

PLANNING STATEMENT

PREPARED BY



ON BEHALF OF

**IGLOO CARE LTD (DEVELOPER) AND
EQ CARE EAST GRINSTEAD LTD (OPERATOR)**

**DEMOLITION OF EXISTING DWELLING AND
ERECTION OF A CARE HOME (CLASS C2) AND
ADDITIONAL CARE UNITS (CLASS C2)**

**HIGHFIELDS, WEST HILL,
EAST GRINSTEAD**

DECEMBER 2024

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1. Introduction and Background

- 1.1 The application site comprises a large residential plot (1.2ha), 'Highfields', within the built-up area boundary of East Grinstead¹, and the East Grinstead Town ward.
- 1.2 This triangular-shaped plot is presently occupied by a 6 No. bed dwellinghouse, outbuildings, extensive grounds and private driveway (shared with two separate dwellings to the north) directly onto West Hill. West Hill is a category C road serving East Grinstead town centre. There is dense tree cover along the boundaries of the site, with a group TPO to the north-western, south-western and south-eastern boundaries of mixed woodland (GR/04/TPO/84). West Hill borders the site to the west and residential development to the north, east and south. The existing dwellinghouse has three storeys and is set within extensive grounds. The surrounding dwellings are of varying designs, ranging from two to four storeys² but all with significantly smaller plots than the application site.
- 1.3 The site slopes significantly in a northwesterly direction, with the properties beyond the eastern boundary, on Dexter Drive and Langridge Drive, sitting at a higher level to the application site, and properties along the southern and western boundaries (on West Lane and West Hill), sitting at a lower level than the application site. The existing dwelling sits on 'high' land to the northeast.
- 1.4 The site benefits from excellent sustainable travel connections. It is within walking distance of local day-to-day facilities and amenities. Bus stops are located within 400-480m of the site and provide access to numerous services to a variety of destinations. East Grinstead rail station is situated 640m from the site and provides opportunities to travel to regional destinations via frequent services. The choice of modes of travel are detailed in the supporting Transport Statement.

¹ As defined in the District and East Grinstead Neighbourhood Plans.

² On West Street, immediately to the north of the site.

- 1.5 The site has recent planning history which is highly material to the determination of this application. On 22nd June 2024, the Council resolved to grant outline planning permission for demolition of the existing dwellinghouse and the erection of an 85-bed care home, with all matters reserved except for access, subject to the completion of a s106 agreement to secure infrastructure (DM/23/0007). The means of access to serve the development (via a new vehicular access from West Hill, and the use of the existing access for pedestrians) was considered acceptable by the LPA and Highways Authority.
- 1.6 The s106 was not, however, signed within the necessary timeframe, and therefore, the application was refused (29th November 2023), albeit **only** on the grounds that relevant infrastructure had not been secured. The relevance of this planning history is considered in greater detail at Section 4. Prior to this, there is no planning history relevant to the current application proposal.
- 1.7 The Site is identified in Mid Sussex Local Plan as falling within the Built-Up Area Boundary of East Grinstead, which is a 'Category 1' settlement. The site is previously developed land³ (being the existing dwellinghouse, driveway, patio swimming pool and previous land-levelling operations. Applications for specialist accommodation for older people and care homes are supported in these 'Built Up Area' locations (Policy DP6 Local Plan, SA39 Site Allocations DPD). The site is therefore considered to be a suitable and sustainable location for a care home and the principle of the development is already accepted.
- 1.8 The site lies within the Ashdown Forest 7km 'Zone of Influence'; Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC). A Habitat Regulations Assessment accompanies this application. As this planning application is for Class C2 development, it does not result in a net increase in dwellings within the 7km zone of influence. Therefore, mitigation is not required⁴. On this basis, and noting the proposal's objectives, it is considered that the 'competent authority' can determine the application.

3. Whilst the NPPG excludes residential gardens from the definition of previously developed land, part of the site is considered to be previously developed land.

4. This is consistent with LPA's approach to Application DM/23/0007.

- 1.9 The application seeks detailed planning permission for the construction of a care facility, including a 78-bed care home, 7 additional care units (both Class C2) and construction of a new access. The rationale and benefits of the scheme are covered in Section 4; but in summary, the objective is to provide high-quality care units by a proven developer and operator (Igloo Care Ltd and the EQ Care Group) which are in significant demand locally, making more efficient use of rare brownfield land, whilst delivering landscape and ecological enhancements, including biodiversity net gain in excess of the mandatory requirement.
- 1.10 The application could, in its simplest terms, be regarded as the reserved matters application which would have inevitably followed the earlier outline planning application, had the resolution to grant translated to a planning permission. But crucially, **this** application relates to the specific operational needs of a care operator with a stated requirement for this location. Unlike the previous proposal, it is realistic, viable and deliverable.
- 1.11 The application is accompanied by a suite of supporting documents, covering a range of design and technical matters. Appendix A demonstrates how all validation requirements have been met.
- 1.12 The purpose of this Statement is to demonstrate that the principle of development is acceptable, and that all relevant policy tests are passed. Section 2 describes the proposed development in detail. Section 3 sets out the development plan policies and related guidance by which the proposal should be assessed, whilst Section 4 assesses its performance. Conclusions are drawn at Section 5.

2. **Proposed Development**

2.1 The proposal comprises a care facility with a 78-bed care home and 7 additional care units at Highfields, West Hill, East Grinstead. The applicants have designed the scheme, and, subject to securing planning permission, will develop and operate the care facility.

2.2 This Section will now discuss the details of this operator-led scheme.

Operator

2.3 The applicants, Igloo Care and EQ Care⁵, have a proven track record of acquiring, developing and operating high-quality care homes across the UK, predominantly in central and southern England. The applicants manage the majority of their homes, which means there is a long-term commitment to the schemes they develop and, therefore, a greater sense of care and engagement with its residents and the community.

2.4 As experienced operators, the applicants are able to mobilise quickly through pre-approved lending structures and other resources to acquire and develop appropriate sites. Individuals in need are then identified. This involves a wide demographic, including those in unsuitable (and underoccupied) properties, private and social rented sectors, hospitals and existing nursing or care homes unable to provide suitable facilities. Having identified substantial demand for the proposed scheme, the applicants are keen to deliver the proposal immediately. Contractors have already been identified to deliver the scheme, ensuring the benefits can be secured for the local community quickly.

2.5 Whilst care commissioning varies depending on region and demand, it is not uncommon for around half of residents to be transferred from local authority housing. This is equal to, or in excess of, the proportion of affordable housing that might otherwise be sought by the Council were the site to be developed for

⁵ Also known as Bracebridge Care and Zephyr Group.

residential use. The remaining residents will be private clients who have selected the home for geographic or for personal reasons.

- 2.6 The East Grinstead home would deliver high levels of care. This includes residents with early on-set or established dementia; an area in which the operator specialises in. Residents are generally referred following assessment by the NHS or local Social Care departments.
- 2.7 The applicants will engage with the local authority commissioning immediately following the grant of planning permission to determine the likely quantum of transfers from social housing and establish their needs, including the likely proportion of stepdown facilities (i.e. for those returning to the community following a period of hospital care or other acute interventions).
- 2.8 Thus, a substantial benefit of the proposed development is that it can transfer a proportion of residents from local authority accommodation, releasing properties to those on the housing register. Furthermore, the home will reduce pressure on NHS beds by increasing the number of step-down facilities in the local area (and at a considerably lower cost to the public purse).
- 2.9 Whilst this scheme does not need to contribute to the provision of affordable housing, it has the same effect by releasing affordable housing back into the local market. Meanwhile, there is evidence that private residents entering care homes release existing housing back into the local market at a rate of around 0.4 dwellings per person, thereby supporting a fluid and effective housing market. Thus, the applicants' approach delivers benefits across society.

The Scheme

- 2.10 The care facilities are delivered in two components; a 78-bed 'traditional' care home, located on the site of the existing large dwellinghouse / driveway, and seven additional care units, adjacent, on the eastern part of the site.
- 2.11 The main building's internal layout revolves around a 'household' model, whereby residents live in small clusters of between 10 and 12 bedrooms (all

with en-suite wet rooms), with related facilities. This is important, not just operationally (efficiency, etc) but to ensure residents have familiar surroundings, regular staffing, benefit from socialising within small groups and, most importantly, give residents a sense of independence in terms of contributing to day-to-day tasks (albeit residents still have access to the wider 'town centre' facilities - shop, salon, gym, activities room, etc).

- 2.12 The site and facilities lend themselves to a 'T-shape' arrangement for the care home here, which also provides opportunities to respond to local context and introduce articulation and relief to the building facades. The top of the 'T' runs southwest to northeast through the centre of the site, with the central wing then spanning northwest to southeast. The building comprises three storeys with pitched roofs concealing the PV panels and plant enclosures.
- 2.13 A total of 25 bedrooms are provided on the ground floor level of the care home, along with the reception, lounges, dining/activities space, hair salon, medication and nurse station, shop and management offices. Vertical stacking within care homes is critical and thus the first floor is similarly laid out, with a total of 28 bedrooms, further dining/activities space and lounges. The second floor generally repeats the layout of the first, with a further 25 bedrooms and lounges, activity rooms and a gym. There is a clear divide between the residential areas and the back-of-house (BOH) areas, such as the plant room and laundry which are provided at basement level.
- 2.14 The associated C2 additional care units are delivered in the adjacent 2.5 storey building to the southeast. The level of care provided here goes significantly beyond that provided by assisted living and extra care schemes, and is aimed at those requiring high levels of intervention. Whilst self-contained and offering a commodious environment, these units will function as an extension of the care home, with similar levels of care and intervention available as the home, and likewise, the ability to use the communal facilities in the main building, including the salon, shop, activities rooms and outdoor spaces. Staff too will be common to both buildings.

2.15 The high level of care, combined by the restricted occupancy of these units clearly defines them within the C2 Use Class, as defined in the Council's own evidence base and Government Practice Guidance. This clarification between uses is set out in the Council's Housing For Older People Topic Paper:

“Such schemes... fall within Use Class C2 where care is provided as a condition of residency and at a high level of provision often associated with residential care homes” (Figure 1).

2.16 The clarification is further provided in the Government Practice Guidance of Housing for Older Disabled People (June 2019):

*“When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwelling house) of the Use Classes Order, consideration could, for example, be given to the **level of care and scale of communal facilities provided**”.*

2.17 The level of care provided and the scale of communal facilities are therefore considered as the relevant factors, not the physical layout of the units. This characterisation is reinforced by the Mid Sussex Strategic Housing Market Assessment (October 2021):

*“It is notable that no reference is made [in the Practice Guidance] to whether units of accommodation have separate front doors. This is consistent with the Use Class Order, where it is **the ongoing provision of care which is the distinguishing feature** within the C2 definition. In a C2 use, the provision of care is an essential and ongoing characteristic of the development” (paragraph 8.51).*

2.18 The high level of care, combined by the restricted occupancy of these units clearly defines them within the C2 Use Class.

2.19 The facades of the proposed buildings are to be constructed from a traditional palette of materials; red facing brickwork, sandstone, and coloured windows

and doors. This reflects the residential character of the development and the local residential surroundings. The mature landscaping along the eastern boundary, together with the stepping down of the building here reduces impacts on neighbouring residents (i.e., on Dexter Drive).

- 2.20 Access to the care facilities is via a new vehicular entrance from West Hill. The bank requires regrading to achieve this, together with new retaining walls. The proposed access would allow for two-way traffic with a 1:20 gradient for the first 10m from the carriageway edge (West Hill). Visibility splays of 2.4 metres by 47.3 metres to a 1 metre offset from the nearside kerb are achieved, consistent with the speed limit of the road, and accommodated within the site ownership and adopted highway. The applicants support the Highway Authority's initiative to deliver double yellow lines along the eastern side of West Hill.
- 2.21 A comprehensive landscaping scheme is proposed, with the removal of some trees and vegetation to achieve this access and visibility splay, offset by the new planting set back behind the visibility splays.
- 2.22 A detailed assessment of this proposed access arrangement is provided in the supporting Transport Statement and on the related drawings. The access arrangement is wholly consistent with that previously accepted by the LPA and Highways Authority in their resolution to grant the 2023 care home scheme⁶ for a similar scale of Class C2 development. The earlier Road Safety Audit accompanies this application, and its conclusions remain up to date given the access design is unchanged.
- 2.23 The existing site access, to the north, will be retained, given it serves two separate properties, and will deliver pedestrian and cycle access, only, to the care facilities.
- 2.24 Two car parking areas are proposed, delivering a total of 39 parking spaces. Two of these are disabled bays, situated in the most accessible location, whilst

⁶ Application Reference DM/23/0007.

six spaces benefit from electric vehicle charging points⁷. There is also an ambulance / delivery bay (in close proximity to the main entrance, goods entrance and additional care units entrance). The car parks provide level access to the additional care units. A platform lift, ramp and stairs provide direct access to the main building from the car parks.

- 2.25 Six secure cycle stands are provided in accessible locations near the building entrances, and two bin stores are also provided. A condition is proposed for the detailed specification of the cycle stands and their canopy to be submitted and approved by the local planning authority, and for their installation prior to occupation and retention thereafter (see Appendix D).
- 2.26 A comprehensive landscaping scheme has been designed, with accompanying PEA and BNG Assessments. The BNG metric confirms the high quality of the formal gardens proposed; a matter of considerable importance for elderly residents. Boundary planting along the West Hill frontage and boundaries enhances the visual amenity of the site and privacy of residents, whilst new trees are found abundantly throughout. Two residents' gardens are provided; to the north and south of the main building, together with formally landscaped grounds, providing both privacy and enhancing local amenity.

7. The remainder will be delivered ready for future connection.

3. Policy Considerations

3.1 Planning applications are to be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan for the site is the National Planning Policy Framework (NPPF), the Mid Sussex District Plan (2018), the Mid Sussex Site Allocations DPD (2022), the Mid Sussex Small Scale Housing DPD (2008) and the East Grinstead Neighbourhood Plan (2016) as interpreted by the National Planning Policy Guidance (NPPG) and relevant Supplementary Planning Document (SPDs) respectively. These are reviewed below.

National Planning Policy Framework

3.2 'The Framework' makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development which has the following mutually supportive and interdependent objectives:

- **Economic** – *“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.*
- **Social** - *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- **Environmental** - *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy” (Paragraph 8 (a)-(c)).*

- 3.3 Section 5 of the NPPF deals with housing supply, where “*boosting the supply of homes*” (Paragraph 60) is identified as a key objective. More specifically, paragraph 63 confirms the need to establish the needs of different groups including older people who “*require retirement housing, housing-with-care and care homes*” and to ensure their needs are properly met in planning policies.
- 3.4 The promotion of healthy and safe communities is considered within Section 8 of the NPPF, with paragraph 96 confirming that a key aim is to “*achieve healthy, inclusive and safe places and beautiful buildings.*” Decisions should not only support proposals which “*enable and support healthy lifestyles*”, but are also “*safe and accessible*”.
- 3.5 Section 11 promotes the “*...effective use of land*”, which is to be achieved through planning decisions which meet “*the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions*” (paragraph 123). The value of brownfield land is also specifically highlighted in paragraph 124, with “*substantial weight*” to be given to proposals here, whilst “*the development of under-utilised land and buildings*” is also robustly supported.
- 3.6 Section 12 deals with the design and sustainability of proposals, with “*the creation of high quality, beautiful and sustainable buildings and places*” central to what the planning process should facilitate (paragraph 131).
- 3.7 The NPPG section on ‘Housing for older and disabled people’ (June 2019) further considers how the needs of older people are to be addressed in plans, confirming that specific sites should be identified where there is an unmet need, with “*clear policies*” to be set “*to address the housing needed of groups with particular needs such as older and disabled people*”.

The Mid Sussex District Plan

- 3.8 The Mid Sussex District Plan (‘District Plan’) was adopted in March 2018 to shape the growth of the District until 2031. The District Plan sets out the overall

vision and objectives, with broad guidance on the distribution and quality of development in the form of 'higher level' strategic policies.

- 3.9 The District Plan contains 15 strategic objectives to deliver its vision, of which two are especially relevant to this proposal.
- 3.10 The first relates to housing, seeking '*to provide the amount and type of housing that meets the needs of all sectors of the community*' (Objective 13). The provision of market housing and "*specialist accommodation or care appropriate for older persons through both public and private sector provision*" is supported (page 81). The District Plan recognises that "*providing suitable and alternative housing for older people can free up houses that are otherwise under occupied*" (page 81). Whilst Policies DP4 (Housing), DP5 (Planning to Meet Future Housing Need) and DP6 (Settlement Hierarchy) are all relevant to this strategic priority, Policy DP30 (Housing Mix) is especially pertinent to care homes. Class C2 development is classified as accommodation for 'older people' and 'vulnerable groups', the delivery of which is supported to create sustainable communities:

"To support sustainable communities, housing development will:

"meet the current and future needs of different groups in the community including older people, vulnerable groups..."

- 3.11 The second relevant objective is to "*support sustainable communities which are safe, healthy and inclusive*" (Objective 12), with Policies DP6 (Settlement Hierarchy), DP25 (Community Facilities and Local Services) and DP28 (Accessibility) specifically relevant to this application. Policy DP25 is the key determining policy in assessing the principle of development here; classifying Class C2 development as "*community facilities and local services*". The policy confirms that "*the provision... of community facilities and local services that contribute to creating sustainable communities will be supported*".

3.12 The Site is identified in Mid Sussex Local Plan as falling within the Built-Up Area Boundary of East Grinstead which is a Settlement 1 Category. Applications for specialist accommodation for older people and care homes are supported in such 'Built-Up Area' locations (Policy DP6 District Plan and SA39 Site Allocations DPD, the latter is examined below), subject to being of "*an appropriate nature and scale (with particular regard to DP26: Character and Design) and not cause harm to the character and function of the settlement*". The site is therefore considered to be a suitable and sustainable location for a care home and the principle of the development is considered acceptable. The nature, scale and design of this redevelopment proposal, is considered appropriate to the East Grinstead's Category 1 settlement status and the surrounding context. This is appraised in detail in Section 4.

3.13 The site also lies within the Ashdown Forest 7km Zone of Influence (Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) (Policy DP17). A Habitat Regulations Assessment accompanies this application. As this planning application is for Class C2, it does not result in a net increase in dwellings within the 7km zone of influence, therefore mitigation is not required⁸. On this basis, and given the proposal's conservation objectives, it is considered that the competent authority can determine the proposed development.

3.14 There are other development management policies relevant to the proposal (DP20, DP21, DP29, DP37, DP38, DP39, DP40, DP41 and DP42). The scheme is appraised against these policies in Section 4 and at Appendix C.

The Mid Sussex Site Allocations Development Plan Document (DPD)

3.15 The Site Allocations DPD ('Sites DPD') was adopted in June 2022. It allocates additional development sites to meet the residual necessary to meet the housing and employment needs to 2031. The Sites DPD does not allocate the application site for any type of development and allocates only one site for

⁸ This is consistent with LPA's approach to Application DM/23/0007.

Class C2 development; Land south and west of Imberhorne Upper School, for a total of 142 Class C2 homes.

3.16 In addition to specific site allocations (Policies SA1 to SA33), the Site Allocations DPD provides some strategic and development management policies, one of which is particularly relevant to this application; Policy SA39: Specialist Accommodation for Older People and Care Homes.

3.17 Policy SA39 is informed by the Council's Housing and Economic Development Needs Assessment Addendum (August 2016) which identifies a need for 2,442 bedspaces (C2) at 2031. Policy SA39 therefore supports proposals which deliver C2 accommodation, where:

"a) It is allocated for such use within the District Plan, Site Allocations DPD or Neighbourhood Plan; or

b) It forms part of a strategic allocation; or

c) It is located within the Built-Up Area Boundary as defined on the Policies Map; or

d) Where the site is outside the Built-Up Area, it is contiguous with the Built-Up Area Boundary as defined on the Policies Map and the development is demonstrated to be sustainable, including by reference to the settlement hierarchy (Policy DP4).

3.18 With the application site falling within the Built-Up Area Boundary of East Grinstead, criteria c), the principle of development is acceptable. The site's accessibility by foot and public transport, to local facilities and the wider public transport network and the reduction in reliance on private cars is examined in detail in Section 4 below and in the supporting Transport Statement. The application is also supported by a Travel Plan.

3.19 Policy SA38 (Air Quality) is also relevant to the application and appraised at Appendix C.

Mid Sussex Small Scale Housing Development Plan Document (DPD)

- 3.20 The Small Scale Housing DPD was the first Development Plan Document adopted by the District Council, in April 2008. This DPD allocates a number of small-scale sites to help meet the District's housing land requirement for the period up to 2016. The DPD confirms the importance of delivering a "*mix of dwellings*" to "*meet the varied needs of the community*" (paragraph 4.3) and expects all housing applications to "*make efficient use of land*" (paragraph 4.4).
- 3.21 The DPD does not allocate the application site for development, does not make any provisions for C2 development and does not provide development management policies relating to C2 development. The Small Scale Housing DPD is not therefore relevant to the determination of this application.

The East Grinstead Neighbourhood Plan

- 3.22 The East Grinstead Neighbourhood Plan ('Neighbourhood Plan') was made in November 2016. The Neighbourhood Plan sets out a vision for the town and surrounding area that reflects the thoughts and feelings of local people. Recognising the constraints to development on the surrounding area, by virtue of the High Weald Area of Outstanding Natural Beauty to the south and east, the 'strategic gaps' to the west and east, and the Metropolitan Green Belt to the north, the Neighbourhood Plan places importance on "*creating opportunities to remedy the underutilised areas of our town that could be better improved through redevelopment*" (page 14). One of the Plan's core objectives is therefore to "*make prudent use of natural resources by promoting development on previously developed sites within the built up area boundary*".
- 3.23 Policy EG5 (Housing Proposals) supports housing development on previously developed land or green infrastructure which is surplus to requirements. The Neighbourhood Plan supports a mix of housing delivery, highlighting the ageing population, but does not make specific provision for Class C2 development. Policies EG3 (Promoting Good Design), EG11 (Mitigating Highway Impact), EG12 (Car Parking) and EG16 (Ashdown Forest Protection) are all pertinent to the determination of this application and appraised at Appendix 3.

Other Material Considerations

- 3.24 The Council have also produced SPDs relating to:
- Mid Sussex Design Guide (November 2020)
 - Development Infrastructure and Contributions (July 2018)⁹
 - Affordable Housing (July 2018)
 - Development Viability SPD (July 2018)
- 3.25 The Design Guide seeks to improve the quality of development in the District, through a focus on context, inclusivity and sustainability. The design of the scheme is appraised in the context of this SPD, and the above design policies in Section 4.
- 3.26 The Council has approved three SPDs relating to developer obligations. The Development Infrastructure and Contributions SPD sets out the overall framework for planning obligations. It confirms that care facilities are “a specialist part of the housing needs market and for Mid Sussex are included in the definition of social infrastructure” (paragraph 3.28).
- 3.27 The Affordable Housing SPD sets out affordable housing requirements, covering both on site delivery and contributions through commuted sums. The application proposal is wholly C2 development and therefore is not required to provide affordable housing or an affordable housing contribution by way of a commuted sum (see paragraphs 2.14 to 2.18 above).
- 3.28 The Development Viability SPD relates to the viability process which is not relevant to this application scheme.

Mid Sussex District Plan 2021-2039 Submission Draft

- 3.29 The preparation of a new District Plan, covering the period 2021 to 2039, is progressing. The District Plan Submission Draft (Regulation 19) was formally submitted to the Planning Inspectorate on 8 July 2024 and the Stage 1 hearings

⁹ Updated in October 2019 in relation to new parking guidance and s106 calculators.

were undertaken in October 2024. The District Plan's draft policies can therefore be afforded some weight in the determination of this application.

3.30 There are development management policies relevant to the proposal (DPS1, DPS2, DPS4, DPS6, DPN1, DPN2, DPN3, DPN4, DPN6, DPN7, DPN8, DPN9, DPN10, DPB1, DPT1, DPT3, DPT4, DPH1, DPH3, DPH4, DPH7, DPH12, DPI1, DPI2, DPI7). The scheme is appraised against these policies in Section 4 and at Appendix C.

4. **Assessing the Proposal**

4.1 The following Section sets out an appraisal of the proposed development in response to the following five key considerations:

(i) Principle of Development

4.2 The site's location within the Built-Up Area of East Grinstead, a Category 1 settlement, its accessibility and the site's 2023 resolution to grant planning permission for a similar scale of care home development on the site, confirms the site's suitability for care home development.

4.3 The development plan supports the re-development of the site for care facilities. The key determining policy is SA39 of the Mid-Sussex Sites DPD 'Specialist Accommodation for Older People and Care Homes'. As the site falls within the Built-Up Area of East Grinstead, the proposal accords with part (c) of Policy SA39. The site is accessible by foot and public transport to local shops, services, community facilities and the wider transport network. This is summarised at paragraph 1.4 above and set out in detail in the supporting Transport Statement. A Travel Plan is included with the Transport Statement outlining how reliance on the private car will be reduced. The proposal therefore fully accords with Policy SA39, and as such, the principle of a care facility on the site is acceptable.

4.4. Policies DP6 of the District Plan and EG5 of the Neighbourhood Plan, further endorse the acceptability, in principle, of development here. These policies relate to more general development (DP6) and housing (EG5). Both policies support development here, within the built up area boundaries and where development is focussed on the previously developed land within this large plot; *'development will be permitted within towns and villages with defined built-up area boundaries'* and *'new housing development on land defined as 'previously developed', where the site is predominantly previously developed or is green infrastructure that can be demonstrated to be surplus to requirements will be supported'* (Policies DP6 and EG5).

- 4.5 The application site is within the Built-Up Area Boundary of East Grinstead and therefore the principle of development is considered acceptable under both more general policies.
- 4.6 The emerging District Plan is equally supportive of the principle of development here. Draft Policy DPH3: Sustainable Development - Inside the Built-up Area supports development within built up area boundaries, subject to being of an appropriate nature and scale. The nature, scale and design of this redevelopment proposal, is considered appropriate to the East Grinstead's Category 1 settlement status and the surrounding context. Finally, Draft Policy DPH4: Older Persons' Housing and Specialist Accommodation supports the development here, meeting all three criteria (3 to 5) being within the built up area boundary, accessible and accompanied by a draft Travel Plan.
- 4.7 The development plan therefore supports the redevelopment of the site for care facilities and the proposal fully accords with Policies SA39 of the Sites DPD, Policy DP6 of the District Plan, Policy EG5 of the Neighbourhood Plan and Policies DPH3 and DPH4 of the Submission Draft District Plan.
- 4.8 Consistent with the favourable policy position, the planning history here establishes the acceptability of care home development at the site. The Council resolved to grant outline planning permission for the erection of an 85-bed care home on the site on 22 June 2023 (DM/23/0007). This resolution was subject to the completion of a s106 agreement to secure the required infrastructure which was not signed within the allotted timeframe, and therefore this application was refused on 29 November 2023.
- 4.9 This proposal delivers a similar amount of bedspaces to the 2023 scheme¹⁰, albeit more efficiently, reducing the massing of the development. All other key elements are consistent; access arrangement, landscaping approach etc. While the emerging District Plan has progressed to Examination since the earlier resolution, the proposal meets the emerging District Plan policies, and

¹⁰ 78 bedspaces plus 7 additional care units, versus the 85 bedspaces of the 2023 scheme.

the development plan's supportive policy position leading to this resolution remains. The resolution to grant planning permission for a similar development in 2023, is therefore an important material consideration in the determination of this application.

- 4.10 In addition to robustly meeting the requirements of the development plan, and a recent resolution to grant a similar development on site, there is also a significant demand for care beds in East Grinstead, as detailed in the Care Needs Assessment at Appendix A of this Statement.
- 4.11 Ultimately, the requirements of Policies SA39, DP6, EG5, DPH3 and DPH4 of the development plan (and emerging plan) are robustly met, and the principle of development readily established.

(ii) An Appropriate Scale of Development

- 4.12 The scale of the development has been informed by the local context and the applicants' detailed understanding of the care home market to ensure the development is viable and deliverable.
- 4.13 The quantum of care home facilities proposed is appropriate to its setting in East Grinstead, a Category 1 settlement. The local context has dwellings of varying scales, plot sizes and designs. The proposal has been designed to utilise the sloping topography of the site, cutting into the bank, allowing the development to sink into the attractive landscape. A detailed landscaping strategy accompanies the application. The proposed landscape strategy improves the visual amenity of the scheme, provides ecological enhancements and maintains the privacy of both residents/workers of the care home and residents of surrounding dwellings. For example, additional planting along the site's boundaries provides visual enhancements to surrounding neighbours, whilst formally landscaped areas to the front of the care home provide suitable amenity space.
- 4.14 It is noted that, as part of the previous application, a Townscape & Visual Appraisal (TVA) was prepared by BEA Landscape Design to understand the

potential implications of introducing a three storey care home development into the site at Highfields. The TVA was prepared in 2022 and was assessed in line with GLVIA3, the industry best practice guidance. The TVA has been reviewed by the project landscape architect and considers it to be a comprehensive and robust assessment.

- 4.15 The site lies within the main built up area of East Grinstead, approximately 330m to the west of the Conservation Area. Areas of residential development and a supermarket separate the site from the Conservation Area, ensuring that there is no intervisibility between the two.
- 4.16 The site benefits from an established landscaped setting, with mature treescape wrapping around the boundaries of the site, physically and visually separating it from the surrounding townscape. The TVA identifies that the site is located within an area of varied townscape and attributes the townscape value, and sensitivity to change, as being Low. A review of the site has been undertaken, its setting and published information, which concurs with these findings.
- 4.17 The TVA included a series of viewpoints, informed by a Zone of Theoretical Visibility (ZTV) model. The ZTV is based on bare earth data and, as such, does not take into account above ground features such as built form or vegetation. The ZTV therefore represents a worst case scenario. The TVA identifies 8 viewpoints within the localised setting that are representative of a variety of receptors, including local residential properties, public rights of way, the local highway network and users of Brooklands Park. The TVA included both summer and winter views to ensure that seasonal variations were accounted for.
- 4.18 While the current scheme differs from the previous proposals in terms of layout, the scale and massing of the two buildings are similar. The access off West Hill is positioned in the same location with the building being positioned centrally within the site, with an area of parking located to the south west of the care home and a series of private amenity spaces wrapping around the building. The

proposed building, parking and garden spaces are located within the open parts of the site, currently defined by the existing property, driveway, lawns and ornamental planting. The mature treescape that envelops the site are retained as part of the proposals.

- 4.19 The TVA concludes that given the existing townscape context of the site, the proposals would result in a Negligible / Neutral effect upon local character.
- 4.20 In terms of the visual effects, the assessment acknowledges that there would be some glimpsed / filtered views of the proposals through the intervening canopies during the winter, however, the proposed building would not break the vegetated skyline and would be perceived within the surrounding townscape context. It is acknowledged that the proposed access would result in some highly localised effects upon views directly opposite the site entrance, identified as Moderate Adverse. However, the depth of the established landscaping and topography of the area would ensure that any perceived effects would be highly localised and not significant. The TVA concludes that the proposals would not give rise to any notable adverse effects and without undue consequences upon the identified visual receptors.
- 4.21 The TVA concludes that the principle of a three storey care home development within the site is acceptable from a townscape and visual perspective. It is also noted that townscape issues were not raised by officers during the previous application.
- 4.22 Overall, the baseline conditions of the site have not changed and, as noted above, it is considered that the proposals reflect the use, scale and layout of the previous scheme. As such, it is concluded that the proposed development could be integrated without any notable adverse effects upon the receiving townscape character or visual environment, and would be wholly acceptable in this location.

- 4.23 Whilst scale was a reserved matter in the 2023 resolution to grant, indicative proposals were submitted. This current proposal delivers a more efficient development; much needed bedspaces within a smaller footprint.
- 4.24 Although the care home would have a higher density of units per hectare than the surrounding area, this must be considered in its context as C2 development which necessitates higher density in order to operate effectively and provide the necessary level of care. Indeed, one is not comparing 'apples with apples' (i.e., bedrooms and related communal areas, versus self-contained dwellings).
- 4.25 That the scheme delivers a similar quantum of development overall, to the 2023 scheme, is clearly impressive given that mandatory BNG requirements necessitate greater areas of open space or undeveloped land, and that CQC requirements have become increasingly onerous. It also secures improved relationships with neighbouring dwellings.

(iii) Assessment Against Local Plan Policies

- 4.26 The following section reviews the performance of the proposed development against relevant development plan policies.
- 4.27 The buildings have been carefully devised to achieve a balance between meeting operator requirements, whilst responding to the policy and physical contexts.
- 4.28 The scale of the care facilities is modest in relation to the extent of the site, whilst limiting the main building to three storeys with a flat roof ensures sufficient space for 78 bedrooms and related communal and back of house facilities, whilst also responding to local constraints. Whilst somewhat distinct from the existing pattern of development here, this is largely defined by the existing residential context and site arrangement (access and existing buildings). Larger buildings in this context are not uncommon (e.g., Elm Court residential development and Waitrose). There is no overriding local character or vernacular. The DAS confirms that a high-quality building is being introduced here. The tests in Policies DP26, EG3 and Draft DPS6 and DPB1 are met.

- 4.29 The provision of photovoltaics, high levels of air tightness and insulation, the installation of an air source heat pump and electric vehicle charging points, demonstrates a positive contribution towards the principles of Policies DP39, DP40, Draft DPS1 and Draft DPS2.
- 4.30 In terms of local amenity, the centralised siting of the main building and car parking, and reduced scale of the ancillary building, minimises impacts on outlook and privacy. Back of house and delivery areas are situated centrally, well away from residential dwellings and their gardens. A detailed landscaping scheme is provided; for one, to demonstrate that the mandatory BNG target is met (and indeed, substantially exceeded) but also to enhance the 'buffer' between the proposed building and residential gardens. Accordingly, the amenity aspects of Policies DP29, Draft DPS6, Draft DPN7 and Draft DPN8 are met.
- 4.31 The provision of amenity space has been a principal consideration throughout the design process, evidenced by the provision of formal and informal gardens to the north, east and south of the main building. Not only do these spaces establish an appropriate setting for the proposed building, but also provide care home residents with a high-quality, varied and peaceful environment. To the extent it is relevant, Policy DP29 is complied with.
- 4.32 The care home access arrangements approved under the resolution to grant planning permission (DM/23/0007) are to be retained. The accompanying Transport Statement confirms this remains wholly acceptable in highways terms. This scheme delivers the added benefit of funding the double yellow line scheme along West Hill, a scheme which the local highway authority would like to see come forward to assist the local highway network.
- 4.33 In terms of transport effects, these are minimal, with 11 additional two-way vehicle movements would be generated by the care home in the AM Peak and nine in the PM peak. This is a minimal level of traffic on the network and into and out of the site, well below the level of change which requires specific junction analysis; such are the sustainable patterns of transport associated with

care home operations with shift changes often occurring outside peak hours and residents generating limited transport demands:

“Due to the specialist nature of a care home, residents would typically be frail and/or living with cognitive impairments, such as dementia, and would not own a car or travel off site regularly – particularly by walking or other sustainable travel modes. As such, movements to and from the care home would be from staff and visitors, including staff potentially leaving the site at break times” (paragraph 3.1.1 supporting Transport Statement).

- 4.34 The parking is consistent with standards and achieves a sensible balance between demand and the encouragement of sustainable travel. Care homes are especially able to exercise control over transport behaviour and a robust draft Travel Plan accompanies the application. Adequate provision is made for service access (junction to HGV standards) along with dedicated delivery and ambulance bays.
- 4.35 The sustainable patterns of transport associated with care home operations is recognised in the supporting text to Policy DP30 ‘Housing Mix’:

“schemes falling within Use Class C2 are considered to usually have a lesser impact on existing communities, for instance through lower vehicle usage levels and reduced parking requirements. For this reason, provided the scheme makes efficient use of land, any site considered appropriate for housing development would be positively considered for such older person accommodation through the decision-making process” (page 81, District Plan).

- 4.36 The proposal accords with Policies DP21, EG11, EG12, Draft DPT1, Draft DPT3 and Draft DPT4, being in a highly sustainable location whilst providing sufficient parking and further promoting sustainable modes of transportation.

General

- 4.37 Ecology has been a significant consideration throughout the design process. A Preliminary Ecological Appraisal¹¹, Bat Survey / Mitigation Plan, Badger Survey Statement and BNG Assessment have been undertaken. Together, these reports confirm that the development will not have any unacceptable impacts on protected species, subject to implementation of the necessary mitigation.
- 4.38 On-site initiatives are proposed for BNG enhancements, with Leigh Ecology's BNG Report confirming the proposal could achieve an increase of 14% habitat biodiversity units and 27% hedgerow units on-site; well in excess of the mandatory 10% net gain and a significant material benefit of the scheme.
- 4.39 This confirms that sufficient enhancements will be secured, demonstrating the proposal's success in relation to ecology in accordance with Policies DP38 and Draft DPN1. A planning condition to deliver and manage the BNG strategy is included at Appendix D.
- 4.40 In terms of transport matters, the site is in a sustainable location, within close proximity to day-to-day local facilities (many being within an 'easy' walking distance, as confirmed in the Transport Statement). The existing road network has also been proven very safe.
- 4.41 Access to the site is provided via West Hill, wholly consistent with the previously accepted access design for the 2023 scheme:
- "the means of access to serve the development with a new vehicular access off West Hill and the use of the existing access for pedestrians accessing this site is considered acceptable"* (paragraph 13.8, Officer's Report to DM/23/0007).
- 4.42 Several opportunities for sustainable travel initiatives are proposed (and these are set out in the accompanying draft Travel Plan). Thus, the site's sustainable

11. See also related letter of reliance.

location and absence of any material change in traffic impacts, ensures the proposal accords with Policies DP21, EG11, Draft DPT1 and Draft DPT3.

- 4.43 Although not required for the purpose of validation, a Sustainability Statement has been prepared. This identifies the emission reduction strategy for the proposal, following the ‘be lean, be green, be clear’ principles. The proposal has been designed to minimise energy usage and integrate low carbon technologies/renewables.
- 4.44 This will include the installation of Air Source Heat Pumps (to facilitate underfloor heating) and roof-mounted solar PV. The Sustainability Statement finds that the proposal will substantially exceed the requirements of the Building Regulations (Part L2), with both building emissions and primary energy rates below relevant maxima.
- 4.45 An Arboricultural Impact Assessment and Tree Survey have been prepared, detailing the potential impacts of the proposed development on existing trees, alongside information regarding proposed tree planting. The removal of 38 trees is required, 26 of which are for reasons of health and safety and 12 to facilitate the new development. These trees are subject to an Area Preservation Order dating back to 1984, and “*consequently many of them are low quality or potentially dangerous trees*” (Council’s Tree Officer, paragraph 12.41, Officer’s Report DM/23/0007). All the trees that are being removed are either category U or C. No category A or B trees will be removed. While this loss will have a temporary negative visual impact, this loss will be mitigated by the comprehensive landscaping scheme proposed (together with tree protection measures).
- 4.46 A detailed landscaping strategy accompanies the application. The proposed landscape strategy improves the visual amenity of the scheme, provides ecological enhancements and maintains the privacy of both residents/workers of the care home and residents of surrounding dwellings. For example, additional planting along the site’s boundaries provides visual enhancements to surrounding neighbours, whilst formally landscaped areas to the front of the

care home provide suitable amenity space. The TVA prepared in 2022 is considered to be comprehensive and robust (as examined above).

- 4.47 Landscaping planning conditions are proposed at Appendix D, which ensures the proposal complies with Policies DP37, Draft DPN4 and Draft DPN3.
- 4.48 A Ground Investigation has also been undertaken to evaluate existing ground conditions, and the extent of any contamination present. The investigative works informed a human health risk assessment which considers the possibility of various risks, their severity and required mitigation strategies where appropriate. The report concludes that the risk from onsite sources to human health is considered to be low to moderate.
- 4.49 Whilst further advice is to be sought from a geotechnical specialist should evidence of made ground be discovered, the implementation of suitable management strategies during demolition and construction (as set out within the Ground Investigation Report) ensure there are no geotechnical reasons as to why the proposal cannot be found acceptable. The proposal is therefore compliant with Policy Draft DPN10.
- 4.50 With regard to environmental considerations, the Site is located in Flood Zone 1 (according to the government's 'Flood Map for Planning'), at low fluvial flood risk and very low surface water floor risk.
- 4.51 A Drainage Strategy accompanies the application, meeting the requirements of Policies DP42 and Draft DPI7. The rate of surface water flows are to be attenuated via SUDS and a geocellular soakaway system below the access road and car park. This exits via a hydrobrake, before discharging to the existing combined sewer. The final outfall can be tuned to ensure the site drains at the equivalent greenfield run-off rate, adjusted for climate change.

(v) Planning Condition and Obligations

- 4.52 A schedule of draft planning conditions which the applicant finds agreeable is provided at Appendix D.

- 4.53 The Development Infrastructure and Contributions SPD sets out the overall framework for planning obligations. The applicants will liaise with the local authority on the relevant contributions here, such as any necessary TRO scheme. The applicant is willing to discuss library contributions and TAD, should the local authority consider such contributions lawful relative to the type of development proposed. The Council's Planning Obligation Form accompanies the application. The proposal will be compliant with Policy DP20.
- 4.54 As a care home facility, the proposal does result in a net increase in dwellings within the 7km zone of influence around the Ashdown Forest SPA. Therefore, mitigation is not required. However, an initial Habitat Regulation Pro-Forma has been completed to assist the Council (as 'competent authority') to reach a view.
- 4.55 In relation to atmospheric pollution, the proposal was modelled in the Mid Sussex Transport Study as a 'windfall development' and therefore its potential effects assessed and confirmed there would not be an overall impact on Ashdown Forest. Furthermore, the traffic generation is minimal, such that there is no combination effect on the Ashdown Forest SAC.

5. **Conclusions**

- 5.1 The proposal involves the construction of care facilities (a 78-bed care home and 7 additional care units) associated access, parking, and other works. A full application is made on behalf of Igloo Care Ltd and EQ Care East Grinstead, proven healthcare specialists. The applicants' position as developer and operator, not only confirms the deliverability of the scheme (setting it apart from the previous application here), but more importantly, is a significant identifier of market demand. There is a full team of professionals on board, together with contractors, reflecting their commitment to delivering this scheme immediately.
- 5.2 The proposed high-quality care facilities would help meet the established need for care home beds in East Grinstead, as identified in the Care Needs Assessment. This provision delivers associated benefits of releasing under-occupied housing back to the housing register and the local market and generating local employment opportunities.
- 5.3 The scheme will be delivered in a highly sustainable and accessible location which has previously been anticipated to accommodate a care development (DM/23/0007). Additional site specific benefits are secured, including ecological enhancements (biodiversity net gain), high quality landscaping, local highway improvements and a well considered design with impressive energy credentials. The proposal evidently results in an effective and realistic use of available land in the Built-Up Area of East Grinstead, largely previously developed, whilst protecting the local environment and amenity of existing neighbours. The proposal is of an appropriate nature and scale to East Grinstead, a Category 1 settlement, and surrounding context.
- 5.4 The application is accompanied by a suite of supporting information across the full range of technical and environmental disciplines, including drainage, trees, ecology, ground conditions and transport. The related reports have positively influenced the proposed siting, massing and design of the buildings, as identified in the DAS. High quality materials and landscaping will ensure the

development integrates into the local context. The performance of the proposal against relevant planning policies is enviable.

- 5.5 The proposed development helps meet the needs of an increasing-important demographic, whilst also generating new employment. The proposed development fully “*accord(s) with an up-to-date development plan*” and should consequently be approved “*without delay*” in accordance with Paragraph 11 (c) of the NPPF (2023).

East Grinstead Care Needs Assessment

1. Executive Summary

1.1 This care home needs assessment is written in support of the Planning Statement for the construction of C2 care facilities at Highfields, West Hill, East Grinstead.

1.2 In June 2019, the DLUHC published the planning practice guidance for 'Housing for older and disabled people' for Councils. The diverse range of older people's needs to be met was emphasised, from accessible housing to those offering the highest level of care support, namely residential care, and nursing homes. The foreword goes:

"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."

1.3 Consistent with the urgent, nationally identified need, the Local Planning Authority, Mid Sussex District Council, has identified "*an increase in demand across almost all types of specialist accommodation for older people in Mid Sussex to 2031*" (paragraph 1.17, Housing for Older People Topic Paper).

1.4 Urgent C2 care needs are therefore established both nationally and locally. It is in this context that the development plan provides in principle support to the delivery of such facilities (Policy DP6 Local Plan and SA39 Site Allocations DPD). This Care Needs Assessment explores how the proposal can help meet these urgent C2 needs in greater detail.

2. **Need Assessment**

- 2.1 Assessing care needs is complex, it is “*not an exact science, especially given the range of needs and the different ways in which such services can be delivered*” (paragraph 1.13 Housing for Older People Topic Paper). There are three key signifiers of need here; the quantitative needs identified in the development plan and its supporting evidence base, the need established by the 2023 resolution to grant a C2 development on the application site and thirdly, the applicant’s firm commitment to the delivery of the facilities.

Need Identified Within the Development Plan

- 2.2 The District Plan sets an ‘Objectively Assessed Need’ (OAN) for housing in Mid Sussex of 14,892, and a minimum housing provision figure of 16,390, to 2031. The current and future needs of older people form part of this requirement; “*specialist accommodation and care homes falling within Use Class C2 form a very specific part of the housing needs market*”¹². The District Plan recognises that there is “*a very high need arising for elderly persons (aged 75 years and over)*”. The substantial added benefit of delivering homes for the elderly is the release of housing stock; “*providing suitable and alternative housing for older people can free up houses that are otherwise under occupied*”¹³.
- 2.3 This overall housing requirement is informed by the Mid Sussex Housing and Economic Development Needs Assessment (HEDNA) (February 2015) and its Update (November 2015) and Addendum (August 2016). An extract of this Assessment, confirming the identified care needs is provided below.

¹² Supporting text to Policy DP30: Housing Mix.

¹³ Supporting text to Policy DP30: Housing Mix.

Table 1: Need for Sheltered, Extra Care and Registered Care 2014-2031

	2014 demand	2014 supply	Need (2014 demand vs. 2014 supply)	2031 demand	Need (2031 demand vs. 2014 supply)
Sheltered Housing (C3)	1,650	1,499	151 (9%)	2,775	1,276 (46%)
Sheltered Housing: Rent	940	848	92 (10%)	1,582	734 (46%)
Sheltered Housing: Purchase	710	651	59 (8%)	1,193	542 (45%)
Enhanced Sheltered (C3)	264	104	160 (61%)	444	340 (77%)
Enhanced Sheltered: Rent	103	41	62 (60%)	173	132 (76%)
Enhanced Sheltered: Purchase	161	63	98 (61%)	271	208 (77%)
Extra Care (mostly C3)	330	210	120 (36%)	555	345 (62%)
Extra Care: Rent	241	154	87 (36%)	405	251 (62%)
Extra Care: Purchase	89	56	33 (37%)	149	93 (62%)
Registered Care (C2)	1,452	1,680	-228 (-16%)	2,442	762 (31%)
Residential Care	858	471	387 (45%)	1,443	972 (67%)
Nursing Care	594	1,209	-615 (-104%)	999	-210 (-21%)

(Source: Housing for Older People Topic Paper).

- 2.4 The Assessment identifies needs across all areas of care (bar nursing care) and a significant quantitative need in residential care (C2), which this application scheme can help meet. With this level of demand, the development plan provides firm support to new specialist accommodation coming forward to help meet this need.
- 2.5 The District Plan Submission Draft (Regulation 19) has been informed by evidence on older persons housing needs within the 2021 Strategic Housing Market Assessment (SHMA). With a significant increase in those aged 65 and over to 2038 identified, continuing support is given to the delivery of older person’s homes:

“the provision of suitable accommodation, including type and tenure, capable of supporting an older population and range of disabilities, is therefore important in delivering sustainable, mixed and balanced communities”¹⁴

¹⁴ Supporting text to Policy DPH4.

- 2.6 The 2021 SHMA continues to identify a need for residential care bedspaces. 310 residential care bedspaces are estimated, albeit the SHMA recognises that these figures may well be an underestimation given they are '*particularly sensitive to the prevalence rates applied, which are typically calculated as a proportion of people aged 75 who could be expected to live in different forms of specialist housing*' (paragraph 8.27). The SHMA is informed by prevalence rates of 40 and 65 for residential care, within the 2016 Housing LIN Review and the SHOP (2008) respectively, which is far lower than the national average or even the HOSPR (2017). Assumptions and adjustments have been made in the SHMA to justify a lower prevalence rate, for example, that the Council might aspire to deliver more extra care housing as an alternative to residential care, and that there is no publicly commissioned provision for residential care.
- 2.7 A more accurate, higher, prevalence rate for residential care would result in considerably higher demand for residential care bedspaces, consistent with the market.
- 2.8 Overall, the development plan, its supporting evidence and the emerging District Plan all confirm the need for additional residential care bedspaces. The significant quantum of need identified in the development plan, is corroborated by the established need within the 2023 scheme and market demand identified by the applicant. While the emerging District Plan identifies demand for residential care, the level of demand would be significantly greater if a more accurate prevalence rate were applied.

Established Need Through 2023 Scheme

- 2.9 The Site benefits from a recent resolution to grant planning permission for a 78-bed care home (2023). The Committee Report to this application (DM/23/0007) confirms a critical need for C2 provision:

“The development would provide specialist accommodation for elderly people, which is a type of accommodation where there is a recognised need (national guidance in the PPG states that the need to provide housing for older people is critical).”

2.10 Whilst this application was subsequently refused in November 2023, as the s106 was not signed within the allotted timeframe, the resolution reinforces the need for care home facilities in East Grinstead. No new care home facilities have come forward in East Grinstead since this resolution to grant, and therefore this needs remains unmet.

Market Demand

2.11 This application for C2 care facilities has been made by an established operator EQ Care¹⁵. The applicants have a proven track record of acquiring, developing and managing high-quality care homes across the UK, and predominantly in central and southern England.

2.12 The applicants undertake detailed analysis of need before proceeding with a scheme. This involves a wide demographic, including those in unsuitable (and underoccupied) properties, private and social rented sectors, hospitals and existing nursing or care homes unable to provide suitable facilities. Having identified an urgent need in East Grinstead, the applicants are committed to urgently delivering this C2 scheme. A full team of professional consultants have been brought on board to bring this application together, and contractors, J Guest Ltd, are already instructed to deliver the scheme. The applicants' position as developer and operator, not only confirms the deliverability of the scheme (setting it apart from the previous application here), but more importantly, is a significant identifier of market demand.

¹⁵ Previously operating as Bracebridge Care and Zephyr Group.

3. Conclusions

- 3.1 This care home needs assessment has confirmed an urgent need for C2 facilities in East Grinstead. Urgent care needs are established both nationally and locally, which reflects the in principle support to such facilities in the development plan (Policy DP6 Local Plan and SA39 Site Allocations DPD).
- 3.2 There are three key signifiers of need here; the quantitative needs identified in the development plan and its supporting evidence base, the need established by the 2023 resolution to grant a C2 development on the application site and thirdly, the applicant's firm commitment to the delivery of the facilities (market demand).
- 3.3 This proposal will help meet the local C2 needs and deliver a high quality facility, delivering qualitative benefits to local supply and releasing under-occupied housing for both the housing register and local housing market.

Validation Requirements Assessment

The following schedule provides an analysis of the material required to secure a valid planning application, having regard to the National Validation List and Mid Sussex District Council’s current Validation List for detailed planning applications.

Table 1: Material Required for Validation

Document	Notes
Application Form, Certificates and Fee	Statutory requirement.
Site Location Plan	Statutory requirement.
Existing & Proposed Site Plans	Statutory requirement.
Proposed Floor and Roof Plans	Statutory requirement.
Proposed Elevations/Sections	Statutory requirement.
Landscape drawings	Local requirement, to demonstrate the site can be successfully integrated in landscape terms. And to achieve parity with the BNG strategy.
Landscape Management Plan	To ensure success of the landscape strategy once implemented.
Planning Statement (and Care Needs Assessment).	Explains context and need for the proposed development, alongside an assessment of performance against relevant planning policies. This includes a Care Needs Assessment.
Design & Access Statement	Explains the design rationale in response to local context and how relevant design policies and standards have been met.
Sustainable Drainage Strategy	Demonstrates appropriateness of proposed detailed drainage strategy.
Sustainability Statement	Local requirement for all non-householder/change of use development, to demonstrate efficient use of energy, water and drainage.

Preliminary Ecological Appraisal (inc. Reliance Letter)	Reviews the impacts of the development on local ecology and opportunities for enhancement.
Bat Survey/Mitigation Plan	Reviews the impacts of demolishing the existing building on potential roosting bats.
Badger Survey/Statement	Identifies the presence of badger sets, and any potential 'no build zones'.
Tree Roost Assessment	Reviews the presence of bats and suitability of trees for bats.
BNG Assessment/Metric	Statutory requirement, to demonstrate 10% mandatory gain (and any uplift) achievable.
Habitat Regulations Assessment Pro-Forma	Assesses the appropriateness of a major development within the zone of influence of the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).
Transport Statement (inc. Travel Plan)	Demonstrates the appropriateness of the proposed junction arrangement, circulation, parking and sustainable transport proposals.
Detailed drawings of proposed access arrangement	Specific to this scheme, given the creation of a new access through a steep embankment.
Stage 1 Road Safety Audit	Prepared for the previous application but remains valid as the access arrangement unchanged.
Planning Obligations Form	Local validation requirement.
Phase I Ground Investigation Report.	Reviews the site levels and proposed excavations.
Tree Survey & Arboricultural Impact Assessment	A Tree Survey, Arboricultural Impact Assessment and Method Statement & Tree Protection Plan is provided.

Table 2: Material Not Required for Validation

Structural Survey	Not involving alteration of existing fabric.
Archaeological Assessment	Not in an area of archaeological importance.

Environmental Statement	No, as the development is not identified in Schedule 1 and is not considered to be Schedule 2 Development.
Heritage Statement	Does not directly affect a heritage asset.
Retail Impact Assessment	No, as there is no creation of retail floorspace.
Lifetime Homes Standards	No, as this is C2 development.
Air Quality Assessment	The proposal will not impact on air quality.
Fire Statement Form	Proposed buildings do not exceed 18m or 7 storeys in height.

Performance Against Relevant Local Policies

The following table appraises the performance of the proposed development against relevant development management policies within the Mid Sussex District Plan (2018), the Mid Sussex Site Allocations DPD (2022) and the East Grinstead Neighbourhood Plan (2016).

Ref	Policy	Response
Mid Sussex District Plan (2018)		
DP4	Housing	The proposal contributes to the clear need for care units in East Grinstead, as set out in Appendix A, specifically meeting the demands of the ageing population.
DP6	Settlement Hierarchy	The Site's location within the Built-Up Area of East Grinstead ensures the development is highly sustainable. The development is of an appropriate nature and scale, and supports the Category 1 status of East Grinstead.
DP17	Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)	The proposal does not result in a net increase in dwellings within the 7km zone of influence, therefore mitigation is not required ¹⁶ . On this basis, and given the proposal's conservation objectives, it is considered that the competent authority can determine the proposed development.
DP20	Securing Infrastructure	Developer contributions have been considered in relation to the delivery of necessary infrastructure, and are set out clearly in Appendix D. The proposal provides for, and contributes towards, necessary infrastructure and mitigation measures.
DP21	Transport	The Site is in a highly sustainable location for care units, with a range of nearby services. Frequent public transport services operate in proximity to the Site, whilst provisions such as for cycle storage help encourage more sustainable modes of transportation. The scheme provides adequate car parking. The application is supported by a Transport Statement and Travel Plan.
DP25	Community Facilities and Local Services	The proposal, being a care home, is classified as such facilities/services and is therefore supported.

¹⁶ This is consistent with LPA's approach to Application DM/23/0007.

DP26	Character and Design	The proposal has been designed to positively respond to the existing context of the Site; drawing from the surrounding residential development and working with the topography, whilst also bringing forward long-anticipated care units in East Grinstead.
DP28	Accessibility	The development has accessibility at its very core, with high standards of accessibility throughout the development.
DP29	Noise, Air and Light Pollution	The proposal has been carefully designed so as to minimise impacts on existing neighbours, such as through the use of landscaping, limited outdoor lighting, and the setback from the site boundary. The amenity of future residents of the care home is also central to the proposal's design, ensuring sufficient private and communal spaces are provided, alongside essential requirements such as cycle storage. Impacts of noise, air and light have all been considered.
DP30	Housing Mix	The proposal helps to meet the needs of older people and vulnerable groups, thereby widening the mix of housing.
DP37	Trees, Woodland and Hedgerows	The removal of 38 trees (26 of which are for reasons of health and safety) will be mitigated by the comprehensive landscaping scheme proposed (together with tree protection measures).
DP38	Biodiversity	The proposal looks to conserve and enhance existing biodiversity networks, with careful landscaping design helping to secure mandatory BNG improvements in excess of 10%, whilst also improving the visual amenity of the site.
DP39	Sustainable Design and Construction	The Sustainability Statement confirms a number of energy efficient measures can be incorporated into the development including; the use of photovoltaic panels, the installation of heat pumps, a reduction in water consumption and electric vehicle charging points. Cycle parking and electric vehicle charging points are proposed to encourage sustainable means of transport. These proposals combined with this highly sustainable location, render the scheme acceptable in sustainability terms.
DP40	Renewable Energy Schemes	The development is highly efficient with regard to energy, whilst its location maximises opportunities

		for sustainable transportation. The care home's flat roof provides space suitable for the installation of solar PV units and an air source heat pump is proposed, further minimising reliance on non-renewable energy sources. Electric vehicle charging points are also provided.
DP41	Flood Risk and Drainage	The Site is in Flood Zone 1, at low fluvial flood risk and very low surface water flood risk. An Outline Drainage Strategy accompanies the application and confirms the surface water and foul water drainage are acceptable.
DP42	Water Infrastructure and the Water Environment	It is understood there is sufficient water capacity to meet the requirements of this development. The proposal is therefore compliant with Policy DP42.
Mid Sussex Site Allocations DPD		
SA38	Air Quality	The Transport Statement confirms the development would result in a minimal level of traffic, which in the context of the site's location within the Built Up Area of East Grinstead, would not have a significant impact on local air quality.
SA39	Specialist Accommodation for Older People and Care Homes	The site falls within the Built Up Area of East Grinstead, and is therefore in accordance with part c) of the policy. The site is accessible to local shops, services, community facilities and public transport. The principle of a care home is therefore acceptable.
The East Grinstead Neighbourhood Plan		
EG3	Promoting Good Design	A high quality design is proposed, satisfactorily accommodating the development on the site and working with the topography to reduce the impact of massing.
EG5	Housing Proposals	The site falls within the Built Up Area of East Grinstead and therefore the principle of a care home is acceptable.
EG11	Mitigating Highway Impact	A Transport Statement accompanies the application and confirms the development would result in a minimal level of traffic. The proposed access arrangement is appropriately designed and delivers adequate visibility splays. The proposal is therefore compliant with EG11.
EG12	Car Parking	Vehicle and cycle parking is compliant with West Sussex Country Council adopted parking standards

		and is wholly contained within the site. The proposal is therefore compliant with EG12.
EG16	Ashdown Forest Protection	The proposal does not result in a net increase in dwellings within the 7km zone of influence, therefore mitigation is not required ¹⁷ . On this basis, and given the proposal's conservation objectives, it is considered that the competent authority can determine the proposed development.
Mid Sussex District Plan Submission Draft (Regulation 19)		
DPS1	Climate Change	The development is highly efficient with regard to energy, whilst its location maximises opportunities for sustainable transportation. The care home's flat roof also provides space suitable for the installation of solar PV to further minimise reliance on non-renewable energy sources. BNG improvements and sustainable drainage are achieved.
DPS2	Sustainable Design and Construction	The Sustainability Statement confirms a number of energy efficient measures can be incorporated into the development including; the use of photovoltaic panels, the installation of heat pumps and a reduction in water consumption. Cycle parking and electric vehicle charging points are proposed to encourage sustainable means of transport. These proposals combined with this highly sustainable location, render the scheme acceptable in sustainability terms.
DPS4	Flood Risk and Sustainable Drainage	The Site is in Flood Zone 1, at low fluvial flood risk and very low surface water flood risk. A Drainage Strategy accompanies the application and confirms the surface water and foul water drainage are acceptable.
DPS6	Health and Wellbeing	The scheme has a high quality, inclusive design with a legible layout. Attractive private amenity space to encourage healthy living and no impact on local amenity.
DPN1	Biodiversity, Geodiversity and Nature Recovery	The scheme has taken opportunities to improve the biodiversity within the site, meeting policy requirements.
DPN2	Biodiversity Net Gain	The scheme delivers a BNG net gain, meeting policy requirements.

¹⁷ This is consistent with LPA's approach to Application DM/23/0007.

DPN3	Green and Blue Infrastructure	The scheme delivers landscape enhancements, meeting the policy requirements.
DPN4	Trees, Woodland and Hedgerows	An Arboricultural Impact Assessment accompanies the application. The removal of 38 trees (26 of which are for reasons of health and safety) will be mitigated by the comprehensive landscaping scheme proposed (together with tree protection measures).
DPN6	Pollution	Proposal protects local amenity considerations.
DPN7	Noise Impacts	The proposal has been carefully designed so as to minimise noise impacts; no new access arrangements near neighbouring properties, car parking located centrally within the site, mature and new tree planting around the boundary.
DPN8	Light Impacts and Dark Skies	The proposal has been carefully designed so as to minimise light impacts and protect dark skies; limited outdoor lighting, setting back the development from the boundaries, mature and new tree planting around the boundary.
DPN9	Air Quality	The Transport Statement confirms the development would result in a minimal level of traffic, which in the context of the site's location within the Built Up Area of East Grinstead, would not have a significant impact on local air quality.
DPN10	Land Stability and Contaminated Land	A Ground Conditions Report accompanies the application and includes effective measures to protect land stability and land quality, thereby meeting policy requirements.
DPB1	Character and Design	A high quality design is proposed, satisfactorily accommodating the development on the site and working with the topography to reduce the impact of massing.
DPT1	Placemaking and Connectivity	A Transport Statement supports the application and explains how sustainable travel methods will be maximised. The site is within the Built Up Area, meeting the 20 minute neighbourhood principle.
DPT3	Active and Sustainable Travel	The development accords with the movement hierarchy and provides high quality, attractive, fit for purpose and convenient active travel infrastructure. All new infrastructure and cycle facilities are designed to an appropriate standard.

DPT4	Parking and Electric Vehicle Charging Infrastructure	Adequate and well integrated parking, with electric vehicle charging points is provided.
DPH1	Housing	The proposal contributes to the clear need for care units in East Grinstead, as set out in Appendix A, specifically meeting the demands of the ageing population.
DPH3	Sustainable Development - Inside the Built-up Area	The Site's location within the Built-Up Area of East Grinstead ensures the development is highly sustainable. The development is of an appropriate nature and scale, and supports the Category 1 status of East Grinstead.
DPH4	Older Persons' Housing and Specialist Accommodation	The proposal is within the Built-Up Area of East Grinstead, is accessible by foot and public transport and accompanied by a Travel Plan. The proposal thereby meets policy requirements.
DPH7	Housing Mix	The proposal helps to meet the needs of older people and vulnerable groups, thereby widening the mix of housing.
DPH12	Accessibility	The development has accessibility at its very core, with high standards of accessibility throughout the development.
DPI1	Infrastructure Provision	Developer contributions have been considered in relation to the delivery of necessary infrastructure, and are set out clearly in Appendix D. The proposal provides for, and contributes towards, necessary infrastructure and mitigation measures.
DPI2	Planning Obligations	Developer contributions have been considered in relation to the delivery of necessary infrastructure, and are set out clearly in Appendix D. The proposal provides for, and contributes towards, necessary infrastructure and mitigation measures.
DPI7	Water and Wastewater Infrastructure	It is understood there is sufficient water capacity to meet the requirements of this development. The proposal is therefore compliant with Policy DPI7.

Schedule of Acceptable Planning Conditions

The following schedule sets out a number of proposed conditions, which our client would be willing to accept upon the grant of planning permission. These ensure that no harm is created by the proposal, and that permission can be granted.

Proposed Conditions
1. Approval of the details of landscaping to be obtained from the LPA in writing before development commences.
2. Landscaping scheme to be submitted shall include planting plans including retained trees, species, numbers, size, and density of planting.
3. Any part of the approved landscaping scheme dying within 5 years shall be replaced in the next planting season.
4. Accordance with plans hereby approved.
5. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
6. Submission of external materials details.
7. Accordance with approved landscape management plan.
8. Accordance with Biodiversity Net Gain scheme and management strategy.
9. Accordance with approved drainage strategy (surface and foul water).
10. Submission of details relating to access.
11. Space laid out for car parking and retained.
12. Space laid out and retained for deliveries (loading and unloading area) as well as emergency vehicle bay.
13. Submission of a Construction Management Plan, to then be carried out in accordance with.
14. Accordance with travel plan/transport statement.
15. Prior to development, to implement the tree protection measures and retained until completion of the relevant part of the works.
16. Any contamination found during construction tested and scheme for remediation prepared and submitted.
17. Cycle parking details to be submitted shall include specification of stands and canopy.
18. Cycle parking shall be made available prior to the occupation of the development and retained thereafter.
18. New access and retaining structures to be complete prior to the occupation of the approved development.
19. Care home not to exceed 75 beds and that this and the additional care units to be operated within Class C2 and no other class.



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