

# 1 Fonthill, 58 Reigate Road, Reigate

## Hearing Statement on Housing Need and Supply

On behalf of Beechcroft Developments Ltd

Date: January 2023 | Pegasus Ref: P22-1854

PINS Ref: APP/L3625/W/22/3310799 | LPA Ref: 21/03270/F

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## Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
ROO1v1	19/12/22	NT		
ROO1v2	19/01/22	NT		



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# 1. EXECUTIVE SUMMARY

## **Compliance with the Development Plan**

- 1.1. The appeal proposals are actively supported by policies CS14 and DES7 of the Development Plan and have been designed to accord with Policy DES6 through the provision of an appropriate amount and tenure of affordable housing.

## **Currency of the policies the Development Plan**

- 1.2. Notwithstanding the fact that the CS has been reviewed and found not to require updating, and in many cases because of this, some of the policies of the Development Plan are now out-of-date including because:

- the policies no longer provide a framework to plan for housing and other development needs for even five-years;
- for this reason, Policy MLS1(2b) is no longer able to be applied and is therefore clearly out-of-date;
- the same will shortly be true of Policy MLS1(2a) owing to the fact that from April 2023 a 5YLS will no longer be able to be assessed or demonstrated in accordance with national policy;
- the housing need figure has changed significantly since the CS was adopted and as such paragraph 33 of the NPPF requires that the housing requirement and the policies which support this are updated given that they are clearly out-of-date; and
- the housing requirement and the policies which support this were reliant upon a level of constraints which now demonstrably does not exist and so are clearly out-of-date.

- 1.3. The consequence of this is that the presumption in favour of sustainable development of paragraph 11d will be engaged for the purposes of this appeal.

## **The need for housing**

- 1.4. Nationally we are in the midst of a housing crisis with a pressing need for additional housing to address the needs of the population. However, this is more pronounced in some areas than in others and the need is particularly pronounced in Reigate and Banstead which is within the 44 least affordable LPAs nationally and this continues to worsen.



- 1.5. The Development Plan did not propose to meet needs in full or require this to be addressed in neighbouring areas. Instead, there was and remains no plan whatsoever to address the substantial unmet need for housing locally.
- 1.6. Unsurprisingly perhaps, the need for housing has increased substantially from 600–640 per annum at the time the CS was adopted to 1,287 per annum now – an increase of over 100%.
- 1.7. Rather than update the Development Plan to respond to this substantially increased need for housing either within Reigate and Banstead or through the duty to co-operate, the Council instead opted to take no action, such that it remains the case that there is no plan-led solution or emerging plan-led solution to address the critical need for housing within the area.
- 1.8. Accordingly, it is currently the case that notwithstanding the fact that the Council is able to demonstrate a 5YLS against the adopted out-of-date housing requirement, it is able to demonstrate only a 1.77yIs with a shortfall of 4,368 homes relative to the need for housing. This provides an indication of quite how acute the need for housing is within the Borough. In this context, it would be expected that at least substantial weight would be afforded to the provision of housing arising from the appeal proposals especially in recognition of the limited opportunities to deliver housing elsewhere within the Borough given the extent of constraints.

#### **The need for sheltered/retirement housing**

- 1.9. Within this overall figure, there is also a substantial unmet need for sheltered/retirement housing. Indeed, there is a critical need for specialist housing for older people nationally and this is also true in Reigate and Banstead owing to the increasing older population and the related social and health and well-being issues associated with many in this population.
- 1.10. Based on the Council's outdated assessment of need, there remains a net need for an additional 838–915 sheltered/retirement homes for sale by 2027. On the basis of updated assessments using different methodologies there is currently a need for 411 sheltered/retirement homes for sale increasing to c.593 by 2023 and to c.705 by 2027, but no need for any sheltered/retirement homes for rent. Accordingly, the entirety of the sheltered/retirement housing proposed should be available for sale including within the market sector and within the affordable sector (i.e. discounted market sales or potentially shared ownership).

### **The benefits of such provision**

- 1.11. The provision of sheltered/retirement housing not only addresses the substantial unmet need for housing more generally and the substantial need for sheltered/retirement housing in particular, it also gives rise to numerous other benefits including:
- Enabling older people to live independently for longer;
  - Reducing the prospects of falls and injuries amongst residents;
  - Improving the physical health and social well-being of residents;
  - Decreasing the chances of residents becoming lonely;
  - Reducing the cost burden on health and social care systems; and
  - Releasing suitably sized and currently under-utilised housing for overcrowded households.
- 1.12. All of these consequent benefits would only heighten the benefits arising from the appeal proposals.



## 2. BACKGROUND

- 2.1. My name is Neil Tiley. I am an associate member of the Royal Town Planning Institute and have worked in the private sector for over eight years. I currently hold the position of Senior Director having previously been a Director, an Associate Director and before that a Principal Planner at Pegasus Group.
- 2.2. Prior to this I was employed in Local Government for 11 years, including as a Planning Manager at Wiltshire Council for 5 years; as a Senior Planner at Wiltshire County Council for 2 years; as the Demographer at Wiltshire County Council for 2 years; and as a Senior Research Assistant responsible for monitoring and analysing housing completions and undertaking demographic modelling for 2 years.
- 2.3. I have a wealth of experience in assessing housing land supply, having been responsible for the production of such assessments and acting as an expert witness at the majority of housing land supply appeals in Wiltshire over the period 2009 to 2014. I also have significant experience in modelling and analysing the need for housing both from my time as a Demographer, and subsequently through preparing and addressing assessments of housing need including the housing needs of older people during my time with the Council and subsequently. I have continued to regularly act as an expert witness dealing with housing need and supply matters for Pegasus Group.
- 2.4. The evidence which I have prepared and provide for this appeal (APP/L3625/W/22/3310799) is true and has been prepared and is given in accordance with the guidance of my professional institution irrespective of by whom I am instructed, and I confirm that the opinions expressed are my true and professional opinions.

### **3. INTRODUCTION**

- 3.1. This Hearing Statement relates to a planning appeal for the conversion of a former nursing home alongside the conversion and extension of existing buildings and the erection of new buildings to provide 37 age restricted homes for older people at 1 Fonthill, 58 Reigate Road, Reigate. The appeal proposals will not provide care services but will provide support to enable residents to live independently including an estate manager. As such, the proposals would be defined as 'retirement living or sheltered/retirement housing' in terms of the PPG (63-010).
  
- 3.2. The planning application subject to this appeal was refused by the Council on 11<sup>th</sup> October 2022 for 4 reasons. The accompanying delegated report (CD10) sets out the considerations that informed this decision but doesn't meaningfully engage in the need for specialist housing for older people, the tenure of affordable housing needed or for housing more generally beyond recognising that there is an unspecified need for the lattermost. These issues will clearly be material to the determination of this appeal and are addressed in this Hearing Statement.

## 4. POLICY CONTEXT

### The Development Plan

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2. The Development Plan relevant to the appeal comprises the Core Strategy (CS) which was adopted in July 2014 and the Development Management Plan (DMP) which was adopted in September 2019. Both of these Development Plan Documents were adopted under the provisions of the former 2012 National Planning Policy Framework<sup>1</sup>.

### The Core Strategy

#### Policy CS13 – Housing Delivery

- 4.3. Policy CS13 sets a housing requirement for at least 6,900 homes over the period 2012–27 at an average of at least 460 per annum.
- 4.4. This housing requirement responded to the objectively assessed need for between 600 and 640 homes per annum or 9,000 to 9,600 over the period 2012–27 which was identified at that time according to paragraph 29 of the examining Inspectors Final Report (CD1.4). The Development Plan therefore sought to deliver at least 6,900 homes in response to a need for between 9,000 and 9,600 homes, meaning that if the minimum housing requirement was met there would remain between 2,100 to 2,700 households (or between 23% and 28% of households) unable to access the housing they need based on the evidence available at that time.
- 4.5. The examining Inspector nevertheless found this to be sound owing to the capacity constraints in the Borough as set out in paragraph 68 of his Final Report (CD1.4). The primary constraints which the Inspector noted as limiting the capacity included flood risk zones as set out in paragraph 42 and Green Belt as set out in paragraphs 46 to 56, neither of which affect the appeal proposals.

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<sup>1</sup> The DMP was adopted under the transitional arrangements of paragraph 220 of the current NPPF.

4.6. The Inspector also recognised in paragraph 68 that no other LPA was prepared to accommodate the unmet need. Accordingly, the policies of the Development Plan did not propose to meet housing needs by between 2,100 and 2,700 homes and this was not planned to be met elsewhere.

4.7. In this context, the examining Inspector sets out in paragraph 69 that the Council should not be complacent and that every effort should be made to meet housing needs in full, including by taking all opportunities to increase housing delivery within the urban areas and through urgent collaboration with neighbouring authorities.

#### Policy CS14 – Housing Needs of the Community

4.8. In paragraph 7.5.2 of the supporting text, it is recognised that it is important to address the needs of older people and their related care and support needs through specialist housing developments. This translates through to Policy CS14(3) which encourages the provision of such accommodation including that proposed by this appeal.

#### **The Development Management Plan**

#### Policy DES6 – Affordable Housing

4.9. Policy DES6(2) sets out that 30% of housing on sites which are not allocated greenfield urban extensions such as the appeal proposals should be provided as affordable housing. Paragraph 2.1.29 and Policy DES7(2d) are explicit that these requirements are applicable to all housing within Use Class C3 including for example the appeal proposals.

4.10. I understand that the parties will work to agree an appropriate amount of on-site provision on this basis, and this will be secured through a s106 agreement.

4.11. Policy DES6(3) identifies that the tenure mix of affordable housing will be determined based on the latest assessment of affordable housing needs. I therefore assess the need for different tenures within this Hearing Statement to ensure that the provisions of this Policy are met.

#### Policy DES7 – Specialist Accommodation

4.12. Policy DES7(2a) identifies that the Council will support proposals for accommodation suitable for older people that are easily accessible to appropriate services such as the appeal proposals.

## Policy MLS1 – Managing Land Supply

- 4.13. Policy MLS1(2a) reflects national policy and identifies that the 5YLS position will be assessed annually setting out the position as of April that year to determine whether a 5YLS can be demonstrated.
- 4.14. Policy MLS1(2b) also identifies that the 5YLS position will be forecast for the subsequent year. Where such a future supply is unable to be demonstrated, Policy MLS1(1) identifies that allocated sustainable urban extensions will be released for development.

### **Core Strategy Review**

- 4.15. The Council reviewed the CS in June 2019 (CD1.5) as required by Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This concluded that none of the policies needed updating.
- 4.16. However, there are numerous procedural and other flaws with the way in which this review was undertaken as briefly summarised below.
- 4.17. Firstly, Section 110(3) of the Localism Act 2011 requires that “activities that can reasonably be considered to prepare the way for activities...[including]...the preparation of development plan documents” are subject to the duty to co-operate. This is similarly set out repeatedly in the PPG which states inter alia:

**“Local planning authorities need to comply with the Duty to Co-operate when revising their development plan documents and reviewing whether they remain up to date...Plans are required to set out strategic policies that address strategic priorities. These may include cross-boundary matters, including issues such as whether an authority is able to meet all its housing need. Given the direct implications of plan reviews in enabling such matters to be addressed through the updating of policies, it is important that the bodies subject to the Duty to Co-operate have an opportunity to engage in both how plan reviews are undertaken and the review of the plan. Engagement with neighbouring authorities and prescribed bodies needs to occur before a final decision on whether to update policies in a plan is made, as such engagement may influence that decision.... A record of how authorities will be engaged in the review of plans and of where agreement has or hasn’t been reached on the need to update a policy or policies can be set out in the Statement of Common Ground.”** (61-075)

**“A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters...In the case of local planning authorities, it**

***also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate.***” (61-010) (emphasis added)

- 4.18. The Council however did not engage in the duty to co-operate or prepare Statements of Common Ground with relevant bodies during the review contrary to the regulatory requirements, the PPG and paragraph 27 of the NPPF. Indeed, in paragraph 36 of the Addendum to the Agenda to the Extraordinary Council Meeting (CD1.6) which considered the review suggests that the duty to co-operate does not apply to plan reviews contrary to regulations, the PPG and the NPPF.
- 4.19. The failure to engage in the duty to co-operate is also directly contrary to the examining Inspector’s requirement in paragraph 69 of his Final Report (CD1.4).
- 4.20. The necessary consequence of this failure to engage in the duty to co-operate is that it remains the case that the housing needs of thousands of households are not being taken into account within any Development Plan or responded to by any LPA such that the Development Plan would not now be found sound as it does not accord with paragraph 35c of the NPPF. As the adopted Development Plan would not now be found sound, it clearly needs to be updated.
- 4.21. Secondly, paragraph 33 of the NPPF requires that strategic policies are updated (rather than reviewed) if the local housing need figure has increased significantly.
- 4.22. The review of the Council however erroneously suggested that the local housing need figure had not increased significantly owing to the application of a cap. The PPG (2a-007) explicitly states inter alia:

***“The cap reduces the minimum number generated by the standard method, but does not reduce housing need itself.”***

- 4.23. Therefore, the cap should not be taken into account when establishing the local housing need. Accordingly, there was a need for 1,148 homes per annum which is clearly significantly greater than the need for between 600 and 640 homes per annum to which the CS responded. In such circumstances, paragraph 33 of the NPPF is unequivocal that the relevant strategic policies including Policy CS13 need to be updated (rather than reviewed). Without such an update, the housing requirement of the Development Plan and the policies which flow from this are clearly out-of-date, inconsistent with national policy, and do not provide for the

needs of current and future generations as is required to provide for sustainable development according to paragraphs 7 and 8b of the NPPF.

- 4.24. Within the review the Council however suggest that even if housing needs are significantly greater as they undoubtedly are, it would not be appropriate to update the housing requirement as:

***“The Core Strategy Inspector identified a number of large-scale and localised constraints, including Green Belt (paragraph 46-56 of the Inspector’s Report) and flood risk (particularly paragraphs 42-43) at one end of the spectrum, and localised constraints of ancient woodland (paragraph 54) which justified why the overall housing needs could not be met. All of these remain protected areas/assets of particular importance for the purposes of footnote 9 of the 2019 NPPF and all of these constraints continue to exist and persist in the borough.”***

- 4.25. This is clearly directly at odds with the findings of the examining Inspector in paragraph 69 of his Final Report wherein he relied upon all opportunities to better respond to meeting housing needs being taken. An update would have provided one such opportunity which the Council has not taken as required by the examining Inspector.

- 4.26. Thirdly, not only is the housing need significantly greater than assumed within the Core Strategy, the extent of the constraint within the housing requirement is demonstrably no longer justifiable. The Council’s latest Housing Monitor (CD1.7) identifies that 5,644 homes have been completed from 2012-22 in Table 3 and that an additional 2,390 homes will be forthcoming in the next five years (2022-27) in Table 24, providing a total supply of 8,034 homes over the period 2012-27<sup>2</sup> in response to the capacity constrained housing requirement for 6,900 homes. It is therefore clearly now the case that the capacity constraints relied upon within the adopted housing requirement are no longer credible and as such the adopted housing requirement is out-of-date and in need of updating.

- 4.27. Fourthly, the adopted Development Plan covers a plan period to 2027, such that at the time of review it only looked ahead over 8 years and now only c.4 years, and so does not anticipate or respond to even medium-term let alone long-term requirements as expected by paragraph 22 of the NPPF. Indeed, in Reigate and Banstead the policies of the Development

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<sup>2</sup> Whilst this is in excess of the adopted housing requirement, this still provides for between 966 and 1,566 homes less than are needed based on the objectively assessed need for between 9,000 and 9,600 homes identified at the time the CS was adopted.

Plan were only intended to be operative until 2027 and provide no scope to address housing (or other development) needs beyond that time. Clearly the relevant policies of a Development Plan with such a short time-horizon do not provide the necessary framework for planning into the future and need to be updated given that they are increasingly out-of-date.

- 4.28. However, notwithstanding the procedural flaws and the departures from national policy and guidance set out above, the Council has completed what it considers to be a review. In such circumstances, as set out in paragraph 26 of the appeal decision at 1 & 2 Rosebank Cottages, Reigate (CD9.1) as the review has not been challenged in the courts it should be treated as a review for the purposes of the NPPF. The consequence of this is that the 5YLS should be assessed against the adopted housing requirement rather than against the minimum local housing need, although this does not detract from the substantial unmet need for housing and the failure of the adopted Development Plan to respond to this as a material consideration. Furthermore, as set out above, the housing requirement and the policies which flow from this are out-of-date regardless of the 5YLS position and as such the presumption in favour of sustainable development of paragraph 11d will be engaged regardless of the 5YLS position.

## Material Considerations

### National Planning Policy Framework (NPPF)

- 4.29. Since the CS and DMP were adopted a new NPPF has been introduced by the Government. This is a material consideration of significant weight which will be referred to as appropriate throughout this Proof of Evidence.

### National Planning Practice Guidance (PPG)

- 4.30. The Planning Practice Guidance provides assistance with the interpretation and application of national policy.
- 4.31. Within the PPG, there is a whole section devoted to 'Housing for older and disabled people' to which reference will be drawn as appropriate. This section identifies amongst other things that:

***"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this***

**is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems...** (63-001)

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

**"Decision makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people. Local planning authorities can encourage the development of more affordable models and make use of products like shared ownership. Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need."** (63-016) (emphasis added)

#### Planning Reform

- 4.32. The Government has recently published the Levelling-up and Regeneration Bill: reforms to national policy (CD1.12) for consultation. In this the Government set out an entire section on the need for more older people's housing stating:

**"5. This government is committed to further improving the diversity of housing options available to older people and boosting the supply of specialist elderly accommodation. The National Planning Policy Framework supports this ambition by asking local authorities to provide for a diverse range of housing needs, including for older people.**

**6. The Framework already makes clear that the size, type and tenure of housing needed for different groups in the community, including older people, should be assessed and reflected in planning policies. In 2019, we also published guidance to help local authorities implement the policies that can deliver on this expectation.**

**7. The population of the UK is ageing rapidly and around 1-in-4 will be aged 65 or over by 2041. We need to ensure that our housing market is prepared for this challenge and that older people are offered a better choice of accommodation to suit their changing needs, to help them to live independently and feel more connected to their communities. In 2021, a report by the International Longevity Centre indicates that there will be a shortfall of 37% in specialist retirement housing by 2040.**

**8. We have therefore been considering ways in which the Framework can further support the supply of older people's housing. We propose to do this by adding an additional specific expectation that within ensuring that the needs of older people are met, particular regard is given to retirement housing,**

**housing-with-care and care homes, which are important typologies of housing that can help support our ageing population.**

***9. Alongside this, we are also launching a taskforce on older people's housing, which we announced in the Levelling Up White Paper. This taskforce will explore how we can improve the choice of and access to housing options for older people and will follow important work conducted recently by Professor Mayhew on meeting the challenges of our ageing population." (emphasis added)***

**The Market Assessment of Housing Options for Older People**

- 4.33. The Market Assessment of Housing Options for Older People (CD1.13) was prepared on behalf of Shelter and the Joseph Rowntree Foundation in 2012. Paragraph 8 states inter alia:

***"There is very limited choice for older person households moving home to accommodate their support needs...Compared with older person's existing housing tenure (around 70% owner-occupation), there is much less specialist housing available for purchase (around 30%) than for social rent."***

**Housing in Later Life**

- 4.34. Housing in Later Life (CD1.14) was prepared by numerous bodies including the Housing Learning and Improvement Network (LIN). On page 7 numerous of the benefits associated with the provision of specialist housing for older people are summarised, including improvements to the quality of those who move to specialist housing for older people, contributing to the creation of sustainable communities, limiting fuel poverty, stimulating the housing market, reducing or delaying the need for care and benefiting the economy.

**Reigate and Banstead Strategic Housing Market Assessment Update, February 2012 (SHMA)**

- 4.35. The SHMA was prepared in support of the CS. In paragraph 5.1.10, this identifies that there is less need for shared equity specialist housing for older people to the fact that a high proportion of those seeking specialist housing for older people are existing owner occupiers and therefore would not be eligible for or seek affordable specialist housing. The same principle holds for other forms of affordable specialist housing for older people, such that the evidence suggests that there is a comparatively lower need for affordable specialist housing for older people than there is for affordable housing more generally.

**Reigate and Banstead Housing for Older People Report of October 2017**

- 4.36. In support of the DMP, the Council prepared the Housing for Older People Report (CD1.15) which sets out that:

- There is a critical need for housing for older people given the increasing number of older people (paragraph 2.4) and a lack of suitable properties for older people looking to downsize (paragraph 3.9), with a need for 725,000 specialist homes with support and 190,000 specialist homes with care nationally by 2025 (paragraph 3.12).
- The most significant growth in Reigate and Banstead is expected to be amongst the older population (paragraph 3.25).
- Specialist housing for older people is required to respond to this need (paragraph 3.14) including (but not limited to) sheltered/retirement housing which provides a low level of support provided by a scheme manager often with a range of communal areas/facilities for residents (paragraph 3.3); and age restricted/age exclusive housing which does not include any support/care for residents but typically includes adaptations to suit older people (paragraph 3.7).
- There is a particular shortage of market specialist housing for older people (paragraphs 3.11 and 3.18).
- Windfall developments of specialist housing for older people such as that proposed will be necessary to meet the need for such accommodation (paragraph 3.33 and 3.34).

4.37. In paragraph 4.7, it then proceeds to consider the need for certain forms of specialist housing for older people and identifies a need for 967–1,044 sheltered/retirement homes. This need originated in the preceding Housing for Older People Report of June 2016 (CD1.16) which calculates the need on the basis of the indicative rates identified by the More Choice, Greater Voice report of February 2008 (CD1.17). The proportion of the need for different tenures of sheltered/retirement was then calculated and this identified that only 15% of sheltered/retirement housing should be provided as affordable housing.

## Summary

4.38. In summary:

- the relevant policies of the Development Plan do not provide any framework for planning to address needs for even five years and are therefore out-of-date.

- the housing requirement and the policies which support this are based on an assessment of housing need which does not accord with national policy and has proved to be substantially too low and are therefore out-of-date.
- the extent of the constraints relied upon within the housing requirement is demonstrably not credible and so the housing requirement and the policies which support this are out-of-date for yet another reason.
- the Development Plan does not make sufficient provision to address the need for housing within the Borough by a substantial margin and this is not planned to be addressed elsewhere, such that there is a very substantial unmet need to be weighed in the planning balance as a material consideration.
- the Development Plan requires that the tenure mix of affordable housing is determined based on the latest evidence.
- the Development Plan requires that the 5YLS is assessed both across the immediate five-year period and the subsequent five-year period, each of which will trigger certain policies of the Development Plan or the NPPF.
- the 5YLS is to be assessed against the adopted housing requirement owing to the review of the CS.
- the Development Plan is supportive of specialist accommodation for older people such as that proposed.
- there is a clear and consistent message from national policy, local policy and a range of evidence-based documents that as part of the very substantial unmet need for housing in Reigate and Banstead, there is a critical need for specialist housing for older people.
- a range of different housing is needed to provide choice to respond to the health and lifestyle needs of older people.
- there is a comparatively low need for affordable specialist accommodation for older people.



- the provision of such housing gives rise to numerous significant benefits including to the health and wellbeing of the older population and their quality of life, to the housing market, and to the economy.

## 5. THE HOUSING CRISIS

### The National Position

- 5.1. The national housing crisis is well documented and evidenced in a vast array of documents, including in relation to its causes, its implications and the necessary response as briefly described below.
- 5.2. The housing crisis has arisen largely as a result of the discrepancy between the number of homes built and the need. The Barker Review in 2004 identified that there was a need to build circa 250,000 homes per annum nationally to prevent spiralling house prices and a shortage of affordable homes. However, in the period 2004 to 2012, an average of only 178,000 homes per annum were built.
- 5.3. The former NPPF was then introduced in 2012 containing the Government objectives to significantly boost the supply of housing and to meet housing needs. However, in the period from 2012 to 2016, an average of only 155,000 homes per annum were built.
- 5.4. As a result of the continued shortfall against the need identified in the Barker Review, the Select Committee on Economic Affairs to the House of Lords identified a need to deliver 300,000 homes per annum in the Building More Homes report, July 2016. This number has been confirmed as being needed by the Government in the Budget 2018, the Technical Consultation on Updates to National Planning Policy and Guidance, October 2018 and Planning for the Future, March 2020. In the period 2016-18, an average of 210,000 homes were built.
- 5.5. In response, the Government published a new NPPF in 2018 which subject to minor revisions in 2019 and 2021 is consistent with the current NPPF<sup>3</sup>. This seeks to address the under-delivery of housing and the existing backlog in housing supply through a number of mechanisms including the use of the standard method for calculating the minimum local housing need and the use of a more realistic and balanced definition of a deliverable site. In

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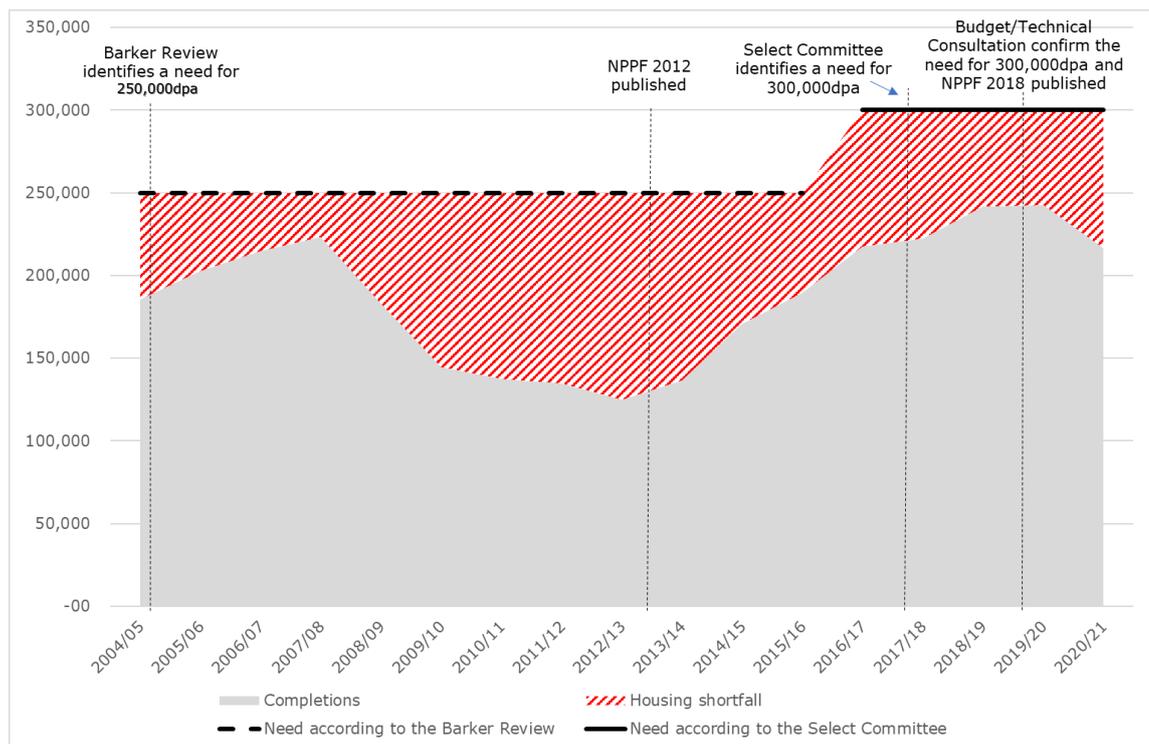
<sup>3</sup> The 2018 NPPF was amended to provide additional clarity in 2019, and the standard method was then revised in December 2020. The further revisions in 2021 were not related to housing need or supply.

the period 2018–21 an average of 234,000 homes have been built which represents a significant improvement but remains substantially below the identified need for housing.

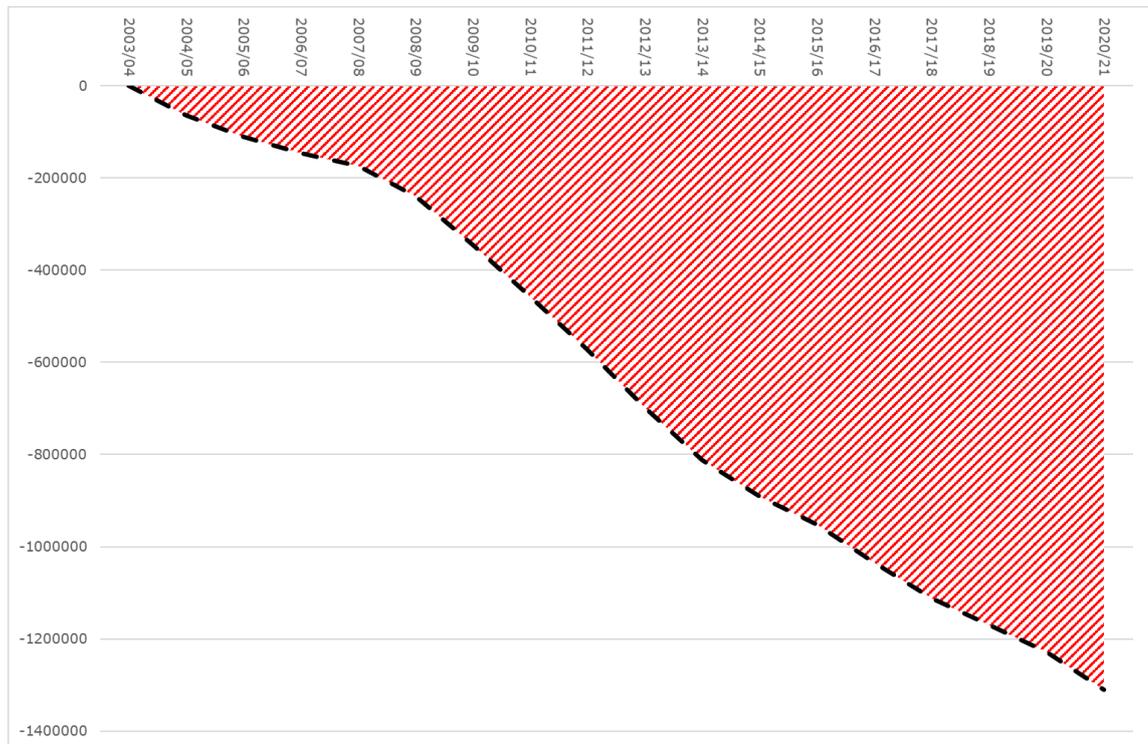
5.6. The balance of need and supply is presented graphically in Figure 5.1 and the cumulative shortfall is presented in Figure 5.2 below.

5.7. This demonstrates that housing supply nationally has not come close to meeting needs over the previous 15 years in any single year and also illustrates that there is a substantial cumulative shortfall in housing supply. Indeed, since 2004 there have been a total of 3,188,961 completions as compared to a need for 4,250,000 based on the need for 250,000 identified in the Barker Review. This equates to a shortfall in the delivery of over a million homes in 17 years.

**Figure 5.1 – a comparison of need and supply nationally**



**Figure 5.2 – the cumulative shortfall**



5.8. As housing need has significantly exceeded the supply, the greater competition for those houses that do exist has had an uplifting effect on the average market value of properties with adverse implications on the accessibility of the housing market to households. There are many statistics which demonstrate the decreasing accessibility of the market including (but not limited to):

- i. The lower quartile house price to lower quartile earnings ratio increased from 6.27 to 8.04 from 2004 to 2021 in England according to the DLUHC;
- ii. The median house price to median earnings ratio increased from 6.60 to 9.05 from 2004 to 2021 in England according to the DLUHC;
- iii. The average house price across the UK increased from £153,482 in 2004 to £247,535 in 2021 according to Nationwide;
- iv. The percentage of overcrowded households has increased from 2.5% to 3.5% from 2003/04 to 2019/20 in England according to the DLUHC;
- v. The number of concealed families has increased from 161,254 in 2001 to 275,954 in 2011 across England according to the Census; and

vi. The number of households living in shared dwellings has increased from 65,998 in 2001 to 77,955 in 2011 across England according to the Census.

5.9. It is clear that housing supply was not meeting housing need under the former NPPF and whilst the position has improved there remain substantial shortfalls with significant adverse effects on accessibility. These effects manifest themselves in real households facing real difficulty and often being unable to access appropriate housing.

## **The Local Position**

5.10. As set out above, there is a national housing crisis, which is causing real harm to real households. However, these issues are more pronounced in some areas than in others. Reigate and Banstead is one of the LPAs in which the housing crisis is particularly pronounced.

5.11. The PPG (2a-004) sets out the standard method for calculating the minimum local housing need and this requires that an affordability adjustment is applied where households are required to spend in excess of 4 times the median income, indicating that the Government consider that housing becomes inaccessible when households have to spend more than 4 times the median income to access a home. This aligns with the fact that most mortgage lenders will only lend up to between 4 and 4½ times a household's income.

5.12. In Reigate and Banstead however, households have to spend 13.58 times the median income to access a median priced house<sup>4</sup>, as compared to 9.05 times nationally. This indicates that housing is particularly inaccessible in Reigate and Banstead. Indeed, the affordability ratio in Reigate and Banstead puts it within the 44 least affordable of the 309 LPAs nationally.

5.13. This position has worsened substantially over the preceding decade (2011-21) with the affordability ratio having increased by 54% from 8.81 to 13.58 in Reigate and Banstead, far in excess of the increase experienced nationally (33%) and greater than that experienced in all but 42 of the 309 LPAs nationally. Indeed, the affordability ratio in Reigate and Banstead in 2011 put it within the 73 least affordable LPAs, whereas in 2021 it is now within the 44 least affordable LPAs.

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<sup>4</sup> According to the ONS data referenced in the PPG (2a-004).



- 5.14. For those households less able to access the housing market, the position is even worse. The lower quartile affordability ratio in Reigate and Banstead indicates that for a household with a lower quartile income, they would need to spend 13.82 times this to access a lower quartile priced house as compared to 8.04 times nationally. The affordability of housing for such households has worsened by 56% from 8.87 to 13.82 over the last decade, in excess of the increases experienced nationally and the 25<sup>th</sup> greatest increase of the 309 LPAs nationally.

## **Summary**

- 5.15. In summary, we are in the midst of a national housing crisis, and this is particularly pronounced in Reigate and Banstead such that there is a desperate and increasingly desperate need for additional housing in the Borough.

## 6. THE FIVE YEAR LAND SUPPLY (5YLS)

- 6.1. The Council's latest assessment of the 5YLS position is set out in the Housing Monitor 2022 (CD1.7) and its Erratum published October 2022 (CD1.8). These documents assess the 5YLS position over both the period 2022–27 and 2023–28 as required by Policy MLS1.
- 6.2. For the purposes of both of these assessments required by Policy MLS1, paragraph 74 and footnote 39 of the NPPF require that the 5YLS is assessed against the adopted housing requirement where this is less than five years old or where it has been reviewed and found not to require updating as is the case in Reigate and Banstead.
- 6.3. It is not however possible to assess the 5YLS against the adopted housing requirement over the period 2023–28 as required by Policy MLS1(2b), owing to the fact that the housing requirement only covers the period to 2027. As such Policy MLS1(1) cannot now be applied owing to the fact that the Development Plan now provides for an insufficiently distant time-horizon. Policy MLS1(2b) is therefore unable to be applied and clearly out-of-date.
- 6.4. Similarly, Policy MLS1(2a) will require that the 5YLS is assessed for the period 2023–28 from April 2023<sup>5</sup> in order to determine whether the most important policies are out-of-date and the tilted balance of paragraph 11d is engaged. As above, the 5YLS will not be able to be assessed at this point, owing to the fact that the housing requirement of the Development Plan only runs to 2027. Accordingly, the entirety of Policy MLS1 will not be able to be applied owing to the insufficient time-horizon of the Development Plan. As such, Policy MLS1 will be out-of-date and furthermore the Development Plan will have an insufficient time-horizon to allow paragraph 74 of the NPPF to be applied.
- 6.5. As the housing requirement will no longer extend to five years, the Council will not only be unable to assess the 5YLS in accordance with paragraph 74 of the NPPF, but it will also be unable to demonstrate a 5YLS in accordance with national policy, such that footnote 8 and paragraph 11d will identify that the most important policies for determining this appeal are out-of-date and the tilted balance of paragraph 11d is engaged for yet another reason.
- 6.6. The Council has sought to work around this issue by seeking to extend the adopted housing requirement to cover the period to 2028 in the Housing Monitor 2022 – Erratum October

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<sup>5</sup> Albeit that the assessment is expected to be published until June according to Policy MLS1.

2022. Such an extended plan period could only be introduced by updating the policies of the Development Plan given that they are out-of-date. However, the Council has opted not to do so and in any event the need to extend the plan period would again demonstrate that the relevant policies of the Development Plan are out-of-date which would again engage the tilted balance of paragraph 11d.

- 6.7. Such an extension of the housing requirement beyond the plan period would also suggest that the Council considers that there is additional capacity for housing that could be brought forward contrary to the basis of their justification for not updating the housing requirement within the review. If there is such additional capacity, then presumably this could have been brought forward within the current plan period and as such the housing requirement should have been updated and is out-of-date for another reason.

## Summary

- 6.8. In summary, the most important policies of the Development Plan are or will shortly be out-of-date for another reason namely owing to the fact that the Development Plan provides no scope to address housing or other development needs beyond March 2027 (in c.4 years' time). In particular:
- the first limb of Policy MLS1 can no longer be applied and is out-of-date owing to the fact that the Development Plan does not provide for a sufficient time-horizon.
  - the second limb of Policy MLS1 and paragraph 74 will no longer be able to be applied in the coming months, such that the Council will be unable to demonstrate a 5YLS in accordance with national policy and the most important policies will be out-of-date regardless of the previous considerations.
- 6.9. As a result, the presumption in favour of sustainable development of paragraph 11d of the NPPF is or will certainly be engaged for yet another reason within the coming months.

## 7. THE OVERALL NEED FOR HOUSING

- 7.1. As set out above, the CS planned for a substantial unmet need for housing of between 2,100 and 2,700 homes compared to the identified objectively assessed need for housing over the plan period. No other LPA proposed to address this unmet need and as such it was planned that between 2,100 and 2,700 households would not be provided the housing they need, either within Reigate and Banstead or elsewhere within the housing market area.
- 7.2. The Government has subsequently introduced the standard method which identifies that the need for housing is significantly greater than that identified at the time the CS was adopted. Indeed, the standard method (uncapped<sup>6</sup>) currently identifies a minimum need for 1,287 homes per annum in Reigate and Banstead as compared to the objectively assessed need for between 600 and 640 homes identified in support of the CS.
- 7.3. In accordance with the findings of the Inspector in paragraph 28 of the appeal decision at 1 & 2 Rosebank Cottages, Reigate (CD9.1) it is therefore appropriate to assess the 5YLS against the minimum need for housing to determine the extent of the need for additional housing. This is simply set out in Table 7.1 below.

**Table 7.1 – the need for additional housing**

Minimum annual local housing need	1,287
5% buffer to provide choice and competition	64
Need for housing within five years	6,758
Deliverable supply identified by the Council	2,390
<b>Five-year land supply against the minimum need</b>	<b>1.77 years</b>
<b>Shortfall in housing need</b>	<b>-4,368</b>

- 7.4. This clearly demonstrates that over 4,300 households will not be provided the housing they need between 2022-27 in Reigate and Banstead if the policies of the Development Plan are rigorously applied.
- 7.5. It is also interesting to note that had the Council not reviewed the CS or reviewed this and found that the CS needed to be updated as required by the NPPF, then the Council would now identify only a 1.77yIs rather than an 8.72yIs as set out in Table 24 of the Housing Monitor

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<sup>6</sup> As per the PPG (2a-007).

2022. This substantial difference emphasises the fact that the review has served to obfuscate the real position that there is a pressing need for additional housing and the policies of the Development Plan do not take account of the extent of this need such that they are arguably out-of-date in any event.

7.6. Additionally, the standard method provides only the minimum local housing need and takes no account of numerous factors including for example the need for affordable housing. In Reigate and Banstead, the latest evidence contained in the Housing Needs Assessment November 2019 (CD1.9) suggests that there is a need for 423 affordable homes for rent per annum in Table 5.15 and 270 affordable homes for sale per annum in Table 5.21, providing a total need for 693 affordable homes per annum. Even if all development was to occur on greenfield urban extensions, such that Policy DES6 required the delivery of 35% affordable housing, there would therefore be a need for 1,980 homes per annum to meet the affordable housing needs in full rather than the minimum need for 1,287 homes per annum identified by the standard method (uncapped).

7.7. Therefore, it is clearly the case that the full need for housing in Reigate and Banstead will be greater than the minimum provided by the standard method, and as such there will be even less than a 1.77yls compared to the full need for housing.

7.8. By any measure therefore, there is a very substantial unmet need for housing which will be material to the weight afforded to the provision of housing.

7.9. Whilst the appeal proposals will make a comparatively limited contribution towards the unmet need for in excess of 4,368 homes, this must be viewed in the context that the Borough is heavily constrained and as such the appeal proposals present one of very few opportunities to respond to the very substantial unmet need.

## **Summary**

7.10. There is a very substantial unmet need for at least 4,368 homes over the period 2022–27 and significantly more once affordable housing needs are taken into account. This will clearly be material to the weight afforded to the provision of housing.

## 8. THE NEED FOR SPECIALIST HOUSING

8.1. The PPG (68-035) states inter alia:

*“Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply.”*

8.2. Accordingly, the provision of specialist housing for older people such as that proposed will not only cater to the specific needs of older people it will also contribute to the addressing the very substantial unmet need for housing identified in the preceding section.

8.3. However, the need for specialist housing for older people and sheltered/retirement housing particularly will also be material to the need for the development proposed and is considered within this section.

### **National guidance**

8.4. The PPG (63-001) is explicit that there is a “critical” need to provide housing for older people owing to the ageing of the population and the need to provide the older population with a better choice of accommodation to suit their needs.

8.5. The starting point is therefore that there is a critical need for such housing nationally. However, the extent of this may vary from area to area.

### **The ageing population and their needs**

8.6. In 2011, there were 22,733 people aged 65 or over in Reigate and Banstead. In the period 2011-21 this had increased by 3,988 people or 16.5%<sup>7</sup>.

8.7. The latest sub-national population projections of the ONS indicate that this significant increase in the local population aged 65 and over will continue into the future, such that by 2038 it is projected the number of people in this age bracket will increase by an additional 40.5% to 37,542.

8.8. With an increasing proportion of the population falling into this age group, there is a critical need for housing to meet the needs of this population.

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<sup>7</sup> These figures are taken from the Census.

8.9. The Projecting Older People Population Information System (POPPI) provides projections of the number of older people with particular needs and is commonly used to establish the need (or otherwise) for accommodation suitable for older persons. This suggests that in Reigate and Banstead the number of people aged 65 or over<sup>8</sup>:

- living alone will increase by 3,895 or 43.6%;
- who need help with at least one domestic task will increase by 3,660 or 45.6%;
- who need help with at least one self-care activity will increase by 3,571 or 45.1%;
- with a limiting long-term illness whose activities are limited a little will increase by 2,188 or 48.1%;
- with depression will increase by 953 or 40.4%;
- with severe depression will increase by 339 or 45.1%;
- with dementia will increase by 1,124 or 53.8%;
- with cardiovascular disease will increase by 3,866 or 44.5%;
- with bronchitis/emphysema will increase by 197 or 43.0%;
- predicted to have a fall will increase by 3,293 or 44.4%;
- predicted to be admitted to hospital as a result of a fall will increase by 471 or 51.6%;
- with a moderate or severe visual impairment will increase by 1,137 or 46.8%;
- with some hearing loss will increase by 7,416 or 43.6%;
- unable to manage at least one mobility activity on their own will increase by 2,510 or 47.8%;
- with diabetes will increase by 1,393 or 41.2%.

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<sup>8</sup> POPPI only provides information for those aged 65 or over.

8.10. It is therefore clear that as a result of the ageing of the population in Reigate and Banstead, a far greater proportion of the population will not experience as good a quality of life as would otherwise be the case. As a result, it would be expected that there will be far greater demands on health and social care services.

### **The need for specialist housing for older people**

8.11. As set out previously the Council assessed the need for sheltered/retirement housing in support of the DMP and identified a need for between 967 and 1,044 units of sheltered/retirement housing in the period 2014–27 as set out in paragraph 4.7 of the Housing for Older People Report of October 2017 (CD1.15).

8.12. In response to this need it is possible to identify the amount of sheltered/retirement housing that has and will be delivered in Reigate and Banstead using information provided by the Elderly Accommodation Counsel (EAC)<sup>9</sup> and the planning portal of the Council. The EAC provide a dataset of sheltered/retirement housing for every local authority in the country<sup>10</sup>.

8.13. The EAC identify that as of October 2022, there were a total of 1,416 sheltered/retirement homes in Reigate and Banstead of which only 93 opened in the period 2014–22<sup>11</sup>. I have been able to identify an additional supply of 36 committed sheltered/retirement homes at Priory House, Banstead<sup>12</sup>. This provides a total potential committed supply of 129 sheltered/retirement homes in response to the need for 967 to 1,044 such homes, leaving a **shortfall of 838–915 sheltered/retirement homes relative to the need identified in 2017**. This assessment of need is however somewhat out-of-date owing to the fact that it is based upon now out-of-date population projections. As such I have updated the assessment which informed the Development Plan below.

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<sup>9</sup> The EAC is a charity that offers information and advice about accommodation and care options for older people. To support this service, it undertakes research into all forms of specialist accommodation and associated care & support services nationally.

<sup>10</sup> As well as other forms of specialist accommodation for older people.

<sup>11</sup> Comprising 34 sheltered homes at Stanley Lodge, Tattenham Corner; 31 sheltered homes at Colebrooke Lodge, Reigate; and 28 sheltered homes at Goldfinch House, Chipstead.

<sup>12</sup> These are set out in the EAC dataset but I have not been able to identify any other committed developments on the Council's planning portal.

### **An updated assessment of the need for older persons accommodation**

- 8.14. There are numerous methodologies for assessing the need for specialist accommodation for older people. As such I consider that it is good practice to apply a number of these methodologies to ensure that the findings are robust.

#### More Choice, Greater Voice

- 8.15. One methodology is set out in the More Choice, Greater Voice report which was relied upon by the Council in support of the DMP. This methodology is set out in the table at the top of page 9 of the Housing for Older People Report of June 2016 which identifies that there is a need for 125 sheltered/retirement homes for every 1,000 people aged 75+. Many younger people aged 65+ will also need sheltered/retirement housing and as such this methodology under-estimates the full need for such accommodation to some extent.
- 8.16. The Housing for Older People report then proceeds to identify in paragraph 2.26 that 15% of older people rent their house and as such should be provided sheltered/retirement housing in the affordable sector and that 85% of older people own their own house and so should be provided sheltered/retirement housing in the market sector.
- 8.17. The 2021 Census now demonstrates that there were 12,847 people aged 75+ in Reigate and Banstead in 2021 and the latest population projections of the ONS suggest that there will be 15,952 people aged 75+ in Reigate and Banstead by the end of the plan period in 2027. It should however be noted that these projections have already over-estimated the extent of the growth of the older population and as such, whilst the needs will be greater than that which currently exist, this methodology may in part over-state the level of need in the future on this basis. However, because this methodology ignores the needs of those aged 65-74, these factors are likely to largely cancel one another out and as such this methodology is likely to provide a good indication of the actual levels of need.
- 8.18. The resultant need for each of these forms of accommodation is calculated on this basis in Table 8.1 below taking account of the current and committed supply of such accommodation.

**Table 8.1 – the need for specialist housing for older people (excluding care homes)**

	Need in 2021	Supply in 2021	Net need in 2021	Need in 2027	Supply in 2027 <sup>13</sup>	Net need in 2027
Sheltered housing for rent	241	671	-430 (0%)	299	671	-372 (0%)
Sheltered housing for ownership	1,365	954	411 (100%)	1,695	990	705 (100%)

8.19. Accordingly, using this methodology and based on the latest evidence there is currently a **need for an additional 411 sheltered/retirement homes for sale currently** and no need for any sheltered/retirement homes for rent currently given the existing over-provision of 430 sheltered/retirement homes for rent. In the future these needs will increase with a need for actually a **need for c.705 sheltered/retirement homes** for sale to be permitted and delivered by the end of the plan period and no need for any rental sheltered/retirement homes given the existing supply which already provides 372 more rental sheltered/retirement homes than will be required to meet the need for such accommodation by 2027. The fact that there is no or a comparatively limited need for rental properties (including market and affordable), as a result of the comparative over-provision of rental properties in the affordable sector, reflects the imbalance of such accommodation as recognised in the paragraph 8 of the Market Assessment of Housing Options for Older People (CD1.13), paragraph 5.1.10 of the Reigate and Banstead SHMA (CD1.10), paragraphs 3.11 and 3.18 of the Reigate and Banstead Housing for Older People Report 2017 (CD1.15) and as found in the recent appeal decision at Little Sparrows, Sonning Common (CD9.2) which states:

***“However, there is a very marked disparity in the availability of specialised housing for older homeowners compared with the supply available to older people in other tenures. The current rate of provision favours those in tenures other than home ownership with nearly four times as many units available to them in sheltered, retirement and extra care housing than are currently available for their peers who are homeowners.”***

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<sup>13</sup> Assuming all existing commitments deliver by then but making no allowance for newly arising windfall developments such as that proposed.



8.20. The same is not however true in terms of home ownership as there is **a need for an additional 411 sheltered/retirement homes for ownership now rising to c.705 by 2027.**

8.21. In summary, there is a substantial need for additional sheltered/retirement homes available for ownership and very few opportunities to address this given the constraints which prevail across much of Reigate and Banstead.

#### Contact Consulting

8.22. An assessment of the need for specialist accommodation for older people was prepared by Three Dragons (CD1.11) in support of the planning application. This adopted the Contact Consulting method set out in Housing in Later Life (CD1.14). This methodology provides an update to that set out in More Choice, Greater Voice reflecting the changes in the behaviour of older people.

8.23. The results of this report once again suggest that there is **a need for 593 additional sheltered/retirement homes** by 2023 and no need for any sheltered/retirement homes for rent.

8.24. In combination, these assessments which use different methodologies indicate that there is a need for 411 sheltered/retirement homes for sale now, and that this will increase to c.593 by 2023 and to c.705 by 2027, but that both now and across the remainder of the plan period there is no need for any sheltered/retirement homes for rent given the existing over-provision. The consistency of the findings of these assessments provides reassurance as to the robustness of each.

#### **The tenure split**

8.25. As there is a significant need for sheltered/retirement homes available for ownership (potentially including discounted sales and shared ownership within the affordable sector) and an over-provision of sheltered/retirement homes for rent (including affordable rent and social rent), the affordable homes provided as part of the appeal proposals should clearly be provided in tenures which respond to the need for ownership, namely discounted market sales and/or shared ownership.



### **The appeal proposals**

- 8.26. The appeal proposals are actively supported by Policy CS14 and DES7(2a) of the Development Plan and through the provision of 30% affordable housing for ownership also comply with Policy DES6(2) and DES6(3).
- 8.27. Beechcroft Developments have a pedigree in developing such retirement properties, having done so for c.40 years. If experience is anything to go by, their previous developments have facilitated social interaction of residents with new communities forming. An Estate Manager will be on hand to oversee and maintain the properties and offer help and advice, and the properties and grounds are fitted with numerous features to assist and eliminate risk for residents including smooth paths, alarms, video entry systems, and ovens at a height to prevent the need for bending down for example.

### **Summary**

- 8.28. There is a demonstrable need for the type of accommodation proposed both now and in the future within Reigate and Banstead. The provision of such accommodation, and the tenure proposed accords with the Development Plan.

## 9. THE BENEFITS ARISING

- 9.1. There is a demonstrable need for specialist housing for older people in Reigate and Banstead.
- 9.2. There are numerous appraisals of the need to provide a choice of accommodation suitable for older people and this need has been recognised by the Government for many years. These assessments also identify a range of benefits<sup>14</sup> that arise from the provision of such housing, which are summarised below.

### **Independent living**

- 9.3. The PPG (63-001) identifies that the provision of specialist accommodation can help older people to live independently for longer. Similarly, in an evaluation of extra care housing in East Sussex, Weis and Tuck (2013) noted that *“the accessible environment, not the care, was a significant factor in enabling independence”*<sup>15</sup>.
- 9.4. WPI Strategy prepared a paper entitled Healthier and Happier in 2019 (CD1.18). This states that purpose-built homes for older people *“mean that everyday essential tasks like getting out of bed, going to the bathroom or getting dressed are safer and more manageable, helping to support their independence”*.

### **Reducing injuries**

- 9.5. A report published in 2017 by the Royal Society for the Prevention of Accidents indicates that the majority of injuries in older people that are treated by A&E are caused by accidents in the home – predominantly falls; and noted that falls in older people can lead to a decline in health from fractures and injuries, to fear of falling resulting in social isolation and activity avoidance<sup>16</sup>.
- 9.6. In a study carried out for the Joseph Rowntree Foundation<sup>17</sup>, Croucher reported that *“living in a purpose-built, barrier-free environment removes many of the difficulties and dangers of living in inappropriate accommodation, in particular the risk of falls”*.

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<sup>14</sup> Page 7 of Housing in Later Life (CD1.14) provides a comprehensive summary of these benefits.

<sup>15</sup> The business case for extra care housing in adult social care: an evaluation of extra care housing in East Sussex (CD1.22).

<sup>16</sup> Action to Prevent Falls (CD1.23).

<sup>17</sup> Making the Case for Retirement Villages (CD1.24).

## Health, wellbeing and quality of life

- 9.7. In a study looking at the health gain from retirement housing, the Institute of Public Care (IPC) at Oxford Brookes University concluded that for those people in retirement housing, *“...the evidence is that for many people there was a substantial improvement in health, a diminution in the volume of care and support required and a greater sense of security and well-being”*<sup>18</sup>.
- 9.8. Specialist forms of housing can also have a positive impact on health which is highlighted by Ball et al. (2011)<sup>19</sup> who report that the overall balance of residents’ perceptions of being able to manage their health was better since their move. This is an important indicator of the potential of specialist housing to reduce demand on formal health and social care services.
- 9.9. Similarly, the Market Assessment of Housing Options for Older People (CD1.13) identifies that *“moving to specialist retirement housing can improve quality of life in terms of physical health and social well-being”*.
- 9.10. A 2018 government report on housing for older people links housing to health and well-being and states that *“There is a well-evidenced link between housing and health and wellbeing, and the consequent costs of treatment by the health service. Poor quality, un-adapted, hazardous, poorly heated and insulated accommodation can lead to reduced mobility, depression, chronic and acute illness and falls and social isolation to loneliness and depression”*<sup>20</sup>.
- 9.11. Loneliness is becoming an increasing issue, with Age UK data from 2018 showing there are 1.5 million people living in England who feel lonely, and this figure is expected to rise to 2 million by 2025 if nothing is done to solve it<sup>21</sup>. On the issue of social isolation, Kneale (2012)<sup>22</sup> looks at the relationship between social exclusion and age, with the main causes of this including:
- Age-related characteristics that are more likely to occur in later life, such as disability, low income and widowhood.

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<sup>18</sup> Identifying the Health Gain from Retirement Housing (CD1.25).

<sup>19</sup> Housing Markets and Independence in Old Age (CD1.26).

<sup>20</sup> House of Commons Housing, Communities and Local Government Select Committee (2018) Housing for Older People (CD1.27).

<sup>21</sup> All the Lonely People: Loneliness in Later Life (CD1.28).

<sup>22</sup> Is social exclusion still important for older people? (CD1.29).

- Cumulative disadvantage, where cohorts become more unequal over time due to, for instance, the impact of labour market experiences on pension outcomes.
- Community characteristics, which make older people more vulnerable to changing conditions like population turnover, economic decline and crime, in their local areas.

9.12. One way to tackle loneliness is through social activities which increases the chance to meet new people and form relationships<sup>23</sup>. Purpose-built accommodation for older people often provides the opportunity for regular social events with other residents improving the health and well-being of older people.

9.13. Research by the Personal Social Services Research Unit (PSSRU)<sup>24</sup> in 2011 on the social impacts of specialist housing for the elderly concludes that it helps to reduce social isolation and loneliness, whilst encouraging social activity and participation in an environment where residents feel safe and secure. The study also found that after a year of moving into specialist housing *“most residents enjoyed a good social life, valued the social activities and events on offer, and had made new friends.”*

9.14. In analysis looking at the fiscal and wellbeing benefits of building more homes for later living, WPI Strategy found that *“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”*<sup>25</sup> according to national wellbeing criteria. Wellbeing scores increased by 7% following the move as residents reported feeling more satisfied with life and having lower levels of anxiety.

9.15. The Housing, Communities and Local Government Committee launched an inquiry into the housing offer for older people in February 2017, to consider whether it is sufficiently available and suitable for their needs. Just before the inquiry began, the 2017 General Election was called and the Inquiry was closed. The Inquiry was relaunched in September 2017. The Housing for Older People (Second Report of Session 2017–2019) report (CD1.19) was published in 2018 and it draws several important conclusions, including:

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<sup>23</sup> All the Lonely People: Loneliness in Later Life (CD1.28).

<sup>24</sup> Improving housing with care choices for older people: an evaluation of extra care housing (CD1.30).

<sup>25</sup> Healthier and Happier (CD1.18).

- Older people who wish to move should be able to choose from a wide range of housing to accommodate their needs and preferences. However, the evidence heard during the Inquiry suggested there was a shortage of desirable mainstream, accessible and specialist housing and bungalows in both the private and social sectors.
- Accessible and specialist homes are a key to housing an ageing population. Specialist housing, particularly extra care housing, can promote the health and well-being of older people and their carers.
- The right kind of housing can keep older people healthy, support them to live independently and in the longer-term reduce the need for home care or residential care and lead to savings in health and social care budgets.

### **Cost savings**

- 9.16. Future of an Ageing Population (CD1.20) was prepared on behalf of the Government Office for Science in 2016. This identifies that *“Poor housing creates hazards that cost the NHS an estimated £2.5 billion per year (across all ages), comparable with the cost of physical inactivity (£1 billion) and alcohol abuse (£3.2 billion).”*
- 9.17. Healthier and Happier (CD1.18) estimates that each person living in a home for later living saves health and social care services £3,490 per annum and estimates that providing 30,000 retirement houses every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.

### **Releasing housing for other households**

- 9.18. The Market Assessment of Housing Options for Older People (CD1.13) acknowledges that *“Older person households are much more likely to under-occupy than other households. Simultaneously, in the current housing market, many young families are struggling to secure housing that is large enough.”*
- 9.19. This is similarly recognised in the White Paper entitled Fixing our Broken Housing Market (CD1.21) in 2017 which recognises that *“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.”*

### **The specific benefits arising from the appeal proposals**

- 9.20. The appeal proposals provide the much-needed choice to the older population recognised in the PPG, by providing retirement housing of which there is currently a shortfall.
- 9.21. The appeal proposals provide the opportunity for 37 households resident in Reigate to remain in Reigate and therefore to remain part of the community, maintaining existing social and familial relationships, whilst at the same time releasing 37 homes for occupation by younger households.
- 9.22. Older households also tend to under-occupy housing<sup>26</sup>. In Reigate and Banstead, 86.7% of household residents aged 65+ lived in a property which is under-occupied according to the 2011 Census, meaning that they have one or more unoccupied bedrooms. Indeed, 57.7% have at least two unoccupied bedrooms. This clearly demonstrates that the housing stock is not being efficiently used and will have contributed to the fact that 8,062 residents in Reigate and Banstead had too few bedrooms and were living in overcrowded accommodation. It is therefore clearly desirable to provide smaller homes for the older population to release the under-occupied larger housing of older residents to address the issue of overcrowding that is evident in the Borough.
- 9.23. For some of the older households the under-occupation may be associated with a feeling of responsibility to maintain a larger property with the anxiety that may cause when things go wrong, and it may be indicative of a larger proportion of households living alone with a greater likelihood of loneliness and the associated health and wellbeing consequences. Therefore, this under-occupation is not only compromising the ability of younger households from accessing suitably sized accommodation, in some circumstances it is also detrimental to the social and emotional well-being of older residents.
- 9.24. The provision of 37 such homes will therefore not only contribute to addressing the very substantial unmet need for housing in Reigate and Banstead, but it will also release larger homes for currently overcrowded households and will in some cases alleviate the stress associated with the maintenance of an unnecessarily large property for some older people.

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<sup>26</sup> I.e. there have at least one spare bedroom.

- 9.25. The provision of the proposed sheltered/retirement housing at the appeal site will provide the opportunity for residents to access the shops and facilities to allow them to live independently for longer<sup>27</sup>, and also provides the opportunity to support these shops and facilities to the benefit of the wider settlement.
- 9.26. The provision of such accommodation which has been designed specifically to meet the needs of older residents as addressed in the previous section will provide numerous benefits to residents including offering safe and well-insulated housing for the older population, as well as facilitating a new community with shared interests and experiences.
- 9.27. Numerous reports set out the health and wellbeing benefits provided by such accommodation and the associated improvements to the quality and length of life of residents with lower demands placed on health and social care and reduced costs. Indeed, using the estimated reduction in costs identified in Healthier and Happier, the provision of 37 retirement homes would save the health and social care sector £171,743 per annum<sup>28</sup>.

## Summary

- 9.28. Not only is there a demonstrable need for the housing proposed as part of the appeal, but this housing will also give rise to numerous significant social, health, and economic benefits, each of which should be considered in the planning balance.

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<sup>27</sup> As set out in the PPG (63-001).

<sup>28</sup> =37 homes x 1.33 people per home x £3,490 per person.

## 10. CONCLUSIONS

### **Compliance with the Development Plan**

10.1. The appeal proposals are actively supported by policies CS14 and DSE7 of the Development Plan and have been designed to accord with Policy DES6 through the provision of an appropriate amount and tenure of affordable housing.

### **Currency of the policies the Development Plan**

10.2. Notwithstanding the fact that the CS has been reviewed and found not to require updating, and in many cases because of this, some of the policies of the Development Plan are now out-of-date including because:

- the policies no longer provide a framework to plan for housing and other development needs for even five-years;
- for this reason, Policy MLS1(2b) is no longer able to be applied and is therefore clearly out-of-date;
- the same will shortly be true of Policy MLS1(2a) owing to the fact that from April 2023 a 5YLS will no longer be able to be assessed or demonstrated in accordance with national policy;
- the housing need figure has changed significantly since the CS was adopted and as such paragraph 33 of the NPPF requires that the housing requirement and the policies which support this are updated given that they are clearly out-of-date; and
- the housing requirement and the policies which support this were reliant upon a level of constraints which now demonstrably does not exist and so are clearly out-of-date.

10.3. The consequence of this is that the presumption in favour of sustainable development of paragraph 11d will be engaged for the purposes of this appeal.

### **The need for housing**

10.4. Nationally we are in the midst of a housing crisis with a pressing need for additional housing to address the needs of the population. However, this is more pronounced in some areas than in others and the need is particularly pronounced in Reigate and Banstead which is within the 44 least affordable LPAs nationally and this continues to worsen.

- 10.5. The Development Plan did not propose to meet needs in full or require this to be addressed in neighbouring areas. Instead, there was and remains no plan whatsoever to address the substantial unmet need for housing locally.
- 10.6. Unsurprisingly perhaps, the need for housing has increased substantially from 600–640 per annum at the time the CS was adopted to 1,287 per annum now – an increase of over 100%.
- 10.7. Rather than update the Development Plan to respond to this substantially increased need for housing either within Reigate and Banstead or through the duty to co-operate, the Council instead opted to take no action, such that it remains the case that there is no plan-led solution or emerging plan-led solution to address the critical need for housing within the area.
- 10.8. Accordingly, it is currently the case that notwithstanding the fact that the Council is able to demonstrate a 5YLS against the adopted out-of-date housing requirement, it is able to demonstrate only a 1.77yrs with a shortfall of 4,368 homes relative to the need for housing. This provides an indication of quite how acute the need for housing is within the Borough. In this context, it would be expected that at least substantial weight would be afforded to the provision of housing arising from the appeal proposals especially in recognition of the limited opportunities to deliver housing elsewhere within the Borough given the extent of constraints.

#### **The need for sheltered housing**

- 10.9. Within this overall figure, there is also a substantial unmet need for sheltered/retirement housing. Indeed, there is a critical need for specialist housing for older people nationally and this is also true in Reigate and Banstead owing to the increasing older population and the related social and health and well-being issues associated with many in this population.
- 10.10. Based on the Council's outdated assessment of need, there remains a net need for an additional 838–915 sheltered/retirement homes for sale by 2027. On the basis of updated assessments using different methodologies there is currently a need for 411 sheltered/retirement homes for sale increasing to c.593 by 2023 and to c.705 by 2027, but no need for any sheltered/retirement homes for rent. Accordingly, the entirety of the sheltered/retirement housing proposed should be available for sale including within the market sector and within the affordable sector (i.e. discounted market sales or potentially shared ownership).

### **The benefits of such provision**

- 10.11. The provision of sheltered/retirement housing not only addresses the substantial unmet need for housing more generally and the substantial need for sheltered/retirement housing in particular, it also gives rise to numerous other benefits including:
- Enabling older people to live independently for longer;
  - Reducing the prospects of falls and injuries amongst residents;
  - Improving the physical health and social well-being of residents;
  - Decreasing the chances of residents becoming lonely;
  - Reducing the cost burden on health and social care systems; and
  - Releasing suitably sized and currently under-utilised housing for overcrowded households.
- 10.12. All of these consequent benefits would only heighten the benefits arising from the appeal proposals.

## APPENDIX 1 – THE SUPPLY OF SHELTERED/RETIREMENT ACCOMMODATION

SchemeName	Address	PostTown	Postcode	YearBuilt	Age exclusive number	Sheltered number	Tenure
<b>Existing supply</b>							
Atherfield House	Atherfield Road, Reigate, Surrey, RH2 7PT	Reigate	RH2 7PT		17	0	AH RENT
Cedars	Woodmansterne, Banstead, Surrey, SM7 3JB	Banstead	SM7 3JB		0	16	AH RENT
Douglas Houghton House	4 Oxford Road, Redhill, Surrey, RH1 1DT	Redhill	RH1 1DT		12	0	MARKET SALE
Lynn Walk	Reigate, Surrey, RH2 7NZ	Reigate	RH2 7NZ		0	10	AH RENT
The Waplings	Deans Lane, Tadworth, Surrey, KT20 7TG	Tadworth	KT20 7TG		0	14	AH RENT
Trentham Road flats	21 - 39 Trentham Road, Redhill, Surrey, RH1 6JB	Redhill	RH1 6JB		0	10	AH RENT
Victoria Almshouses	124 London Road, Redhill, Surrey, RH1 2JS	Redhill	RH1 2JS		0	10	AH RENT
Allum Grove	Preston Lane, Tadworth, Surrey, KT20 5HX	Tadworth	KT20 5HX	0	0	8	AH RENT
Bovey House / Swale House	Carlton Road, Redhill, Surrey, RH1 2BU	Redhill	RH1 2BU	0	0	16	AH RENT
Castle Drive Bungalows	Castle Drive, Reigate, Surrey, RH2 8DQ	Reigate	RH2 8DQ	0	0	5	AH RENT
Chestnut Mead	Oxford Road, Redhill, Surrey, RH1 1DR	Redhill	RH1 1DR	0	0	20	AH SALE
Copthorne	Brighton Road, Burgh Heath, Tadworth, Surrey, KT20 6XL	Tadworth	KT20 6XL	0	29	0	AH RENT
Greystones bungalows	Hardwick Road, Meadvale, Redhill, Surrey, RH1 6NL	Redhill	RH1 6NL	0	0	6	AH RENT
Horsecroft Meadows	Lyme Regis Road, Banstead, Surrey, SM7 2EY	Banstead	SM7 2EY	0	0	16	AH RENT



Lordsgrove Close	Tadworth, Surrey, KT20 5NN	Tadworth	KT20 5NN	0	0	22	AH SALE
Merland Green	Preston Lane, Merland Rise, Tadworth, Surrey, KT20 5JU	Tadworth	KT20 5JU	0	0	14	AH RENT
Nutley Court	Nutley Lane, Reigate, Surrey, RH2 9ES	Reigate	RH2 9ES	0	0	13	AH RENT
Orchid Mead	Flint Close, Banstead, Surrey, SM7 3AP	Banstead	SM7 3AP	0	21	0	AH RENT
Ranmore Bungalows	11 Ranmore, Redhill, Surrey, RH1 2JY	Redhill	RH1 2JY	0	0	1	AH RENT
Thornton Close	Court Lodge Road, Horley, Surrey, RH6 8RJ	Horley	RH6 8RJ	0	0	20	AH RENT
Abbeyfield House	34 Somers Road, Reigate, Surrey, RH2 9DZ	Reigate	RH2 9DZ	1890	0	11	AH RENT
Weston Acres	Woodmansterne Lane, Banstead, Surrey, SM7 3HA	Banstead	SM7 3HA	1906	0	0	AH RENT
Victoria Almshouses	75a Deerings Road, Reigate, Surrey, RH2 OPS	Reigate	RH2 OPS	1910	0	24	AH RENT
Delta House & Bungalows	Delta Drive, Cheyne Walk, Horley, Surrey, RH6 7LD	Horley	RH6 7LD	1960	0	43	AH RENT
Purbeck Close	Merstham, Surrey, RH1 3PG	Merstham	RH1 3PG	1960	0	2	AH RENT
Woodlands Court	Woodlands Road, Redhill, Surrey, RH1 6JE	Redhill	RH1 6JE	1960	0	16	AH RENT
Emmott House	23 Chart Way, Reigate, Surrey, RH2 ONZ	Reigate	RH2 ONZ	1972	0	15	AH RENT
Hanover Close & Broadmead	Station Road, Merstham, Redhill, Surrey, RH1 3AP	Redhill	RH1 3AP	1978	0	44	AH RENT
Myers House	19 Chart Way, Reigate, Surrey, RH2 ONZ	Reigate	RH2 ONZ	1979	0	4	AH RENT
Beecholme	High Beeches, Banstead, Surrey, SM7 1NP	Banstead	SM7 1NP	1980	0	25	AH RENT
Hampton Lodge	Russells Crescent, Horley, Surrey, RH6 7DR	Horley	RH6 7DR	1980	15	0	MARKET RENT
Portland House	Portland Drive, Merstham,	Redhill	RH1 3HX	1980	0	40	AH RENT



	Redhill, Surrey, RH1 3HX						
Maycroft	20 Furzefield Road, Reigate, Surrey, RH2 7HG	Reigate	RH2 7HG	1981	0	16	AH RENT
Highwood	Beech Drive, Reigate, Surrey, RH2 OQU	Reigate	RH2 OQU	1982	0	16	AH RENT
Derby Close	Tattenham Grove, Epsom, Surrey, KT18 5QN	Epsom	KT18 5QN	1984	0	22	MARKET SALE
Field Lane Ashdown Close	9 Dovers Green Road, Reigate, Surrey, RH2 8BU	Reigate	RH2 8BU	1984	0	19	AH RENT
Thomas Moore House	Reigate Road, Reigate, Surrey, RH2 OQW	Reigate	RH2 OQW	1984	0	21	AH RENT
Gardenfields & Duncan Road	Duncan Road, Tadworth, Surrey, KT20 6DR	Tadworth	KT20 6DR	1985	0	22	AH RENT
The Knowle	Preston Lane, Tadworth, Surrey, KT20 5JU	Tadworth	KT20 5JU	1985	0	22	AH RENT
Brooklands Court	Wray Park Road, Reigate, Surrey, RH2 OEE	Reigate	RH2 OEE	1987	0	20	MARKET SALE
Chilmead	North Street, Redhill, Surrey, RH1 1EF	Redhill	RH1 1EF	1987	0	22	AH RENT
Church Court	Monks Walk, Reigate, Surrey, RH2 OST	Reigate	RH2 OST	1987	0	17	MARKET SALE
Rowan Mead	Henbit Close, Tadworth, Surrey, KT20 5LN	Tadworth	KT20 5LN	1987	0	48	AH SALE
Heathside Court	Tadworth Street, Tadworth, Surrey, KT20 5RY	Tadworth	KT20 5RY	1988	0	44	MARKET SALE
Wraymead Place	Wray Park Road, Reigate, Surrey, RH2 OEF	Reigate	RH2 OEF	1988	0	39	MARKET SALE
Magnolia Court	Victoria Road, Horley, Surrey, RH6 7FB	Horley	RH6 7FB	1989	0	43	MARKET SALE
Oaklands Park	Brambletye Park Road, Redhill, Surrey, RH1 6RN	Redhill	RH1 6RN	1989	0	113	MARKET SALE
Redlin Court	1-3 Linkfield Lane, Redhill, Surrey, RH1 1TB	Redhill	RH1 1TB	1989	0	47	MARKET SALE
Roslan Court	Rosemary Lane, Horley, Surrey, RH6 9XZ	Horley	RH6 9XZ	1989	0	32	MARKET SALE



Ashfields	26-30 Alma Road, Reigate, Surrey, RH2 OBZ	Reigate	RH2 OBZ	1990	0	32	MARKET SALE
Briarwood	32 High Street, Banstead, Surrey, SM7 2JA	Banstead	SM7 2JA	1990	0	16	MARKET SALE
Churchfield Court	Roebuck Close, Bancroft Road, Reigate, Surrey, RH2 7RS	Reigate	RH2 7RS	1990	0	36	MARKET SALE
Somers Place	83-85 Reigate Hill, Reigate, Surrey, RH2 9NF	Reigate	RH2 9NF	1990	0	38	MARKET SALE
Stokes Ridings	Chapel Road, Tadworth, Surrey, KT20 5SG	Tadworth	KT20 5SG	1991	22	0	MARKET SALE
Avenue Court	The Avenue, Tadworth, Surrey, KT20 5BG	Tadworth	KT20 5BG	1992	34	0	MARKET SALE
Willow Glade	47a Hornbeam Road, Woodhatch, Reigate, Surrey, RH2 7NP	Reigate	RH2 7NP	1993	37	0	AH RENT
Kellaway House	23 Chart Way, Reigate, Surrey, RH2 ONZ	Reigate	RH2 ONZ	2001	0	4	AH RENT
Linnell Park	Crofters Close, off Oaklands Drive, Redhill, Surrey, RH1 6RB	Redhill	RH1 6RB	2003	22	0	MARKET SALE
Holmesdale Manor	89 Ladbroke Road, Redhill, Surrey, RH1 1NX	Redhill	RH1 1NX	2004	0	41	MARKET SALE
Linters Court	93-101 London Road, Redhill, Surrey, RH1 2JN	Redhill	RH1 2JN	2004	0	0	MARKET SALE
Mitchell Court	22 Massetts Road, Horley, Surrey, RH6 7DF	Horley	RH6 7DF	2005	0	38	MARKET SALE
Pegasus Court	6 Bolters Lane, Banstead, Surrey, SM7 2AR	Banstead	SM7 2AR	2005	0	29	MARKET SALE
Wavertree Court	Massetts Road, Horley, Surrey, RH6 7BP	Horley	RH6 7BP	2006	0	0	MARKET SALE
Lewis Court	65 Linkfield Lane, Redhill, Surrey, RH1 1DU	Redhill	RH1 1DU	2007	0	33	MARKET SALE
Ridings Court	Prices Lane, Reigate, Surrey, RH2 8BP	Reigate	RH2 8BP	2008	0	30	MARKET SALE

Douglas House	The Drive, Horley, Surrey, RH6 7GU	Horley	RH6 7GU	2009	0	27	AH RENT
Furze Hill Court	Furze Hill, Kingswood, Tadworth, Surrey, KT20 6EP	Tadworth	KT20 6EP	2012	0	11	MARKET SALE
Anvil Court	2 Blacksmith Road, Horley, Surrey, RH6 9FD	Horley	RH6 9FD	2013	0	0	AH RENT
Colebrooke Lodge	32-42 Prices Lane, Reigate, Surrey, RH2 8AX	Reigate	RH2 8AX	2020	0	31	MARKET SALE
Goldfinch House	Outwood Lane, Chipstead, Coulsdon, Surrey, CR5 3LU	Coulsdon	CR5 3LU	2020	0	28	MARKET SALE
Stanley Lodge	130-138 Great Tattenhams, Tattenham Corner, Surrey, KT18 5SF	Tattenham Corner	KT18 5SF	2022	0	34	MARKET SALE
<b>Committed supply</b>							
Priory House	Ashley Drive, Bolters Lane, Banstead, Surrey, SM7 2AG	Banstead	SM7 2AG	2022	0	36	MARKET SALE
Kingswood - Forthcoming development	St. Monicas Road, Kingswood, Tadworth, Surrey, KT20 6EU	Tadworth	KT20 6EU	2023	0	0	MARKET SALE
Banstead Place	Park Road	Banstead	SM7 3EE		0	0	MARKET SALE

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