543-the-limes-retirement-home-eye-england>

THURLESTON RESIDENTIAL HOME

Whitton Park, Thurleston Lane, Ipswich, Suffolk IP1 6TJ. [View on a map](#)



Enquiries to: Guyton Care Homes Ltd

Telephone: 01473 240 325

Email: thurleston@guytoncarehomes.net

Type(s): CARE HOME

Properties: This home accommodates 37 residents in 37 single rooms (13 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-133093-thurleston-residential-home-ipswich-england>

UVEDALE HALL RESIDENTIAL HOME

Coddenham Road, Needham Market, Ipswich, Suffolk IP6 8AX. [View on a map](#)



Enquiries to: Healthcare Homes Group Ltd

Telephone: 01449 722 250

Email: admin@uvedalehall.healthcarehomes.co.uk

Type(s): CARE HOME

Properties: This home accommodates 29 residents in 18 single and 9 shared rooms (29 en suite). It is a converted building with a garden. Facilities are available for family or friends to stay overnight.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-125569-uvedale-hall-residential-home-needham-market-england>

WESTHORPE HALL

Westhorpe, Stowmarket, Suffolk IP14 4SS. [View on a map](#)



Enquiries to: Three Arches Care Ltd

Telephone: 01449 781691

Email: office@westhorpehall.co.uk

Type(s): CARE HOME

Properties: This home accommodates 21 residents in 15 single rooms (9 en suite).

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-125515-westhorpe-hall-stowmarket-england>

WOODFIELD COURT RESIDENTIAL HOME

Temple Road, Stowmarket, Suffolk IP14 4AT. [View on a map](#)



Enquiries to: Mr B Gibbs

Telephone: 01449 614114

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-145952-woodfield-court-residential-home-stowmarket-england>

YAXLEY HOUSE RESIDENTIAL HOME

Church Lane, Yaxley, Nr Eye, Suffolk IP23 8BU. [View on a map](#)



Enquiries to: Kingsley Healthcare Ltd

Telephone: 01379 783230

Email: yaxley.manager@kingsleyhealthcare.co.uk

Type(s): CARE HOME

Properties: This home accommodates 34 residents in 32 single and 1 shared rooms (32 en suite). It is a converted building with a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-125578-yaxley-house-residential-home-yaxley-england>

HousingCare

A service provided by EAC

Appendix 4

Nursing Care provision



Search: (8 facilities) Housing (none) or Home (nursing), Room (all types) in England, Suffolk, Mid Suffolk with Stay Type (all)

Ordered By: Facility Name.

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

Results...

BARHAM CARE CENTRE

Church Lane, Barham, Ipswich, Suffolk IP6 0PS. [View on a map](#)



Enquiries to: Optima HCI Limited

Telephone: 01473 830 247

Email: barhamcarecentre@optimacare.co.uk

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

Properties: This home accommodates 43 residents in 42 single and 1 shared rooms (32 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-133080-barham-care-centre-barham-england>

BARKING HALL NURSING HOME

Barking, Nr Needham Market, Ipswich, Suffolk IP6 8HJ. [View on a map](#)



Enquiries to: Healthcare Homes Group Ltd

Telephone: 01449 720 793

Email: admin@barkinghall.healthcarehomes.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 49 residents in 41 single rooms (41 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-133048-barking-hall-nursing-home-needham-market-england>

BAYLHAM CARE CENTRE

Upper Street, Baylham, Ipswich, Suffolk IP6 8JR. [View on a map](#)



Enquiries to: Cardinal Healthcare

Telephone: 01473 830 267

Email: baylhamcarecentre@optimacare.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 55 residents. It was purpose built.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-159459-baylham-care-centre-baylham-england>

CEDRUS HOUSE

Creeping Road East, Stowmarket, Suffolk IP14 5GD. [View on a map](#)



Enquiries to: Care UK

Telephone: 0333 321 1987

Email: enquiries@careuk.com

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

Properties: This home accommodates 70 residents in 70 single rooms (70 en suite). It was purpose built in 2015 and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-160768-cedrus-house-stowmarket-england>

CHILTON MEADOWS CARE HOME

Union Road, Onehouse, Stowmarket, Suffolk IP14 1HL. [View on a map](#)



Enquiries to: BUPA Care Homes

Telephone: 0808 231 2105

Email: carehomes@BUPA.com

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 120 residents in 120 single rooms. It was purpose built and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-133049-chilton-meadows-care-home-onehouse-england>

DEPPERHAUGH, THE

Chickering Road, Hoxne, Nr Eye, Suffolk IP21 5BX. [View on a map](#)



Enquiries to: Kingsley Healthcare Ltd

Telephone: 01379 384236

Email: depperhaugh.manager@kingsleyhealthcare.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 30 residents in 12 single and 9 shared rooms (21 en suite).

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-147551-depperhaugh-the-nr-eye-england>

HARTISMERE PLACE

Castleton Way, Eye, Suffolk IP23 7DD. [View on a map](#)



Enquiries to: Care UK

Telephone: 01728 885413

Email: enquiries@careuk.com

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 2015 and has a garden.

Tenure: Licence

Web link: <https://housingcare.org/housing-care/facility-info-161258-hartismere-place-eye-england>

STOWLANGTOFT HALL NURSING HOME

Stowlangtoft, Bury St Edmunds, Suffolk IP31 3JY. [View on a map](#)



Enquiries to: Stow Healthcare

Telephone: 01359 230216

Email: enquiries@stowlangtofthall.co.uk

Type(s): CARE HOME WITH NURSING

Properties: This home accommodates 44 residents in 28 single and 8 shared rooms. 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-133576-stowlangtoft-hall-nursing-home-bury-st-edmunds-england>

HousingCare

A service provided by EAC

Appendix 3

Appeal summaries



Land to the rear of 237-259 London Road, West Malling (19 December 2018)
APP/H2265/W/18/3202040 [CD 6/1]

iii.1 This was an allowed appeal for 79 extra care units on a greenfield site in the Green Belt.

iii.2 At paragraph 31 the Inspector considered the approach to calculating the present and future need for specialist housing, noting that:

“Whilst the Appellant’s estimates of need exceed those of the Council, their expert witness still only expects 4.5% of people in relevant age groups to be accommodated in extra care schemes, divided between 3% in leased units for sale and 1.5% in rented units. These are lower percentages than occur in other countries such as the United States and Australia and may reflect the fact that this is a relatively novel and high cost concept with relatively luxurious units, and that significant annual service charges and lease assignment fees have to be paid to the operator. The great majority of older people are thus likely to remain within their own homes although some will move to sheltered housing schemes or to residential care homes. That there are already some other types and tenures of specialist housing for the elderly in West Malling does not negate the need in the Borough for this type of extra care market housing or render West Malling an unsuitable location.”

iii.3 At paragraph 40 the Inspector concluded that based on the evidence presented to him for the appeal that:

“there is a local need for residential accommodation of this type and tenure for which the current and emerging development plan does not make adequate provision and that the development would make a significant contribution towards meeting such needs.”

iii.4 When undertaking the planning balance, the Inspector gave substantial weight to the Green Belt harm. However, he concluded at paragraph 65 that:

“I accord substantial weight to the contribution that the development would make towards the need for specialist extra care housing for sale to older people which was not accurately estimated in the SHMA and for which the current and emerging development plan does not make adequate provision.”

Beechmoor Garden Centre, Whitchurch Road, Great Boughton (17 July 2019)
APP/A0665/W/18/3203413 [CD 6/2]

iii.5 This was a Green Belt appeal for 110 apartments and bungalows on a former nursery site. In this case the council lacked any specific development plan policy for delivering older persons housing and took the approach that this would be delivered within the general housing requirement (paragraph 38).

iii.6 The inspector considered the evidence submitted for the appellant and noted at paragraph 39 that:

“While there may be some scope for error in the appellant’s figures, there is no clear evidence that they are wholly unreasonable. I also note that they relate specifically to the need for the type of facility being proposed here. There are therefore likely to be separate ‘needs’ for different types of specialist housing and care models. The presence of other care homes or existing extra care facilities does not alter the fact that further provision may be required. Furthermore, it is unlikely to be the case that other forms of housing will necessarily meet the demand the appellant has identified.”

iii.7 When going on to consider the matter of weighting the Inspector commented at paragraph 40 that:

“Nevertheless, even if other housing or care models could help meet some of this need, it still seems likely that a specific need for this form of extra care housing would remain. The fact that the development would make a sizeable contribution to help meeting these demands is something to which I have attributed very substantial weight.”

iii.8 When undertaking the planning balance, the harm to the green belt and encroachment into the countryside was afforded substantial weight, whilst a failure to provide affordable housing was afforded additional weight. However, at paragraph 50 the Inspector again noted that:

“I have attached significant weight to the contribution the development would make to meeting the needs for specialist housing in the area for older people and the associated social and economic benefits it would bring. I have also given substantial weight to the evidence relating to alternative available sites and the likelihood of the needs identified being met in the short to medium term by development within defined settlements.”

Land to the east of Reading Road, Lower Shiplake (14 October 2019)
APP/Q3115/W/19/3220425 [CD 6/3]

iii.9 This was an appeal for up to 65 extra care units on a greenfield site outside of the defined village envelope.

iii.10 The council broadly accepted that there was a need for additional specialist housing provision with the inspector noting at paragraph 55 that:

“It is not disputed that there is an ageing population in South Oxfordshire, with significant increases projected for the over 75 age range.”

iii.11 When concluding on the matter of need the inspector stated at paragraph 58 that:

“On the basis of the above, in broad terms, I am satisfied that there is a need for the provision of extra care housing, that that need is high, and given the population profile that the need is likely to increase. There is currently under provision to meet that need and the evidence I have before this Inquiry to suggest that that need would be met in the medium to longer term is not robust. I am therefore satisfied that this is a factor which should weigh positively in the planning balance and given the evidence before me my judgement would be that that should attract significant weight.”

Land to the rear of Burston Garden Centre North Orbital Road, Chiswell Green (9 January 2020) APP/B1930/W/19/3235642 [CD 6/4]

iii.12 This was a dismissed appeal for a retirement village comprising of a 64 bed care home and 125 assisted living bungalows and apartments.

iii.13 When considering the matter of need it is relevant to note that the Inspector stated at paragraph 70 that:

“...it is not necessary for me to reach a precise conclusion on the need and supply of this type of housing. This is because, even using the Council’s more modest figures, there is an immediate unmet and growing need which would not be met by the emerging LP in the short term...”

iii.14 The Inspector then noted at paragraph 72 that:

“In light of the current shortfall in C2 accommodation, there can be no doubt that the development could make a very significant contribution towards meeting such local needs and based on the evidence supplied, this would be likely to be achieved within the next 5 years...I thus consider the benefits relating to general

and C2 housing need to be very significant which weighs substantially in favour of the development.”

- iii.15 When going on to undertake the planning balance the Inspector then noted at paragraph 92 that:

“it is clear that there is a very significant local need for elderly persons’ accommodation. The development would help meet a significant proportion of this need and would address this in the short term. St Albans is an area where there is a significant shortfall in overall housing land supply and the development would contribute to this. The development would also help to free up existing market housing. As a care village, the development would cater for a wide range of individual needs in terms of physical ability, dependency and personal care, and would give rise to health and welfare benefits. These considerations all weigh substantially in favour of the development.”

- iii.16 It is relevant to then consider that the subsequent later appeal in January 2022 (APP/B1930/W/21/3279463) [CD 6/5] adopted a similar approach with the inspector concluding at paragraph 65 that:

“With regard to specialist elderly housing needs, even if I were to rely on the Council’s figures for extra care units, the need for and shortfall of such housing remains high. It has not improved in any meaningful way since the previous appeal and the delay to the ELP gives no certainty of resolution any time soon. Even if this development were to be implemented, the current and future need and shortfall figures would remain significant. Combined with the local tenure and Government policy issues outlined above, these factors indicate that more weight should be attached to addressing specialist elderly housing needs than previously.”

- iii.17 Subsequently noting at paragraph 66:

“Taking all of the above into account, I afford the benefits relating to general and specialist housing needs very substantial weight in favour of the development.”

**Homebase Site, New Zealand Avenue, Walton on Thames (21 June 2021)
APP/K3605/W/20/3263347 [CD 6/6]**

- iii.18 This appeal was for 222 retirement units on the site of a former homebase store on the edge of a town centre. The council had a policy in the development plan supporting the delivery of specialist accommodation for older people in suitable locations, with the

inspector noting at paragraph 63 that to determine compliance with the policy it was necessary to consider whether or not there was a need.

- iii.19 Having considered the implications of the alternative approaches to calculating the need the Inspector importantly noted at paragraph 77 that:

“I am conscious that these prevalence rates do not take into account that there may be those in the age cohort 65-74 years of age who also require Housing with Care. In my view it would be unsafe to assume that those in that age bracket would not need appropriate housing for their care needs.”

- iii.20 Following a consideration of supply and the future picture, including the potential implications from COVID, the inspector concluded at paragraph 89 that:

“in respect of future housing provision the appeal proposal would make a significant contribution to this specific area of housing need to which I give considerable weight.”

Little Sparrows, Sonning Common (25 June 2021) APP/Q3115/W/20/3265861 [CD 6/7]

- iii.21 This was a scheme for up to 266 retirement units (class C2) on a site constrained in part by the AONB. This was another scheme in South Oxfordshire (the previous being Lower Shiplake) but followed the adoption of a recent local plan.

- iii.22 The inspector commented at paragraph 27 that:

“Clearly the need for specialist accommodation for older people is recognised in the SOLP, which promotes the identification of suitable sites in the neighbourhood planning process and the inclusion of specialist accommodation on strategic sites, and favours specialist housing for the elderly over conventional housing on unallocated sites.”

- iii.23 The inspector then went on at paragraph 31 to note:

“Plainly, when compared with Government guidance, the development plan is left wanting in terms of addressing a need for extra care. There is no reference in Policy STRAT 1 to the PPG insofar as assessing the needs of older people. There is no reference in Policy STRAT 2 to the accommodation needs of those local residents who will make up more than a quarter of the total population of South Oxfordshire by 2035. Policy H13 in the SOLP expressly deals with specialist housing for older people. It covers all forms of specialist housing for older people, but it is completely generic as to provision. No attempt is made to differentiate

between types and tenure of specialist housing for older people, nor to address the need for each.”

- iii.24 On the basis that the appeal scheme was major development in the AONB the relevant test was to consider whether there were exceptional circumstances to support the scheme and that the development was also in the public interest (the now paragraph 177 test of the NPPF). The inspector undertook that assessment in detail from paragraph 107 onwards. This then fed into the planning balance from paragraph 130 onwards with the inspector concluding at paragraph 132 that:

“the circumstances in this case are exceptional and that the grant of planning permission would be in the public interest.”

Homebase Site, Pines Way, Bath (2 September 2021) APP/F0114/W/21/3268794 [CD 6/8]

- iii.25 This appeal scheme was for a new care community (Class C2 use) on another former homebase site close to the city centre.

- iii.26 The matter of need was addressed in the context of the heritage balance due to the location of the site and the impacts of the proposed development. The inspector noted at paragraph 81 that:

“In cross-examination the Council confirmed that these estimates and the underlying methodology of the assessment undertaken by the appellant [CD 2.2] are not disputed and that the scheme would help to meet the identified unmet need. The Council also confirmed that the moderate weight it gave to this benefit only flowed from the contribution it would make to general housing targets despite the fact no other schemes had come forward in the plan area to address this need.”

- iii.27 The inspector then proceeded to comment at paragraph 82 that:

“I am mindful of the fact that the PPG has identified that the need to provide housing for older people is ‘critical’ because their proportion of the overall population is increasing. It emphasises that 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. Bearing this in mind, as well as the established unmet need, I give this public benefit substantial weight.”

Royal Cambridge Home, 82-84 Hurst Road, East Molesey (18 October 2021)
APP/K3605/W/20/3257109 [CD 6/9]

iii.28 This appeal was for a 32 bed care home and 60 extra care units in East Molesey, on a site in a conservation area and within the setting of a listed building. When considering the impacts on the heritage elements the inspector noted at paragraph 31 that there would be substantial harm.

iii.29 In considering the matter of need the council advanced the case that due to different population projections there was a reduced future need for specialist housing and therefore the supply and demand was finely balanced. However, the inspector noted at paragraph 36 that:

“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.”

iii.30 He then continued at paragraph 36 to state that:

“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.”

Kent & Surrey Golf Club, Crouch House Road, Edenbridge (2 November 2021)
APP/G2245/W/21/3271595 [CD 6/10]

iii.31 This was a case for a replacement golf clubhouse and hotel plus additional development to create a continuing care retirement community in the Green Belt.

iii.32 The evidence for the council demonstrated that there was a need for additional specialist housing for older people although the level of need was disputed. The inspector noted at paragraph 49 that:

“it seems to me that with increased provision of extra care housing there could be an uplift in demand due to a shift from more traditional care home accommodation. This is borne out in the MPS, the SHMA and the Council’s 2017 Local Housing Needs Study. On this basis, I agree that the appellants’ figures based on 4.5 per cent may be conservative but I am unable to reach any firm conclusions on this.”

iii.33 The inspector then went on to note at paragraph 63 that:

“I conclude that the proposed development would make a significant contribution to meeting the overall need for specialist housing within the District for which the current development plan does not make adequate provision for and for which the emerging local plan, whilst supportive, would be unlikely to deliver for some time yet.”

iii.34 When undertaking the planning balance, the inspector concluded at paragraph 97 that:

“The scheme would provide 100 units of extra care housing for older people. This would address an existing shortfall and contribute to meeting a critical need. Due to its location on the edge of the settlement with limited direct access to the existing services and facilities, I reduce the weight attributed to this provision. I nevertheless consider this carries significant weight.”

163-187 High St, Bottisham (7 April 2022) APP/V0510/W/21/3282241 [CD 6/11]

iii.35 This was a scheme for a retirement village including the provision of affordable housing on a Green Belt site outside the settlement boundary.

iii.36 At paragraph 66 the inspector summarised the case for need stating that:

“Overall, I am therefore satisfied that there is a need for not only older persons accommodation, but specifically extra care accommodation, in the District. I am also satisfied that the need is acute and growing.”

iii.37 the Inspector concluded at paragraph 73 that:

“due to the acute, growing, and unmet need for older persons accommodation generally, and extra care accommodation specifically, as well as the additional benefits of retirement care village on improved health for occupiers, I place substantial positive weight on the proposed use class C2 accommodation.”

iii.38 Whilst the inspector found that there were considerable benefits associated with the appeal proposals these were not found to outweigh the substantial harm to the green belt when considered in addition to the concerns raised over the approach to alternative sites due to the limited amount of green belt land within the District and therefore the option of more:

“suitable, available and deliverable non-Green Belt alternatives, including greenfield development outside of settlement boundaries, which would be sequentially preferable to the appeal site.”

- iii.39 It is relevant to note that a subsequent appeal was made (APP/V0510/W/23/3324141) [CD 6/12] where the alternative sites issue was addressed such that the appeal was subsequently allowed.

Land South of Arlesey Road, Stotfold (31 August 2022) APP/P0240/W/21/3289401 [CD 6/13]

- iii.40 This was an application for up to 181 dwellings including 35% affordable housing in addition to an integrated care village within a Class C2 use. It should be noted that in considering the matter of need the Inspector commented at paragraph 57 that:

“It is difficult to accurately assess the precise numbers because of the technical nature of the evidence base and also because of the difficulties in cross referencing between different forms of elderly person’s accommodation, which are rarely defined in the same way between different data sets. Fortunately, however, I do not need to undertake a forensic analysis. The key point is that there is agreement between the parties that there is a significant need for extra care accommodation, and that the demand for private owner occupied units is greater than that for affordable.”

- iii.41 This is relevant given that in this appeal case the council acknowledge the need for this provision as well, it is more the matter of weight that is of difference.

- iii.42 When going on to consider the evidence the Inspector noted at paragraph 62 that:

“The total supply and pipeline of market extra care accommodation does not even meet the current day need, either based on the appellant’s or the Council’s figures. The current day affordable need might be met, depending on how its calculated. However, this does not account for future need.”

- iii.43 The Inspector then went on to conclude at paragraph 64 that:

“Taking all of the above into account, I place significant positive weight on the proposed market extra care accommodation and moderate positive weight on the proposed affordable extra care accommodation.”

- iii.44 This was repeated as a significant positive benefit at paragraph 93 under the planning balance assessment.

Land at Sandown Park, Royal Tunbridge Wells (2 September 2022)
APP/M2270/W/21/3289034 [CD 6/14]

- iii.45 This was an appeal for up to 180 units of accommodation for older people. The inspector grappled with the matter of determining need for those aged 75 and over, as well as accounting for those aged 65 to 74. In respect of the 75 and over the Inspector noted at paragraph 76 that:

“The Council argues that a rate of 45/1000 is appropriate and is consistent with evidence supporting its Submission Local Plan and with some appeal decisions.”

- iii.46 They then noted at paragraph 77 that:

“The appellant considers that a prevalence rate of 40/1000 should apply to the over 75 age group. The appellant states that this is in line with recent appeal decisions.”

- iii.47 They concluded at paragraph 79 that:

“Both parties agree on a 40/1000 - 45/1000 range for the over 75 age group should be the starting point but differ on how that figure should be developed taking account of other need evidence.”

- iii.48 The issue only arose in how to assess the need for those aged 65 to 74 with the appellant suggesting an additional 25 per 1,000 aged 65 to 74 should be assumed (paragraph 77), however ultimately the Inspector opted to side with the Council's approach.

- iii.49 The key issue in this appeal though was the implications of delivery from other identified sites in meeting the identified need, with the Inspector concluding at paragraph 109 that:

“Overall, I consider that the sites identified, together with windfalls, would be likely to meet need for extra care housing over the plan period. This reduces the weight I attach to the benefit of the extra care housing which this proposal would provide.”

- iii.50 This appeal therefore demonstrates that where an LPA are able to clearly evidence a route to delivering other specialist schemes to meet an agreed need the weight in favour can be reduced.

iii.51 This was an appeal for 128 extra care apartments and communal facilities, including a Wellness Centre and restaurant. The appeal site was within a Strategic Area of Special Character as well as being close to locally listed buildings, thus forming non-designated heritage assets.

iii.52 When considering the heritage impacts the Inspector noted at paragraph 37 that:

"I have also identified some limited harms to non-designated heritage assets and these will be weighed in the balance against the proposal in my planning balance below."

iii.53 In respect of the matter of need this was addressed at paragraph 67 where it stated:

"The Appellant's Extra Care Need Assessment identifies a need for 468 extra care units in the borough. When this is taken in the context of the LP identifying an annual benchmark of 105 units of specialist older person housing in the Borough and against a back drop that to date the Council has delivered no extra care housing in the Borough and that there is non permitted or pending there is a significant shortfall. The provision of 128 units for older people accommodation is therefore again a substantial positive benefit of the scheme."

iii.54 In concluding on the planning balance, the Inspector provided a detailed assessment of their approach with regards the heritage impacts as per paragraph 90:

"Whilst the proposals would affect non-designated heritage assets the effect on their significance, either individually or collectively, would not be such that would warrant dismissal of this appeal having regard to the scale of any harm or loss and their significance balanced against the positive benefits of the scheme. The proposed development does not impact on any designated heritage assets and there are not policies in the Framework that protect areas or assets of particular importance that provide a clear reason for refusing the proposed development. Paragraph 11 d) ii of the Framework would therefore be engaged."

iii.55 They then considered the alternative approach in paragraph 91 setting out that:

"However, if the conflict I have identified in respect of Tall buildings were to be construed to be fundamental to the accordance with the development plan as a whole I would, as 11d)ii would be engaged, conclude that the adverse impacts of granting permission, derived from the conflict with policies D9 and CS8 and any

limited adverse effect on the significance of the non-designated heritage assets, would not significantly and demonstrably outweigh the benefits of the scheme, when assessed against the policies in the Framework as whole. The scheme would thereby, in that instance, still benefit from the presumption in favour of sustainable development.”

- iii.56 This appeal therefore clearly sets out the approach to balancing heritage harm against the wider benefits of a specialist housing scheme.

Land West of Wroslyn Road, Freeland (18 January 2023) APP/D3125/W/22/3301202 [CD 6/16]

- iii.57 This appeal related to a scheme for up to 160 extra care units and associated communal facilities. The appeal site affected a number of non-designated heritage assets both on site and adjacent, with additional designated assets in near proximity.

- iii.58 When considering the heritage aspects to the case the Inspector noted at paragraph 38 that:

“The proposal would not fit with the overall form and layout of its surroundings but cause serious harm to the intrinsic character and quality of the appeal site, as well as wider harm the historic, architectural and landscape character of the locality. Such harms, though localised, would be both severe and permanent. The proposal would not realise ‘limited development’ in a village, nor would it respect village character or local distinctiveness.”

- iii.59 They then further noted at paragraph 39:

“Notwithstanding the Council’s case does not advance an objection in respect of heritage asset, my findings in respect of the harm to the significance of NDHA’s indicates conflict with LP Policy EH9 would also arise, given that it seeks to conserve and/or enhance the special character, appearance, and distinctiveness of West Oxfordshire’s historic environment.”

- iii.60 When assessing the matter of need there was debate over the right approach to determine need, however the Inspector reached a conclusion on this at paragraph 48, stating that:

“While I recognise that there may be a relatively small shortfall, if not a surplus, in the current supply I nonetheless see a significant benefit in meeting the need for older persons’ accommodation and broadening the choice of such accommodation on offer in the District.”

- iii.61 Ultimately when considering the overall planning balance, the inspector noted at paragraph 61 that:

“Bearing in mind the scale and nature of the proposals, the degree of harm to the significance of the RPG as a designated heritage asset would be less than substantial, and at the lower end of that scale. In these circumstances, paragraph 202 of the Framework requires the harm be weighed against the public benefits of the proposal. The public benefits the proposal include the provision of Extra Care housing and economic benefits associated with job creation and the construction phases. In my judgement, these would be sufficient to outweigh the scale of harm identified to the significance Eynsham Hall RPG as a designated heritage asset.”

- iii.62 The inspector also provided further clarity on the matter of need at paragraph 64 where they stated:

“I have born in mind the arguments that no feasible alternative sites exist and the consequences of my dismissing the appeal. Even if the apparent shortfall in Extra Care accommodation is not to the degree claimed by the Appellant, the provision of Extra Care housing carries social benefits associated with enabling older people to live more independently, while also saving on health and social costs in the future and potentially freeing up family homes. Up to 160 extra care units would count against the LPA’s housing requirement and against a backdrop of a clear and pressing need. It is accepted that there is a HLS shortfall and one more severe than set out by the Council in their evidence. In accordance with the Framework, this leads to a conclusion that the policies which are most important for determining the application area out-of-date. These are material considerations that carry significant weight in favour of the proposal.”

- iii.63 Nevertheless, in this particular case the identified design concerns as well as the loss of the non-designated heritage assets were such that the inspector ultimately concluded that:

“the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.”

Land off Ellesmere Road, Hencote (2 March 2023) APP/L3245/W/22/3306381 [CD 6/17]

- iii.64 This was an appeal for up to 164 units of extra and close care in addition to a 75 bed nursing home and dementia unit with related communal facilities. When considering the matter of need it is relevant to note that the inspector at paragraph 44 commented:

“The Council predominantly relies on the use of prevalence rates based on the over 75s to determine the need for specialised older persons housing (SHMA). However, I consider that this approach is fundamentally flawed. It presupposes, at a fixed point in time, that the level of older persons housing and nursing care provision was appropriate to provide the optimum choice of tenure, care, and housing needs for Shropshire’s elderly population.”

iii.65 The inspector then went on to note at paragraph 47 that:

“Consequently, I prefer the appellant’s methodology based on Housing in Later Life. This takes into account the tenure of housing. This figure, which I accept is not totally transparent, suggests a figure of 30 units of extra care market housing per 1000 of population aged over 75, or 3%. This contrasts starkly with the existing provision in Shropshire of 3.1 units per 1000 in an area which has higher than average levels of home ownership. There is no exact science for determining the level of need for older person’s housing or care needs, as it is dependent on a number of variables which relate to the individual circumstances of that person, including the wider environment, building stock, and social network in which they live. However, I am confident even in a rural county such as Shropshire, notwithstanding the Council’s worthy objective of helping to keep the elderly in their own homes and communities, that were the need for extra care older person’s housing not to be at the quantum put forward by the appellant, it is substantially above that suggested by the Council.”

iii.66 When specifically considering the matter of quality of care home provision the inspector notes at paragraph 49 that:

“In Shropshire, as is the case nationally, many of those living in care homes do not enjoy private ensuite accommodation. This is because the beds are in converted older properties or were built when it was considered appropriate for care home residents to share bathrooms. I am aware that the 2002 minimum standards for care homes have since been rescinded, nonetheless, the principle of providing high quality accommodation for the elderly still holds good. The appellant’s need figure for residential care home beds, derived by the Laing Buisson methodology, is lower at 2,578 beds than that of the Council at 3,000 as of 2020/10. However, the appellant’s approach to discount beds from the supply which do not provide private washing facilities, with benefits both for disease control and residents’ dignity, results in a greater emphasis on providing more capacity now, with a requirement of 750 bedspaces.”

iii.67 They then continued at paragraph 51:

“I fully accept the need for a choice in accommodation, including its cost, and that there may be potential residents who are happy to share a bathroom. Nonetheless, it is reasonable to assume that there is a need to provide a choice of residential care accommodation built to modern care standards for those considering going into a home. The Council have already accepted in the Statement of Common Ground for the Need for Specialist Housing for Older People, that at 2025 there will be a further need for more residential care beds. Consequently, I conclude, even if a conservative approach was taken which did not discount all non ensuite bedspaces from the supply, this would still result in a more pressing need to provide modern beds than that evidenced by the Council.”

iii.68 In considering the planning balance the inspector reasoned from paragraph 64 onwards:

“in this case, I have found substantial benefits resulting from the proposed development. These principally relate to the provision of 164 units of specialist older persons’ accommodation in addition to a 75-bed nursing home and dementia unit, which could be provided by early 2026. I give this positive benefit which would contribute towards meeting a pressing need for older persons housing substantial weight.

65. Similarly, the freeing up of around 200 homes within the housing stock is a significant benefit to which I accrue significant weight.

66. It was agreed at the Inquiry that the continuing care community is likely to have a positive impact on the resources of the NHS and the health and wellbeing of those living at the development. I consider that this benefit should be given significant weight, as should the wider positive impacts on the health service. I have also concluded that significant weight should be given to the economic benefits of the proposed development.”

Land to the south & east of the former Chimes Garden Centre, Nazeing (November 2024)
APP/J1535/W/24/3342224 [CD 6/18]

iii.69 This was an appeal for 65 extra care units in addition to 10 self-build & custom houses and 4 affordable homes. The inspector considered the matter of need and availability of alternative sites concluding at paragraph 78 that:

“Despite the LP policies in relation to housing mix and site allocations, there is no compelling evidence that older people’s housing of comparable type to the proposal would be delivered in the short or medium term. Even if site allocations and existing consents were to be delivered, in light of the critical national need for older people’s housing, I do not consider harm would arise were the supply of older people’s housing to exceed the identified local need. In addition, whilst the proposal would provide housing for older people, it is accepted that housing of this type assists in releasing existing dwellings to the market and is therefore beneficial to the supply of housing as a whole.”

- iii.70 Being a green belt site, the inspector had to consider the matter of very special circumstances, noting at paragraph 115 that:

“Set against the Green Belt harm, there are other considerations that weigh in the scheme’s favour. The proposal would provide major housing development within the context of a shortfall in supply; deliver on-site and off-site affordable housing; provide older people’s housing for which there is a critical need; and provide SBCH plots within the context of a failure to comply with the duties of the SBCH Act. These other considerations are of a very high order, to which I afford significant weight in the scheme’s favour.”

- iii.71 Ultimately, they concluded at paragraph 119 that:

“For the reasons discussed above, the adverse impacts the proposal do not demonstrably outweigh the benefits. Of particular importance are the contribution of housing, including, affordable housing, older people’s housing, and SBCH plots, which would support the objective at paragraph 60 of the Framework to significantly boost the supply of homes, and to address the needs of groups with specific housing requirements.”

**Land East of Vicarage Road, Sunbury-on-Thames (November 2024)
APP/Z3635/W/24/3342657 [CD 6/19]**

- iii.72 This was a hybrid application to deliver up to 164 extra and close care units and a 60 bed care home together with communal facilities to support the delivery. When addressing benefits the inspector gave particular attention to the matter of specialist housing need noting at paragraph 32 that:

“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.”

iii.73 They the noted at paragraph 33 that:

“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.”

Land South of Leighton Road, Stanbridge (December 2024) APP/P0240/W/24/3347529
[CD 6/20]

iii.74 This was an appeal for 99 extra care units and a 66 bed care home with communal facilities, in addition to 43 affordable dwellings. When assessing the matter of need the inspector noted at paragraph 35 that:

“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.”

iii.75 In this case however the inspector ultimately concluded at paragraph 48 that:

“other considerations do not clearly outweigh the harms to the Green Belt, and the other harms, identified. They do not therefore amount to the very special circumstances required to justify the development.”

**Former North Hill Sawmill Yard, Baddesley Road, Chandlers Ford (March 2025)
APP/C1760/W/23/3328784 [CD 6/21]**

- iii.76 This was an appeal for 101 extra care units and either a 65 bed care home or a further 48 extra care units, together with the relevant communal facilities. In considering the planning balance the inspector noted at paragraph 34 that:

“there are a number of clear benefits which would arise if the reserved matters were approved. In particular this would include the delivery of the new homes of the original planning permission, specifically tailored to cater for older people. This is particularly important given the undersupply of land for homes in the Borough and the acknowledged undersupply of homes of this particular type. There would also be economic benefits arising from the construction process and from ongoing expenditure into the local economy by future occupants and their families. There would also be some benefit arising from the renewal of landscaping and associated onsite biodiversity enhancements which would be delivered as part of the scheme. While acknowledging these benefits, they do not amount to material considerations of sufficient weight to outweigh the conflict found with the development plan.”

- iii.77 In this instance the habitat site affected by the development countered the provisions of paragraph 11d) such that the proposals did not benefit from the presumption in favour of sustainable development.

Former Hook Estate and Kennels, Coopers Lane Road/Firs Wood Close, Northaw (March 2025) APP/C1950/W/24/3354772 [CD 6/22]

- iii.78 This was an outline application for extra care where matters of Green Belt and heritage impacts were main issues.

- iii.79 In considering the heritage impacts the inspector noted at paragraph 59 that:

“Both main parties accept that the appeal site lies in the setting of the Grade II listed Hook House and the Council acknowledge that if harm is found then the public benefits of the appeal scheme outweigh the harm.”

- iii.80 The inspector then concluded at paragraph 77 that:

“The appeal scheme would not conflict with policies SADM15 and D2. I conclude that there would be no harm to the setting and significance of the asset, as expressed in the terms of the Framework. No heritage balance is therefore required.”

iii.81 When assessing the matter of need the inspector noted at paragraph 122 that:

“Both main parties accept that there is a critical need to provide housing for older people. In the calculation of demand for C2 housing with care both accept that there is no preferred approach as it is largely dependent on the preferences of individuals in how they anticipate future housing needs can best be provided dependent on both their health and wealth.”

iii.82 They then continued at paragraph 125 that:

“To date almost 9 years into the plan period no schemes for Class C2 housing with care have the benefit of planning permission. Whilst 33 units have permission on a site north east of Welwyn it is unclear whether this would actually be for C2 housing. Whilst 114 C2 units have the benefit of planning permission on the former Shredded Wheat site it appears that this scheme will not proceed as a new application for a revised scheme for 141 C2 units has just been submitted. An application for 51 extra care dwellings at Elizabeth House remains undetermined.”

iii.83 This meant that the inspector concluded on need at paragraph 127:

“These matters reflect the importance of schemes for Class C2 development and in this regard the comments of the County’s Adult Social Care team¹¹ in support of the scheme are instructive. When taken in the round this issue has substantial weight in the overall planning balance.”

iii.84 In the final balance, the Inspector noted at paragraph 144 that:

“there are substantial benefits arising from the scheme. These include the provision of housing and in particular C2 housing with care. These matters carry substantial weight not least as a consequence of the Council’s chronic five year housing land supply exacerbated by the shortfall in allocated sites. This is unlikely to be resolved through a plan led solution within the next two years. Other benefits of the scheme including the savings to the NHS and improvements to health and wellbeing are accorded significant weight. These matters meet the social objectives of the Framework.”

Conclusion on weight to be attributed to the provision of older persons housing

iii.85 This assessment shows clear evidence of a significant unmet need for older persons housing within Mid Suffolk.

iii.86 As identified above, a number of appeal decisions have afforded substantial or very substantial weight to the provision of older persons housing in the overall planning balance. This has been the case in schemes within the Green Belt particularly and has been deemed sufficient to be part of the VSC case even where:

- Substantial harm is afforded to the inappropriate development in the green belt;
- There has been additional heritage harm;
- There has been additional harm to the character and appearance of the area; and
- There has been a failure to provide affordable housing.

iii.87 Several of the appeals summarised (notably West Malling and Sonning Common) reflect a failure of the plan led system to identify suitable policies or allocations to meet the identified need and therefore afforded additional weight in favour of the scheme. Conversely, in the case of Bottisham the failure to robustly demonstrate that there were no alternatives resulted in a failure to demonstrate VSCs to allow the appeal.

iii.88 Therefore, in light of the lack of any detailed development plan policy to ensure delivery of sites, a clear identified need now and up to 2040, and acknowledgement through the PPG of the critical need for this accommodation, I consider that nothing less than **substantial weight** should be afforded to the provision of older persons housing in the overall planning balance.

iii.89 The consequences of failing to afford such weight and deliver the appeal scheme will be a continuation of the present failure to ensure appropriate provision is made for such specialist housing. This was put best by the inspector in the Sonning Common appeal who stated at paragraph 45 that:

“I consider there is hardly any market extra care housing in the District. The stark fact is that choice is largely unavailable.”

iii.90 That of course reflects the position at present in Mid Suffolk with a mere 20 units of leasehold provision available to residents, despite an overwhelming preference for owner occupation of property for those aged 65 and over (see table 7.1).

Appendix 4

Committee report for DC/21/04549



Committee Report

Item No: 7A

Reference: DC/21/04549

Case Officer: Vincent Pearce

Ward: Thurston.

Ward Member/s: Cllr. Austin Davies and Cllr. Harry Richardson.

RECOMMENDATION:

GRANT FULL CONDITIONAL PLANNING PERMISSION

Description of Development

Erection of a 54 no. unit extra care Affordable Housing scheme comprising of 40 apartments, 14 bungalows and communal areas with associated car parking and landscaping.

Location

Land South of Heath Road, Thurston.

Expiry Date: 28/02/2022

Application Type: FULL - Full Planning Application

Development Type: Major Small Scale - All Other

Applicant: Housing 21

Agent: Mr Mark Slater

Parish: Thurston

Site Area: 1.3ha

Density of Development:

Gross Density (Total Site): normal density calculation not applicable¹

Net Density (Developed Site, excluding open space and SuDs): normal density calculation not applicable²

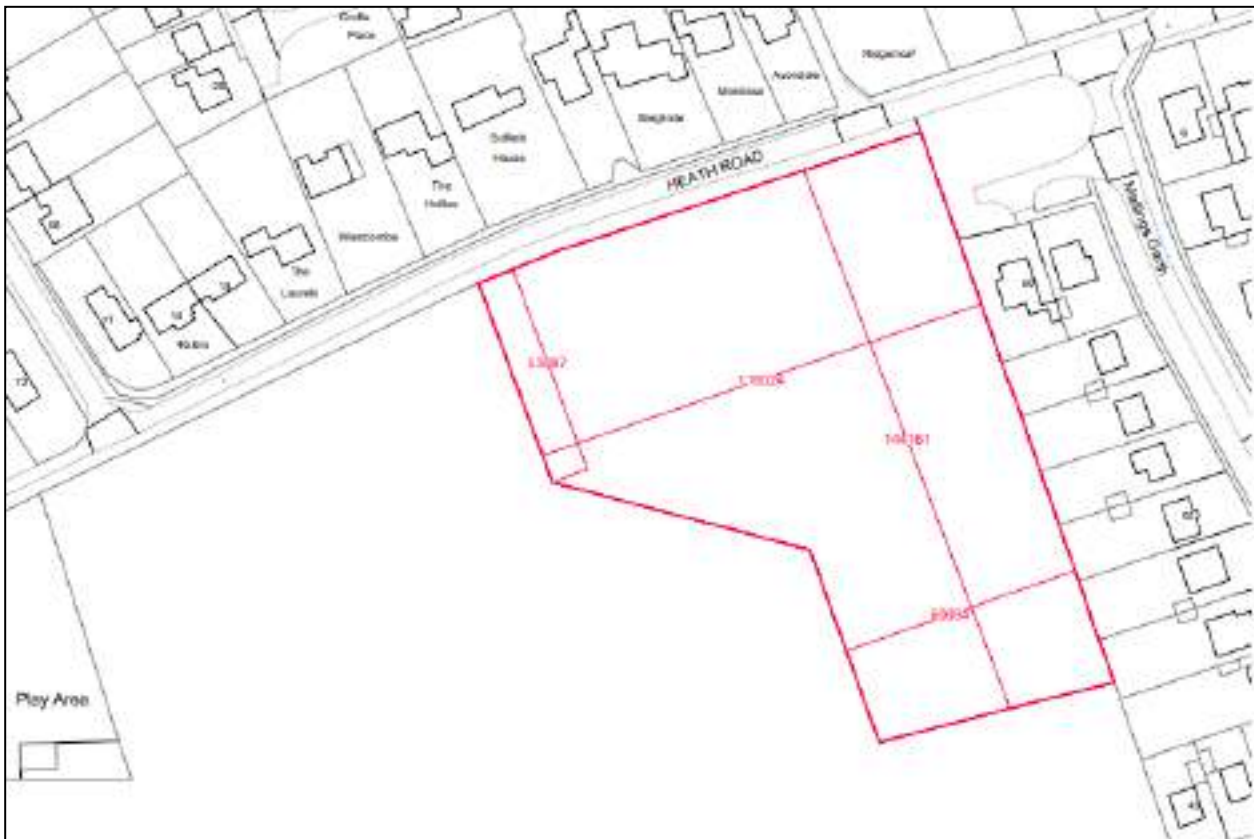
Details of Previous Committee / Resolutions and any member site visit: None

Has a Committee Call In request been received from a Council Member (Appendix 1): No

Has the application been subject to Pre-Application Advice: No

¹ Whilst this application provides residential accommodation it includes an element of care

² ditto



figures 1: **Application site red line** *[top]* and **site in context of Thurston** *[bottom]*

CLASSIFICATION: Official

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reasons:

Whilst it is not a purely residential scheme as it contains an element of care it is of size that equates to being beyond the 15 dwelling threshold that limits the Chief Planning Officer's ability to deal with an application through the delegated procedure.

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

Neighbourhood Plan – Thurston Neighbourhood Development Plan 2019 [TNDP19]

Thurston Neighbourhood Development Plan [October 2019] [TNDP19]



figure 2: **Cover of TNDP19**

Neighbourhood Plan Status

Thurston has a 'Made' and Adopted Neighbourhood Development Plan – October 2019.

The Thurston Neighbourhood Plan attracts full weight as a material planning consideration.

It forms parts of the Council's Adopted Development Plan.

It is considered to be an 'up to date' expression of the Council's planning policy and represents the most up to date planning policy for the locality.

Particular regard is given in this report to the following policies in the TNDP19.

- Policy 1: Thurston Spatial Strategy
- Policy 2: Meeting Thurston's Specialist Care Needs
- Policy 4: Retaining and Enhancing Thurston's Character Through Residential Design
- Policy 5: Community Facilities
- Policy 6: Key Movement Routes
- Policy 7: Highway Capacity at Key Road Junctions
- Policy 8: Parking Provision
- Policy 9: Landscaping and Environmental Features
- Policy 11: Provision for Wildlife in New Development
- Policy 12: Minimising Light Pollution

The site is outside of the defined settlement boundary for Thurston in the TNDP19

Adopted Core Strategy [September 2008] [CS2008]

CS1: Settlement Hierarchy

Thurston is defined as a Key Service Centre [CS1] where:

"The majority of new development (including retail, employment and housing allocations) will be directed to towns and key service centres...."

CS2: Development in the Countryside and countryside villages

Although adjacent to the defined settlement boundary for Thurston, the application site is outside of the defined settlement boundary. It is therefore considered to be located in the countryside where development is more strictly controlled. It will be recommended in this report that despite this Members can give greater weight to TNDP19 Policy 3: Meeting Specialist Care Needs, which does enable care facilities outside of the settlement boundary in certain circumstances.

CS3: Reduce contributions to climate change

This report will demonstrate that the proposal includes suitable measures

CS4: Adapting to climate change

This report will demonstrate that the proposal includes suitable measures

CS5: Mid Suffolk's Environment

The proposed development is not considered to harm the local environment for reasons that will be explored in this report. The development is considered to be sustainable under all three golden threads of the NPPF21. [Environmental Economic and Social] *[NPPF21 paragraph 8]*

CS6: Services and infrastructure

The proposal is not considered to generate the requirement for mitigation under S106 of the Town Country Planning Act 1990. Such mitigation as may be required may be eligible for funding via a CIL bid.

Adopted Core Strategy Focused Review [December 2012]

Policy FC1 Presumption in favour of sustainable development

This development is sustainable and officers will advise the Committee that it is their opinion that it falls within Paragraph 11 c of the NPPF21 meaning the *'decision-taker' 'approving the development proposal without delay.'*

Policy FC1.1 Mid Suffolk approach to delivering sustainable development

The development is considered consistent

Adopted Local Plan [1998]

SB2 Development appropriate to its setting

This is low level development that will be well landscaped. It is accepted that no site within the settlement boundary is immediately available for a development of this size and nature. If it is to be located in Thurston it will of necessity require a site outside of the settlement boundary. This will inevitably mean a change of character to some degree. The campus style development will have its own character but will include positive design elements and themes. TNDP19 Policy 4: Retaining and Enhancing Thurston Character Through Residential Design [particularly but not exclusively parts A, B c/f/g].

SB3 Retaining visually important open spaces

This site is not within an area of special landscape or environmental designation and the site is not identified in the TNDP19 Policy 10: Local Green Spaces

GP1 Design and layout of development

Officers believe this a well-designed, attractive, supportive and accessible development

GP3 Taking account of people with disabilities

This is a central design theme within the proposal

CL8 Protecting wildlife habitats

The proposed development will enhance biodiversity on the site whilst retaining existing flora at the margins as will be described in this report. Not only does the development conform to CL8 but also addresses the requirements of TNDP19 Policy 11: Provision for Wildlife in New Development. Protection in terms of minimising light pollution will be secured by recommended condition *[if members are minded to grant planning permission]*. In this way the development will address the requirements of TNDP19: Minimising Light Pollution.

CL11 Retaining high quality agricultural land

The site is classified as Grade 3 agricultural land [moderate to good]. It is therefore not the best quality [grade 2 – very good , grade 1-excellent] but may still be BMV land because that includes Grade 3a. That said members will wish to consider the impact of the loss of this site to potential agricultural when considering the overall merits of the proposal. Taking a strategic view, the loss of approx. 1.3ha of possibly grade 3a agricultural land does not prejudice farming activity in the District and the remainder of the site can continue in agricultural activity if that is the owners [or an agricultural tenant's] desire. It is officers opinion that this aspect of the proposal is not determinative.

H7 Restricting housing development unrelated to the needs of the countryside

The proposal does not represent standard residential development but is specialist accommodation designed to provide for care needs. Officers are of the opinion that the development is consistent with TNDP19 Policy 3: Meeting Specialist Care Needs.

H14 A range of house types to meet different needs

This development will deliver much needed extra care accommodation that will be able to respond to the specialist needs of older people. [TNDP19 Policy 2 Meeting Thurston's Housing Needs]. The delivery of such a facility is considered welcomed at a time where the care needs of a growing older population. The centre will be able to accommodate residents in need of dementia care and support.

T9 Parking standards

The proposal meets the Council's Adopted Parking standards and TNDP19 Policy 8: Parking Provision subject to enhanced electric vehicle charging under TNDP19 Policy 4 C: Retaining and Enhancing Thurston Character Through Residential Design

T10 Highway considerations in development

The proposal raises no objection from Suffolk County Council as local highway authority from a highway safety or capacity point of view and neither has Thurston Parish Council. The Parish Council's support [with provisos unrelated to highway safety and capacity within the village] suggests that there is not considered to be a conflict with TNDP19 Policy 6: Key Movement Routes, Policy 7 and Highway Capacity at Key Road Junctions.

T11 Facilities for pedestrians and cyclists

Cycle parking spaces are being provided in line with adopted standards and the proposal includes a footway extension to link the site with a nearby bus stop. [³a condition is recommended to secure this improvement]

T12 Designing for people with disabilities

The proposal has been carefully planned to suit although a need for disabled parking spaces for people with a disability [staff/visitors] has been noted and this can be addressed by the suggested within the recommendation.

SC10 Siting of local community health services

Whilst the proposal is not strictly a local community health service it certainly fits within the spirit of policy SC10 in that whilst it is not a publicly provided and run facility it will help to address a national and local shortage for such healthcare related accommodation and support.

Draft Babergh Mid Suffolk Joint Local Plan 2021 [JLP21]

Following the exploratory meeting with the inspectors on Thursday 16 December 2021, it is proposed to progress the current Joint Local Plan (JLP) as a 'Part 1' local plan. This will be followed by the preparation and adoption of a 'Part 2' local plan as soon as possible.

The Local Development Scheme is currently being updated to reflect this, and this will provide details of what each plan will cover, and the timetable for their production. In the meantime, the letter from the inspectors gives details on the areas each plan will be likely to include.

The Councils are currently working with our consultants and project partners to scope and progress the outstanding matters raised by the inspectors during the examination so far, and the

³ such a condition would read "Prior to the occupation of any part of the development a footway as shown on drawing [add reference] shall be provided to the satisfaction of SCC as local highway authority and be available for use and thereafter retained in perpetuity..."

necessary main modifications. Further details of this work and timescales - including consultation periods - will be provided on our website in due course.

Presently the JLP21 attracts little weight as a material planning consideration such that it plays no determinative role in this case, and this report therefore reflects that position.

The National Planning Policy Framework 2021

Suffolk Guidance for Parking: Third Edition May 2019

Consultations and Representations

During the course of the application Consultation and Representations from third parties have been received. These are summarised below.

A: Summary of Consultations

Parish Council (Appendix 3)

- **Thurston Parish Council [17 December 2021] supports** the principle of this development subject with provisos. Their consultation response in full reads:

"Having reviewed the further documentation submitted for this application, the Parish Council would like to state that overall it continues with its support of this application and is of the opinion that this proposal will help address Objective H2 - "To address the specific housing needs of older people". However, in the anticipation that this proposal creates an opportunity to set the highest standards of design for the whole site and tackle some of the global climate issues at a local level, the Council is concerned that Points 8 and 9 of its submission dated 23rd September 2021 have not been addressed (repeated below for clarity):

Point 8: The parish council is concerned that there are only two communal electric vehicle charging point for the residents and staff plus visitors. and would like to request that the applicant takes into consideration the fact that the number of electric charges in use will increase significantly over the coming years. Reference should be made to the draft Suffolk County Council Climate Action Plan. Point 9: The applicant should also be encouraged to ensure that the location for the electric charging facility is most practical and will meet the needs of different users including occupants, visitors and people with disabilities. Further consideration should also be given as to how additional facilities can be accommodated in a variety of ways, in terms of location, allocation and design.

Following the consultation by the government in July-October 2019, a number of proposals were consulted upon and new measures are to be introduced which will mandate charge point infrastructure into new homes. The Parish Council would like to request that the proposal is conditioned following the guidelines set out for residential

buildings undergoing major renovation ensuring that where there are to be more than 10 parking spaces within the site, there is to be at least one electric vehicle charging point for each dwelling with associated parking within the site boundary and cable routes in all spaces without charge points. Point 9 also needs to be considered and addressed in terms of location ensuring that the needs of all users are fully met in terms of accessibility.”

Officer comment:

The support of Thurston Parish Council is noted as are the provisos. This report will fully consider the matters raised along with relevant Adopted Thurston Neighbourhood Development Plan 2019 [TNDP19] policies within its Assessment section.

Members will of course be aware of the growing need for extra care accommodation with the nationally growing elderly population and the fact that people are tending to live longer lives. This often brings its own health issues⁴. Mid Suffolk is no different.

National Consultee (Appendix 4)

- **NHS ~ West Suffolk Clinical Commissioning Group [CCG] [14 December 2021]: raises a conditional no objection. Extracts:**

“This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore, a proportion of the required funding for the provision of increased capacity by way of extension, refurbishment or reconfiguration at Mount Farm Surgery, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.”

West Suffolk CCG would not wish to raise an objection to the proposed development.

9. West Suffolk CCG is satisfied that the basis of a request for CIL contributions is consistent with the Position Statement list produced by Babergh and Mid Suffolk District Councils West Suffolk CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response....”

⁴ “Dementia is a growing challenge. As the population ages and people live for longer, it has become one of the most important health and care issues facing the world. In England it is estimated that around 676,000 people have dementia. In the whole of the UK, the number of people with dementia is estimated at 850,000.

Dementia mainly affects older people, and after the age of 65, the likelihood of developing dementia roughly doubles every five years. However, for some dementia can develop earlier, presenting different issues for the person affected, their carer and their family.

There are around 540,000 carers of people with dementia in England. It is estimated that one in three people will care for a person with dementia in their lifetime. Half of them are employed and it's thought that some 66,000 people have already cut their working hours to care for a family member, whilst 50,000 people have left work altogether.” NHS

<https://www.england.nhs.uk/mental-health/dementia/>

West Suffolk CCG notes:

“ ... The proposal comprises a development of up to 54 extra care dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. The CCG would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application 3.

There are no GP practices within a 2km radius of the proposed development, there is one GP practice closest to the proposed development and this is within circa 6km. This practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact”.

Officer comment:

In the event of planning permission being granted and that permission being implemented West Suffolk CCG will be able to make a bid to BMSDC for CIL funding and that will be assessed on its merits in the normal way.

- **Historic England [23 August 2021]**

They advise that it is not necessary to consult them

- **Highways England [30 November 2021]**

No objection

- **Sport England [30 November 2021]**

“The proposed development does not fall within either our statutory or non-statutory remit”

- **Environment Agency [22 September 2022]**

“We have no comments on this application”

- **Natural England [27 August 2021]**

“Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.”

County Council Responses (Appendix 5)

- **Suffolk County Council, Highways:**

“...we are satisfied with the proposal, subject to ... planning conditions:”

- **Suffolk County Council, Floods and Water [LLFA & SuDS]:**

Additional consultation with the LLFA is at the time of writing this report underway and so a verbal update will be provided at the meeting or in associated tabled papers. Currently there is a holding objection with a request for additional detail. That additional information has been supplied. IF the information satisfies the LLFA then it is likely that the holding objection will be lifted and conditions recommended. Members will be updated at Committee.

- **Suffolk County Council, Developer Contributions: [8 September 2021]**

No S106 requirements

- **Suffolk County Council, Fire and Rescue:**

“Access and Fire Fighting Facilities

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2019 Edition, Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence. Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2019 Edition.

Water Supplies

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies./continued OFFICIAL We are working towards making Suffolk the Greenest County. This paper is 100% recycled and made using a chlorine free process. OFFICIAL

Sprinklers Advised

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter). Consultation should be made with the Water Authorities to determine flow rates in all cases. Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control or appointed Approved Inspector in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters."

▪ **Suffolk County Council, Archaeology: [20 August 2021]**

"This site lies in an area of archaeological potential recorded on the County Historic Environment Record (HER), in close proximity to a section of Roman road (HER ref nos. THS 002, THS 007 & SUF 098) and finds spots dating from the Late Iron Age (THS 004) and Roman period (THS 002). Archaeological investigations north of the site have identified Neolithic pits (THS 011 & THS 030) and ditches associated with the Roman road (THS 030). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate: 1. No development shall take place within the area indicated [the whole 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 to and approved in writing by the Local Planning Authority. The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording*
- b. The programme for post investigation assessment*
- c. Provision to be made for analysis of the site investigation and recording*
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation*
- e. Provision to be made for archive deposition of the analysis and records of the site investigation*
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.*
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.*

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local

Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2021)."

Internal Consultee Responses (Appendix 6)

▪ Heritage: [7 September 2022]

"The site lies adjacent to existing residential development on two sides and will appear entirely within the context of this existing development. There do not appear to be any heritage assets whose setting would potentially be affected by the proposal. Accordingly I do not consider the proposal would result in any harm to any heritage assets."

▪ Strategic Housing [3 September 2021]

"2. Housing Need Information:

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2019, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The SHMA indicates that in Mid Suffolk there is a need for 127 new affordable homes per annum. The Council's Choice Based Lettings system has 10 applicants registered for affordable housing, who are seeking accommodation in Thurston as at the end of August 2021, 2 of whom are aged over 55 and 1 requires an adapted property¹. This figure increases to 203 applicants aged over 55, of whom 91 require an adapted property, in terms of the number of applicants on the register currently seeking accommodation somewhere in Mid Suffolk.

2.3 The SHMA also indicates a need for 1,005 additional specialist housing units in Mid Suffolk, of different types, between 2014 and 2036². This development could make a contribution to meeting this need. Given the range of different facilities and levels of support which different specialist housing schemes provide, it is difficult to pigeonhole individual proposals, and the labels used for different types of housing can be overlapping, contradictory and/or confusing.

2.4 The application documents describe this proposal as being 'Extra Care', and it appears that this proposal would fit somewhere between what the SHMA would categorise as 'Enhance Sheltered Housing' and 'Extracare Housing',

based on the definitions on provided in the footnotes of page 92. The SHMA sets out a need for 249 units of these types of housing, so this development meets a significant proportion of Mid Suffolk's need.

2.5 Schemes such as these – affordable Extra Care Housing schemes which include features for supporting people with dementia – are understood to be a priority for the County Council.

2.6 The Thurston Neighbourhood Plan is supportive of the principle of specialist housing for older people. The NDP was supported with a survey of housing needs, carried out in 2017, which identified specialist housing and bungalows as a priority housing need locally.

2.7 This development could help enable downsizing by local residents. It is worth noting that the 2011 Census calculated that under-occupation levels in both Thurston (85.1%) and Mid Suffolk (80.6%) are significantly higher than England as a whole (68.7%), suggesting a demand for downsizing. There are wider housing market and economic benefits to enabling downsizing by older households.

2.8 With the ageing population, it can be expected that this development would contribute to meeting overall needs for housing for older people, but further analysis of the development is set out below.

3. Affordable Housing

3.1 The development is intended to bring forward 54 affordable units; a mix of social rent (56%) and shared ownership (44%). The tenure split / mix, and unit floorspaces, are as follows. Please note that this information has been sought from the Agent and it has not been specified within the application documents.

Tenure	Number	Description	Gross Internal Floor Areas (m²)
Social Rent	26	1-bed Flat	53.0 - 58.7 (54.5 average)
	2	2-bed Flat	66.1 - 68.5 (67.3 average)
	2	2-bed Bungalow	65.9 - 67.4 (66.5 average)
Older Person's Shared Ownership	2	1-bed Flat	53.0 - 58.7 (54.5 average)
	10	2-bed Flat	66.1 - 68.5 (67.3 average)
	12	2-bed Bungalow	65.9 - 67.4 (66.5 average)

3.2 Whilst the SHMA does not estimate a requirement for affordable specialist housing units, the evidence provided in this memo (above) indicates that there is a current demand for affordable housing with adaptations.

3.3 It is understood that the applicant intends to allocate units in line with the usual approach for Extra Care facilities, through a panel made up from representatives from Suffolk County Council, Mid Suffolk District Council and Housing 21.

3.4 All units meet and exceed the overall Gross Internal Floor Areas required for the Nationally Described Space Standards. Further information regarding the design of these units is set out below.

4. Design

4.1 As a development aimed at the over 55s, which includes care services, the way in which the design reflects the needs of an aging population is particularly pertinent.

4.2 Whilst not currently a planning policy requirement, the design is understood to meet the requirements of Part M4(2) of the Building Regulations. This does not appear to be specified in the application documents, but the applicant has indicated that this is the case. If it needs to be confirmed, colleagues from the Council's Building Control team may be able to advise.

4.3 Part M4(2) is a set of design requirements for residential development which is intended to support residents as their mobility changes, for example with:

- Low level windows and window handles, services and switches at specified heights.
- Bathrooms walls to be strong enough to support grab rails
- Bedrooms and bathrooms of a size and layout to support provision of care with 'access zones' around beds.

M4(2) represents the Government's codification of the Lifetime Homes Standard into the Building Regulations, through the 2015 Housing Standards Review. The M4(2) standard is not specifically designed for people in wheelchairs, but should still make it easier for those with reduced mobility to occupy these dwellings.

4.4 The Design and Access Statement notes, on page 4 of part 4, that 'the design uses HAPPI principles', meaning the recommendations made by the All Party Parliamentary Group on Housing Our Ageing Population in 2009.³ The 'made' Thurston Neighbourhood Plan also references HAPPI as a set of important criteria for older people's housing (albeit without setting it in policy). It may be appropriate to thoroughly examine the design, with reference to these principles, as a way of determining the suitability and quality of the design.

4.5 Reference is also made to design measures which could support those with dementia, for example legible layouts with wayfinding elements. There are also principles which can be used to assess the suitability of design of residential development the public realm in respect of supporting those with dementia; with research from Stirling University and the Royal Town Planning Institute.

4.6 The provision of on-site facilities, including internal and external social areas, and guest accommodation, is welcomed."

▪ **Arboricultural Officer [26 August 2021]**

"I have no objection to this application subject to it being undertaken in accordance with the measures outlined in the **accompanying arboricultural report**, an appropriate **condition** should be used for this purpose. No trees are proposed for removal and all appear to have been given adequate space within the layout design".

▪ **Environmental Health, Air Quality [7 December 2022]**

"No objections"

▪ **Environmental Health, Land Contamination [2 December 2022]**

"no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Please could the applicant be made aware that we have updated our Land Contamination Questionnaire and advise them that the updated template is available to download from our website at <https://www.babergh.gov.uk/environment/contaminated-land/land-contaminationand-the-planning-system/>."

▪ **Environmental Health, Pollution [29 November 2022]**

"No observations or comments to make"

▪ **Environmental Health, Sustainability [27 August 2021]**

"I note the contents therein and welcome the Applicant's recognition of the Climate Emergency and the sustainability requirements that are needed as a result. The fabric first approach, higher than Building Regulations air tightness, minimal thermal bridging, use of MVHR systems and other water and resource efficiency measures are good practice.

However I would suggest that the provision of one electric vehicle charging point per five parking spaces will be insufficient for future needs considering the sale of new fossil fuelled cars and vans will be prohibited in the UK from 2030.

Babergh and Mid Suffolk Councils declared a Climate Emergency in 2019 and have an aspiration to be Carbon Neutral by 2030, this will include encouraging activities, developments and organisations in the district to adopt a similar policy. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable

techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability, taking into account the requirements to mitigate and adapt to future climate change.

I have no objections however if the planning department decided to permit and set conditions on the application, I would recommend the following.

Prior to the commencement of development a scheme for the provision and implementation of water, energy and resource efficiency measures, during the construction and operational phases of the development shall be submitted to and approved, in writing, by the Local Planning Authority. The scheme shall include a clear timetable for the implementation of the measures in relation to the construction and occupancy of the development. The scheme shall be constructed and the measures provided and made available for use in accordance with such timetable as may be agreed.

A Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3, and NPPF) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water (suggested maximum of 105ltr per person per day).

The document should clearly set out the unqualified commitments the applicant is willing to undertake on the topics of energy and water conservation, CO2 reduction, resource conservation, use of sustainable materials and provision for electric vehicles.

Details as to the provision for electric vehicles should also be included please see the Suffolk Guidance for Parking, published on the SCC website on the link below: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-developmentadvice/parking-guidance/> Guidance can be found at the following locations: <https://www.midsuffolk.gov.uk/environment/environmentalmanagement/planningrequirements/>

Reason – To enhance the sustainability of the development through better use of water, energy and resources. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, has the potential to include energy and resource efficiency measures that may improve or reduce harm to the environment and result in wider public benefit in accordance with the NPPF.”

▪ **Landscape [Place Services] [17 December 2021]**

“The site is outside of the settlement boundary of Thurston which would be considered development in the countryside and would be subject to Policy CL1 of the Adopted Mid Suffolk Local Plan, CS2 of the Mid Suffolk Core Strategy and SP03 of the emerging Joint Local Plan. While we accept the proposals have retained existing and proposed new planting in an effort to screen the development there will still be a significant and permanent

change in the character of landscape. In terms of mitigating landscape and visual effects the use of vegetative screening should only be used if all other considerations, such as alignment and mass of buildings, have been fully exhausted to reduce potential adverse effects. Any design considerations which have been made to reduce the level of harm should be clearly evidenced and only then should the landscape scheme be used to remove or reduce any residual effects.

A Landscape and Visual Appraisal (LVA) should form part of the design process. It is a tool when working through the design of the layout for development and should also be used as a test at the end of the process to ensure the impacts have been considered and where possible removed or reduced.

Therefore, we are still of the opinion that a Landscape and Visual Appraisal (LVA) should be undertaken by a suitably qualified landscape professional and submitted prior to determination. This should not be confused with an LVIA which could be considered disproportionately onerous and expensive.

The Landscape and Visual Appraisal (LVA) should follow the principles set out on the third edition of "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3) should include: - Context and character appraisal - Landscape constraints and opportunities - Analysis of visual impact from a number of viewpoint locations and key receptors - Mitigation proposals and recommendations Place Services is a traded service of Essex County Council

Secondly, the LVA would highlight opportunities to better integrate the development with its surrounding, such as pedestrian links to the village and also any potential desirable views out onto the countryside for the enjoyment of residents. The current layout and screening could serve to segregate the development and create a perceived barrier which would inhibit integration with the surrounding community and landscape."

▪ **Ecology [Place Services] [18 October 2021]**

"No objection subject to securing ecological mitigation and enhancement measures

Summary

We have reviewed the Report on the Scoping Survey for the Ecological Assessment Report (Huckle Ecology, July 2021), supplied by the applicant, relating to the likely impacts of development on designated sites, protected and Priority species & habitats. We are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on designated sites, Protected and Priority Species & Habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The mitigation measures identified in Report on Ecological Assessment Report (Huckle Ecology, July 2021) should be secured and implemented in full. This is necessary to conserve Protected and Priority Species.

We also recommend that a Wildlife Friendly Lighting Strategy is implemented for this application. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely present within the local area. This should summarise the following measures will be implemented:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Warm White lights should be used at <3000k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effects on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- The provision of motion sensors or timers to avoid the amount of 'lit-time' of the proposed lighting.
- Lights should be designed to prevent horizontal spill e.g. cowls, hoods, reflector skirts or shields.

In addition, we support the proposed reasonable biodiversity enhancements, which have been recommended to secure bespoke biodiversity net gains for protected and priority species. The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Strategy. The strategy should be secured prior to commencement as a condition of any consent.

However, to ensure that measurable biodiversity net gains will be achieved for this development, in line with paragraphs 174[d] and 180[d] of the NPPF 2021, we encourage the developer to provide a Biodiversity Net Gain Assessment using the DEFRA Biodiversity Metric 3.0 (or any successor). The Biodiversity Net Gain Assessment should preferably follow the Biodiversity Net Gain Report & Audit Templates (CIEEM, 2021)¹. The Biodiversity Net Gain Report should then inform the finalised soft landscaping scheme / Landscape Ecological Management Plan for this application.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

Submission for approval and implementation of the details below should be a **condition** of any planning consent."

▪ **Waste Services [31 September 2021]**

"No objection subject to **conditions**"

Others [Appendix 7]

▪ **Anglian Water [2 September 2021] extracts**

“The foul drainage from this development is in the catchment of Thurston Water Recycling Centre that will have available capacity for these flows

The sewerage system at present has available capacity for these flows

From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse”

▪ **East Suffolk Drainage Board [19 August 2021]**

“the site in question lies outside the Internal Drainage Districts of the East Suffolk Internal Drainage Board and the Waveney, Lower Yare and Lothingland Internal Drainage Board as well as both Board's wider watershed catchments, therefore the Board has no comments to make.”

▪ **Suffolk Wildlife Trust [7 September 2022]**

“There are records of Hedgehog, a UK and Suffolk Priority Species, in the surrounding area. To maintain connectivity for this species, we recommend maintaining hedgehog permeable boundaries (with gaps of 13x13cm at ground level) as part of this development.

We recommend that integral swift nest bricks should be incorporated into buildings that are of minimum two storeys. The incorporation of swift nest bricks is an established way to enhance biodiversity within a development and provide net gain. Therefore, we request that this is done to provide enhancement to this Suffolk Priority Species, whose numbers have seen a dramatic decline in recent years.”

▪ **West Suffolk District Council [8 September 2021 & 6 December 2021]**

“..has no comment to make”

Representations follow.....

B: Representations

At the time of writing this report at least 12 letters/emails/online comments have been received. It is the officer opinion that this represents 6 objections and 3 expressions of support and 1 neutral response. A verbal update shall be provided as necessary.

Views are summarised below:-

Objection: these include

- Too much green space/farmland being lost in Thurston to development.
- If approved rest of wider site [outside of application site] should be planted up,
- why wasn't this development included in new residential developments in North Thurston?
- Poor design
- Too high
- Out of keeping with character
- Dominating and overbearing
- Health & safety issues
- Inadequate access
- Increased traffic
- Noise
- Ecological impacts
- Boundary issues
- Building work
- Increased pollution
- Adverse landscape impacts
- Loss of open space
- Strain on existing facilities
- Trees
- Loss of privacy
- Council consultation not wide enough
- Heath road too narrow
- Pedestrian safety
- Barton Road junction unsafe and has standing water
- Creation of rush hours
- Development here will open the gates for more in this vicinity
- Heath road should be improved
- Scale
- Application lacking information

Support: includes

- Complies with TNDP19 and meeting care needs
- Will address needs of older people
- Massive benefit to the community

- Appropriate form of development suited to Heath Road
- No environmental harm
- Field was donated for benefit of the village, this achieves that
- A much needed facility
- Applicant consulted widely

Neutral:

No objection to having a development catering for older people but developer could do better

PLANNING HISTORY

REF: DC/21/04549

Planning Application. Erection of a 54no unit extra care Affordable Housing scheme comprising of 40 apartments, 14 bungalows and communal areas with associated car parking and landscaping.

DECISION:

CURRENT APPLICATION

This part of the page is deliberately left blank.

The Assessment follows

PART THREE – ASSESSMENT OF APPLICATION

1.0.0 The Site and Surroundings

- 1.1.0 The application site sits within a wider triangle of land, two sides of which are bounded by residential development and the hypotenuse of this triangle defined by the Bury St Edmunds to railway lines.
- 1.1.2 The site measures approximately 1.3ha
- 1.1.3 Presently the site forms part of a small field which has hedgerow to the Heath Road frontage
- 1.1.4 A small remote equipped play area is located further to the west.



figure 3: **The Site in immediate context [aerial view]**



figure 4: **The site from Heath Road and the unrelated nearby play area**

2.0.0 The Proposal

- 2.1.0 Construction of 54 unit extra care units to include 40 apartments and 14 bungalows.
- 2.1.0 The applicant has explained that “the new extra buildings will be designed around the latest thinking in the older persons’ housing sector and will be built to modern standards in line with HAPPI guidelines. Particular attention will be given to dementia friendly design.”
- 2.1.1 Included within the scheme are communal facilities.
- 2.1.2 The design philosophy behind the scheme is described as:

“The resulting design is shaped around a series of open courtyard gardens which provide amenity space for residents and also allow for natural light and ventilation to enter the building. The development has been arranged to maximise the views towards the green spaces surrounding the site. All the trees have been retained and the green infrastructure and biodiversity on the site will be enhanced thorough increased planting and creation of new habitats.

The communal facilities are located centrally to the development and are located to create an active street scene.”

3.0.0 The Principle Of Development

- 3.1. 1 Central to the determination of this application is Thurston Neighbourhood Development Plan 2019 Policy 3, which states:



figure 5: **Extract from TNDP19: Policy 3**

- 3.1.2 The TNDP19 does not specifically allocate a site/s for care home purposes.
- 3.1.3 The sites that are allocated for development within the TNDP19 are those which relate to orthodox residential development where there is no element of care.
- 3.1.4 The first question to explore therefore when considering the merits of this proposal is – “To what extent is the fact that the application is outside of the defined settlement boundary in the TNDP19 and the Adopted Local Plan 98 an impediment to securing planning permission?”

3.1.5 To answer this question we need to look deeper into the TNDP19. [The Plan]

3.1.6 The supporting text to Policy 3 in the TNDP19 explains why the Plan supports the provision of care/assisted living facilities.

“Care home/assisted living

5.18 Feedback from questionnaires shows a clear need for housing that can cope with the various needs of an ageing population. The TNP Steering Group has engaged with a care provider that showed initial interest if a potential site could be made available. Given the nature of the occupiers, the provision of a care home would not expect to significantly increase the traffic pressures on the road system.

5.19 The types of housing envisaged under this policy have been informed by the ‘Housing our Ageing Population Panel for Innovation’ (HAPPI) report⁶ which defines suitable homes for older people. The report states that, “good retirement housing involves plenty of space and natural light, accessibility, bathrooms with walk-in showers, the highest level of energy efficiency and good ventilation, a pleasing natural environment outside, balconies/outside space”.

5.20 The development of homes suitable for older people, including affordable and market housing of a type and size that meet local need, will be supported on sites that satisfy the policies in this Plan.”

3.1.7 Clearly the plan is responding to an identified need and there is a strong expression of support for such facilities provided that they are on sites that satisfy the policies in [The Plan].

3.1.8 So what does the TNDP19 say about development in Thurston and specifically that which is responding to care needs?

3.1.9 To address this question we first need to look to Policy 1 of The Plan as this sets out the spatial strategy for Thurston.

3.1.10 Policy 1 opens at Part A with:

A. New development in Thurston parish shall be focused within the settlement boundary of Thurston village as defined on the Policies Maps (pages 75-76).

figure 6: **Extract from TNDP19: Policy 1 A**

3.1.11 The Policies Maps on pages 75-76 show the settlement boundary and that the boundary has been drawn to include five large sites that currently already benefit from planning permission for residential development. [the plan on page 76 is merely an inset of that shown on page 75. Policy 1 affords support for development proposals within the settlement boundary subject to compliance with other policies in The Plan. [Policy 1, Part B]

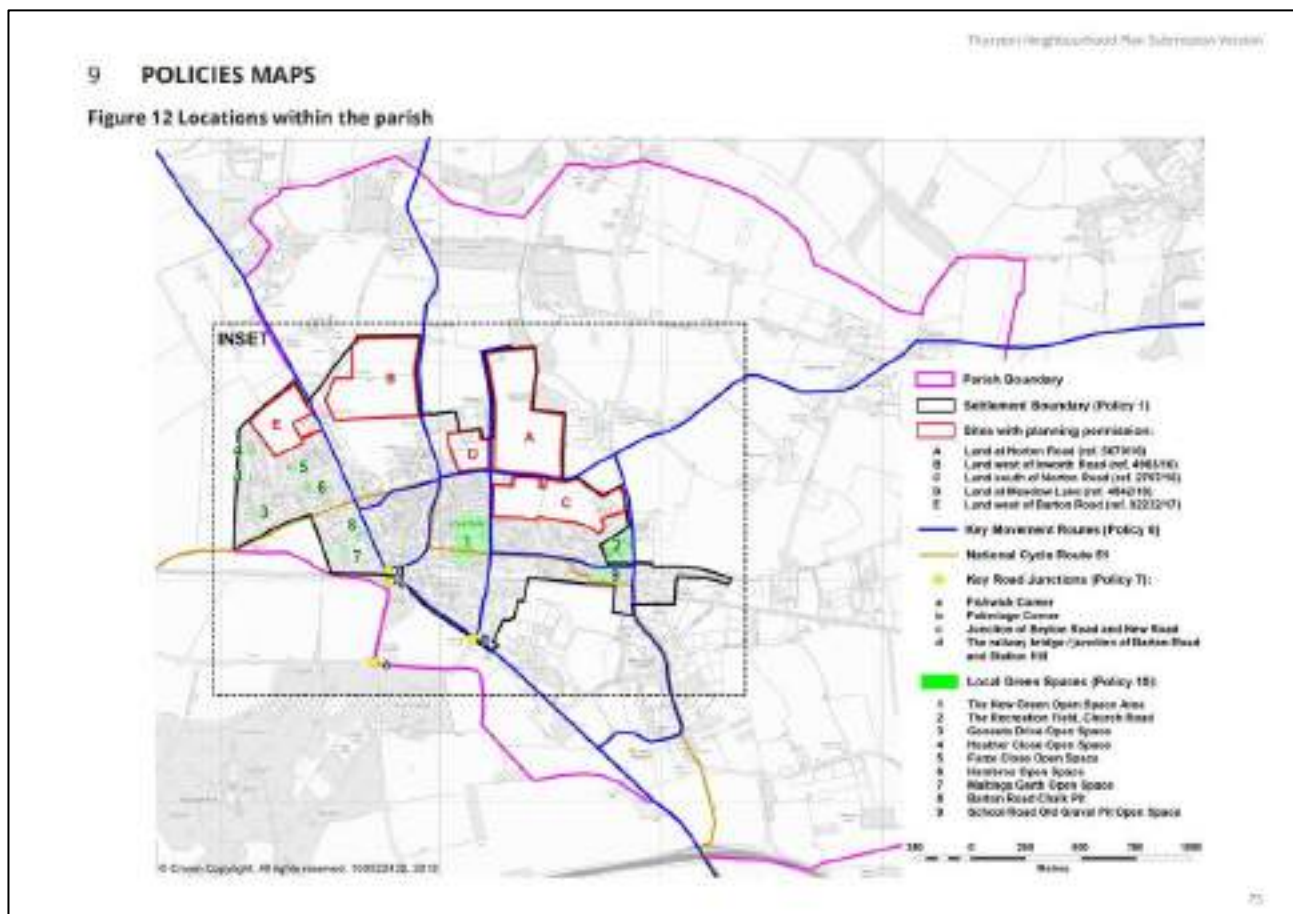


figure 7: **Extract from TNDP19: Figure 12 – policies map**

- 3.1.12 Whilst there is a requirement for new development to be focused within the settlement boundary, there does not appear to be a site that is available for the larger extra care facility being proposed by the applicant within the settlement boundary in the case of the application before the Committee as all of the specifically allocated sites have the benefit of planning permission for orthodox housing.
- 3.1.13 That being the case and as the application site is outside of the settlement boundary what does the TNDP19 say about development outside of the settlement boundary in this case.
- 3.1.14 Policy 1 that addresses specialist housing and care needs on sites that are outside of settlement boundary. This is Policy 1, part D. It states:

D. Development proposals to meet specialist housing and care needs on sites that are outside the settlement boundary will be permitted where it can be demonstrated that no available and deliverable site exists within the settlement boundary.

figure 8: **Extract from TNDP19: Policy 1 D**

- 3.1.15 On the basis that the TNDP19 supports the delivery of care/assisted living facilities but does not allocate a site within the defined settlement boundary and as there appears not be no immediately available site for such a use Policy 1, part D is engaged.
- 3.1.18 The application site sits within a wider triangle of land two sides of which are bounded by residential development. The hypotenuse of this triangle defined by the railway lines.
- 3.1.19 As a result it does not intrinsically read as part of the wider countryside as that character effectively only fans out from the other side railway line.
- 3.1.20 Certainly the wider site hereabouts reads as open land and that has a character and inevitably residents whose properties currently overlook the wider site gain some enjoyment from that aspect.
- 3.1.21 This proposal if approved will inevitably encroach into and dilute some of that character.
- 3.1.22 A significant element of open land beyond the application site will however remain and will continue to provide amenity.
- 3.1.23 Officers are of the opinion that the development can be approved without undermining objective E1 of the TNDP19 for the reasons described above.
- 3.1.24 In trying to interpret the position it is noted that Thurston Parish Council in its formal consultation response of 21 September 2021 opened by expressing:
- “continued support of this application and is of the opinion that this proposal will help address Objective H2 – “To address the specific housing needs of older people....”
- 3.1.25 Whilst the Parish Council went on to say that it anticipated the development setting the highest standards for design and global climate issues at a local level it is clear that it accepts the principle of the development in the location being proposed.
- 3.1.26 It is easy to see why the location, despite being outside of the defined settlement boundary is acceptable for the proposed use. It:
- Is principally for specialist housing and care needs
 - Immediately adjoins the settlement boundary
 - Is within easy walking distance of Thurston Station [just to the south-east] [staff and visitors]
 - Is well connected to existing village facilities [staff, visitors and residents where appropriate]
 - Is easily accessible
- 3.1.27 The location is considered therefore considered sustainable in terms of its accessibility and connectivity.

- 3.1.28 When considering whether the principle is acceptable one must also have regard to flood risk.
- 3.1.29 In terms of 'fluvial' flood risk [rivers and watercourses] the site lies within flood risk zone 1 where there is no sequential presumption against development of this nature.
- 3.1.30 In terms of 'pluvial' flood risk [from surface water/ rainfall events] is noted that the Council's Strategic Flood Risk Assessment produced as part of the Joint Local Plan evidence base indicates a small pocket of surface water flood risk within the site.
- 3.1.31 This therefore requires the Council to consider the sequential test in order to explore whether there is an alternative site within Thurston that is available for the proposed use that does not have any flood risk [fluvial and/or pluvial].
- 3.1.32 This committee report has already noted that there is not a site allocated within the defined settlement boundary for a use of this nature and size. The applicants have not identified such a site as being available themselves.
- 3.1.33 The Council is not aware of any other site outside of the defined settlement boundary being available for the specific development proposed and that supports the applicants own research prior to gaining an interest in the present application site.
- 3.1.34 Certainly the applicant is now able to demonstrate a genuine interest in the land the subject of this application and therefore an ability to deliver the project.
- 3.1.35 That being the case it is necessary to assess whether the identified potential surface water flood risk can be mitigated suitably and effectively.
- 3.1.36 Following discussion and negotiation with Suffolk County Council as the LLFA officers are of the opinion that the identified flood risk can be satisfactorily mitigated. This will be explored in greater detail later in this report.
- 3.1.37 That being the case the potential hurdle to development can be successfully overcome.

3.1.38 Sub-conclusion: Principle

- 3.1.39 The proposal is acceptable in principle as it accords with those policies of the TNDP19 that are most important to the consideration and determination of this application. Namely:

Policy 3: Meeting Specialist Care Needs; and,

Policy 1: Thurston Spatial Strategy, Part D. Specialist housing and care needs outside the settlement boundary

3.1.40 There is not a sequentially preferable site immediately available and the identified surface water flood risk can be suitably mitigated.

3.1.41 Having concluded that the principle of development is acceptable and as that conclusion is supported by Thurston Parish Council this report now moves on to considering the merits of the details of the proposal.

3.2.0 Details

3.2.1 Access

3.2.2 It is intended to access the site via a new vehicular access formed onto Heath Road at the eastern end of the site frontage. Suffolk County Council as local authority has indicated formally that it has no objection to this arrangement.

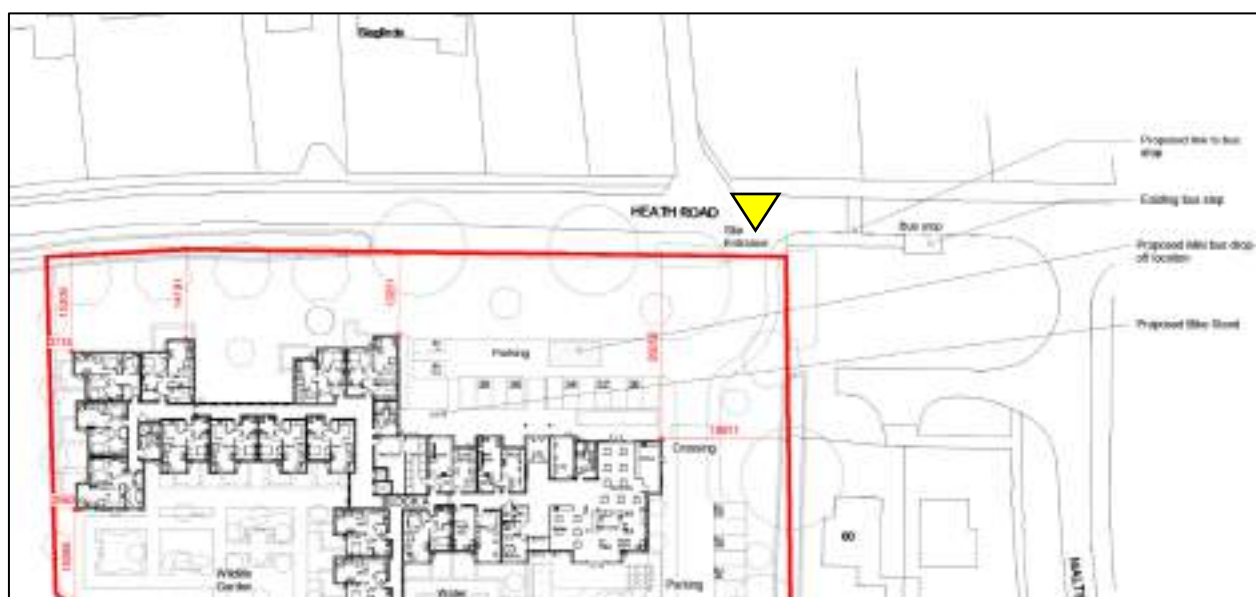


figure 9: **Proposed access**

3.2.3 This new access will also be connected by a new footway to the nearby bus stop just to the east of the site. The majority of existing footway runs along the north side of Heath Road.

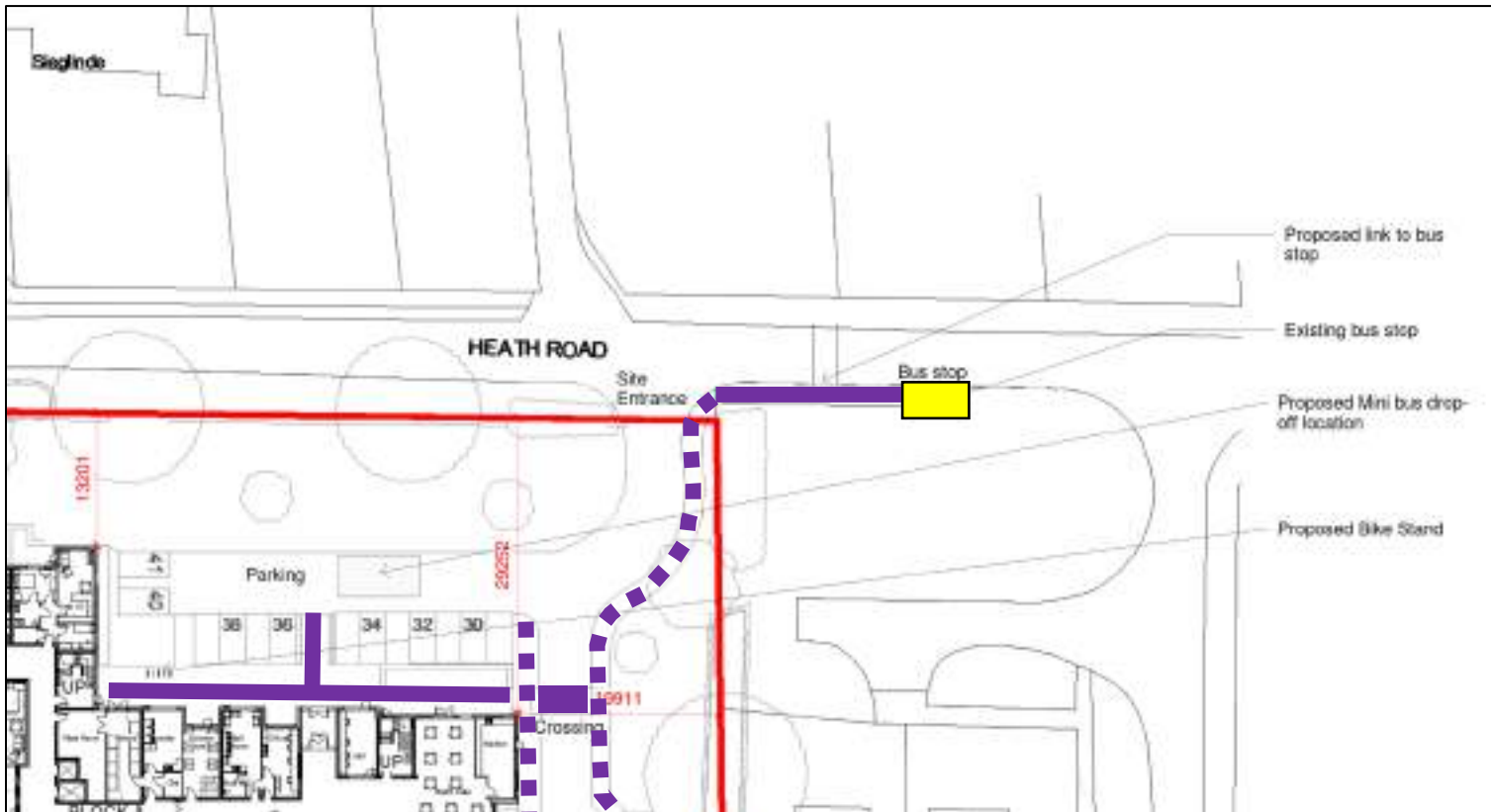


figure 10: **Proposed footway to bus stop, Heath Road**

3.2.4 The bus stop is on the route of the 384 & 385 Stowmarket – Thurston – Bury St Edmunds service.

Mon-Fri: Thurston to Bury St Edmunds

3 buses [384] per day from Heath Road
5 buses per day incl from post office Barton Road

Return
2 Heath Road
4 post office

Sat: Thurston to Bury St Edmunds
2 buses [384] from Heath Road
4 buses incl 385 from post office Barton Road

Return
2 Heath Road/Genista Drive
3 post office

Mon-Fri: Thurston to Stowmarket

3 buses [384] per day from Heath Road
4 buses per day incl 385 from post office Barton Road

Return
2 Heath Road
4 post office

Sat: Thurston to Stowmarket
2 buses [384] per day from Heath Road
4 buses per day incl 385 from post office Barton Road

Return
2 Heath Road
3 post office

The above includes:

A school service [384] leaves Stowupland High School for Heath Road/Genista Drive at 15.50 Mon-Fri



figure 11: **Existing bus stop, south side of Heath Road near the application site and suggested footway connection [red shading]**

3.2.5 Cycling

3.2.6 It is noted that National Cycle Route 51 runs along Heath Road on its route through Thurston and that Thurston has an extensive and expanding cycle network. This suggests that staff

living within the vicinity who might wish to cycle to work at the extra care centre would find that an attractive prospect. *[subject to noting the staff shower point and the need to provide covered secure cycle parking made elsewhere in this report]*



figure 12: **Route of National Cycle Route 51 in the vicinity of Thurston.** *[application site shown with turquoise star]*

3.2.7 **Parking**

3.2.8 Included within the proposal are:

- A mini-bus drop off point at the from the development [with turning head]
- A proposed bike stand [shown on the layout as having 5 hoops.
- 41 parking spaces

3.2.9 The Council’s Adopted Parking Standards [3rd edition 2019] specify the following parking requirements for a residential care home.

Standard:

Use	Vehicle Requirement	Cycle Minimum	PTW Minimum	Disabled Minimum
Residential care home	1 space per full time equivalent staff + 1 visitor space per 3 beds	2 spaces per 5 staff	1 space + 1 per 20 car spaces (for 1 st 100 car spaces), then 1 space per 30 car spaces (over 100 car spaces).	Dependent on actual development, on individual merit, although expected to be significantly higher than business or recreational development requirement

figure 13: **Extract from Adopted Parking Standards [3rd edition 2019] residential care homes**

3.2.10 obs.

3.2.11 It also will provide 54 units of care accommodation.

3.2.12 Using the parking provision calculation described above that generates a parking expectation for:

$$16 \text{ staff} \times 1 = 16$$

$$54 \text{ units} \div 3 = 18$$

That creates a total requirement of 36 off street spaces.

3.2.13 Within the projected 16 FTE staff there will be shift working and so the provision of the proposed 41 spaces builds in a degree of welcomed capacity. It is therefore unlikely that the proposed use will result in parking spilling out onto Heath Road.

3.2.14 No car parking on spaces for residents are to be provided as a result of the nature of the care provided.

3.2.15 No **disabled parking spaces** appear to have been proposed. For staff or visitors. This should be rectified and **should be secured by condition**.

3.2.16 Vehicle parking spaces measure 5m x 2.5m. This meets the dimension standard at paragraph 3.4.4.2 of the Parking Standards.

3.2.17 Noting the cycle parking requirement within the adopted standards 16 FTE staff generates a requirement for $16 \div 5 = 3.2$ spaces [rounded up to 3]. The layout therefore includes sufficient cycle parking.

3.2.18 Whilst it is noted that sufficient parking rack space is to be provided, it is considered appropriate for this facility to be **covered and secure**. That requirement **should be secured by condition**.

3.2.19 The staff area within main block A [closest to the parking racks] appears not to have a shower facility. This is not what the Council expects from employers seeking to encourage cycling to work. One might also expect staff to have access to a shower.



figure 14: **Block A staff room**

3.2.20 The applicant has been asked to expand on whether or not **shower facilities for staff** are included. If not then these **should be secured by condition**.

3.2.21 Layout

2.2.22 The proposed layout will create an interesting campus style development comprising a truncated cruciform shaped main block on the northern half of the site arranged to create two internal and contained garden courtyards. This will create an intimate attractive sense of place for residents.

2.2.23 These outdoor spaces provide what are described as:

- a sun lounge courtyard
- water courtyard with water features
- wildlife garden

2.2.24 It is clear that the outdoor spaces will also provide a delightful and enthralling sensory experience.



figure 15: **Extract from proposed layout plan – northern half of site**

2.2.25 The southern half of the site features a series of six smaller individual blocks containing 14 bungalows, this time arranged generally in a horse-shoe pattern – development on three sides with the fourth side open to create intimate defensible space that will give residents their own communal amenity space and provide a sense of identity.

2.2.26 Eight of these units will have their own small garden.

2.2.27 Scale and Form of buildings

2.2.28 The scale of development falls into two distinct components. A main two storey-building in the northern half of the site and single storey development in the southern half.



figure 16: **Proposed storey heights**

2.2.29 The truncated cruciform shape of the building allows clusters of apartments to be arranged along a full-length corridor from a central access hub comprising both a staircase and lifts

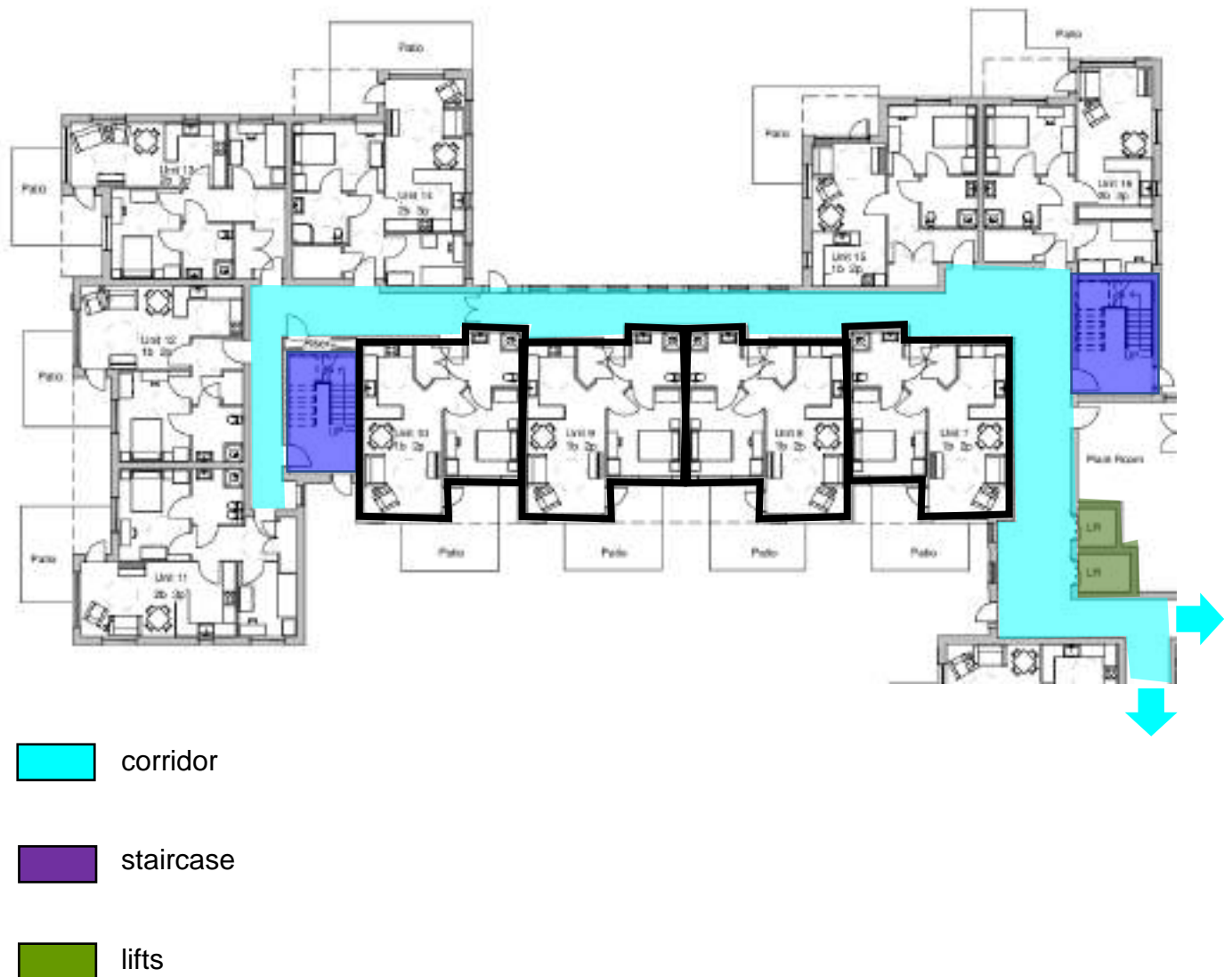


figure 17: **Internal circulation space and access [gr fl block A]**

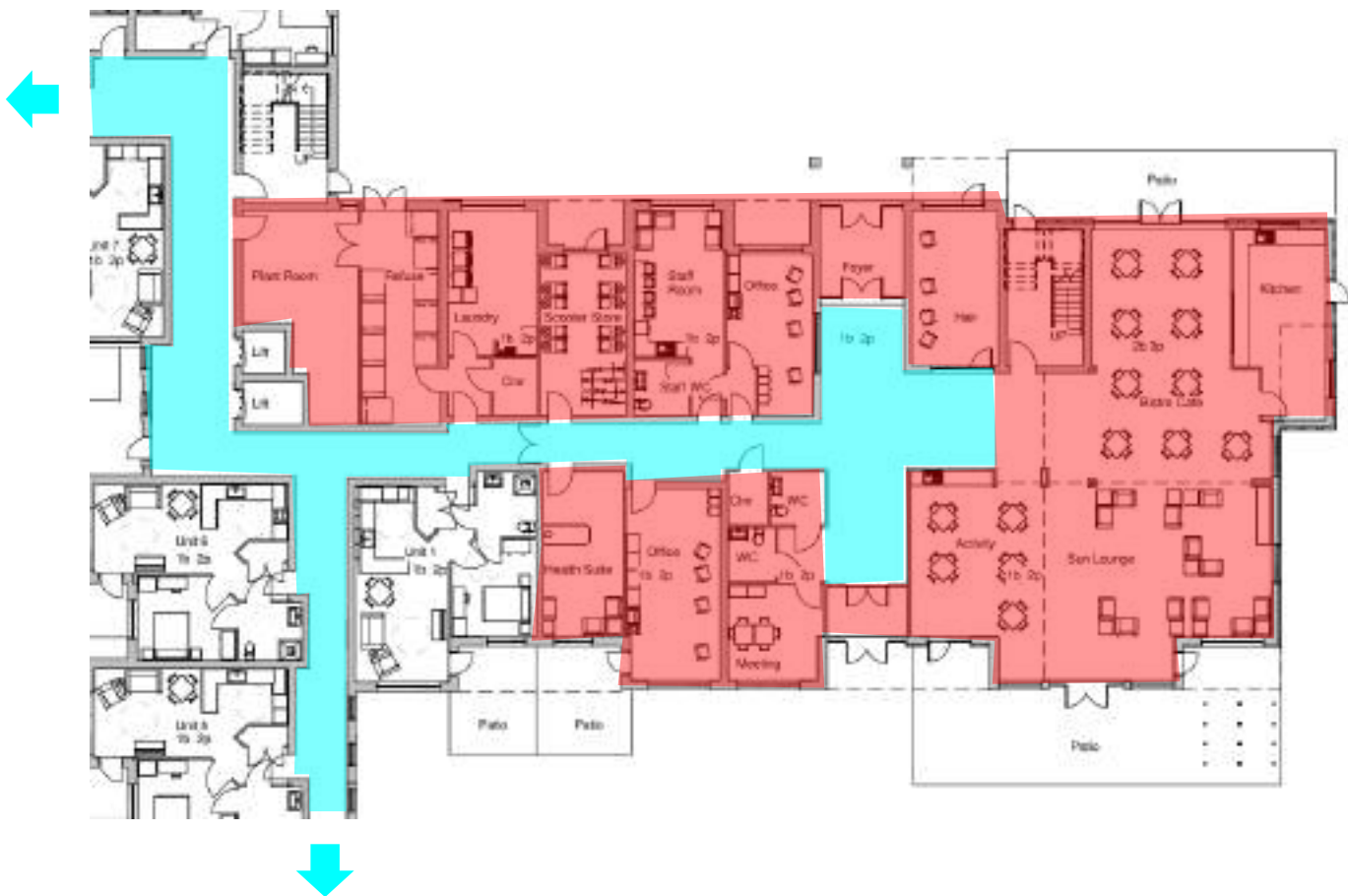


figure 18: **Internal circulation space and ancillary space [gr fl block A]**

- 2.2.30 Whilst Members may have worries that a block of this size might appear monolithic the architect has cleverly broken down the scale and mass by the use of articulation, changes to materials, decorative brickwork, projecting and recessed balconies at second floor and the inclusion of projecting wings of varying sizes and gables. This has the effect of creating what appear to be as series of juxtaposed buildings. There will be interesting elements of light and shade much of which will change with the passage of the sun. The building therefore should not appear institutional.
- 2.2.31 These design elements will all work together to present visually interesting elevations. This is particularly true on the sites Heath Road frontage which will be the most prominent to public view.

2.2.32 The following two images show how what might appear at first glance to be a flat elevation is in fact dynamic.



figure 19: **Proposed elevations block A**

CLASSIFICATION: Official



figures 20

**Proposed rear elevation
block A courtyard**

2.2.33 The single storey elements also successfully use articulation and projection to break up the form, thereby adding visual interest and a sense of rhythm that avoids sterile blandness.



figures 21: **Typical bungalow cluster**

2.2.34 Thurston Parish Council has not objected to the scale of the proposed development

2.2.35 Design/Appearance

2.2.36 The buildings have been designed to produce a fresh modern character.

2.2.37 The nature of the proposed development is such that it is bound to have a character of its own when judging appearance against the requirements of the TNDP19, The Adopted Local Plan, the Suffolk Design Guide and even the National Design Guide. The layout is of a campus style and the elevations have been designed to reflect that fact the each of the buildings is part of a wider whole.

2.2.38 Whilst there is a coherent approach to the design it is not bland or unsubtle. There are design cues and themes that appear across the development that tie it together in a lively and interesting way.

2.2.39 As a result it is difficult to strictly apply THNDP19 Policy 4: 'Retaining and Enhancing Thurston Character Through Residential Design' which states:

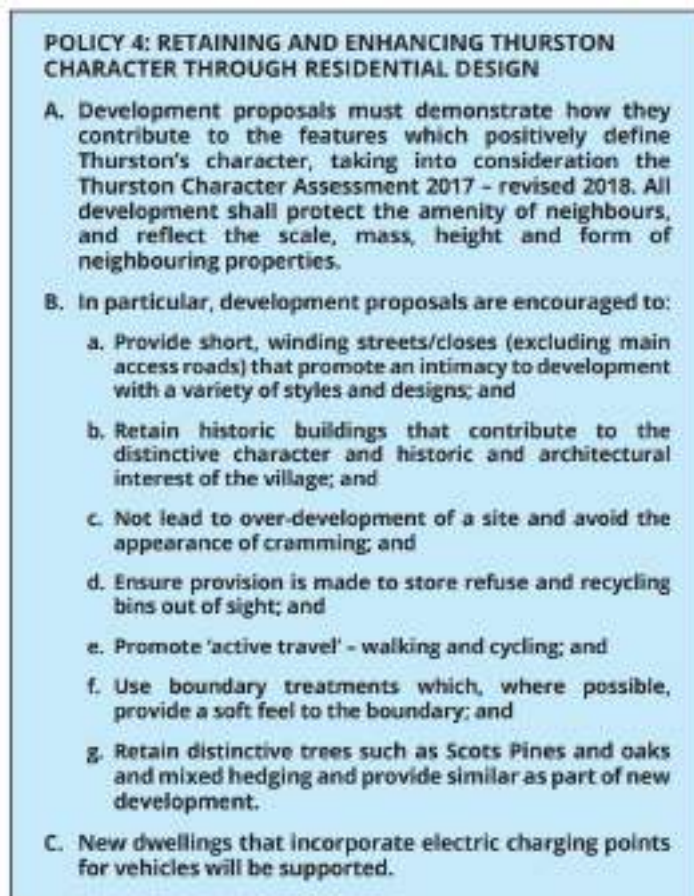
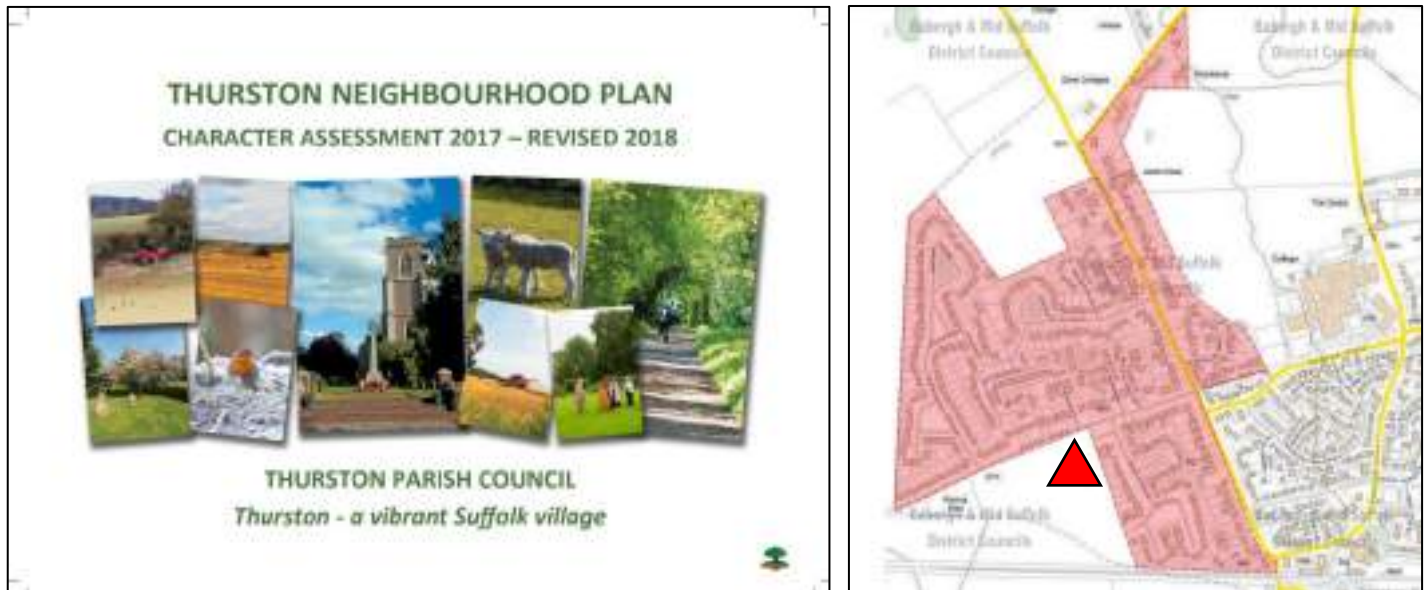


figure 22: TNDP19 Policy 4

- 2.2.40 Looking at the Thurston Neighbourhood Plan Character Assessment revised 2018 the site sits adjacent to and not within what has been defined as Character Area 1 Barton Road/heath Road Area



figures 23: **Character Assessment Revised 2018. Character Area 1**

- 2.2.41 The TNPCA revised 2018 summarises the existing character of Heath Road, Maltings Garth, Heath Court, The Crescent and The Hawthorns as:



figure 24: **Character Assessment Revised 2018. Character Area 1: Extract**

- 2.2.42 The proposed character cannot be said to be reflective of the established character of Heath Road in the immediacy of the application site. It will if approved have a character all of its own.
- 2.2.43 That character is not inappropriate as it will sit between the railway line and the south side of Heath Road and read as a self-contained development with a unique appearance that reflects the sense of place that it is trying to create for its residents whose particular needs require an element of care within a pleasant and contained environment.
- 2.2.44 Thurston Parish Council has not objected to the design [save for **ev charging** provision which can be increased through the application of a **suitable condition**]
- 2.2.45 An example of the use of interesting design elements is the use of panels of projecting bricks laid in an alternate pattern to create texture and allow sunlight to play across them casting moving shadows as the sun arcs across the sky.



figures 25: **Detailing example**

- 2.2.46 Thurston Parish Council has not objected to the proposed elevations

2.2.47 Materials

- 2.2.48 Where consistency with Policy 4 of the TNDP19 can be achieved is in the use of materials from the traditional palette. In places the drawings show buildings in cream bricks which are typical of the Suffolk palette, elsewhere the bricks appear to be of a buff multi. This is less synonymous with Suffolk. It is recommended that a condition requiring the further submission of brick details is appropriate and that the palette should include soft red stock bricks as well as cream and/or buff bricks provided the latter are not yellow in hue.
- 2.2.49 Typically bricks in this part of Suffolk are Suffolk Whites, Gault cream bricks and soft red/orange stock bricks]
- 2.2.50 The submitted drawings do not specifically identify the type of roof material intended for use – the application form merely describing them as grey tiles.
- 2.2.51 The Council will expect the roof materials to be either real Welsh slate or artificial slates of a size, colour, profile, texture and thickness that us authentic with real slate. Large format concrete tiles are not acceptable.
- 2.2.52 It is recommended that the use of appropriate traditional materials from the vernacular Suffolk palette be secured by condition.**
- 2.2.53 Amenity Space** [for residents of the development]
- 2.2.54 The application includes a range of spaces for residents from formal communal garden space, small private amenity to many of the ground floor units, incidental space beside pathways and strategic landscaping.
- 2.2.55 These not only combine to provide excellent enclosed amenity for recreation but also create a sense of airiness. The communal gardens are accessible and feature extensive seating and pathways.

This part of the page has been left blank deliberately...

figure 26 follows.....

Amenity Areas and Landscaping



figure 26: **Amenity Areas and Landscaping Northern half of site**

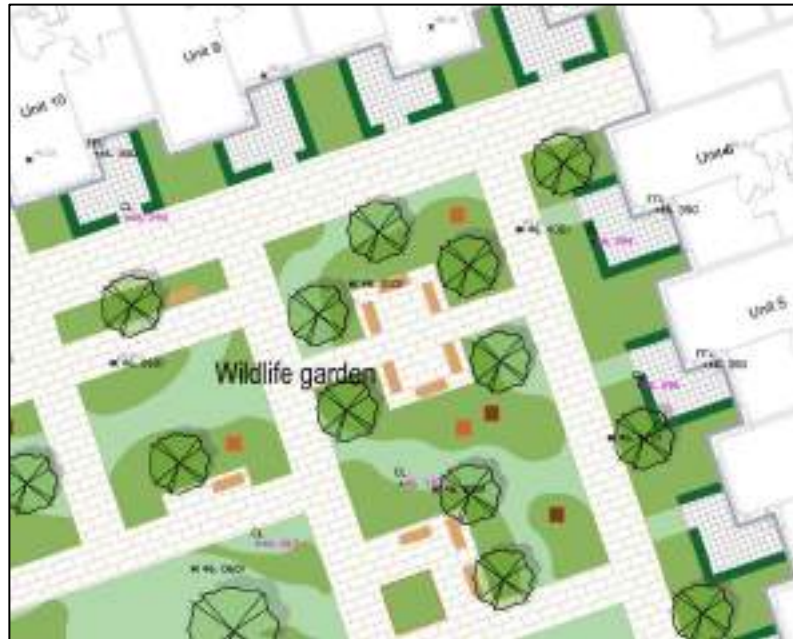


Figure 27: **Amenity Areas detail extract**

2.2.56 **Residential Amenity** [adjoining properties]

- 2.2.57 The elongated two-storey building proposed to front Heath Road will be set back from the edge of the carriageway behind an approximately 13m deep landscape belt. This will immediately soften the visual impact of the development on the streetscene by reinforcing the dominance of flora.
- 2.2.58 Existing dwellings on the opposite side of Heath Road [*predominantly bungalows*] are themselves generally set back from the edge of road by substantial front gardens such that the building-to-building distances [existing to proposed] range from approximately 50m to 62m.
- 2.2.59 This is sufficient to ensure that there is not a significant infringement on the amenity enjoyed by the houses opposite in terms of potential loss of daylight/sunlight, harm to outlook from visual dominance, undue invasion privacy.

This part of the part of page has been left blank deliberately



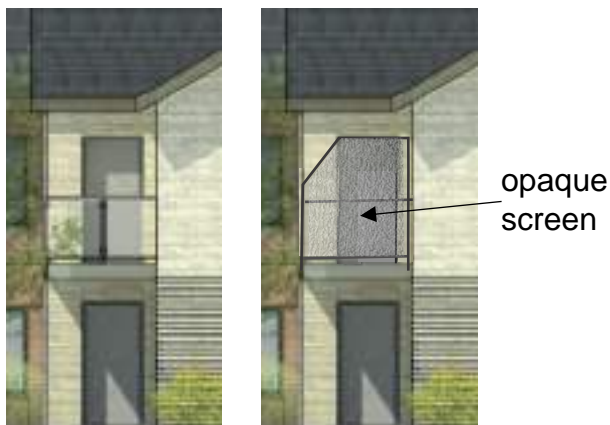
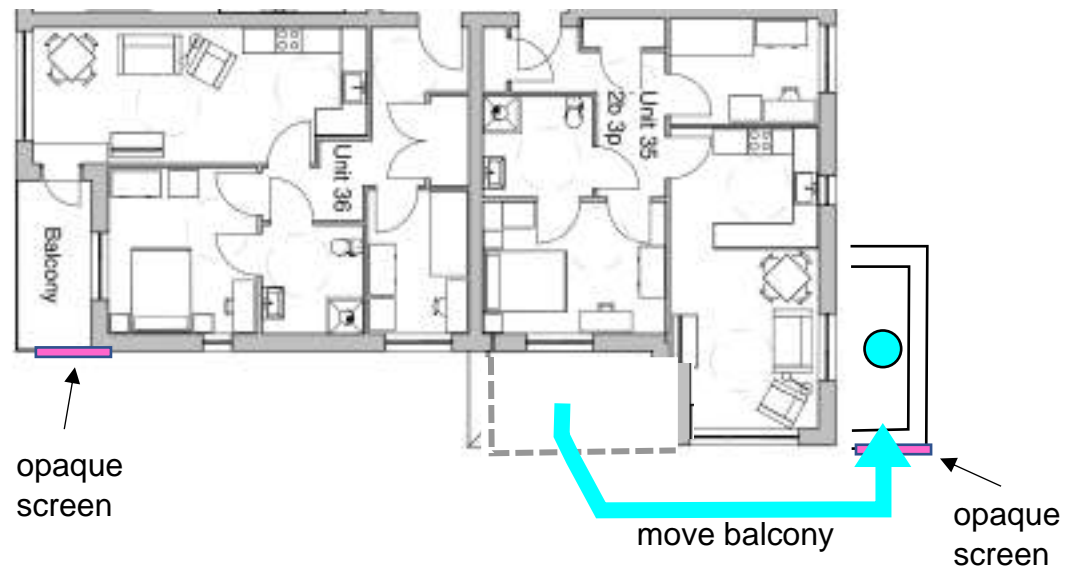
figures 28: **Distances to adjacent dwellings**

2.2.60 Looking now at the impact of the proposed development on existing properties that lie immediately to the east on the west side of Maltings Garth Members will note that existing rear gardens run up to the boundary of the proposed extra-care facility.

- 2.2.61 It is therefore important to assess whether proximity of proposed built-form and associated uses will cause unacceptable impact/s on the amenity enjoyed not just within rooms to the rear of those homes but also their gardens.
- 2.2.62 The closest of the neighbouring properties, number 60 Garth Maltings Garth, is some 28m from the closest part of the proposed building, thereby exceeding the Council's established back-to-back norm of 25m. The proposed building at this point is two storey and the elevation presented are end elevations.
- 2.2.63 Whilst the acceptable back-to-back distance is noted officers believe that the inclusion at first floor of balconies within the closest end wall to number 60 Maltings Garth may pose a risk of unacceptable overlooking. This can be easily remedied however, by relocating one balcony to the front elevation whilst serving the same apartment and room and an addition of a side screen to it and the other balcony. The latter is side on to number 60 whereas the one to be relocated is full on as shown below. The suggested remedy is shown in figure 30.



figures 29: **Possible amenity issues from balconies in end wall [east] of block A**



figures 30: **Resolving possible amenity issues from balconies in end wall [east] of block**

2.2.64 It is recommended that these adjustments are secured by condition.

2.2.65 Whilst it is proposed to provide parking spaces along much of the sites eastern boundary, arranged at right angles to the rear garden boundaries of properties in Maltings Garth this is unlikely to result in acceptable disturbance as vehicle turnover is likely to be low and there is intervening landscaping.

2.2.66 No properties lie to immediately the west or south of the application site and so the question of possible impact on residential amenity in these directions does not arise.

2.2.67 The single storey blocks are unlikely to pose any risk to the amenity of properties in Maltings Garth as a result of their low profile and the fact that in places they are more than 50m from adjoining houses [back-to-back].

2.2.68 Boundary Detailing

2.2.69 The submitted landscape drawing indicates the following for the edges of the site:

- West, South West, South: MF1 - 1.2m high estate railing
- East: TF2 - Proposed timber post and rail fence with added stock proof mesh, to eastern boundary ***[height to be confirmed]***
- North: landscaping

2.2.70 This is appropriate in principle but full detail is needed as to the type of posts and rails [timber or metal], the type of mesh [incl colour] and the full heights in all cases]. It is recommended that this information be secure by condition

2.2.71 Ecology and landscaping

2.2.72 Included in the design are:

Bird boxes
Bat boxes
Insect hotels
Log piles
Native hedging
Wildflower Meadow

2.2.73 The applicant has been asked to provide a Biodiversity Net Gain statement and the response will be reported verbally at the meeting.

2.2.74 That said, Members will have noted the consultation response from Place Services - Ecology which raises no objection subject to specific conditions.

2.2.75 The ecological impact is therefore considered acceptable with the added conditions suggested by Place Services.

2.2.76 Whilst the advice of Place Services – Landscape is noted in respect of the benefit of receiving a Landscape Visual Assessment, development management officers are of the opinion that the fact that this site is already bounded on two sides by residential development and the railway on its third side it does not read as part of the open

countryside. Indeed views in and out of the site are already constrained by the intrusion of the railway.

2.2.77 Members will have noted the support offered by Thurston Parish Council to this proposal.

2.2.78 Indeed the Parish Council hopes to work with the Thurston Relief in Need charity that owns the application site and land around it in the event of planning permission being granted for the extra care facility to recreational use of the wider site for the benefit of the community. This will further reinforce the character of the land as informal recreational space rather than countryside per se.

2.2.79 In terms of the proposed detailed landscaping within the site this is considered acceptable.

2.3.0 Drainage

2.3.1 The application has been the subject of ongoing discussion and as reported earlier further information is being submitted and considered at the time of writing this report. Officers are working with the LLFA and the applicant on establishing that that ground water flood risk can be satisfactorily mitigated such that the buildings can be kept safe and flood risk not increased elsewhere. Recent discussion suggests a positive outcome can be achieved. That said **a verbal update for Members will be provided at the meeting if not in tabled papers.**

2.3.2 Members will have noted that the application has:

- not attracted objection from the Environment Agency
- not attracted objection from Anglian Water
- and is outside of the East Suffolk Drainage Boards catchment

2.4.0 Archaeology

2.4.1 Members will have noted the comments from SCC Archaeology and the fact they raise no objection subject to conditions:

“There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.” - extract

2.5.0 Lighting

- 2.5.1 The comments made by Thurston Parish Council in respect of the need for sensitive lighting are shared by officers and what's more echoed by Place Services. it is recommended that if Members are minded to grant planning permission then a **specific condition be added** to any permission [if such is forthcoming] **requiring submission of a lighting strategy and full external lighting details** – in the interest of safeguarding wildlife, residential amenity and to prevent unnecessary unacceptable skyglow whilst providing a safe and secure environment for residents, staff and visitors of/to development.

2.7.0 Heritage

- 2.7.1 Noting the consultation advice of the Council's Heritage Officer:

“The site lies adjacent to existing residential development on two sides and will appear entirely within the context of this existing development. There do not appear to be any heritage assets whose setting would potentially be affected by the proposal. Accordingly I do not consider the proposal would result in any harm to any heritage assets.”

...Members can be assured that this development will not have no harm heritage assets.

- 2.7.2 Having undertaken the necessary assessments Members are advised that the proposed development is acceptable within the context of the Section 16 of the NPPF 21: Conserving and enhancing the historic environment and the Council's duties under S66 of the Planning (Listed Building and Conservation Areas) Act 1990.

2.8.0 Wider highway considerations

- 2.8.1 In determining this application care needs to be given to ensure that the proposal conforms to TNDP19 Policy 7: Junction Capacity at Key Junctions. It states:

Extract from TNDP19 follows....

POLICY 7: HIGHWAY CAPACITY AT KEY ROAD JUNCTIONS

A. Where a Transport Assessment or Transport Statement is required, this should address the transport impacts on road junctions, particularly including the following junctions on the Policies Maps:

a. Fishwick Corner;

b. Pokeriage Corner;

c. Junction of Beyton Road and New Road;

d. The railway bridge/junction of Barton Road and Station Hill.

figure 31: **TNDP19 Policy 7A**

2.8.2 The County Council as local highway authority has not raised conflict with TNDP19 Policy 7 as an issue in this case.

2.8.3 Whilst Heath Road provides access to Barton Road from which a traveller can head north towards the Bunbury Arms Junction or south under the railway bridge towards either Pokeriage Corner or Fishwick Corner the expected level of traffic to be generated is so low as not to pose a highway capacity issue at any of the junctions identified in policy 7.

2.8.4 Thurston Parish Council has not raised conflict with policy 7 as a material issue in this particular case.

2.8.5 Members will be familiar with proposed developments within Thurston where this has been the case.

2.8.6 In the context of the low traffic generation Policy 6 B [a] [b] is not engaged and there is no need for junction improvements required to accommodate this development on the local highway network.

2.9.0 Sustainability

2.9.1 In the supporting Sustainability Statement the agent describes the following features as being included in the design to enhance the green credentials of the development.

- Orientation and passive design to maximise solar gain at different times of the day

- Fabric first approach [exceeding⁵ Building Regulations by a minimum of 48%]
- Mechanical Ventilation Heat Recovery [MVHR]
- Apartment heating will be supplied by low surface temperature electric panel heaters
- Hot water via electric immersion
- EV charging to one in five spaces
- SuDS drainage system

Renewable energy

“A full review will be undertaken of renewable energy sources which will be best suited to the site and building will be completed at the technical design stage. This will include looking at solutions to provide heating and hot water.”

- 2.9.2 Members will have noted that the Council’s sustainability officer raises no objection subject to conditions and with a recommendation that ev charging point numbers be increased.
- 2.9.3 Officers have already indicated that support for the Parish Council’s concerns about a seeming lack adequate ev changing is recommended through the addition of an appropriate **condition requiring further details and additional charging points**.

PART FOUR – CONCLUSION

3.0.0 Planning Balance and Conclusion

- 3.1.0 It is clear from this report that a variety of adopted policies within the various elements of the Council’s Adopted Development Plan may be said to be relevant to the consideration of this proposal. These policies all sit within the within the basket of relevant policies and regard needs to be and has been given to them in this report.
- 3.1.1 The Adopted Development Plan is the starting point for determining any application.
- 3.1.2 The Thurston Neighbourhood Development Plan 2019 [TNDP19] is the most recently adopted expression of planning policy relevant to the determination of this planning application.
- 3.1.3 The most important policies for the determination of this planning application are Policies 1 and 3. These specifically relate to the settlement boundary of the village and meeting specialist care needs in Thurston. It contemplates such needs being satisfied *outside* of

⁵ Report prepared July 2021

the Settlement boundary for Thurston in certain circumstance that apply here with the application before Members.

- 3.1.6 The proposed development is considered to accord with those policies and Thurston Parish Council's support for the principle of this development on this site reinforces that point.
- 3.1.7 It is also considered to conform to Policy 2 [part E] Meeting Thurston's Housing Needs [addressing the needs of older people] of the TNDP19. This view is shared by Thurston Parish Council who support the principle of delivering this extra care facility on this site. This too needs to be given significant weight.
- 3.1.8 In such circumstances the benefits associated with the development and the fact that it complies with the most important policy for the determination of the application [TNDP19 Policy 3] means that any harm that may arise from a development outside of the settlement boundary for Thurston is significantly outweighed in the planning balance.
- 3.1.9 The proposal is consistent with other relevant policies within the TNDP19 as analysed earlier. Regarding other policies of the development plan, where taken together policies CS1, CS2, and H7 strictly control new development in the countryside, the development in this case is held to be acceptable because in the words of policy CS2 it would represent a facility meeting a proven local need. Even if conflict were identified, and the direction of those policies differed from that of the TNDP19, they would yield because the TNDP19 is the most recently adopted development plan document. It therefore remains that because of the specific nature of this proposal it is the policies of the TNDP19 that should be followed.

Overall, the development is considered to accord with the development plan as a whole.

- 3.1.10 The proposed development is consistent with paragraph 8 of the NPPF21 in that it is a sustainable development.
- 3.1.11 In terms of economic-sustainability it represents *amongst other things*:
- a significant financial investment within the District
 - an opportunity for short-term construction jobs and opportunities for local suppliers and contractors
 - an opportunity to create 16 FTE direct jobs in the healthcare sector
 - an opportunity to support indirect jobs via local suppliers
- 3.1.12 In terms of environmental-sustainability it represents *amongst other things*:
- the chance to enhance biodiversity
 - the occasion to plant additional landscaping [accepting that the development will itself introduce built-form into the landscape south of Heath Road and north of the railway line and that this will in any event require softening].
 - The opportunity to include electric vehicle charging and energy and water conservation measures

- A chance to facilitate improved accessibility to an existing bus stop [*albeit largely for staff and visitors to the extra care campus*].
- The chance to create tranquil spaces that engage and stimulate the senses through the medium sight, sound, touch and smell.

3.1.13 In terms of social-sustainability it represents *amongst other things*:

- an opportunity to provide much needed specialist care in a safe and supportive environment to those who need it from the older community.
- the chance for the proposed development to include over time ancillary facilities such as a possible hairdressers and/or a small café facility that can also be used by the wider population helping to foster a sense of cohesion and integration between the new residents and the established community
- the chance for the land owner, The Thurston Relief in Need [TRiN] Charity to secure funding through the sale of the land to invest in charitable activity within Thurston.
- An opportunity for Thurston Parish Council to engage with TRiN after the sale to explore whether there is an opportunity for joint working to deliver new community facilities on the remainder of the site [or part of it]. Whilst this desire sits outside of the consideration of the application before Members it has been reported that TRiN is not in a position to explore additional community use until the future of the application site has been resolved.

3.1.14 In the light of the above the positive benefits in terms of sustainability lend weight to the proposal.

3.1.15 The proposed use with its light traffic generation expectations is not considered to pose significant highway safety or capacity issues. It is supported by Suffolk County Council as local highway authority. It takes due regard of T10 of the Adopted Local Plan 98 and TNDP19 Policy 6 - Key Movement Routes, Policy 7: Highway Capacity at Key Road Junctions and policy 8: Parking Provision and paragraph 110 of the NPPF21 and is therefore considered acceptable from a highway point of view.

3.1.16 With the mitigation suggested in this report the proposed development is unlikely to result in any unacceptable harm to the amenity enjoyed by nearby residential properties. This sympathetic juxtapositioning with careful attention within the layout and design to create a good neighbour should attract positive weight.

3.1.17 The proposed development will not result in harm to any heritage asset. It therefore complies with the Adopted Development Plan and Section 15 of the NPPF 21 Conserving and Enhancing the Historic Environment.

3.1.18 The introduction of built form on the part of the south side of Heath Road will inevitably change the character of the wider parcel of land within which it sits. That landscape has

no special designation. However, the proposed mitigation in terms of landscaping and biodiversity enhancement is considered suitable. The application site sits in the elbow of continuous length of development that currently borders the application site on two sides. The fact that the railway line runs close by means that the wider parcel of land does not read with the wider rural landscape that spreads out beyond the railway. Its landscape impacts are therefore limited. It is officer judgement that the impact of this development with its mitigation on the landscape and/or ecology is significant. This can therefore be given low weight.

3.1.19 The design and appearance of the development will be of a high quality and will lend its own character to the area in way that is considered acceptable. This should attract substantial weight as should the fact that this is a sustainable development within the meaning of the golden thread of sustainability that runs throughout the NPPF21, with particular reference to paragraph 8 therein the NPPF21.

3.1.20 Conclusion

3.1.23 **The proposed development is considered acceptable for the reason fully described in this report should be approved without delay in accordance with Paragraph 11 c of the NPPF21.**

RECOMMENDATION

1. That in the event of the LLFA being able to formally withdraw its holding objection as a result of being satisfied that the additional drainage information recently submitted has adequately addressed their concern's;

then:

2. Authority be delegated to the Chief Planning Officer to GRANT full planning permission subject to conditions that shall include:
 - 2 year commencement condition
 - Use restricted to the purpose of extra care and ancillary purposes only and no other use [in whole or part] including any use that may ordinarily fall within the same use class or constitute permitted development
 - No occupation until a footway to the satisfaction of the local highway authority has been provided from the development to the nearby bus stop on the south side of Heath Road. That path to remain in perpetuity
 - Approved drawings subject to modification of prescribed balcony positions and the inclusion of suitably opaque screens to prescribed balconies as described in the report

- No additional windows apertures or other openings to be installed in the eastern flank wall/s of block A and no dormers skylights or other openings to be installed into roof spaces
- Additional ev charging points to the satisfaction of the Council prior to occupation
- Additional details of precise materials to be used and these to be from a traditional vernacular palette
- Further details as to heights of boundary enclosure and the types of posts, rails and mesh to be used
- Prior to proceeding above slab level, the submission of external sensitive lighting scheme. Such scheme as shall have been approved by the lpa shall be implemented prior to occupation and thereafter retained.
- Tree protection and hedge protection measures
- Staff shower facilities
- Secure and covered cycle parking
- Landscape management plan
- Construction method statement
- Ecological mitigation
- Implementation of ecological appraisal recommendations
- Energy statement
- Communications strategy
- Regular liaison with the Parish Council throughout the construction phase of the development
- Such conditions as may be required by the LLFA and are considered reasonable by the CPO
- As required by SCC Highways
- As required by Environmental Health
- as required by SCC Archaeology

Along with such other conditions as may be deemed reasonable and necessary by the CPO;

- 3 In the event that the LLFA is unable to withdraw its holding objection then the CPO is not able to determine the planning application and it must be re-presented to Committee.

Appendix 5

Agricultural Statement



**LAND AT SCHOOL ROAD,
ELMSWELL, SUFFOLK**

**AGRICULTURAL STATEMENT
ON BEHALF OF
THE APPELLANT**

BY

TONY KERNON BSc(Hons) MRICS FBIAC

PINS REF: APP/W3520/W/25/3364061

LPA Ref: DC/23/05651

August 2025





**LAND AT SCHOOL ROAD,
ELMSWELL, SUFFOLK**

**AGRICULTURAL STATEMENT
ON BEHALF OF
THE APPELLANT
BY
TONY KERNON BSc(Hons) MRICS FBIAC**

**PINS REF: APP/W3520/W/25/3364061
LPA Ref: DC/23/05651**

August 2025

COPYRIGHT

The contents of this document must not be copied in whole or in part without the written consent of Kernon Countryside Consultants.

Authorised By APK 08/25

*Greenacres Barn, Stoke Common Lane, Purton Stoke, Swindon SN5 4LL
T: 01793 771333 Email: info@kernon.co.uk Website: www.kernon.co.uk*

*Directors - **Tony Kernon** BSc(Hons) MRAC MRICS FBIAC **Sarah Kernon**
Consultants - **Ellie Clark** BSc(Hons) MBIAC **Dan Miller** MSc(Hons)*

CONTENTS

- 1 Introduction to Witness
- 2 Introduction to the Statement
- 3 The Site and Its Land Quality
- 4 Planning Policy and Guidance
- 5 Assessment
- 6 Summary and Conclusions

Appendices

- KCC1 Curriculum Vitae
- KCC2 Natural England's Technical Information Note TIN049
- KCC3 MAFF ALC Report 1992
- KCC4 Extracts from Nix Farm Management Pocketbook
- KCC5 Extracts from Cereal and OSR December 2024
- KCC6 Defra Press Release December 2022
- KCC7 Natural England's Guide to Assessing Development on Agricultural Land

1 INTRODUCTION TO THE WITNESS

The Witness

- 1.1 This agricultural statement has been prepared by Tony Kernon. I am a Chartered Surveyor and a Fellow of the British Institute of Agricultural Consultants. I have specialised in assessing the effects of development proposals on agricultural land for over 35 years, and act nationwide for local planning authorities and applicants alike.
- 1.2 As part of preparing this statement I have reviewed the relevant application material and interviewed the farmer. I have not visited the site.
- 1.3 My Curriculum Vitae is at **Appendix KCC1**. As a Chartered Surveyor giving evidence, I am bound by the RICS Practice Statement "Surveyors Acting as Expert Witnesses", 4th Edition (February 2023). A declaration is provided below.
- 1.4 In accordance with the requirements of the Royal Institution of Chartered Surveyors Practice Statement, "Surveyors acting as expert witnesses" (4th edition, amended 2023):
- (i) I confirm that my report has drawn attention to all material facts which are relevant and have affected my professional opinion.
 - (ii) I confirm that I understand and have complied with my duty to this Appeal as an expert witness overrides any duty to those instructing or paying me, that I have understood this duty and complied with it in giving my evidence impartially and objectively, and that I will continue to comply with that duty as required.
 - (iii) I confirm that I am not instructed under any conditional or other success-based fee arrangement.
 - (iv) I confirm that I have no conflicts of interest.
 - (v) I confirm that my report complies with the requirements of the Royal Institution of Chartered Surveyors (RICS), as set down in "*Surveyors acting as expert witnesses*": RICS practice statement (2023).

Signed:



(Tony Kernon)

Dated: 6th August 2025

2 INTRODUCTION TO THE STATEMENT

Officer's Report

- 2.1 The officer's report records at 2.3 that **"the site is currently utilised for agriculture (noted as being Grade 2 agricultural land)"** although at present a portion is used as a construction compound (that temporary use has since ceased). Thereafter there are a number of references to agricultural land, but all in the context of the setting of heritage assets.
- 2.2 The officer's report recommended refusal. Reason for Refusal no 4, as recommended, was as follows:
- "4) Landscape – The development will have a harmful impact on the landscape approaching Elmswell from the A14 and Woolpit. Development intrudes on the link between Elmswell Hall and the Church and removes the agricultural land between the two. This is contrary to policies LP15, LP17 and LP24 of the JLP and paragraph 84 of the NPPF. It also impacts on important views of Elmswell identified within policy ELM2 of the Elmswell Neighbourhood Plan".**
- 2.3 It will be noted that there was no reference to Grade 2 / BMV in the recommended reason.

Reason for Refusal

- 2.4 At the Committee the Reason for Refusal no 4 (RfR4) was expanded and now states the following:
- "The proposed development would lead to a [sic] irreparable loss of the countryside landscape to the edge of Elmswell. This area creates the entrance to the village itself through the transition from a rural area to an urban area and views of the Church of St. John from the rural area and over the landscape itself are identified within policy ELM2 of the Elmswell Neighbourhood Plan and is also noted to be high quality agricultural land (Grade 2) and adequate justification for its loss is not provided. The impact on the landscape is considered to be harmful with adverse impacts noted with regards to the onsite landscape and to a limited extent on the district level landscape. This is contrary to policies LP15, LP17 and LP24 of the Babergh and Mid Suffolk Joint Local Plan, policy ELM2 of the Elmswell Neighbourhood Plan and paragraph 84 of the NPPF".**

Case Management Conference Notes

- 2.5 The Inspector's note to the Case Management Conference (CMC) has identified "**the effect of the development on high quality agricultural land**" as a main issue.

This Statement

- 2.6 This Statement:
- (i) identifies the land quality of the site and wider area in section 3;
 - (ii) sets out the planning of policy of relevance in section 4;
 - (iii) sets out an analysis against the relevant planning policy in section 5;
 - (iv) ending with a summary and conclusions in section 6.

3 THE SITE AND ITS LAND QUALITY

The Site

- 3.1 The site is shown at Insert 1, taken from Google Earth (2024).

Insert 1: The Site (boundary approximate)



- 3.2 The site forms an arable field. It forms a small part of a substantial arable farm.

Land Quality

- 3.3 The quality of agricultural land is determined by an Agricultural Land Classification (ALC). This considers the long-term physical limitations of land for agricultural use. Factors affecting the quality of agricultural land are climate (temperature, rainfall, aspects, exposure, etc.), site considerations (slope, micro-relief, flood risk) and soil (texture, structure, depth, stoniness, etc.) and the interactions between these factors. These factors affect soil wetness and droughtiness and influence the choice of crops that can be grown along with the level or consistency of yields.

- 3.4 The ALC system divides land into five Grades, being Grade 1 to Grade 5. The largest graded area is Grade 3, which is divided into subgrades of Subgrade 3a “good quality” and Subgrade 3b “moderate quality”. The current guidelines and criteria for ALC were published by the Ministry of Agriculture, Fisheries and Food (MAFF) in 1988.
- 3.5 The ALC system is described in Natural England’s Technical Information Note TIN049, reproduced in **Appendix KCC2**.

Published Land Quality Data for the Site and Surrounding Area

- 3.6 The Site is shown on “provisional” ALC maps from the 1970s as land of Grade 2 quality. These maps were not the result of extensive field survey and were produced under an old ALC methodology. They therefore are not suitable for being used for site specific use. The maps have, nevertheless, been digitised. The site is shown below.

Insert 2: Extract Provisional ALC (site boundary approx.).



Likelihood of BMV

- 3.7 In 2017 Natural England produced maps that show the likelihood of BMV land, dividing the country into low, medium and high likelihood. The site is shown as high likelihood, meaning that 60% or more of land is expected to be of BMV quality.

Insert 3: Extract Likelihood of BMV Land



Site Survey

- 3.8 The site was surveyed by MAFF in 1992. The site is shown on the www.magic.gov.uk website as shown below. The original ALC report is reproduced in **Appendix KCC3**.

Insert 4: Detailed ALC Results



- 3.9 Based on the ALC survey, the results for the site are as set out in Table 1.

Table 1: ALC Results

Grade	Description	Area (ha)	Area (%)
2	Very good	5.3	46
3a	Good	2.8	24
3b	Moderate	3.5	30
Total		11.6	100

4 PLANNING POLICY AND GUIDANCE

National Planning Policy Framework

- 4.1 The National Planning Policy Framework (NPPF) (2024), paragraph 187 notes that planning policies and decisions should contribute to enhance the natural and local environment by, inter alia, recognising **“the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”**.
- 4.2 The best and most versatile (BMV) agricultural land is defined in Annex 2 of the NPPF as land which is of Grade 1, 2 and Subgrade 3a of the Agricultural Land Classification.
- 4.3 Paragraph 188 of the NPPF discusses plan making. It requires plans to, inter alia, allocate land with the least environmental or amenity value, where consistent with other policies in the Framework. Footnote 65 of the NPPF identifies that **“where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”**.
- 4.4 There is no definition of what constitutes “significant” development. However, the “Guide to assessing development proposals on agricultural land” (Natural England, February 2021) advises local planning authorities to **“take account of smaller losses (under 20 ha) if they’re significant when making your decision”**, suggesting that 20 ha is a suitable threshold for defining “significant” in many cases.

Local Planning Policy

- 4.5 Policy LP15 of the Babergh and Mid Suffolk Joint Local Plan (2023) requires development proposals to demonstrate appropriate consideration of, inter alia, land. Criterion 2 a) requires that **“where development needs to take place on greenfield land, avoidance of the best and most versatile agricultural land should be prioritised”**.

Comment

- 4.6 There is no reference to the NPPF paragraphs 187 or 188 in Reason for Refusal no 4. Policy LP15 is referred to. This requires priority to be given to avoiding use of BMV.

5 ASSESSMENT

The Issue and the Basis

- 5.1 RfR4 states that adequate justification for the loss of use of high quality Grade 2 agricultural land has not been provided.
- 5.2 This was added into RfR4 by the Committee at the decision time (as is their right), but as a consequence there is no explanation of the basis for this statement in the officer's report.
- 5.3 Policy LP15 of the Local Plan is referenced in RfR4. It is not, however, identified as an important policy in the Council's Statement of Case. Nor is there mention of agricultural land in the Statement of Case paragraphs 5.19 to 5.22 addressing RfR4. It must be concluded that this is not considered an important point by the Council.

Factual Basis

- 5.4 The site is not all Grade 2. The site was surveyed by MAFF in 1992 and found to comprise a mix of Grade 2, 3a and 3b. The site contains 5.3 ha (46% by area) Grade 2, and in total 70% of the site is of BMV quality.

The Importance of This for the Planning Balance

- 5.5 The site is not all Grade 2 and to that extent Reason for Refusal no 4 is incorrect. The site is a mixture including 70% BMV, but only 46% of the site is Grade 2.
- 5.6 The site comprises a single arable field in arable farming uses. There will be no significant impact on the farm business.
- 5.7 The NPPF sets out that the "economic and other benefits" of BMV land should be "recognised". There is no suggestion that agricultural land per se cannot be used for non-agricultural development. The NPPF relates only to the economic and other benefits of BMV. The Council's RfR4 refers to "adequate justification" for loss of Grade 2 land. The comparison must, therefore, focus on the incremental difference between BMV land and non-BMV land.

Economic Benefits

- 5.8 The economic benefits of BMV land on this site are modest. In the absence of any empirical data, any economic assessment is inevitably crude. Taking standard budgeting textbooks, such as the Nix Farm Management Pocketbook (extracts from which are

reproduced in **Appendix KCC4**), it is possible to show the difference between moderate and high yields, as an illustration, between crops.

- 5.9 This is a theoretical assessment. It assumes that the BMV land achieves a high yield, which the farmers have advised is not normally achievable due to drought stress in the spring. Nonetheless, taking that crude measure for winter wheat and oilseed rape, the differences are shown below.

Table 2: Assessment of Economics of Farmed Land

Item	Winter Wheat		Oilseed Rape	
	Average	High	Average	High
Yield (t/ha)	8.3t/ha	9.5t/ha	3.5t/ha	4.0t/ha
Output (£)	£1,765/ha	£1,993/ha	£1,488/ha	£1,700/ha
Gross Margin (£)	£1,110/ha	£1,338/ha	£906/ha	£1,118/ha
Uplift (£)	-	£228/ha	-	£212/ha

John Nix Pocketbook for Farm Management, September 2024

- 5.10 For the 8.1 ha of BMV land within the site the economic benefits of BMV land to non-BMV land would be £1,700 - £1,850 per annum. Hence the theoretical economic benefits are modest. This assumes all the land is arable, with no field margins etc.
- 5.11 The proposed development will not have a significant adverse effect on any farm business, nor will it result in any other agricultural land in the wider area being affected or becoming unfarmable. Other land can continue to be managed as it is now.

Other Benefits

- 5.12 There is no reference in the NPPF or the Joint Local Plan to food production, only to “other benefits”. These could include food production. There is no policy requiring land to be used for food production. For completeness, however, food production is assumed to fall into the “other benefits” of BMV referred to in paragraph 187.
- 5.13 As set out in Table 2 above, if we used the crude measurement from the John Nix Pocketbook the uplift in yield for wheat, the heaviest cropping arable cereal, would be 1.2t/ha over a maximum of 8.1 ha, equivalent to 9.7 tonnes.
- 5.14 The United Kingdom produced over 19 million tonnes of cereals plus 1.0 million tonnes of oilseed rape in 2024 (Cereal and oilseed production in the United Kingdom 2023, Defra, 7 January 2025 (see extracts in **Appendix KCC5**)). 2024 production was down because of weather-related problems in autumn 2023, plus agri-environment policy influences. The food production benefit of the BMV land compared to non-BMV land, at less than 10

tonnes, is clearly a negligible contribution to the UK production (less than half of one millionth of annual production).

- 5.15 There is no food production policy in this country. There is no food crisis. The Government confirmed, in a press release dated 6th December 2022, that food supplies are robust (**Appendix KCC6**).
- 5.16 The focus of Government support is currently on biodiversity enhancement. The latest “Agricultural Land Use in England at 1st June 2024” figures¹ show that 305,000 ha of arable land were used for environmental benefit as at 1st June 2024.

Is Poorer Quality Land Available?

- 5.17 The Joint Local Plan policy CP15 sets out that poorer quality land should be “**prioritised**”, where “**development needs to take place on greenfield land**”. The NPPF, in a footnote to the plan-making paragraph 188, sets out that poorer quality land should be used in preference to higher quality. This footnote applies where there is to be “**significant development of agricultural land**”.
- 5.18 The Site includes 8.1 ha of BMV land. This is only 40% of the threshold for consultation with Natural England. It is a “**smaller loss**” in Natural England’s Guide (**Appendix KCC7**). As it is not “significant development” footnote 65 is not triggered.
- 5.19 The Joint Local Plan does not have the same trigger, and therefore could apply to all scales of development.
- 5.20 Whether there is a “**need**” (LP15) or whether development is “**necessary**” (NPPF fn 65) is a matter for others, and for this assessment is assumed. Therefore this statement now reviews whether poorer quality land is available that could be used in preference. The assessment does so purely from the perspective of agricultural land quality, recognising that this is but one of many considerations that will need to go into the overall planning balance.
- 5.21 As shown on the “provisional” ALC maps, at Insert 2, land west of Elmswell is shown as Grade 2, and land to the north, east and south is shown as undifferentiated Grade 3. On the Likelihood of BMV maps, land to the west has a higher likelihood of BMV, but land to the north, east and south still has a 20-60% likelihood of BMV.

¹ Defra, 26th September 2024

5.22 I have reviewed available land quality data from some nearby sites, identified on the extract below from the Council's application map.

Insert 5: Sites on Planning Application Map



5.23 So far as I can ascertain, there was no ALC data for the development to the east (17/03853, withdrawn, and 18/02146, approved), and there is no reference to ALC in the officer's report. There are no documents for the 10.1 ha of housing and play area for 0119/86, to the east of the settlement, which was approved.

5.24 In 4911/16, to the south east, the site was a mixture of Grade 1, 3a and 3b. An ALC report is available for the site, by Reading Agricultural Consultants (September 2016). The ALC covered a larger area. The relevant section for the site is reproduced below.

Insert 6: Extract from ALC Map for 4911/86



5.25 In the officer's report for 4911/16 reference to the 2.1 ha of Grade 1 and 0.4 ha of Grade 3a was as follows:

"101 Due to the presence of Grade 1 and 3a agricultural land, the proposal would give rise to the loss of the best and most versatile agricultural land. However, as identified, the majority of the site is of moderate quality (Grade 3b), thereby leading to small loss. Furthermore, in reviewing records of agricultural land classifications for Mid Suffolk, the majority of the land within the district is classified as 2, 3a and 3b. Accordingly, Officers thereby consider there to be limited poorer quality land available that would represent a preferable location for the development.

102 Nonetheless, the proposal would give rise to the loss of agricultural land and thus give rise to a degree of harm in this regard. However, Officer consider given the above and that the district is predominantly rural in character, the loss of this parcel of agricultural land will give rise to limited harm".

5.26 Officers referred to the breakdown of land quality in the District. Based on the provisional ALC maps, and therefore to be treated with caution for the reasons explained earlier and in TIN049 (**Appendix KCC2**), the Mid Suffolk and Barbergh ALC data is set out in Table KCC3. Statistically broadly 40% of Grade 3a is predicted to be subgrade 3a, so the bottom row shows an estimated BMV breakdown.

Table 3: Proportion by ALC Grade

ALC Grade	Mid Suffolk (%)	Barbergh (%)
1 excellent	0	0.6
2 very good	18.5	41.6
3 good to moderate	78.7	55.8
4 poor	2.8	2.0
5 very poor	0	0
Total	100	100
Estimated Proportion of BMV^①	50	64.5

① 1, 2 and 40% of 3

- 5.27 The proportion of BMV locally is higher than the national average of 42% (TIN049, **Appendix KCC2**).
- 5.28 The NPPF (2024) footnote 65 relates to plan making. The emphasis is therefore for local planning authorities to consider, in plan making, whether poorer quality land is available. I have found no evidence of the local planning authority having reviewed the land quality of the periphery of Elmswell.
- 5.29 The analysis in this report identifies that:
- despite the undifferentiated Grade 3 indication, land on the east side can include BMV (in this case the highest grade);
 - the Council has historically weighed this in the planning balance, and concluded that only limited harm arises.

Conclusions

- 5.30 This is not “significant development of agricultural land” under the NPPF, so the footnote 65 test, which relates to plan making is not triggered.
- 5.31 The Joint Local Plan prefers land of poorer quality to be used. From published ALC and Likelihood of BMV maps, the eastern side of the settlement would appear likely to be slightly poorer, but ALC surveys have found at least some Grade 1 in that area. It is not, therefore, possible to conclude that there is a realistic expectation that development on that side will, if surveyed, be any poorer.
- 5.32 Irrespective of this, the economic and other benefits of the BMV land within the site, are limited.

6 SUMMARY AND CONCLUSIONS

- 6.1 RfR4 states that the use of Grade 2 land has not been fully justified. This was added by the Committee. There is no expansion of the Council's case in the officer's report as a consequence, but nor is the matter referenced and justified in the Council's Statement of Case.
- 6.2 As a matter of fact, less than half the Site is Grade 2. The rest is a mixture of subgrades 3a and 3b.
- 6.3 The proposed development will not result in any significant economic or other impacts. The economic and other benefits of the BMV within the Appeal Site are limited. This will need to be assessed in the overall planning balance.
- 6.4 The proposed development is not significant development, and accordingly there is no conflict with the NPPF (paras 187 or 188).
- 6.5 The Local Plan prefers poorer quality land to be used. Analysis of land quality around the settlement does not identify that there are areas of such land. The limited amount of field survey data has found higher quality land as well as lower quality land on the eastern side.
- 6.6 Irrespective of whether poorer quality land could be found through extensive field survey, the Council has previously concluded that given the extensive amount of BMV land locally, only limited weight should be accorded the loss of small areas of BMV.
- 6.7 I agree with the Council's previous assessment. This will need to go into the planning balance, but limited weight (at most) should be accorded to the use of BMV land, given the likelihood of it needing to be used wherever development is to go around Elmswell.
- 6.8 As such the proposals accord with the policy in the NPPF and JLP.

APPENDIX KCC1
Curriculum Vitae



CURRICULUM VITAE

ANTHONY PAUL KERNON

SPECIALISMS

- Assessing the impacts of development proposals on agricultural land and rural businesses
- Agricultural building and dwelling assessments
- Equestrian building and dwelling assessments (racing, sports, rehabilitation, recreational enterprises)
- Farm and estate diversification and development
- Inputs to Environmental Impact Assessment
- Expert witness work



SYNOPSIS

Tony is a rural surveyor with 35 years experience in assessing agricultural land issues, farm and equestrian businesses and farm diversification proposals, and the effects of development proposals on them. Brought up in rural Lincolnshire and now living on a small holding in Wiltshire, he has worked widely across the UK and beyond. He is recognised as a leading expert nationally in this subject area. Married with two children. Horse owner.

Tony's specialism is particularly in the following key areas:

- assessing the need for agricultural and equestrian development, acting widely across the UK for applicants and local planning authorities alike;
- farm development and diversification planning work, including building reuse and leisure development, Class Q, camping etc;
- assessing development impacts, including agricultural land quality and the policy implications of losses of farmland due to residential, commercial, solar or transport development, and inputs to Environmental Assessment;
- and providing expert evidence on these matters to Planning Inquiries and Hearings, court or arbitrations.

QUALIFICATIONS

Bachelor of Science Honours degree in Rural Land Management, University of Reading (BSc(Hons)). 1987. Awarded 2:1.

Diploma of Membership of the Royal Agricultural College (MRAC).

Professional Member of the Royal Institution of Chartered Surveyors (MRICS) (No. 81582). (1989).

OTHER PROFESSIONAL ACTIVITIES

Co-opted member of the Rural Practice Divisional Council of the Royal Institution of Chartered Surveyors. (1994 - 2000)

Member of the RICS Planning Practice Skills Panel (1992-1994)

Member of the RICS Environmental Law and Appraisals Practice Panel (1994 - 1997).

Fellow of the British Institute of Agricultural Consultants (FBIAC) (1998 onwards, Fellow since 2004).

Secretary of the Rural Planning Division of the British Institute of Agricultural Consultants (BIAC) (1999 – 2017).

Vice-Chairman of the British Institute of Agricultural Consultants (2019 – 2020)

Chairman of the British Institute of Agricultural Consultants (2020 – 2022)

*Greenacres Barn, Stoke Common Lane,
Purton Stoke, Swindon SN5 4LL
T: 01793 771333 Email: info@kernon.co.uk
Website: www.kernon.co.uk*



EXPERIENCE AND APPOINTMENTS

- 1997 -----> **Kernon Countryside Consultants.** Principal for the last 27 years of agricultural and rural planning consultancy specialising in research and development related work. Specialisms include essential dwelling and building assessments, assessing the effects of development on land and land-based businesses, assessing the effects of road and infrastructure proposals on land and land-based businesses, and related expert opinion work. Tony specialises in development impact assessments, evaluating the effects of development (residential, solar, road etc) on agricultural land, agricultural land quality, farm and other rural businesses.
- 1987 - 1996 **Countryside Planning and Management,** Cirencester. In nearly ten years with CPM Tony was involved in land use change and environmental assessment studies across the UK and in Europe. From 1995 a partner in the business.
- 1983 - 1984 **Dickinson Davy and Markham,** Brigg. Assistant to the Senior Partner covering valuation and marketing work, compulsory purchase and compensation, and livestock market duties at Brigg and Louth.

RECENT RELEVANT EXPERIENCE

TRAINING COURSES

- Landspreading of Non Farm Wastes.** Fieldfare training course, 24 – 25 November 2009
- Foaling Course.** Twemlows Hall Stud Farm, 28 February 2010
- Working with Soil: Agricultural Land Classification.** 1 – 2 November 2017

TRANSPORT ENVIRONMENTAL ASSESSMENT CONTRIBUTIONS

- 1992 Port Wakefield Channel Tunnel Freight Terminal, Yorkshire
- 1993 A1(M) Widening, Junctions 1-6 (Stage 2)
- 1994 - 1995 A55 Llanfairpwll to Nant Turnpike, Anglesey (Stage 3)
- 1994 - 1995 A479(T) Talgarth Bypass, Powys (Stage 3)
- 1995 Kilkhampston bypass (Stage 2)
- 1997 A477 Bangeston to Nash improvement, Pembroke
- 2000 Ammanford Outer Relief Road
- 2001 A421 Great Barford Bypass
- 2001 Boston Southern Relief Road
- 2003 A40 St Clears - Haverfordwest
- 2003 A470 Cwmbrach – Newbridge on Wye
- 2003 A11 Attleborough bypass
- 2003 - 2008 A487 Porthmadog bypass (Inquiry 2008)
- 2004 A55 Ewloe Bypass
- 2004 A40 Witney – Cogges link
- 2005 – 2007 A40 Robeston Wathen bypass (Inquiry 2007)
- 2005 – 2007 East Kent Access Road (Inquiry 2007)
- 2006 M4 widening around Cardiff
- 2007 – 2008 A40 Cwymbach to Newbridge (Inquiry 2008)
- 2007 A483 Newtown bypass
- 2008 – 2009 A470/A483 Builth Wells proposals
- 2009 – 2017 A487 Caernarfon-Bontnewydd bypass (Inquiry 2017)
- 2009 – 2010 North Bishops Cleeve extension
- 2009 – 2010 Land at Coombe Farm, Rochford
- 2009 – 2011 A477 St Clears to Red Roses (Inquiry 2011)
- 2010 – 2011 Streethay, Lichfield
- 2010 – 2012 A465 Heads of the Valley Stage 3 (Inquiry 2012)
- 2013 – 2016 A483/A489 Newtown Bypass mid Wales (Inquiry 2016)
- 2013 - 2016 High Speed 2 (HS2) rail link, Country South and London: Agricultural Expert for HS2 Ltd
- 2015 – 2017 A487 Dyfi Bridge Improvements

2016 – 2018 **A465 Heads of the Valley Sections 5 and 6 (Inquiry 2018)**
 2017 - 2018 **A40 Llanddewi Velfrey to Penblewin**
 2017 – 2018 **A4440 Worcester Southern Relief Road**
 2019 – 2020 **A40 Penblewin to Red Roses**
 2019 – 2020 **A55 Jn 15 and 16 Improvements**

NSIP/DCO SOLAR INPUTS

2020 – 2023 **Heckington Fen**
Mallard Pass
Penpergwm
Parc Solar Traffwll
Alaw Môn
Parc Solar Caenewydd
Tween Bridge Solar Farm
Gate Burton
Great North Road Solar
Helios Renewable Energy Project
Dean Moor
Oaklands Solar

EXPERT EVIDENCE GIVEN AT PUBLIC INQUIRIES AND HEARINGS

<p> 1992 Brooklands Farm: Buildings reuse Chase Farm, Maldon: Removal of condition 1993 Haden House: Removal of condition 1994 Brooklands Farm: 2nd Inquiry (housing) Barr Pound Farm: Enforcement appeal Fortunes Farm Golf Course: Agric effects 1995 Village Farm: New farm dwelling Claverdon Lodge: Building reuse Harelands Farm: Barn conversion Castle Nurseries: Alternative site presentation 1996 Church View Farm: Enforcement appeal Flecknoe Farm: Second farm dwelling 1997 Basing Home Farm: Grain storage issue Viscar Farm: Need for farm building / viability Lane End Mushroom Farm: Need for dwelling 1998 Moorfields Farm: New farm dwelling Maidstone Borough LPI: Effects of dev'ment Glenfield Cottage Poultry Farm: Bldg reuse 1999 Holland Park Farm: Farm dwelling / calf unit Northington Farm: Existing farm dwelling 2000 Twin Oaks Poultry Unit: Traffic levels Meadows Poultry Farm: Farm dwelling Hazelwood Farm: Beef unit and farm dwelling Shardeloes Farm: Farm buildings Aylesbury Vale Local Plan: Site issues Deptford Farm: Buildings reuse 2001 Lambriggan Deer Farm: Farm dwelling Blueys Farm: Mobile home 2002 A419 Calcutt Access: Effect on farms Cobweb Farm: Buildings reuse / diversification Philips Farm: Farm dwelling West Wilts Local Plan Inquiry: Dev site Manor Farm: Building reuse 2003 Fairtrough Farm: Equine dev and hay barn Hollies Farm: Manager's dwelling </p>	<p> Bonehill Mill Farm: New farm building Manor Farm: New farm dwelling Cameron Farm: Mobile home Land at Harrietsham: Enforcement appeal Attlefield Farm: Size of farm dwelling Bromsgrove Local Plan: Housing allocation Lichfield Local Plan: Against MAFF objection Hyde Colt: Mobile home / glasshouses Highmoor Farm: New farm dwelling Gwenfa Fields: Removal of restriction Yatton: Horse grazing on small farm Newbury Local Plan: Effects of development Two Burrows Nursery: Building retention Dunball Drove: Need for cattle incinerator Lambriggan Deer Farm: Farm dwelling Coldharbour Farm: Buildings reuse Heathey Farm: Mobile home Wheal-an-Wens: Second dwelling Apsley Farm: Buildings reuse Home Farm: Size of grainstore A34/M4 Interchange: Agricultural evidence Weyhill Nursery: Second dwelling Mannings Farm: Farm dwelling Land Adj White Swan: Access alteration Happy Bank Farm: Lack of need for building Lower Park Farm: Building reuse / traffic Stourton Hill Farm: Diversification Darren Farm: Impact of housing on farm Greenways Farm: Farm diversification </p>
---	---

	Land at Springhill: Certificate of lawfulness	Land at Four Marks: Dev site implications
	Oak Tree Farm: Mobile home	
2004	Chytane Farm: Objector to farm dwelling	Oldberrow Lane Farm: Relocation of buildings
	Crown East: Visitor facility and manager's flat	Forestry Building, Wythall: Forestry issues
	Swallow Cottage: Widening of holiday use	Lower Dadkin Farm: Mobile home
	Etchden Court Farm: New enterprise viability	Villa Vista: Viability of horticultural unit
	Attleborough Bypass: On behalf of Highways Agency	
2005	Howells School: Use of land for horses	Newton Lane: Enforcement appeal
	Otter Hollow: Mobile home	Manor Farm: Change of use class
	Springfield Barn: Barn conversion	South Hatch Stables: RTE refurbishment
	Ashley Wood Farm: Swimming pool	Trevaskis Fruit Farm: Farm dwelling
	The Hatchery: Mobile home	Tregased: Enforcement appeal
	Stockfields Farm: Building reuse	
2006	Manor Farm: Replacement farmhouse	Bhaktivedanta Manor: Farm buildings
	Sough Lane: Farm dwelling	Military Vehicles: Loss of BMV land
	Whitewebbs Farm: Enforcement appeal	Ermine Street Stables: Enforcement appeal
	Land at Condicote: Farm dwelling	Featherstone Farm: Replacement buildings
	Rye Park Farm: Enforcement appeal	Flambards: Mobile home and poultry unit
	Woodrow Farm: Buildings reuse	Manor Farm: Effect of housing on farm
	Rectory Farm: Retention of unlawful bldg	Goblin Farm: Arbitration re notice to quit
	Walltree Farm: Retention of structures	Terrys Wood Farm: Farm dwelling
	Weeford Island: Land quality issues	Etchden Court Farm: Mobile home
	College Farm: Relocation of farmyard	Hollowshot Lane: Farm dwelling and buildings
2007	Woolly Park Farm: Manager's dwelling	Barcroft Hall: Removal of condition
	Park Gate Nursery: Second dwelling	Kent Access Road: Effect on farms
	Penyrheol Ias: Retention of bund	Greys Green Farm: Enforcement appeal
	Hucksholt Farm: New beef unit in AONB	A40 Roboston Wathen bypass: Underpass
	The Green, Shrewley: Mobile home	Woodland Wild Boar: Mobile homes
	Brook Farm: Retention of polytunnels	
2008	Weights Farm: Second dwelling	Whitegables: Stud manager's dwelling
	Hill Farm: Mobile home	Balaton Place: Loss of paddock land
	Relocaton of Thame Market: Urgency issues	Point to Point Farm: Buildings / farm dwelling
	Spinney Bank Farm: Dwelling / viability issues	Norman Court Stud: Size of dwelling
	Higham Manor: Staff accommodation	High Moor: Temporary dwelling
	Roboston Watham bypass: Procedures Hearing	Land at St Euny: Bldg in World Heritage Area
	Monks Hall: Covered sand school	
	Porthmadog bypass: Road scheme inquiry	Baydon Meadow: Wind turbine
2009	Claverton Down Stables: New stables	Meadow Farm: Building conversion
	Hailsham Market: Closure issues	Bishop's Castle Biomass Power Station: Planning issues
	Gambledown Farm: Staff dwelling	Foxhills Fishery: Manager's dwelling
	Oak Tree Farm: Farm dwelling	Bryn Gollen Newydd: Nuisance court case
	A470 Builth Wells: Off line road scheme	Swithland Barn: Enforcement appeal
	Hill Top Farm: Second dwelling	Woodrow Farm: Retention of building
	Sterts Farm: Suitability / availability of dwelling	
2010	Poultry Farm, Christmas Common: Harm to AONB	Stubwood Tankers: Enforcement appeal
	Wellsprings: Rention of mobile home	
	Redhouse Farm: Manager's dwelling	Meridian Farm: Retention of building
	Lobbington Fields Farm: Financial test	Swithland Barn: Retention of building
2011	Fairtrough Farm: Enforcement appeal	
	Etchden Court Farm: Farm dwelling	A477 Red Roses to St Clears: Public Inquiry
	Trottiscliffe Nursery: Mobile home	Upper Bearfield Farm: Additional dwelling
2012	Tickbridge Farm: Farm dwelling	North Bishops Cleeve: Land quality issues
	Blaenanthir Farm: Stables and sandschool	Langborrow Farm: Staff dwellings
		Heads of the Valley S3: Improvements

2013	Land at Stonehill: Eq dentistry / mobile home	Seafeld Pedigrees: Second dwelling
	Cwmcoedlan Stud: Farm dwelling with B&B	Beedon Common: Permanent dwelling
	Barnwood Farm: Farm dwelling	Upper Youngs Farm: Stables / log cabin
	Spring Farm Barn: Building conversion	Tithe Barn Farm: Enforcement appeal
	Baydon Road: Agricultural worker's dwelling	Lower Fox Farm: Mobile home / building
	Stapleford Farm: Building reuse	Tewinbury Farm: Storage barn
2014	Meddler Stud: Residential development	Church Farm: Solar park construction
	Deer Barn Farm: Agricultural worker's dwelling	
	Land at Stow on the Wold: Housing site	Land at Elsfield: Retention of hardstanding
	Allspheres Farm: Cottage restoration	Queensbury Lodge: Potential development
	Land at Stonehill: Equine dentistry practice	Kellygreen Farm: Solar park development
	Spring Farm Yard: Permanent dwelling	Spring Farm Barn: Building conversion
2015	Land at Valley Farm: Solar park	Land at Willaston: Residential development
	Land at Haslington: Residential development	Bluebell Cottage: Enforcement appeal
	Manor Farm: Solar farm on Grade 2 land	Clemmit Farm: Mobile home
	Penland Farm: Residential development	Honeycrock Farm: Farmhouse retention
	Sandyways Nursery: Retention of 23 caravans	The Mulberry Bush: Farm dwelling
	The Lawns: Agricultural building / hardstanding	Redland Farm: Residential dev issues
2016	Harefield Stud: Stud farm / ag worker's dwelling	Emlagh Wind Farm: Effect on equines
	Newtown Bypass: Compulsory purchase orders	Fox Farm: Building conversion to 2 dwellings
	Barn Farm: Solar farm	Wadborough Park Farm: Farm buildings
	Hollybank Farm: Temporary dwelling renewal	Delamere Stables: Restricted use
	Five Oaks Farm: Change of use of land and temporary dwelling	
	Clemmit Farm: Redetermination	Meddler Stud: RTE and up to 63 dwellings
2017	The Lawns: Replacement building	Land off Craythorne Road: Housing dev
	Land at the Lawns: Cattle building	Berkshire Polo Club: Stables / accomm
	Low Barn Farm: Temporary dwelling	Harcourt Stud: Temporary dwelling
	High Meadow Farm: Building conversion	Clemmit Farm: Second redetermination
	Windmill Barn: Class Q conversion	Stonehouse Waters: Change of use of lake
	Land at Felsted: Residential development	
2018	Thorney Lee Stables: Temporary dwelling	Watlington Road: Outline app residential
	Benson Lane: Outline app residential	A465 Heads of the Valley 5/6: Agric effects
	Park Road, Didcot: Outline app residential	The Old Quarry: Permanent dwelling
	Coalpit Heath: Residential development	Chilaway Farm: Removal of condition
	Mutton Hall Farm: Agric worker's dwelling	Leahurst Nursery: Temporary dwelling
	Clemmit Farm: Third redetermination	Icomb Cow Pastures: Temp mobile home
2019	Ten Acre Farm: Enforcement appeal	Forest Faconry: Construction of hack pens
	Harrold: 94 Residential dwellings	
	Stan Hill: Temp dwelling/agric. buildings	Hazeldens Nursery: Up to 84 extra care units
	Allspheres Farm: Enlargement of farm dwelling	Leahurst Nursery: Agricultural storage bldg
	Ruins: Dwelling for tree nursery	Sketchley Lane, Burbage: Industrial and residential development
		Park Solar Traffwl: Solar Hearing
2020	Thornbury: Local BMV	
	Penpergwym: Solar Farm Hearing	Scruton Solar Farm: Effects on BMV and food
	Mudds Bank: Equestrian workers dwelling	Land at East Burnham: Equestrian facilities
	Mallard Pass NSIP: Issue specific hearing	Fladbury: Housing on BMV land
	Bramford Solar: Loss of BMV / food	Pound Road, Axminster: BESS and BMV
	Gate Burton NSIP: BMV and Food	Wymondley Solar: Use of BMV
2021	Heckington Fen NSIP: Issue Hearing	Little Acorn Farm, St Keyne: Worker's dwelling
	Cutlers Green Solar: Use of BMV	
	Twigworth, Glos: Use of BMV land	East End Solar, Harlow: Use of BMV
	Sheepwash Solar, Kent: Use of BMV land	Sittingbourne, Kent: Housing on BMV
	Washdyke Solar, Grantham: Use of BMV	Murrells End Solar, Gloucester: BMV
	Copper Bottom Solar, Camborne: Use of BMV	

APPENDIX KCC2
Natural England's Technical
Information Note TIN049

Agricultural Land Classification: protecting the best and most versatile agricultural land

Most of our land area is in agricultural use. How this important natural resource is used is vital to sustainable development. This includes taking the right decisions about protecting it from inappropriate development.

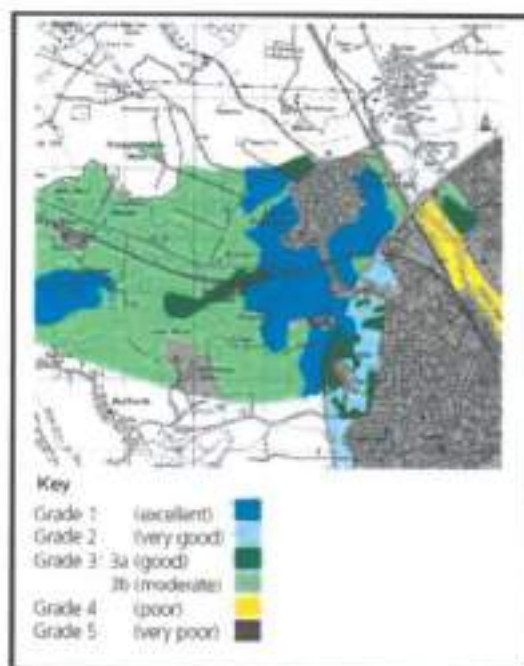
Policy to protect agricultural land

Government policy for England is set out in the National Planning Policy Framework (NPPF) published in March 2012 (paragraph 112). Decisions rest with the relevant planning authorities who should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality. The Government has also re-affirmed the importance of protecting our soils and the services they provide in the Natural Environment White Paper *The Natural Choice: securing the value of nature* (June 2011), including the protection of best and most versatile agricultural land (paragraph 2.35).

The ALC system: purpose & uses

Land quality varies from place to place. The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It helps

underpin the principles of sustainable development.



Agricultural Land Classification - map and key

Second edition 19 December 2012

www.naturalengland.org.uk



Agricultural Land Classification: protecting the best and most versatile agricultural land

The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non food uses such as biomass, fibres and pharmaceuticals. Current estimates are that Grades 1 and 2 together form about 21% of all farmland in England; Subgrade 3a also covers about 21%.

The ALC system is used by Natural England and others to give advice to planning authorities, developers and the public if development is proposed on agricultural land or other greenfield sites that could potentially grow crops. The Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended) refers to the best and most versatile land policy in requiring statutory consultations with Natural England. Natural England is also responsible for Minerals and Waste Consultations where reclamation to agriculture is proposed under Schedule 5 of the Town and Country Planning Act 1990 (as amended). The ALC grading system is also used by commercial consultants to advise clients on land uses and planning issues.

Criteria and guidelines

The Classification is based on the long term physical limitations of land for agricultural use. Factors affecting the grade are climate, site and soil characteristics, and the important interactions between them. Detailed guidance for classifying land can be found in: *Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land* (MAFF, 1988):

- **Climate:** temperature and rainfall, aspect, exposure and frost risk.
- **Site:** gradient, micro-relief and flood risk.
- **Soil:** texture, structure, depth and stoniness, chemical properties which cannot be corrected.

The combination of climate and soil factors determines soil wetness and droughtiness.

Wetness and droughtiness influence the choice of crops grown and the level and consistency of yields, as well as use of land for grazing livestock. The Classification is concerned with the inherent potential of land under a range of farming systems. The current agricultural use, or intensity of use, does not affect the ALC grade.

Versatility and yield

The physical limitations of land have four main effects on the way land is farmed. These are:

- the range of crops which can be grown;
- the level of yield;
- the consistency of yield; and
- the cost of obtaining the crop.

The ALC gives a high grading to land which allows more flexibility in the range of crops that can be grown (its 'versatility') and which requires lower inputs, but also takes into account ability to produce consistently high yields of a narrower range of crops.

Availability of ALC information

After the introduction of the ALC system in 1966 the whole of England and Wales was mapped from reconnaissance field surveys, to provide general strategic guidance on land quality for planners. This Provisional Series of maps was published on an Ordnance Survey base at a scale of One Inch to One Mile in the period 1967 to 1974. These maps are not sufficiently accurate for use in assessment of individual fields or development sites, and should not be used other than as general guidance. They show only five grades: their preparation preceded the subdivision of Grade 3 and the refinement of criteria, which occurred after 1976. They have not been updated and are out of print. A 1:250 000 scale map series based on the same information is available. These are more appropriate for the strategic use originally intended and can be downloaded from the Natural England [website](http://www.naturalengland.org.uk). This data is also available on 'Magic', an interactive geographical information website <http://magic.defra.gov.uk/>.

Since 1976, selected areas have been re-surveyed in greater detail and to revised

Agricultural Land Classification: protecting the best and most versatile agricultural land

guidelines and criteria. Information based on detailed ALC field surveys in accordance with current guidelines (MAFF, 1988) is the most definitive source. Data from the former Ministry of Agriculture, Fisheries and Food (MAFF) archive of more detailed ALC survey information (from 1988) is also available on <http://magic.defra.gov.uk/>. Revisions to the ALC guidelines and criteria have been limited and kept to the original principles, but some assessments made prior to the most recent revision in 1988 need to be checked against current criteria. More recently, strategic scale maps showing the likely occurrence of best and most versatile land have been prepared. Mapped information of all types is available from Natural England (see *Further information* below).

New field survey

Digital mapping and geographical information systems have been introduced to facilitate the provision of up-to-date information. ALC surveys are undertaken, according to the published Guidelines, by field surveyors using handheld augers to examine soils to a depth of 1.2 metres, at a frequency of one boring per hectare for a detailed assessment. This is usually supplemented by digging occasional small pits (usually by hand) to inspect the soil profile. Information obtained by these methods is combined with climatic and other data to produce an ALC map and report. ALC maps are normally produced on an Ordnance Survey base at varying scales from 1:10,000 for detailed work to 1:50 000 for reconnaissance survey.

There is no comprehensive programme to survey all areas in detail. Private consultants may survey land where it is under consideration for development, especially around the edge of towns, to allow comparisons between areas and to inform environmental assessments. ALC field surveys are usually time consuming and should be initiated well in advance of planning decisions. Planning authorities should ensure that sufficient detailed site specific ALC survey data is available to inform decision making.

Consultations

Natural England is consulted by planning authorities on the preparation of all development

plans as part of its remit for the natural environment. For planning applications, specific consultations with Natural England are required under the Development Management Procedure Order in relation to best and most versatile agricultural land. These are for non agricultural development proposals that are not consistent with an adopted local plan and involve the loss of twenty hectares or more of the best and most versatile land. The land protection policy is relevant to all planning applications, including those on smaller areas, but it is for the planning authority to decide how significant the agricultural land issues are, and the need for field information. The planning authority may contact Natural England if it needs technical information or advice.

Consultations with Natural England are required on all applications for mineral working or waste disposal if the proposed afteruse is for agriculture or where the loss of best and most versatile agricultural land agricultural land will be 20 ha or more. Non-agricultural afteruses, for example for nature conservation or amenity, can be acceptable even on better quality land if soil resources are conserved and the long term potential of best and most versatile land is safeguarded by careful land restoration and aftercare.

Other factors

The ALC is a basis for assessing how development proposals affect agricultural land within the planning system, but it is not the sole consideration. Planning authorities are guided by the National Planning Policy Framework to protect and enhance soils more widely. This could include, for example, conserving soil resources during mineral working or construction, not granting permission for peat extraction from new or extended mineral sites, or preventing soil from being adversely affected by pollution. For information on the application of ALC in Wales, please see below.

Agricultural Land Classification: protecting the best and most versatile agricultural land

Further information

Details of the system of grading can be found in: *Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land* (MAFF, 1988).

Please note that planning authorities should send all planning related consultations and enquiries to Natural England by e-mail to consultations@naturalengland.org.uk. If it is not possible to consult us electronically then consultations should be sent to the following postal address:

Natural England
Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
CREWE
Cheshire
CW1 6GJ

ALC information for Wales is held by Welsh Government. Detailed information and advice is available on request from Ian Rugg (ian.rugg@wales.gsi.gov.uk) or David Martyn (david.martyn@wales.gsi.gov.uk). If it is not possible to consult us electronically then consultations should be sent to the following postal address:

Welsh Government
Rhodfa Padarn
Llanbadarn Fawr
Aberystwyth
Ceredigion
SY23 3UR

Natural England publications are available to download from the Natural England website: www.naturalengland.org.uk.

For further information contact the Natural England Enquiry Service on 0300 060 0863 or e-mail enquiries@naturalengland.org.uk.

Copyright

This note is published by Natural England under the Open Government Licence for public sector information. You are encouraged to use, and re-use, information subject to certain conditions. For details of the licence visit www.naturalengland.org.uk/copyright. If any information such as maps or data cannot be used commercially this will be made clear within the note.

© Natural England 2012

APPENDIX KCC3
MAFF ALC Report 1992

AGRICULTURAL LAND CLASSIFICATION

ELMSWELL SUFFOLK

AGRICULTURAL LAND CLASSIFICATION ELMSWELL, SUFFOLK

1. BACKGROUND

- 1.1 The site, an area of 44.7 hectares is the subject of a planning application for a golf course and clubhouse. In August and September 1992, ADAS Resource Planning Team undertook a detailed Agricultural Land Classification (ALC) survey of the site at an auger boring density of approximately one boring per hectare. These borings were supplemented by two soil inspection pits, to provide more detailed information on subsoil conditions. Slope measurements were also taken where appropriate to assess gradients.
- 1.2 On the provisional 1:63,360 scale Agricultural Land Classification Map, sheet no. 136 (MAFF 1972) almost all of the site has been mapped as grade 2. A small sliver of grade 3 land is mapped on the eastern boundary of the site. The above map is of a reconnaissance nature designed primarily for strategic planning and the current survey was undertaken to provide more detailed information on land quality for the site.

2. PHYSICAL FACTORS AFFECTING LAND QUALITY

Climate

- 2.1 Climate data for the site was interpolated from data contained in the published agricultural climatic dataset (Met Office, 1989). This indicates that for the survey area's average altitude of 60m AOD, the annual average rainfall is 605mm (23.8"). This data also indicates that the field capacity days are 112 and moisture deficits for wheat and potatoes are 114 mm and 108 mm respectively. These climatic characteristics do not impose any climatic limitation on the ALC grade of the site.

Altitude and Relief

- 2.2 A small stream runs in a southerly direction across the site, dissecting the area with a valley feature. The land surveyed rises in altitude from 47m in the valley floor to approximately 65m AOD. Typically the gradients are gentle (between 2-4°), but the south eastern valley side is steeper (typically 8-9°).

Geology and Soils

- 2.3 The published 1:50,000 scale, solid and drift edition geology map, sheet 189 (Geological Survey of England & Wales, 1982) shows the majority of the site to be covered by boulder clay. The above mentioned stream has associated alluvium and head deposits and there are patches of glacial sand and gravel in the east and central parts of the site. These drift deposits overlay Quaternary Crag except in the south of the site where the valley has cut down to Cretaceous Upper Chalk.
- 2.4 No detailed soil map is available of the area but the reconnaissance 1:250,000 scale soil map "Soils of Eastern England" published by the Soil Survey of England and Wales in 1983, shows almost all of the site to be covered by Ashley (572q) Association (*1) soils. Along the northern boundary of the site there is a narrow band of Hanslope (411d) Association (*2) soils. During the survey work two soil types were identified.
- 2.4.1 The first soil type is found in the northern and eastern parts of the site. Typically these soils have well drained sandy clay loam generally to a depth of 60 cm (range 40/120 cm) over chalky boulder clay containing up to 20% chalk and flints. Often below 80 cm soils become too stony to auger. Topsoils tend to be non calcareous but subsoils become calcareous at depth. There is a slightly heavier variant of this soil type with deep heavy clay loams over clay (wetness class I).
- 2.4.2 The second soil type is found in the south west of the site along the valley feature and also along the northern edge of the site. Typically the soils are heavier in texture with heavy clay loam (occasionally clay) topsoils to a depth of 35 cm, over clay subsoils. Some profiles are calcareous throughout, some calcareous in subsoils only (associated with chalky boulder clay) and some are non calcareous throughout. Drainage characteristics within these profiles are variable (Wetness Class II/III).
-
- (*1) Ashley Association - fine loamy over clayey soils with slowly permeable subsoils and slight seasonal waterlogging, associated with similar but wetter soils. Some calcareous and non-calcareous slowly permeable clayey soils.
- (*2) Hanslope Association - slowly permeable calcareous clayey soils. Some slowly permeable non-calcareous clayey soils. Slight risk of water erosion.

3. AGRICULTURAL LAND CLASSIFICATION

- 3.1 The definition of the ALC grades (MAFF, 1988) are included in Appendix 1.
- 3.2 Most of the northern and eastern parts of the site are graded 2 with the western area and valley graded 3a. A small area north of the church has been graded 3b. The table below shows the precise breakdown of the ALC grades of the site.

	Agricultural Land Classification	
	ha	%
Grade 2	21.0	47
Subgrade 3a	20.2	45
Subgrade 3b	3.5	8
TOTALS	44.7	100

3.3 Grade 2

The grade 2 land is associated with the soils described in paragraph 2.4.1. These soils are generally well drained (Wetness Class I occasionally wetness class II) and hold moderately good reserves of available water for crop growth. However the very dry climate in this area results in a slight droughtiness limitation which excludes this land from grade 1. Some profiles also show evidence of profile wetness in the lower subsoils which would also restrict the land to grade 2. Grade 2 land also occurs in areas of moderately well drained (wetness class III) calcareous profiles where sandy clay loam topsoil overlies slowly permeable clay subsoils.

3.4 Subgrade 3a

- 3.4.1 This land is associated with the heavier textured soils as described in paragraph 2.4.2. Soils are slowly permeable at depth (wetness class II) and this combined with non calcareous heavy clay loam textured topsoils excludes this land from a higher grade on wetness and workability grounds.

- 3.4.2 Although smaller area of wetness class III soils occur locally, often in conjunction with heavier clay topsoils, these profiles are typically calcareous throughout. This improves the structural stability of the soil and the land is therefore eligible for subgrade 3a.

3.5 Subgrade 3b

This is associated with land that has gradients in excess of 7° restricts the type and range of machinery that can be effectively and safely used.

This area is also believed to contain disturbed soils which have been used to infill an old pit.

R ORPIN/N THORNTON
ADAS Statutory Unit
Resource Planning Team
Cambridge

REFERENCES

GEOLOGICAL SURVEY OF GREAT BRITAIN (ENGLAND & WALES) 1982. Solid and drift edition, sheet 189 1:50 000.

MAFF 1972. Agricultural Land Classification Map, Sheet 136, Provisional 1:63,360.

MAFF 1988. Agricultural Land Classification of England and Wales (Revised Guidelines and Criteria for grading the quality of Agricultural Land). Alnwick.

METEOROLOGICAL OFFICE 1989. Climate data extracted from the published agricultural climatic dataset.

SOIL SURVEY OF ENGLAND AND WALES 1983. Soils of Eastern England. Sheet 4 1:250,000.

SOIL SURVEY OF ENGLAND AND WALES 1984. Soils and their use in Eastern England by C A Hodges, R G O Burton, W M Corbett, R Evans and R S Seale, Harpenden.

Appendix 1

Grade 1 - excellent quality agricultural land

Land with no or very minor limitations to agricultural use. A very wide range of agricultural and horticultural crops can be grown and commonly include top fruit, soft fruit, salad crops and winter harvested vegetables. Yields are high and less variable than on land of lower quality.

Grade 2 - very good quality agricultural land

Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable crops. The level of yields is generally high but may be lower or more variable than Grade 1.

Grade 3 - good to moderate quality agricultural land

Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in Grades 1 and 2.

Subgrade 3a - good quality agricultural land

Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.

Subgrade 3b - moderate quality agricultural land

Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of winter range of crops or high yields of grass which can be grazed or harvested over most of the year.

Grade 4 - poor quality agricultural land

Land with severe limitations which significantly restrict the range of crops and/or levels of yields. It is mainly suited to grass with occasional arable crops (eg. cereals and forage crops) the yield of which are variable. In most climates, yields of grass may be moderate to high but there may be difficulties in utilisation. The grade also includes very droughty arable land.

Grade 5 - very poor quality agricultural land

Land with very severe limitations which restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.

ELMSWELL · SUFFOLK

Map 1: Agricultural Land Classification

APPENDIX KCC4

Extracts from John Nix Pocketbook for Farm Management



NIX FARM MANAGEMENT POCKETBOOK

2025 55TH
EDITION

The most comprehensive business information in British agriculture

Graham Redman

WHEAT

Feed Winter Wheat

Production level	Low	Average	High	
Yield: t/ha (t/ac)	7.1 (2.9)	8.3 (3.4)	9.5 (3.8)	
	£	£	£	£/t
Grain at £190/t	1,349	1,577 (639)	1,805 (731)	
Straw in Swath	188 (76)	188 (76)	188 (76)	
Total Output	1,537 (622)	1,765 (715)	1,993 (807)	213
Variable Costs £/ha (£/ac):				
Seed.....		82 (33)		10
Fertiliser.....		295 (119)		36
Sprays.....		278 (112)		33
Total Variable Costs		655 (265)		79
Gross Margin £/ha (ac)	882 (357)	1110 (449)	1,338 (542)	134

Fertiliser Basis 8.3t/ha				Seed:	sprays £/ha:		
Nutrient	Kg/t	Kg/ha	£/ha	£/t C2	£515	Herbicides	£121
N	23	190	£184	Kg/ha	175	Fungicides	£110
P	7.0	58	£58	% HSS	30%	Insecticides	£3
K	10.5	87	£52	£/t HSS	£354	PGRs	£16
						Other	£27

1. Yields. The average yield is for all winter feed wheat, i.e. all varieties and 1st and subsequent wheats. See over for First and Second Wheats. The yield used for feed and milling wheats including spring varieties is 8.18t/ha (overall 10-year average Defra).

The table below offers a weighted estimate of yield variations according to wheat type based on a national yield of 8.4t/ha. Percentages compare yield categories with 'all wheat'. These yields are used in the gross margins.

Calculation of spread of 'average yields depending on wheat type –

	Yield					
	Adjustment	Winter	1st WW	2nd WW	spring	Total
t/ha		101%	102%	93%	85%	100%
Total	100%	8.27	8.40	7.61		8.18
Feed	101%	8.35	8.48	7.69		8.27
Bread	93%	7.69	7.81	7.08	6.02	7.61
Biscuit	99%	8.18	8.32	7.54		8.10

2. Straw is sold in the swath. Assuming 1 hectare is worth 2.5 tonnes baled straw at 4.2t/ha. So £75/tonne baled = £188/ha for winter wheat.
3. Seed is costed with a single purpose dressing. Up to a third of growers require additional seed treatments, specifically to suppress BYDV. This can add £170/t of seed (£30/ha). This has not been added in the gross margins.
4. This schedule does not account for severe grass weed infestations such as Black Grass or Sterile Brome. Costs associated with managing such problems can amount to up to £190/hectare additional agrochemical costs. Yield losses increase as infestation rises.

OILSEED RAPE

Winter Oilseed Rape

Production level	Low	Average	High	
Yield: t/ha (t/ac)	3.0 (1.2)	3.50 (1.4)	4.0 (1.6)	
	£	£	£	£/t
Output at £425/t	1,275 (516)	1,488 (602)	1,700 (689)	425
Variable Costs £/ha (£/ac):				
Seed.....		73 (29)		21
Fertiliser.....		257 (104)		73
Sprays.....		252 (102)		72
Total Variable Costs		582 (236)		166
Gross Margin £/ha (ac)	693 (281)	906 (367)	1,118 (453)	259

Fertiliser Basis 3.5t/ha				Seed:		Sprays:	
Nutrient	Kg/t	Kg/Ha	£/Ha	£/Ha C	43	Herbicides	£124
N	54	190	£184	£/Ha Hy	88	Fungicides	£68
P	14	49	£49	£/Ha HSS	29	Insecticides	£16
K	11	39	£23	C-Hy-HSS	20:20:60	PGRs	£0
	Seed write-off	8%	Kg/Ha	5.5	Other		£44

Spring Oilseed Rape

Production level	Low	Average	High	
Yield: t/ha (t/ac)	1.9 (0.8)	2.25 (0.9)	2.6 (1.1)	
	£	£	£	£/t
Output at £425/t	808 (327)	956 (387)	1,105 (448)	425
Variable Costs £/ha (£/ac):				
Seed.....		69 (28)		31
Fertiliser.....		115 (47)		51
Sprays.....		131 (53)		58
Total Variable Costs		316 (128)		140
Gross Margin £/ha (ac)	492 (199)	641 (259)	789 (320)	285

1. *Prices:* The price used is £399/t plus oil bonuses at 44% oil content making £425/. The bonus is paid on the percentage of oil over 40%, at 1.5 times the sale value of the crop and an equal but opposite penalty below 40%. For example, in this case, the bonus is on 4% oil x £410 x 1.5 = £25.
2. *Spring OSR Inputs:* Seed as per WOSR, but 35% conventional, 5% HSS, 60% hybrid. Fertiliser: N/P/K at 70/32/25 kg/ha. Sprays: Herbicides, £50, Fungicides, £41, insecticides £13, and Others £27/ha
3. *Winter Versus Spring:* As little as 8,000 hectares of spring OSR are grown in the UK which is 2.5% of the entire crop. The financial reward is slim compared with other combinable crops.

APPENDIX KCC5
Extracts Cereal and OSR Production
2024



Department
for Environment,
Food & Rural Affairs

Accredited official statistics

Cereal and oilseed production in the United Kingdom 2024

Updated 7 January 2025

Contents

Key points

Section 1: Area, yield, production and straw

Section 2 Methodology: Final estimates of 2024 UK cereal and oilseed rape production

Section 3: What you need to know about this release



© Crown copyright 2025

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/statistics/cereal-and-oilseed-rape-production/cereal-and-oilseed-production-in-the-united-kingdom-2024>

This release contains the final estimate of UK 2024 cereal and oilseed harvest.

For detailed area, yield and production results by country and regions in England go to the [accompanying data set](https://assets.publishing.service.gov.uk/media/6759681c51df3604e0a292b0/uk-cops-webseries-241212.ods) (<https://assets.publishing.service.gov.uk/media/6759681c51df3604e0a292b0/uk-cops-webseries-241212.ods>).

Key points

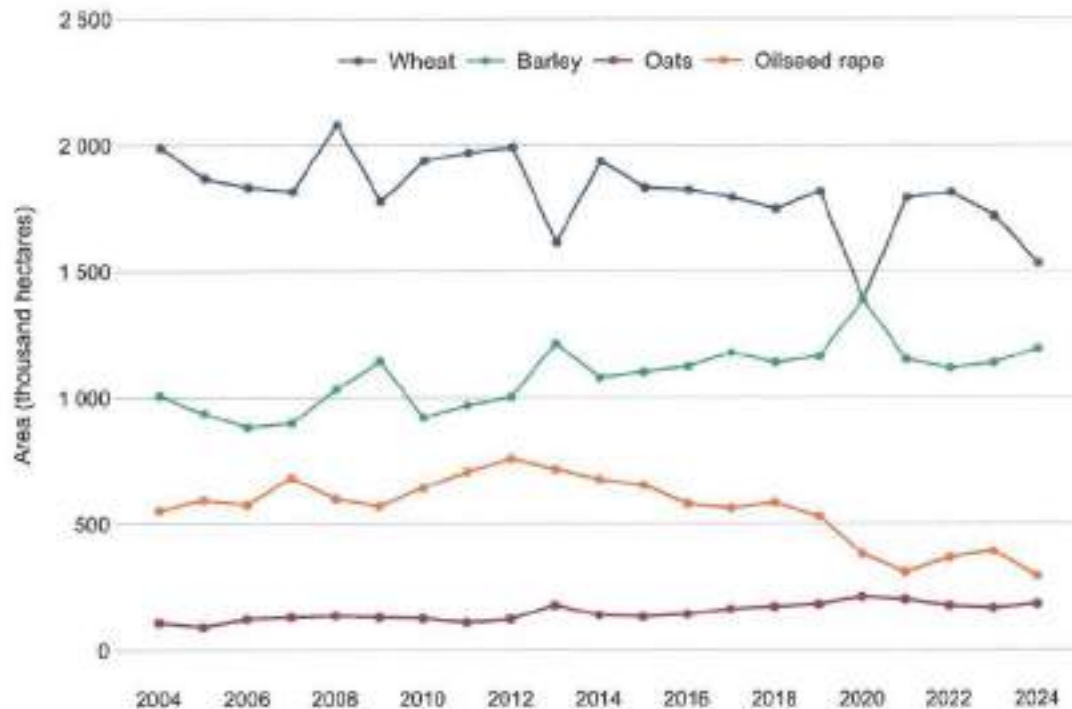
- All the main cereal crops and oilseed rape saw reductions in yields in 2024 compared to 2023 except for oats which saw a 8.6% increase. Overall yields were down on the five year average.
- The final estimate of the 2024 UK wheat harvest is 11.1 million tonnes, a decrease of 20% on 2023. This was driven by an 11% decrease in area and 10% decrease in yield.
- The final estimate of the 2024 UK barley harvest is 7.1 million tonnes, an increase of 1.8% on 2023. This comprises a 24% decrease in winter barley production offset by a 24% increase in spring barley.
- Oat production increased by 19% to 986 thousand tonnes in 2024, driven by increases in both area and yield.
- Oilseed rape production decreased by 32% to 824 thousand tonnes in 2024, driven by decreases in both area and yield.

Section 1: Area, yield, production and straw

Following a very wet July, the drier and warmer weather in early August aided the start of the harvest. Further periods of wet weather disrupted progress in many regions through August into September but drier conditions in mid-September supported progress across the United Kingdom.

1.1 Areas

Figure 1: United Kingdom crop areas between 2004 and 2024



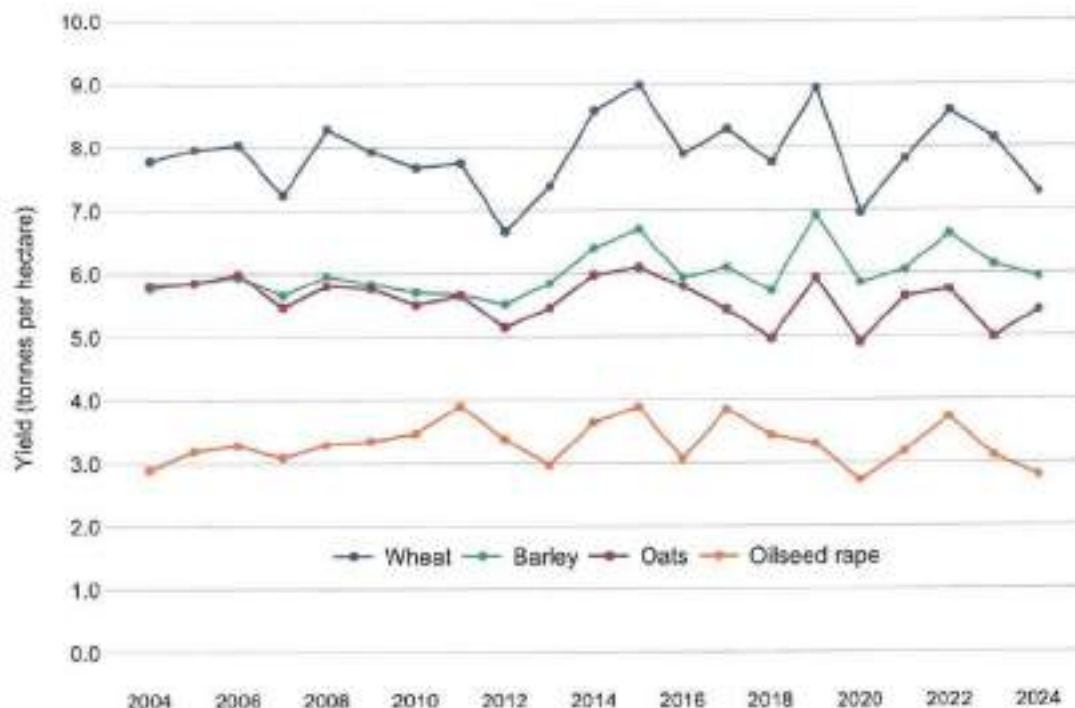
The wheat area saw a decrease of 11%, whereas barley and oats both saw increases in area in 2024, of 5.1% and 9.3% respectively (see Figure 1). Difficult weather conditions in the autumn led to a swing between winter and spring plantings with a 19% increase in the spring barley area and a 15% decrease in winter barley area.

[Download the full dataset](#)

(<https://assets.publishing.service.gov.uk/media/6759681c51df3604e0a292b0/uk-cops-webseries-241212.ods>)

1.2 Yields

Figure 2: United Kingdom crop yields between 2004 and 2024



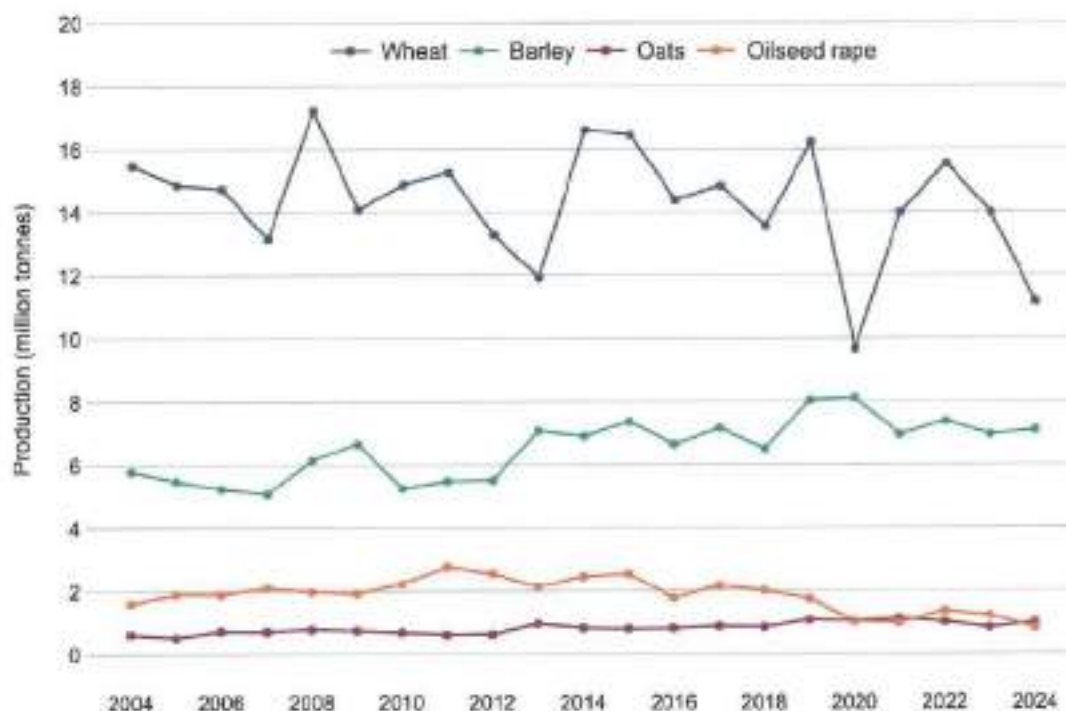
UK main cereal crops and oilseed rape all showed decreases in 2024, except for oats which saw an 8.6% increase (see Figure 2). There was some variation in yields across the UK nations reflecting the different regional challenges.

[Download the full dataset](#)

<https://assets.publishing.service.gov.uk/media/6759681c51df3604e0a292b0/uk-cops-webseries-241212.ods>

1.3 Production

Figure 3: United Kingdom crop production between 2004 and 2024



The final 2024 UK wheat harvest is 11.1 million tonnes, a decrease of 20% on 2023. This is the smallest wheat harvest since 2020 when wet weather last affected autumn plantings. Area and yield were both below the five-year average, with area down by 11% and the yield down by 10% to 7.3 tonnes per hectare (t/ha). Production was down across all UK nations.

The final 2024 UK barley harvest is 7.1 million tonnes, an increase of 1.8% on 2023. This comprised a 24% decrease in winter barley to 2.4 million tonnes, offset by a 24% increase in spring barley to 4.6 million tonnes. Winter barley yield decreased by 9.8% to 6.4 t/ha and area decreased by 15% to 384 thousand hectares. Spring barley yield increased by 4.1% to 5.7 t/ha and area increased by 19% to 810 thousand hectares.

Oats production increased by 19% on 2023 to 986 thousand tonnes, however this was still below the five-year average. This was driven by increases in both area by 9.3% and yield by 8.6% to 182 thousand hectares and 5.4 t/ha respectively.

Oilseed rape production is 824 thousand tonnes, down by 32% on 2023. Oilseed rape area decreased by 25% and yield decreased by 9.7% to 2.8 t/ha.

[Download the full dataset](#)

(<https://assets.publishing.service.gov.uk/media/6759681c51df3604e0a292b0/uk-cops-webseries-241212.ods>)

Appendix KCC6

Defra Press Release December 2022

Food supply and food security

[Defra Press Office](#), 6 December 2022 - [Weekly stories](#)



There has been some coverage of calls by the National Farmers Union (NFU) for more government support for farmers to safeguard the nation's food supplies.

We understand that farmers are facing increasing costs as a result of the impacts of the conflict in Ukraine and global economic shocks including the spike in oil and gas prices, and have announced a range of measures throughout the course of the year to help mitigate these challenges and support industry.

The UK's food supply chain remains resilient, with supply from diverse sources guaranteeing a high level of food security.

A Government spokesperson said:

"The UK has a large and highly resilient food supply chain. Our high degree of food security is built on supply from diverse sources; strong domestic production as well as imports through stable trade routes. The government is in regular contact with the food and farming industries to ensure they are well

prepared for a range of scenarios, and we continue to take all the necessary steps to ensure people across the country have the food they need."

To support the food and farming industry in the face of these pressures, the government has:

- Brought forward 50% of direct payments earlier this year to help farmers with cashflow
- Delayed proposed changes in the use of urea fertiliser back in March to help farmers manage costs and give them more time to adapt
- Brought forward New slurry storage grants which will help farmers reduce their reliance on artificial fertilisers
- Continued progress of the roll out of the Sustainable Farming Incentive scheme, and over 4000 applications have now been started. This pays farmers for actions, including improving soil health, which will reduce dependence on manufactured fertilisers which are linked to gas prices
- Removed the 25% tariff on US maize imports, which are a key ingredient for animal feed
- Brought in The Energy Bill Relief scheme, meaning businesses will be paying less than half of predicted wholesale energy costs this winter
- Cut fuel duty for petrol and diesel by 5p per litre across the UK until March 2023
- Reduced employer national insurance by increasing the Employment Allowance
- Put the brakes on bill increases by freezing the business rates multiplier - worth £9.3 billion over the next five years.
- Relaxed marketing rules so that farmers who breed turkeys, geese or ducks for their meat have the option to slaughter their flocks early and freeze these products
- Brought in Swifter compensation payments to farmers affected by avian influenza
- And earlier this year we confirmed the release of an extra 10,000 visas under the Seasonal Worker Visa Route, with 2,000 of these going to the poultry sector, meaning in total 40,000 visas are available for seasonal workers in 2022 to help ensure businesses have the workforce they need

The Food and Farming Minister met representatives from the UK egg sector on 6 December to discuss the challenges that the industry is currently facing. This is part of our regular and close engagement with the sector.

[Follow Defra on Twitter](#), and [sign up for email alerts here](#).

Tags: [direct payments](#), [farming](#), [food security](#), [food supply](#), [gas prices](#)

[All GOV.UK blogs](#) [All GOV.UK blog posts](#) [GOV.UK](#)
[All departments](#) [Accessibility statement](#) [Cookies](#)

APPENDIX KCC7

Guide to Assessing Development on Agricultural Land



(<https://www.gov.uk/government/organisations/natural-england>)

Guidance

Guide to assessing development proposals on agricultural land

Updated 5 February 2021

Applies to England

Contents

1. Policies to protect agricultural land and soil
2. LPAs: consult Natural England
3. LPAs: how to use agricultural land classification (ALC)
4. About ALC grades
5. LPAs: carry out ALC assessments to support your planning decisions
6. Use ALC to support your planning decisions
7. Developers: check if your proposal affects agricultural land



© Crown copyright 2021

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

1. Policies to protect agricultural land and soil

Developers and local planning authorities (LPAs) should refer to the following government policies and legislation when considering development proposals that affect agricultural land and soils. They aim to protect:

- the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals
- all soils by managing them in a sustainable way

Natural England uses these policies to advise on development proposals as a [statutory consultee](https://www.gov.uk/guidance/consultation-and-pre-decision-matters#Statutory-consultees) (<https://www.gov.uk/guidance/consultation-and-pre-decision-matters#Statutory-consultees>) in the planning process.

1.1 A Green Future: Our 25 Year Plan to improve the Environment 2018

[A Green Future: Our 25 Year Plan to Improve the Environment](https://www.gov.uk/government/publications/25-year-environment-plan) (<https://www.gov.uk/government/publications/25-year-environment-plan>) sets out the government's 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. It plans to:

- protect the best agricultural land
- put a value on soils as part of our natural capital
- manage soils in a sustainable way by 2030
- restore and protect peatland

1.2 National Planning Policy Framework (NPPF)

LPAs should use the NPPF to make decisions about the natural and local environment to:

- protect and enhance landscapes, biodiversity, geology and soils
- recognise soils as a natural capital asset that provide important ecosystem services
- consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land
- prevent soil, air, water, or noise pollution, or land instability from new and existing development

Read [Chapter 15: Conserving and enhancing the natural environment](https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment) (<https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment>) for full details.

1.3 Town and Country Planning (Development Management Procedure (England) Order) (DMPO) 2015

Planning authorities must consult Natural England on all non-agricultural applications that result in the loss of more than 20 hectares (ha) of BMV land if the land is not included in a [development plan](https://www.gov.uk/guidance/national-planning-policy-framework/3-plan-making) (<https://www.gov.uk/guidance/national-planning-policy-framework/3-plan-making>). For example, this includes the likely cumulative loss of BMV land from the proposed development if it's part of a phased development.

This is required by [schedule 4\(y\) of the Order](http://www.legislation.gov.uk/uksl/2015/595/schedule/4/made) (<http://www.legislation.gov.uk/uksl/2015/595/schedule/4/made>).

1.4 Planning Practice Guidance for the Natural Environment

[Paragraphs 001 and 002: Planning Practice Guidance for the Natural Environment](https://www.gov.uk/guidance/natural-environment#brownfield-land-soils-and-agricultural-land) (<https://www.gov.uk/guidance/natural-environment#brownfield-land-soils-and-agricultural-land>) explain why planning decisions should take account of the value of soils and [agricultural land classification \(ALC\)](#) to enable informed choices on the future use of agricultural land within the planning system.

2. LPAs: consult Natural England

You must consult Natural England for development proposals that are both:

- likely to cause the loss (or likely cumulative loss) of 20ha or more of BMV land
- not in accordance with an approved development plan

Natural England will advise you on the level of impact the proposal may have on BMV agricultural land. Natural England will take into account the type of development and its likely long-term effects.

Email consultations@naturalengland.org.uk or write to:

Natural England consultation service
Hornbeam House
Electra Way
Crewe Business Park
Crewe
Cheshire
CW1 6GJ

3. LPAs: how to use agricultural land classification (ALC)

You can use ALC to help inform decisions on the appropriate sustainable development of land.

ALC uses a grading system to enable you to assess and compare the quality of agricultural land in England and Wales.

A combination of climate, topography and soil characteristics and their unique interaction determines the limitation and grade of the land. These affect the:

- range of crops that can be grown
- yield of crop
- consistency of yield
- cost of producing the crop

4. About ALC grades

ALC is graded from 1 to 5.

The highest grade goes to land that:

- gives a high yield or output
- has the widest range and versatility of use
- produces the most consistent yield
- requires less input

BMV agricultural land is graded 1 to 3a.

4.1 Grade 1 – excellent quality agricultural land

Land with no or very minor limitations. A very wide range of agricultural and horticultural crops can be grown and commonly includes:

- top fruit, for example tree fruit such as apples and pears
- soft fruit, such as raspberries and blackberries
- salad crops
- winter harvested vegetables

Yields are high and less variable than on land of lower quality.

4.2 Grade 2 – very good quality agricultural land

Land with minor limitations that affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown. On some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops, such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than grade 1.

4.3 Grade 3 – good to moderate quality agricultural land

Land with moderate limitations that affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in grades 1 and 2.

4.4 Subgrade 3a – good quality agricultural land

Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of crops including:

- cereals
- grass
- oilseed rape
- potatoes
- sugar beet
- less demanding horticultural crops

4.5 Subgrade 3b – moderate quality agricultural land

Land capable of producing moderate yields of a narrow range of crops, principally:

- cereals and grass
- lower yields of a wider range of crops
- high yields of grass which can be grazed or harvested over most of the year

4.6 Grade 4 – poor quality agricultural land

Land with severe limitations which significantly restrict the range of crops or level of yields. It is mainly suited to grass with occasional arable crops (for example cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties using the land. The grade also includes arable land that is very dry because of drought.

4.7 Grade 5 – very poor quality agricultural land

Land with very severe limitations that restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.

5. LPAs: carry out ALC assessments to support your planning decisions

For an overview of ALC use:

- [1:250,000 scale regional ALC maps](http://publications.naturalengland.org.uk/category/5954148537204736) (<http://publications.naturalengland.org.uk/category/5954148537204736>) (grade 3 land is not divided into subgrades 3a and 3b)
- [1:250,000 scale regional maps predicting the likelihood of BMV agricultural land](http://publications.naturalengland.org.uk/category/5208993007403008) (<http://publications.naturalengland.org.uk/category/5208993007403008>)

These maps are not at a scale suitable or accurate for assessment of individual fields or sites.

You can assess if a development proposal is likely to affect BMV agricultural land by using the [post 1988 ALC Magic map](http://magic.defra.gov.uk/MagicMap.aspx?chosenLayers=dudleystampIndex,backdropDIndex,backdropIndex,europeIndex,vmlBWIndex,25kBWIndex,50kBWIndex,250kBWIndex,miniscaleBWIndex,baseIndex&box=449447:459357:467834:470294&useDefaultBackgroundMapping=false) (<http://magic.defra.gov.uk/MagicMap.aspx?chosenLayers=dudleystampIndex,backdropDIndex,backdropIndex,europeIndex,vmlBWIndex,25kBWIndex,50kBWIndex,250kBWIndex,miniscaleBWIndex,baseIndex&box=449447:459357:467834:470294&useDefaultBackgroundMapping=false>) and [detailed site survey reports](http://publications.naturalengland.org.uk/category/6249382855835648) (<http://publications.naturalengland.org.uk/category/6249382855835648>).

If no site survey reports are available, a [new detailed survey](#) may be necessary.

6. Use ALC to support your planning decisions

Use ALC survey data to assess the loss of land or quality of land from a proposed development. You should take account of smaller losses (under 20ha) if they're significant when making your decision. Your decision should avoid unnecessary loss of BMV land.

6.1 Protect soil

You should make sure development proposals include plans to:

- [manage soils in a sustainable way during construction](https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites) (<https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>)

- avoid peat extraction
- protect soils from contamination
- [reclaim land after mineral working or landfilling](https://www.gov.uk/government/publications/reclaim-minerals-extraction-and-landfill-sites-to-agriculture)
(<https://www.gov.uk/government/publications/reclaim-minerals-extraction-and-landfill-sites-to-agriculture>)

6.2 Carry out new surveys

If there's not enough information from previous data, you may need to have a new field survey to plan for development or to inform a planning decision. You should use soil scientists or experienced soil specialists to carry out new surveys. They should be:

- members of the British Society of Soil Science, the British Institute of Agricultural Consultants or similar professional body
- knowledgeable about the [ALC 1988 guidelines](http://publications.naturalengland.org.uk/publication/6257050620264448)
(<http://publications.naturalengland.org.uk/publication/6257050620264448>)
- experienced in soil description and ALC assessments

6.3 Survey requirements

For a detailed ALC assessment, a soil specialist should normally make boreholes:

- every hectare on a regular grid on agricultural land in the proposed development area
- up to 1.2m deep using a hand-held auger

They should:

- dig small inspection pits by hand to a minimum depth of 1m to add supporting evidence to the borehole data
- dig pits where there's a change in main soil type and ALC grade to provide a good depiction of the site
- combine the survey results with local climate and site data to plot on an Ordnance Survey (OS) base map
- use a base map at an appropriate scale for detailed work, such as 1:10,000 scale

7. Developers: check if your proposal affects agricultural land

Use the [post 1988 ALC Magic map](http://magic.defra.gov.uk/MagicMap.aspx?chosenLayers=dudleystampIndex,backdropDIndex,backdropIndex,europaIndex,vmlBWIndex,25kBWIndex,50kBWIndex,250kBWIndex,miniscaleBWIndex,baseIndex&box=449447.459357:467834.470294&useDefaultbackgroundMapping=false) (<http://magic.defra.gov.uk/MagicMap.aspx?chosenLayers=dudleystampIndex,backdropDIndex,backdropIndex,europaIndex,vmlBWIndex,25kBWIndex,50kBWIndex,250kBWIndex,miniscaleBWIndex,baseIndex&box=449447.459357:467834.470294&useDefaultbackgroundMapping=false>) and [detailed site survey reports](http://publications.naturalengland.org.uk/category/6249382855835648) (<http://publications.naturalengland.org.uk/category/6249382855835648>) to help you assess whether a development proposal is likely to affect BMV agricultural land. If no suitable data exists, you may need to carry out a [detailed survey](#) to support your planning application.

7.1 Free and chargeable advice

Natural England offers advice for proposals. Some initial advice is free. More [detailed advice is chargeable](https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals#when-you-can-pay-for-agency-advice) (<https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals#when-you-can-pay-for-agency-advice>), for example if your proposal is 20ha or more and requires more detailed advice.

Email: consultations@naturalengland.org.uk

[↑ Back to top](#)

OGL

All content is available under the [Open Government Licence v3.0](#), except where otherwise stated

© Crown copyright



Greenacres Barn/Stone Common Lane, Purton Stoke, Swindon, Wiltshire SN5 4LL
Telephone: 01793 771333 • Email: info@kernon.co.uk • Website: www.kernon.co.uk

Appendix 6

Agricultural Land Classification map



East Region

1:250 000 Series Agricultural Land Classification

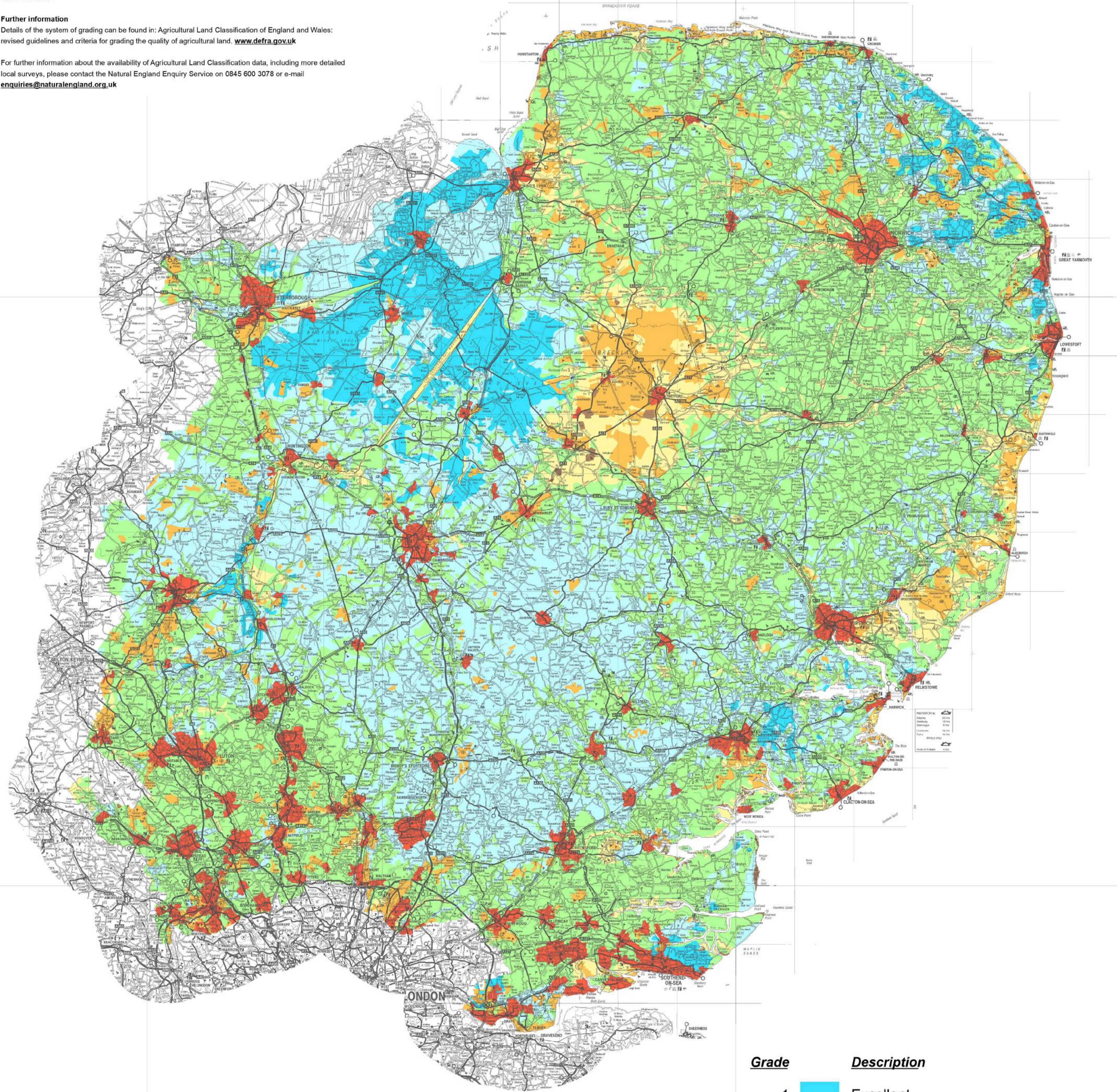
This map represents a generalised pattern of land classification grades and any enlargement of the scale of the map would be misleading. This map does not show subdivisions of Grade 3 which are normally mapped by more detailed survey work.

1:250 000 at A0

Further information

Details of the system of grading can be found in: Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land. www.defra.gov.uk

For further information about the availability of Agricultural Land Classification data, including more detailed local surveys, please contact the Natural England Enquiry Service on 0845 600 3078 or e-mail enquiries@naturalengland.org.uk



<u>Grade</u>	<u>Description</u>
1	Excellent
2	Very Good
3	Good to Moderate
4	Poor
5	Very Poor

<u>Non-Agricultural Land</u>	
	Other land primarily in non-agricultural use
	Land predominantly in urban use

1:250,000 at A0

