

Planning Application LPA Ref: PL/2021/09778

Land at Station Works, Station Road, Tisbury, Wiltshire SP3 6QU



Appeal Reference: APP/Y3940/W/22/3308919



Statement of Case Appendix C Care Home Proposal

Prepared for Tisbury Parish Council

Final version – 15th December, 2022



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1. Introduction

This document provides additional evidence relating to the benefits and impacts of the alternative deployment of the Station Works site for residential use only (comprising up to 86 dwellings and a care home of up to 40 bed spaces) as set out in the current application, compared with the Neighbourhood Plan's allocation of the site for mixed use, "including an appropriate balance of housing, commercial units and parking¹."

Background

- C 1.1. The development proposal is based on a description and indicative site plan contained in the Planning Statement (prepared by Intelligent Land, dated August 2021) and a Design and Access Statement (prepared by Thrive Architects, dated September 2021). The Care Home proposal is not supported by other documents.
- C 1.2. Tisbury Parish Council understands that the Planning and Design & Access Statements remain unchanged from those presented in November 2021 and this paper therefore considers them as they currently appear on Wiltshire Council's website.
- C 1.3. Of the 260 representations made during the planning consultation in October/November 2021, 106 (41%)² objected to the inclusion of a Care Home, 95 (37%) considered that the resulting proposal did not represent mixed development as set out in the Neighbourhood Plan and 91 (35%) cited lack of conformity with the Neighbourhood Plan as a whole.
- C 1.4. Wiltshire Council's assessment of the Care Home proposal is set out in the following documents:
- the Senior Planning Officer's Report dated 25th November, 2021
 - the Case Officer's Report to the Southern Area Planning Committee meeting held on 10th November, 2022

Purpose of this document

- C 1.5. Tisbury Parish Council disagrees with the conclusions of Wiltshire Council's Case Officer on the benefits and impacts of the appellant's proposal. The purpose of this document is to show:
- that the care home proposal is not plan-led and involves a high level of risk;
 - that there is insufficient evidence of the benefits arising from the appellant's wish to substitute a residential care home for the commercial uses set out in the Neighbourhood Plan, and there are significant drawbacks; and
 - that development would not enable the proposal site to support future economic growth, as contemplated by the Neighbourhood Plan and, in the event that the care home model fails, would result in the permanent loss of all employment at the site.

¹ Neighbourhood Plan, policy BL.7 (Appendix E)

² Appendix D, Report on Community Representations, page 9

2. Policy Setting – Older People

National Statement of Supported Housing Expectations

- C 2.1. For England, government policy is that development of supported housing for older people should be delivered through a plan-led rather than a piecemeal approach.
- C 2.2. A relevant document is the National Statement of Supported Housing Expectations, which sets the following objectives for the provision of supported housing:

“Local councils have the lead role in planning to meet local demand for supported housing. To be effective, councils need to plan strategically to ensure that supply aligns with the current and future supported housing needs of vulnerable people in their areas. This will include any appropriate supply of accommodation that might come from private market development, including non-commissioned and leased provision.”

To plan effectively and assess current and future needs of all client groups, local councils must ensure joined up working between teams, for example housing, public health commissioners and adult social care, authority tiers, local health commissioners (Clinical Commissioning Groups) and other local partners.³”

Wiltshire Older People Accommodation Development Strategy

- C 2.3. Wiltshire Council’s strategy for the accommodation for older people, as set out in its Core Strategy, was developed on the basis of professional research, which included development of a forecasting model.
- C 2.4. The Core Strategy is based on the strategy set by the “Wiltshire’s Older People Accommodation Development Strategy (“WOPAS”).^{4 5}”
- C 2.5. WOPAS concluded that provision of residential care homes in Wiltshire represented a “stable market” with “good spread throughout the county⁶”. However, there was under-supply of shared ownership and leasehold sheltered housing, and significant under supply of extra care homes which, unless addressed “will impact upon Wiltshire’s ability to meet future demand and older people’s expectations⁷”
- C 2.6. The Strategy stated that unbalanced demand and supply meant that “older people with their future care and health costs are being imported from other areas.”
- C 2.7. The Strategy’s main findings were set out as follows:

“WOPAS concludes that In Wiltshire there is:

- *An adequate supply of care home provision but a shortage of dementia and nursing home provision, especially when considering future trends and demographic projections*

³ Supported Housing: National Statement Of Expectations, Department of Levelling Up, Housing and Communities and the Department of Work and Pensions, October 2020 (C1)

⁴ Wiltshire Core Strategy, paragraph 6.54

⁵ Wiltshire’s Older People Accommodation Development Strategy – revised version, December 2010 (C2)

⁶ Ibid, page 7

⁷ Ibid, page 8

- *A shortage of private retirement housing and a tenure imbalance between the percentage of home ownership in general needs housing and in retirement housing*
- *A shortage of extra care housing across all tenures*
- *Considerable potential to develop the supported housing market further to divert more people away from residential care through a number of mechanisms, of which the further development of extra care is one. They are:*
 - *An enhanced extra care programme, using a range of models across all tenures*
 - *Reduced move on from sheltered housing into residential care*
 - *Diversion of self-funders from residential care into supported housing options across all tenures*
 - *Further development of community based services such as Telecare*
- *A private retirement housing market that is not operating in the best interests of the county. Older people with their future care and health costs are being imported from other areas when they buy into new private sheltered housing schemes, and housing with care models demanded by older people are not being provided*⁸.

C 2.8. The Strategy set the course for future planning policy as follows: *“in response to the recommendations identified in the Older People’s Accommodation Strategy, the Council has embarked on an innovative and extensive programme to help people to remain in their own homes.”*⁹

C 2.9. The Strategy uses a modelling tool developed by Peter Fletcher Associates which projected the additional number of Extra Care homes needed in each town and local service centre over the 20 years between 2006 and 2026.

C 2.10. “Extra Care” accommodation is defined as independent living accommodation, *“whereby properties are available for rent, low cost home ownership and outright sale”*¹⁰.

C 2.11. A requirement for 24 additional Extra Care homes is forecast for Tisbury during the period to 2026 and the WOPAS strategy sought to deliver them through enhancement to the sheltered housing provided at Nadder Close, Tisbury.¹¹

C 2.12. Appendix A shows the spatial strategy set out in WOPAS¹², which informs Wiltshire Core Policy 46, and in which Tisbury was allocated for the provision of the additional “Virtual Care” or “Community Extra Care” homes mentioned above.

Wiltshire Core Policy 46 – Vulnerable and Older People

C 2.13. Core Policy 46 builds on the WOPAS strategy by seeking to achieve two objectives:

- to direct development towards provision which enables people to stay in their own homes for longer; and

⁸ WOPAS, page 8

⁹ Ibid, page10

¹⁰ Ibid, page 13 – “forecasting future accommodation requirements”

¹¹ Ibid, page 13

¹² Ibid, page 16

- to direct development of specialist accommodation towards principal settlements and market towns with good communications.
- C 2.14. Specialist provision within Wiltshire is focused on extra care housing and “Lifetime Homes” *“designed to allow dwellings to meet the changing needs of their occupiers over time and enable people to stay in their own homes for longer.”*¹³ The preamble to Core Policy 46 states its objective is *“the provision, in suitable locations, of new housing to meet the specific needs of vulnerable and older people will be required. Wherever practicable, accommodation should seek to deliver and promote independent living.”*
- C 2.15. For all housing, Core Policy 46 sets the following requirement to ensure appropriate provision is made for older people:
- “Housing schemes should assist older people to live securely and independently within their communities. Residential development must ensure that layout, form and orientation consider adaptability to change as an integral part of design at the outset, in a way that integrates all households into the community.*
- Developers will be required to demonstrate how their proposals respond to the needs of an ageing population.”*
- C 2.16. For specialist accommodation, including residential care homes, Core Policy 46 directs future development towards *“sustainable locations” “within settlements identified in Core Policy 1 (normally in the Principal Settlements and Market Towns) where there is good access to services and facilities.”*
- C 2.17. Exceptions will be considered, but only in clearly defined circumstances, set out by Core Policy 46 as follows:
- “in exceptional circumstances, the provision of specialist accommodation outside but adjacent to the Principal Settlements and Market Towns will be considered, provided that:*
- *a genuine, and evidenced, need is justified*
 - *environmental and landscape considerations will not be compromised*
 - *facilities and services are accessible from the site*
 - *its scale and type is appropriate to the nature of the settlement and will respect the character and setting of that settlement.”*

Neighbourhood Plan

- C 2.18. The Neighbourhood Plan echoes Core Policy 46 by seeking homes that will help older people to remain independent for longer. Paragraphs 69 and 75 express this as follows:
- “Carefully planned development can enable the various housing needs in the community to be met, including smaller or lower-cost housing options. However, TisPlan also seeks to provide for the increasingly older demographic, and development should facilitate the objective of enabling older people to live independently.*
- There is evidence of a need for affordable housing, low-cost starter homes (both for purchase and rental) and a demand for retirement accommodation - consistent with the anticipated requirements of the ageing population seeking suitable accommodation for ‘downsizing’.”*
- C 2.19. Paragraph 76 states that *“as the TisPlan questionnaire data suggests, there may well be a significant demand for targeted accommodation for older people during the plan period”,*

¹³ Wiltshire Core Strategy, paragraph 6.55

referring to a question in the 2015 Neighbourhood Plan survey which asked whether those responding felt someone in their household would need either “independent living” or “assisted living/care home” accommodation before 2026. The data was collected in 2015 from 587 respondents, 5.3% of whom felt someone in their household would need sheltered retirement accommodation or care home accommodation within the next 11 years to 2026.

- C 2.20. Policy BL.1 expects developments to show explicitly how they have catered for the needs of older people.

3. Policy Setting – Out-commuting

Wiltshire Core Strategy

- C 3.1. The Wiltshire Core Strategy sets as one of its over-arching strategies, the avoidance of out-commuting. Paragraphs 2.7 to 2.9 state:

“Reducing levels of out-commuting from many of Wiltshire’s settlements is perhaps the most important strategic challenge in planning for the future of Wiltshire.”

“Out-commuting may have some beneficial effect on the local economy through income earned outside the area being spent in Wiltshire, but this is far outweighed by the negative impacts on sustainability.”

“The key challenge is to improve the self-containment of the main settlements, to ensure that there are a range of appropriate employment opportunities available, reflecting the needs of inward investors and Wiltshire’s communities.”

- C 3.2. The importance of this objective is reflected by the fact that the word “out-commuting” appears 27 times in the Core Strategy.

- C 3.3. The spatial strategy informs Core Policies 1 and 27, which seek to balance housing with employment growth. The application of these policies to Tisbury is summarised in paragraph 5.145:

“The strategy for Tisbury Community Area is to provide for modest growth of both housing and employment to ensure development is balanced, thus helping to minimise out-commuting and also to provide support for local services and communities. Identifying suitable non-strategic allocations will include working closely with existing employers to ensure they have the potential to meet their future needs.”

- C 3.4. Core Policy 60 “Sustainable Transport” seeks to support this strategy by directing development towards sustainable locations:

“The council will use its planning and transport powers to help reduce the need to travel particularly by private car, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire.

This will be achieved by:

i. planning developments in accessible locations

ii. promoting sustainable transport alternatives to the use of the private car”

- C 3.5. Core Policy 61 seeks to ensure the layout of developments promotes sustainable travel and reduces the need to travel by private car:

“New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives.

As part of a required transport assessment, the following must be demonstrated:

i. That consideration has been given to the needs of all transport users, where relevant, according to the following hierarchy:

- a. Visually impaired and other disabled people*
- b. Pedestrians*
- c. Cyclists*
- d. Public transport*
- e. Goods vehicles*
- f. Powered two-wheelers*
- g. Private cars.”*

National Planning Policy

- C 3.6. Paragraph 105 emphasises that the role of transport planning in ensuring that developments are sustainable:

Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

- C 3.7. Paragraph 106 makes clear that policy-making should balance employment and housing:

Planning policies should ..a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.

Neighbourhood Plan

- C 3.8. Paragraphs 177 and 178 echo Wiltshire Core Strategy on the link between employment and out-commuting, stating “*As in many rural communities across the country, there is a need to balance the anticipated growth of housing with the provision of local business and employment possibilities. The decline in local employment and growth of out-commuting is clearly evidenced by the distances that people travel out of Tisbury to work*”, “*There is a high percentage of out-commuting amongst young people who live in the area, reflecting the necessity to access education, training and employment elsewhere. This has been a significant factor for consideration during the preparation of TisPlan.*”

- C 3.9. Policy TR.2 states that proposals for development of the Station Works site should “*be developed in conjunction with the Local Planning Authority, Network Rail and other interested parties as appropriate*” and have regard for, among other things, “*increasing and accommodating the use of public transport*”, “*accommodating sustainable travel needs, such as pedestrian accesses...*” and “*extending car parking in line with the levels of station usage.*”

- C 3.10. Paragraph 105 emphasises that the role of transport planning in ensuring that developments are sustainable:

Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes

4. Policy Setting – Economy & Employment

Wiltshire Core Strategy

- C 4.1. The need to balance housing with a diverse employment base is regarded as key strategy to reduce out-commuting and is reflected in Core Policies 1 and 27 mentioned above. Core Policy 35 – “Existing Employment Sites” includes specific policies to protect existing employment uses and is relevant to the current application:

Within the Principal Settlements, Market Towns, Local Service Centres and Principal Employment Areas proposals for the redevelopment of land or buildings currently or last used for activities falling within use classes B1, B2 and B8 must demonstrate that they meet, and will be assessed against, the following criteria:

i. The proposed development will generate the same number, or more permanent jobs than could be expected from the existing, or any potential employment use.

ii. Where the proposal concerns loss of employment land of more than 0.25 ha in the Principal Settlements, Market Towns or Local Service Centres it is replaced with employment land of similar size elsewhere at that settlement.

iii. It can be shown that the loss of a small proportion of employment floorspace would facilitate the redevelopment and continuation of employment uses on a greater part of the site, providing the same number or more permanent jobs than on the original whole site.

iv. The site is not appropriate for the continuation of its present or any employment use due to a significant detriment to the environment or amenity of the area.

v. There is valid evidence that the site has no long term and strategic requirement to remain in employment use; the ability of the site to meet modern business needs must be considered, as well as its strategic value and contribution to the local and wider economy both currently and in the long term. It must be shown that the site is no longer viable for its present or any other employment use and that, in addition, it has remained unsold or un-let for a substantial period of time (at least 6 months), following genuine and sustained attempts to sell or let it on reasonable terms for employment use, taking into account prevailing market conditions.

vi. The change of use is to facilitate the relocation of an existing business from buildings that are no longer fit for purpose to more suitable premises elsewhere within a reasonable distance to facilitate the retention of employment.”

- C 4.2. Core Policy 36 - “Economic Regeneration”, supports proposals for re-use of brownfield land where these are aligned with local or community-led strategies. Paragraph 6.20 states:

“The Core Strategy supports the development of community-led plans, including town plans and neighbourhood plans to support and facilitate economic regeneration in these settlements, and the preparation of masterplans for specific sites may also be appropriate.”

- C 4.3. The Policy expresses this as follows:

“Regeneration of brownfield sites will be supported in the Principal Settlements, Market Towns and Local Service Centres where the proposed uses help to deliver the overall strategy for that settlement, as identified in Core Policy 1 (Settlement Strategy) and in any future community-led plans, including neighbourhood plans, and/or enhance the vitality and viability of the town centre by introducing a range of active uses that complement the existing town centre.”

Neighbourhood Plan

- C 4.4. The Neighbourhood Plan echoes the Wiltshire Core Strategy in linking the strategy of matching employment with housing as a means of reducing out-commuting. Paragraph 177 states:

“As in many rural communities across the country, there is a need to balance the anticipated growth of housing with the provision of local business and employment possibilities. The decline in local employment and growth of out-commuting is clearly evidenced by the distances that people travel out of Tisbury to work: 61% of respondents to the TisPlan questionnaire travel six or more miles to work; 31% travel more than 20 miles

There is a high percentage of out-commuting amongst young people who live in the area, reflecting the necessity to access education, training and employment elsewhere. This has been a significant factor for consideration during the preparation of TisPlan.”

- C 4.5. Paragraphs 109 and 110 link this strategy to the Station Works site as follows:

“A business park comprising units of a size and form required by modern businesses could attract a diverse employment offer. This could provide for technology-focused businesses, or similar enterprises within use Class B1, supporting the needs of smaller local firms, as well as businesses moving into the area. This would help to minimise out-commuting by extending the availability of local employment opportunities.

A small-scale survey of local businesses in 2017 carried out by the TisPlan steering group suggested that there is demand from local businesses to relocate to the site. Many of them would appreciate employment units with good access to the railway. By providing accommodation to meet modern business needs, Station Works could achieve a greater density of employment, even if there were to be a net loss in the area of commercial land on the site. Indeed, this strategy has been endorsed by Wiltshire Council as part of their response to the Reg 14 Consultation version of TisPlan and is supported by the NPPF.”

- C 4.6. Policy BL.3, together with Policy EB.1 seek to promote development on brownfield sites in a way which does not restrict Tisbury’s economic and employment potential:

➤ Policy BL.3

“1. The character of the Cranborne Chase and West Wiltshire Downs AONB not being adversely affected,

2. Policy EB.1 not being compromised, and

3. There being no unacceptable impact on the local road network.”

➤ Policy EB.1:

“Proposals requiring a planning consent that would result in the loss of an employment use should provide evidence that appropriate steps have been taken to remarket the premises for alternative employment uses. The retention of retail and public buildings within the centre of Tisbury is considered vital to its Local Service Centre status.”

- C 4.7. Policy BL.7 allocates the site for “for comprehensive redevelopment to include an appropriate balance of housing, commercial units and parking” and presents a range of policies to guide development.

- C 4.8. The Neighbourhood Plan emphasises the continuing importance of the Station Works site Tisbury’s economic sustainability in a number of ways:



- Policy BL.7 states that development of the site should “*make provision for commercial uses, having particular regard for the needs of local and current on-site business, in accordance with Policy BL.3.*”
- Paragraph 191 states that “*any proposals for change of use at Station Works should include consultation with the local business community to determine how best to meet their business needs.*”
- Paragraph 182 indicates that provision should be made for both existing and future business needs: “*as the major brownfield employment site, a comprehensive mixed development at Station Works could provide additional employment, if sufficient land is set aside to meet the needs of existing and future businesses, in addition to providing for future housing needs in the plan area.*”
- Paragraphs 188 and 189 set out the strategic importance of the Station Works site to Tisbury's future commercial growth:

“The projection of TisPlan into the next Core Strategy period to 2036 reflects the optimism that Tisbury can continue to attract, support and sustain more small businesses if the right premises and services are provided. It is anticipated that the most appropriate sites to deliver this will be mixed business and housing developments, primarily on the site of Station Works”

C 4.9. Paragraph 112 states that delivery of employment and housing should be balanced to ensure that housing does not outpace local need or available employment:

“As this is a mixed use site, development should be phased so that employment units are brought forward during the early stages of its development, in accordance with Wiltshire Core Strategy (CP2 Delivery Strategy) and residential development should be phased to satisfy the outstanding number of dwellings required before the end of the current Core Strategy to 2026. This should ensure that development is sustainable and in line with anticipated levels of modest growth for the Neighbourhood Area to 2036.”

C 4.10. Paragraph 191 seeks to protect the existing employment roles offered at the Station Works site and promote early consultation with the local business community:

“Any proposals for change of use at Station Works should include consultation with the local business community to determine how best to meet their business needs. TisPlan has consulted the existing tenants of Station Works to ensure their requirements can be met in the event of redevelopment of the site.”

National Planning Policy

C 4.11. Paragraph 81 of the Framework seeks that development takes account of wider economic objectives and supports local business needs:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.”

C 4.12. Paragraph 93 states that planning decisions should seek to “*provide the social, recreational and cultural facilities and services the community needs*” and should, among other things:

“a) plan positively for the provision and use of shared spaces, community facilities (such as open space) and other local services to enhance the sustainability of communities and residential environments;

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”

5. Benefits - the Appellant's Case

- C 5.1. The appellant's Statement of Case and Planning Statement put forward benefits which, in the appellant's view:
- justify development of a residential care home on the proposal site even though it was not contemplated by the site allocation set by the Neighbourhood Plan; and
 - justify the omission of any form of commercial and business use, in the form of "commercial units" set by the Neighbourhood Plan allocation.
- C 5.2. As a result, the proposal puts forward an entirely residential use for the Station Works site.
- C 5.3. The Parish Council considers that these changes are significant and that they represent an alternative use for the site, which the appellant wishes to promote in preference to the strategy and use for the site set out in the Neighbourhood Plan.
- C 5.4. The benefits for the change of use, as proposed by TCH are that it would:
- deliver valuable extra **local employment**;
 - offer "associated **medical facilities**" for community use
 - meet "acknowledged local need" for a new **residential care home**
 - has been put forward because no **alternative uses** of the site would deliver employment and be viable.

Employment

- C 5.5. The appellant's Planning Statement states "*the care home and medical facilities use could be expected to provide in excess of 40 full and part-time jobs in a range of skills and functions, providing significant employment in the local area. This would also represent an increase in employment from that existing on the site now, which is estimated to be 20-22 full and part time jobs.*"¹⁴
- C 5.6. The appellant's argument on employment therefore appears to be twofold:
- that the care home will offer a beneficial net employment gain compared with the existing employment potential of the site; and
 - that the employment offered will be varied and involve "*jobs in a range of skills and functions.*"¹⁵

Medical Facilities

- C 5.7. The Planning Statement refers to the possibility of provision of "*community medical facilities*" within "*the same building footprint on site*"¹⁶, although it also has given rise to some uncertainty as to what these would be through differing descriptions as follows:
- Paragraph 7.6 of the Planning Statement states "*this will also allow the provision of community medical facilities within the same building footprint on the site, which could also facilitate new premises for Tisbury surgery.*"

¹⁴ Planning Statement, paragraph 6.30

¹⁵ Planning Statement, paragraph 6.30

¹⁶ Planning Statement, paragraph 7.6

- However, in setting out the site layout, paragraph 3.10 states “A 30-40-bed care home, to possibly also include community medical facilities.”, implying that these facilities might or might not be delivered;
- The Application Form, which sets out the principle of development refers to a “care home of up to 40 bedspaces with associated medical facilities”, implying that the facilities are not necessarily for community use;
- Paragraph 6.14 of the Planning Statement states that “The Station Works site indicative layout demonstrates the provision of a 30-40-bed care home, combined with associated provision of medical facilities which can be used by local residents.”, indicating a useful facility which could be used, possibly to provide alternative GP and healthcare services to take pressure off Tisbury surgery, perhaps on a private basis.

Local Need

- C 5.8. The only reference to the rationale for the proposed care home is in the Planning Statement which presents the home as “providing supported accommodation for older people, for which there is an acknowledged need in the area.”¹⁷ “Provision of a care home on the site makes effective and efficient use of land in delivering employment as well as an acknowledged need for older persons accommodation.”¹⁸
- C 5.9. The Wiltshire Council Case Officer’s report likewise indicated that little or no supporting evidence on need had been provided, but considered that there could not be “no need” for a residential care home and interpreted the Neighbourhood Plan’s reference to the need for “targeted accommodation for older people” in the plan period as a need for a new care home:

“Furthermore, the provision of a care home would at least provide a form of local employment, and would provide a local community facility in the broadest sense. Whilst limited justification has been submitted by the applicant, the Council’s own evidence related to care home need dates from 2011, and new evidence is only currently in the process of being compiled. Whilst this is current indicating that there might be limited need, it however seems unlikely that any such report would indicate that there was no need for a care home, and it is noted that the current adopted Tisbury Neighbourhood Plan suggests that there is currently limited provision of such accommodation in the area. Therefore there is likely to be some public benefit resulting from the provision of a care home and possible medical facility, which would weigh in favour of the proposal.”¹⁹

Absence of Alternatives

- C 5.10. The Planning Statement argues that “the linear nature of the Station Works site makes locating more traditional business uses on the site challenging, whilst the significant costs of decontaminating the site mean that traditional employment uses would render the development unviable.”²⁰

¹⁷ Planning Statement, paragraph 6.30

¹⁸ Planning Statement, paragraph 6.32

¹⁹ Wiltshire Council Case Officer’s Report to the Southern Area Planning Committee dated 10th November, 2022, page 23 (C3)

²⁰ Planning Statement, paragraph 6.10

- C 5.11. In addition the Case Officer's Report notes²¹: *"The applicants viability assessment envisaged an alternative scheme containing 86 houses, and 8 industrial units (in lieu of the care home). This assessment indicated that if the current proposal were to be altered to be more in line with the allocated policy BL7, then the alternative scheme would not be viable enough to provide policy compliant affordable housing. So it appears that even if a more policy-compliant scheme were to be put forward, that scheme would be unlikely to provide the full required amount of affordable housing on the site."*
- C 5.12. The appellant's argument on viability therefore takes the form that the proposed use of the site is the only viable use which would deliver a reasonable number of affordable homes, and that all other uses, including all uses for commercial and employment purposes would not represent an *effective use of land*²². The implication is that among those uses which have been rejected on viability grounds are:
- continued use of the site for commercial activity; and
 - any form of mixed use combining housing and commercial use.

²¹ Ibid, page 23

²² Framework, paragraph 119

6. Issue 1 - Deliverability

- C 6.1. In the Parish Council's view the appellant's proposal offers insufficient evidence that benefits proposed by TCH could be delivered in a timely fashion or at all, for the reasons set out below.

Risk

- C 6.2. Critically, the proposal appears to have been developed independently as a speculative project rather than through the plan-led approach, as promoted by both Wiltshire Council and the National Statement of Supported Housing Expectations.
- C 6.3. In the Parish Council's view, this means that the proposal involves a significantly higher risk than would apply had it been developed in conjunction with Integrated Care Board (formerly the Clinical Commissioning Group) and other local healthcare partners.
- C 6.4. The Parish Council considers that a key issue would be the presence of an established 19-bed residential care home within 400 metres walking distance of the proposal site. No evidence has been offered of any other village of Tisbury's size, in a rural location, some distance from major settlements, which has been able to sustain two residential care homes offering a total of 59 bed spaces.

Lack of Engagement with Integrated Care Board

- C 6.5. It is clear from the Statement of Community Involvement that the first engagement between the appellant and the Integrated Care Board (the "ICB"), formerly the Clinical Commissioning Group first occurred at a meeting on 14th June 2021²³, five months after the appellant had submitted its proposal for the care home to Wiltshire Council for pre-application advice and three months after Wiltshire Council had formally issued their pre-application assessment.
- C 6.6. The Parish Council notes that the limited nature of this engagement is confirmed by the statement of Dr. Adam Smith, the senior clinician at Tisbury GP Surgery to the public meeting held on 16th November, 2021:

"When we raised these issues with the developer they scaled down the home... but didn't really have any answers. They now mention provision of a medical room or facility, but that would be wholly inadequate. This would in no way replace what is needed from a GP surgery and they have made no attempt to negotiate what would be reasonable."

Lack of Supporting Evidence

- C 6.7. The Parish Council considers that no evidence has been offered by the appellant to indicate that a 40-bed care home as proposed is a deliverable proposition. In particular, the Parish Council would expect to see credible evidence from more than one established care home operator as to :
- the local demand;
 - the appropriateness of the site;
 - the staffing model, rates of pay, including distribution between part-time and full-time roles, broad salary rates, skills required and the approach to recruitment;

²³ Statement of Community Involvement, paragraph 4.3 (S10)

- for those staff recruited from outside the area, the forecast need for market or affordable housing in Tisbury;
- viability;
- the nature of “community medical facilities” to be delivered, demonstrating how these will integrate with the care model of the ICB and Tisbury surgery; and
- the forecast demand for services from Tisbury surgery, whether this had been agreed with the ICB, including arrangements for any additional infrastructure and/or funding necessary for the ICB to perform this additional role.

C 6.8. The Parish Council notes that the lack of supporting evidence on deliverability does not appear to have been questioned during either the pre-application or application stage. In his report on 10th November, 2022, the Case Officer concluded that there was “*likely to be some public benefit resulting from the provision of a care home.*”²⁴

Intelligent Land’s view on deliverability

C 6.9. The Parish Council notes evidence given to the Regulation 14 Consultation on the Neighbourhood Plan by Intelligent Land, on behalf of their client, which indicates that established care home operators do not in fact consider that a care home located in Tisbury would represent a viable proposition.

C 6.10. Intelligent Land referred to research conducted with a number of care home operators as follows:

*“Further, Dudsbury Homes Southern has received correspondence from three specialist leading developers of older person housing (Churchill, Renaissance and McCarthy Stone) which states that the Station Works site is not considered suitable given its proximity to the rail station and its isolation from the services and facilities of Tisbury.”*²⁵

C 6.11. The Parish Council gives these views significant weight, given the established nature and financial strength of the three care home operators whom Intelligent Land consulted.

C 6.12. The Council considers that the presence of the existing 19-bed care home approximately 400 metres walking distance from the Station Works site is something which these three providers could not have ignored in making their assessments, together with the considerations on viability and local need which are presented below. It does not consider that these factors have changed materially since Intelligent Land’s representation was made in 2017.

Viability

C 6.13. The Parish Council notes the decision to close or mothball two specialist homes for older people in Shaftesbury during 2022:

- Castle Hill House, Bleke Street, Shaftesbury, Dorset, SP7 8JZ²⁶
 - 29-bed residential care home
 - Charitable
 - Reasons given – staff recruitment and costs

²⁴ Wiltshire Council Case Officer’s Report to the Southern Area Planning Committee dated 10th November, 2022, page 23 (C3)

²⁵ Representation to the Qualifying Body from the Director of Planning, Intelligent Land, dated 8th September, 2017 (S13)

²⁶ Alfred Radio, “Castle Hill House ‘Mothballed’ Due To Shortages And Cost Hikes”, 11th November, 2022 (C4)

- Pepperell House, Bleke Street, Shaftesbury, Dorset, SP7 8JZ²⁷
 - 15-unit sheltered accommodation
 - Charitable
 - Reasons given – under-occupancy, increased costs and repairs
- C 6.14. Whilst this evidence is not conclusive it does in the Parish Council's view, align with evidence that traditional care home occupancy nationally is declining²⁸ and that occupancy rates for residential care homes in the area around Tisbury are below the national average.
- C 6.15. Appendix D presents a list of all care homes within a 10 mile radius of Tisbury, showing their occupancy levels at the time of their last rating by the Care Quality Commission. It indicates that the average occupancy level across all these local homes was 73.3%, compared with an average occupancy rate for England of 77.8²⁹%.
- C 6.16. This evidence is supported by the following data, published by Skills for Care³⁰ showing that:
- between 2020/21 and 2021/22, care homes without nursing saw a decrease of around 13,000 filled posts and an increase of around 9,400 vacant posts (a 70% increase);
 - between 2012/13 and 2021/22 the number of care homes without nursing has decreased by around 1,700 (-14%)
- C 6.17. Appendix I shows the Parish Council's own analysis of viability, based on the above data and assuming a 15% profit requirement from a care home operation. This assessment leads to the following conclusions:
- that to achieve viability at the appellant's proposed staffing level of 40 part time and full-time would require **90%** occupancy'; and
 - due to the significant financial commitment required at the outset (through acquiring a leasehold and initial fitout costs) a care home operator would need great certainty as to levels of occupancy before committing.

7. Issue 2 – Evidence on Employment

Care Home Employment Numbers

- C 7.1. The appellant's Statement of Case indicates that provision of a care home of up to 40 bed spaces could *"be expected to provide in excess of 40 full and part-time jobs in a range of skills and functions"*, but (as set out above) offers no evidence from established care home operators regarding viability and employment.
- C 7.2. The Parish Council notes that the residential care workforce is characterised by a large proportion of low-paid, part-time roles and this is confirmed by the recent care home

²⁷ Alfred Radio, "End of the Line for Pepperell House", 27th July, 2022 (C5)

²⁸ Workforce Intelligence Summary Care homes without nursing in the adult social care sector 2021/22, Skills for Care, page 1 (C6)

²⁹ ONS, Care homes and estimating the self-funding population, England: 2021 to 2022 (C7)

³⁰ Skills for Care, Workforce Intelligence Summary Care homes without nursing in the adult social care sector 2021/22 (C6)



workforce report by Skills for Care³¹, who are commissioned by the Department of Health and Social Care to collect data on adult social care providers and their workforce.

- C 7.3. In its latest report Skills for Care found that in 2021/22 46% of roles in residential care homes were part-time and 8% were on zero-hours contracts.
- C 7.4. Based on appellant's estimated workforce of 40, the Parish Council calculates that this would be represented by 22 full-time and 18 part-time staff, delivering **31** full time equivalent (FTE) roles.

Quality of Employment

- C 7.5. A number of representations from members of the public pointed to the narrow employment base and low paid jobs offered by a care home, compared with commercial uses.
- C 7.6. The Skills for Care publication provides data indicating the skills and gender characteristics of residential care home roles. This evidence indicates that of the 31 FTE roles generated by the proposed care home:
- 3 x FTE positions would be managerial
 - 28 FTE positions would involve either direct caring or ancillary roles
 - 84% of the workforce would be female³²
- C 7.7. The most recent Skills for Care report indicates that the average mean hourly wage for workers in residential care homes not providing nursing care in 2020/2021 was **£9.05**.³³
- C 7.8. In the same period the national living wage for those aged 25 and over was £8.72³⁴.
- C 7.9. The Parish Council considers that the profile of the employment offer delivered by the proposed Care Home would have two effects:
- it would fail to reduce **out-commuting** as the low wages offered by the care home would make it more attractive for local people to drive elsewhere to work; and
 - it would result in more **in-commuting**, because the low wages and strongly vertical employment profile will require the care home to recruit from outside Tisbury, leading to greater and not less pressure on the local affordable housing stock.
- C 7.10. The Parish Council considers that this evidence underpins local concern that the workforce associated with the proposed care home would have the following characteristics, compared with the workforce associated with a mixed development as contemplated by the Neighbourhood Plan:
- dependent on a single sector;
 - narrow skills base, with little variety in roles; and
 - paid at or close to the National Living Wage.

³¹ Workforce Intelligence Summary Care homes without nursing in the adult social care sector 2021/22 (Skills for Care, 2022), page 2 (C7)

³² ibid pages 2 & 3

³³ ibid page 3

³⁴ UK Government [National Minimum Wage Rates](#).(C8)

Existing Employment Base

- C 7.11. The appellant's Statement of Case states that "*The Station Works site has largely been vacated by all but two businesses³⁵*" and its Planning Statement estimates the current employment at the site to be "*20-22 full and part time jobs³⁶*".
- C 7.12. To provide a more specific assessment of current employment at the proposal site, and the potential for growth, the Parish Council conducted an on-site survey of current workforce numbers at all businesses operating from the proposal site on 22nd November 2022, by interview.
- C 7.13. Appendix C shows the results of this assessment. As at 22nd November:
- the Station Works site supported seven businesses owned by six proprietors; and
 - the four businesses operating from the main Station works Site (currently owned by the appellant), supported 29 FTE roles, whilst three other businesses operate from the "Cookery School", which occupies a corner of the Station Works site not currently owned by the appellant.
- C 7.14. The skills base of these businesses appears to be relatively diverse ranging from aeronautical engineering, to light manufacturing, logistics, to food preparation.
- C 7.15. When asked about the future potential of the Station Works site, staff at one business indicated that between 40-50 FTE are employed by their company as a whole and consideration would be given to moving them to the Station Works site were the level of commercial confidence in its future as an employment site sufficient to justify further investment.

8. Issue 3 – Evidence on Medical Facilities

- C 8.1. The judgement of the senior clinician at Tisbury Surgery, Dr. Adam Smith, on the proposal to include "associated" or "community" medical facilities, is as follows:
- "They now mention provision of a medical room or facility, but that would be wholly inadequate. This would in no way replace what is needed from a GP surgery and they have made no attempt to negotiate what would be reasonable³⁷".*
- C 8.2. A similar statement was made by Dr. Smith in his submission for the current inquiry sent to the Parish Council on 26th November, 2022³⁸.
- C 8.3. The Parish Council has discussed the practicalities of the appellant's proposal with Dr. Smith and it appears that in his judgement it would offer very limited benefit (if any) for three reasons:
- an isolated medical room in the care home would not be an effective alternative for Tisbury GP Surgery, given the range of equipment and staff who are available there;
 - the proposal for "medical facilities" seems to have emerged at a very late stage, leading to doubt as to whether there is a genuine commitment to it; and

³⁵ Appellant Statement of Case, paragraph 2.1 and Planning Statement, paragraph 1.4

³⁶ Planning Statement, paragraph 6.30

³⁷ Remarks by Dr. Adam Smith at the public meeting held on 16th November 2021

³⁸ Statement by Dr. Adam Smith, 26th November, 2022 (C9)

- the “satellite” medical room would require resourcing and would result in an inefficient delivery model.

C 8.4. These concerns are to some extent echoed by the Case Officer, who commented “*No detailed layout plans have been provided which indicate how such a proposal would incorporate a medical facility or how large it would be, or whether such a facility is available to the wider public, and if so, would there be sufficient parking on site*³⁹”

9. Issue 4 – Evidence on Local Need

- C 9.1. A significant number of public representations questioned the need for a second residential care home in Tisbury.
- C 9.2. The Parish Council considers that little or no evidence has been submitted to support the proposition that building a residential care home on the Station Works site would meet “*an acknowledged need in the area*⁴⁰”
- C 9.3. In the Council’s view planning of specialist accommodation requires an integrated approach in which local authorities and integrated care boards work together to ensure that development is aligned with an area’s Joint Strategic Needs Assessment (JSNA), its Joint Health & Well-being Strategy (JHWS) and with local needs
- C 9.4. As the proposal does not offer its own evidence, the Council has looked to local evidence, based on:
- quantitative data on local care home use;
 - Wiltshire Council’s published strategy; and
 - the judgement of the local Integrated Care Board (the successor to the Clinical Commissioning Group).

Evidence on Local Care Home Provision

- C 9.5. Appendix D summarises the capacity of care home beds within a ten mile radius of Tisbury, using data supplied by the Care Quality Commission. It shows that the total capacity is 430 beds, with a vacancy rate of 27%, based on unoccupied beds at each home at the time of their last CQC inspection.
- C 9.6. For a settlement of its size, Tisbury is unusual in South Wiltshire in having its own 19-bed care home at Albany House in the centre of Tisbury village.

Evidence on Local Care Home Need

- C 9.7. Further evidence was supplied by Wiltshire Council to the Unitary Councillor for the division on 10th November and is reflected in his remarks to the Southern Area Planning Committee⁴¹.

³⁹ Report of the Case Officer to the Southern Area Planning Committee, 10th November 2022, page 23. (C3)

⁴⁰ Planning Statement, paragraph 6.30

⁴¹ Remarks made by the Unitary Councillor for the division to the Southern Area Planning Committee, 10th November, 2022 (S3)



- C 9.8. Wiltshire Adult Social Services supplied an assessment of the average number of care home residents during the calendar year 2020, who were both funded by Wiltshire Council and had been resident in the Tisbury local area prior to entering into care.
- C 9.9. The average concurrent number during 2020 was 7 residents.
- C 9.10. Using data published by the ONS and the Institute of Public Care, the Parish Council have used this data to forecast the total number of concurrent care home residents in 2040 who can be expected to have lived previously in the Tisbury local area.
- C 9.11. Appendix B shows the resulting calculation, which indicates that by 2040, there will be a population of **19** care home residents (both self-funded and state-funded) who previously lived in the Tisbury local area before going in residential care.

Wiltshire Council's Spatial Strategy

- C 9.12. Section 2 of this paper described Wiltshire Council's strategy to accommodate older people ("WOPAS"), which informs Core Policy 46 and Appendix A shows the spatial strategy which results⁴². The strategy involves three elements which are relevant to Tisbury:
- it directs development towards provision which enables people to stay in their own homes for longer;
 - it directs development of specialist accommodation towards principal settlements and market towns with good communications; and
 - it allocates Tisbury for the provision of additional "Virtual Care" or "Community Extra Care" homes and links this with planned upgrades at the Nadder Close sheltered housing scheme.
- C 9.13. Core Policy 46 reinforces this strategy by stating that "*provision of specialist accommodation outside but adjacent to the Principal Settlements and Market Towns*" will only be considered "in exceptional circumstances" and then only where "*a genuine, and evidenced, need is justified, environmental and landscape considerations will not be compromised, facilities and services are accessible from the site, and its scale and type is appropriate to the nature of the settlement and will respect the character and setting of that settlement.*"
- C 9.14. Given the evidence presented in this paper, it is the Parish Council's view that the strategic approach taken by Wiltshire Council is consistent with current market data, and no evidence presented with the application would justify deviating from the planned approach.

Evidence from the Integrated Care Board

- C 9.15. The Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board ("the ICB"), formerly the NHS Bath, North East Somerset, Swindon & Wiltshire Clinical Commissioning Group, currently commissions Primary Care Services across Wiltshire and in the Tisbury area.
- C 9.16. The views of the Integrated Care Board on the need for a second care home in Tisbury have been expressed by its Senior Estates Manager, who wrote to Intelligent Land "*on the basis of our experience, we would contend that such a home would be largely occupied by those who do not live in this area and would thus be of limited benefit to the local population.*" and this assessment is recorded in its Statement of Community Involvement⁴³

⁴² Ibid, page 16

⁴³ Statement of Community Involvement, page10 (S10)

- C 9.17. This view has been echoed in the representation from Dr. Smith, the senior clinician at Tisbury GP practice, who noted in his representation to Wiltshire Council in November 2021 “*I also have considerable concerns about the necessity for a care home of this size.*”⁴⁴

10. Issue 5 – Absence of Alternatives

- C 10.1. The Parish Council notes that the Planning Statement indicates “*the significant costs of decontaminating the site mean that traditional employment uses would render the development unviable.*”, implying that the current proposal represents the only effective land use for the site.
- C 10.2. From this and other statements, there seems little doubt of the appellant’s position that the use for the Station Works site set by the Neighbourhood Plan allocation (a mixed development of housing and commercial units) is not realistic.
- C 10.3. However, the Parish Council’s view is that this statement is not conclusive, for the following reasons:
- whilst the Neighbourhood Plan allocation policy could and should be amended if the appellant is correct, such a significant policy change must be based on robust evidence and careful consideration as to the impacts of the loss of an important employment site. It would also require a process of community engagement;
 - the appellant’s own viability model upon which its assertions are based has been questioned by Wiltshire Council;
 - at the present time little evidence is offered by the appellant to show that it has made a genuine effort to assess the potential of the land for alternatives to its proposed scheme, including development based on its existing use;
 - the appellant’s view of existing use differs with:
 - feedback from the local business community and public in representations to the planning consultation⁴⁵ (and those set out in the Neighbourhood Plan⁴⁶) which point to a continuing employment value for the site;
 - the appellant’s own Affordable Housing Viability Statement, which shows continuing existing use value;
 - the views of the workforce at existing businesses on the site, who have told the Parish Council that their companies would consider investing in the site if there was less uncertainty as to its future;
 - the views of the previous landowner, St. Modwen Developments Ltd; and
 - the appellant’s assessment of alternatives assumes that a significant part of the site is used for housing, resulting in a high decontamination cost, overlooking other options with less housing, which might avoid the contaminated part of the site and result in lower costs;
 - the appellant’s assessment is based solely on “stand-alone” development of the proposal site, rather than an integrated approach promoted by the Neighbourhood

⁴⁴ Representation by Dr. Smith to the planning consultation, 17th November, 2021 (C10)

⁴⁵ Appendix D - Report on Community Representations, sections 6.2 and 6.3 (S10)

⁴⁶ Neighbourhood Plan, paragraphs 105, 109, 110, 179, 180, 191, 193, 194

Plan in which the costs of important enabling infrastructure will be shared between the development and railway enhancement.

- C 10.4. In addition to phone and email contact, the Qualifying Body held six meetings with the Senior Planning Manager at St. Modwen Developments Ltd. between February 2013 and February 2018 whilst preparing the Neighbourhood Plan to gather evidence on the most appropriate mix for the Station Works site. The view of the former landowner was that an allocation of one third of the site to commercial uses would be viable.
- C 10.5. In his report, the Case Officer suggested a second reason to support the view that only the development proposal put forward by the appellant might be realistic stating “*additionally, it appears that a more policy compliant scheme containing industrial units would also not be viable enough to provide the full quota of affordable housing required by policy CP43*”⁴⁷.
- C 10.6. The Parish Council would question this statement for the following reasons:
- the affordable housing contribution proposed of 12%⁴⁸ would still be substantially below the level of 30% set by Core Policy 43;
 - there is ample evidence that affordable housing levels significantly in excess of 30% are being achieved on other sites in Tisbury, as set out elsewhere in this Statement of Case;
 - as set out above, little evidence has been offered to support the view that the site is unviable for any form of commercial use;
 - no account is taken of the viability or deliverability of the proposal for a residential care home, as set out above; and
 - ending all commercial activity at the site would conflict with the Wiltshire Council’s long-established position and the position of the Case Officer’s predecessors, who stated “*this large site and the loss of available land for employment/industrial use are of significant importance.*”⁴⁹ and
 - for reasons set out elsewhere, the effect of the appellant’s proposal would be substantially more than a failure to comply, but rather to undermine the Neighbourhood Plan’s vision for the proposal site and transform it into something which the community did not intend.

11. Impacts of the proposed site allocation

- C 11.1. This section deals with the impacts which would result from altering the use of the Station Works site from the “*comprehensive redevelopment to include an appropriate balance of housing, commercial units and parking*” set by the Neighbourhood Plan⁵⁰, substituting for commercial units and parking “*a care home of up to 40 bedspaces with associated medical facilities*”⁵¹ as promoted by the appellant.

⁴⁷ Case Officer’s Report to the Southern Area Planning Committee, 10th November 2022, page 23 (C3)

⁴⁸ Appellant Statement of Case, paragraph 5.31

⁴⁹ Officer Reports S2002/1367 Recommendation 1 (B10) and S2003/2547 Recommendation 1 (C11)

⁵⁰ Neighbourhood Plan, policy BL.7 (Appendix E)

⁵¹ Appellant Statement of Case, paragraph 1.2

Health and Social Infrastructure

- C 11.2. In the Parish Council's view, the fact that the current proposal has been brought forward without the involvement of the Integrated Care Board and the local GP Surgery means that the care home element, if implemented has the potential to cause significant harms to the local social and health infrastructure.
- C 11.3. Both the Integrated Care Board and the senior clinician at Tisbury surgery have indicated that to be implemented safely the proposal would require significant structural changes to the way in which healthcare is delivered in Tisbury and the surrounding rural areas, which would require the joint agreement of the Integrated Care Board (the "ICB") and Wiltshire Council. They have not indicated that such agreement would be forthcoming.
- C 11.4. The views of the Integrated Care Board are set out:
- in its communication following the first meeting with the appellant's advisors held on 14th June, 2021⁵²; and
 - in its representation to the planning consultation made on 12th November, 2021.
- C 11.5. The views of the senior practitioner at Tisbury GP Surgery, Dr. Adam Smith, are set out:
- in Dr. Smith's remarks to the public meeting held on 16th November, 2021;
 - in his representation to the planning consultation made on 17th November, 2021; and
 - in his letter to Tisbury Parish Council sent on 18th November, 2022
- C 11.6. For ease of reference, these statements are reproduced at Appendix E and Appendix F and their key conclusions are summarised below:-
- **first**, the existing Tisbury GP surgery has limited spare **capacity**, having experienced growing demand on its services. In recent years the ICB has noted increasing pressure from developments in and around Tisbury and the surgery's patient roll has doubled since 2002 to 4,200. It is "weighted" at *in excess of 5000* by NHS England reflecting an older population with above average healthcare needs. The surgery currently serves both Tisbury's existing residential care home (19 beds) and a nursing home (15 beds);

as a result the surgery is almost at capacity in terms of both premises and staff. Local recruitment problems have caused the surgery's GP workforce to shrink, one third of surgery staff are over 55 years old, and the existing premises are at capacity with no room for further expansion;
 - **second**, the proposed 40-bed residential care home would generate an additional 1,000 GP appointments annually and combined with the 86 dwellings would increase the practice's list by approximately 237. The ICB consider this to be a significant uplift, particularly as the demands on GP services made by care homes are significantly more intensive than those arising from normal housing growth;
 - **third**, to accommodate the additional demand would require significant changes to the model under which care is delivered in the Tisbury area, including:
 - the service model;
 - the staffing model;
 - the premises model;

⁵² As set out in the Statement of Community Involvement, paragraph 4.13 (S10)



- the financial model, including both capital and revenue spend; and
 - impact on impacts on Children’s Services, Mental Health Services, Community Services, and Acute Services in the area;
- **fourth**, no capacity modelling has been done to understand what changes will be required, or whether they can be supported. The current delivery model is determined by national policy and strategic priorities set by both the NHS and local partners, including Wiltshire Council; and
- **finally**, it would take approximately 12 months to complete the capacity modelling and form a view as to whether and how a new service model could be introduced. This will almost certainly involve the co-operation of Wiltshire Council to assist with premises relocation for the surgery.
- C 11.7. The conclusion of Dr. Smith was that none of these matters had been taken into account in the current application and consequently:
- “This proposal would not only impact severely on the practice’s ability to provide good care to the new residents and those in the care home, but also our capacity to look after those patients currently registered with us – and this at a time of every increasing demand from those concerned for their health following the pandemic as well as many vulnerable patients with chronic medical conditions.”⁵³*
- C 11.8. This conclusion was repeated in Dr. Smith’s letter to the Parish Council on 26th November 2022 and echoed his remarks to the public meeting held on 16th November, 2021: *“So to summarise it would have a profound effect on our ability to deliver care, overnight. challenges which would normally take five or ten years to be able to plan for and slowly build upon, and I don’t think any provision has really been made for the local health needs of the population whatsoever.”*
- C 11.9. The Parish Council agrees with the ICB and local practitioners that any proposal for a second residential care home in Tisbury will upset the local current service model for healthcare services, including but not limited to GP services, particularly in view of the fact that Tisbury already possesses one residential care home, with another nursing home close by.
- C 11.10. Whilst the limitations of the local health infrastructure should not create a barrier to development, the Council considers that they do require an integrated and strategic plan, involving the ICB and other local healthcare providers to ensure that development in the form contemplated is feasible and that the demands it creates can be met in a way which does not compromise existing services.
- C 11.11. The Parish Council considers that there is insufficient evidence at the current time to show that such a plan exists, or even that it could be produced and it agrees with the views of the senior clinician that to proceed without such a plan would impact severely on the care offered to Tisbury’s community.
- C 11.12. In the Parish Council’s view, this defect cannot be addressed by condition, because the outcome of the planning process may significantly affect the principle of developing a care home and its size, for which approval is now sought.

Suitability of the site

- C 11.13. The principal practitioner at Tisbury surgery, Dr. Smith has also questioned the suitability of the Station Works site for a care home in view of its isolation from Tisbury Village and his

⁵³ Dr. Adam Smith, representation to Wiltshire Council in connection with the planning consultation, 17th November, 2021 (C10)

comments have been echoed in a number of public representations⁵⁴. In Dr. Smith's view *"I consider the proposed access to the site particularly unsuitable. Recent floods in Tisbury have highlighted how vulnerable this area is to flooding by the River Nadder and the navigation of this particular area by means of traffic lights for vehicles with the other side under the bridge being used for pedestrian access seems ill thought out and dangerous. I am concerned about the speed of access for emergency vehicles, such as ambulances and fire engines. The site seems inappropriate for a 40 bed care home. There is inadequate parking provision and I feel isolation for patients/residents would be a real issue."*

C 11.14. The Parish Council considers that there is a significant body of evidence which confirms Dr. Smith's view that the Station Works site is an inappropriate location for a residential care home because of its isolation from Tisbury village and the difficulty of the access route. Evidence supporting the importance of easy access and integration with the community in care home location includes:

- the Care Services Improvement Partnership concluded that specialist housing for older people should be no further than 400 metres walking distance from a general store, a newsagents, post office, library, pharmacy, doctor's surgery and places of worship and that the locations most favoured by older people are those which are well-located, in busy areas with good access;⁵⁵
- the House of Commons Select Committee for Communities and Local Government reporting in 2018⁵⁶ heard evidence from the Chartered Institute for Housing that specialist homes for older people should be located at *"small infill or brownfield sites well located within existing settlements and well connected to transport and with local facilities"* and from Professor Carol Holland of the Centre for Ageing Research at Lancaster University that the three housing-related factors impacting on the health of older people are *"cold, the risk of falls and the location of the home"*;
- Planning Practice Guidance states that "developments should address the needs of people with disabilities and reduced mobility in relation to all modes of transport. Issues to consider include:
 - ease and comfort of movement on foot and with mobility aids between homes, services and town centres;
 - proximity and links to public transport and local amenities;
 - the accessibility of public spaces including step free spaces and seating;
 - integration with the surrounding context;
 - social spaces that link with the community; and
 - space standards that facilitate flexibility.⁵⁷

C 11.15. Kent County Council is one of a number of local authorities to have developed standards to guide the design and location of care homes. Principle Number 4 in its Care Home Accommodation Strategy states: *"Care homes should be seen as a part of the community and as a 'hub' of activity, rather than a 'bubble' operating in isolation from the surrounding*

⁵⁴ Appendix D - Report on Community Representations, section 5.1

⁵⁵ [More Choice, Greater Voice](#), Nigel Appleton, 2008, published by the Care Services Improvement Partnership (A9)

⁵⁶ House of Commons Select Committee, Communities and Local Government Committee, Housing for older people, 2018 paragraphs 13 and 117 (C12)

⁵⁷ Planning Practice Guidance – Housing for Older and Disabled People – paragraph 018 Reference ID: 63-018-20190626

population. This will include promoting resident interaction with the community and using the potential of families and friends to engage in the life of the care home.⁵⁸

C 11.16. In the words of Professor Holland to the Select Committee:

“If you are in a home that is completely inaccessible to your friends or relatives, or there is no bus service, and your environment outside the home is not age friendly, you are going to be isolated. You are going to struggle to get a healthy diet because you cannot get to the shops properly. You are not going to be physically active, because it is too difficult to get out and about in your environment. Maybe there is no bench between you and the shop, when you could walk as long as there was a bench or toilet there.⁵⁹”

C 11.17. This Parish Council notes that this view is also reflected in the representation made by Intelligent Land to the Regulation 14 consultation on the Neighbourhood Plan, which said:

“It is contended that due to the isolation and separate location of Station Works and its poor proximity to Tisbury’s facilities and services, that this site is not appropriate for elderly care.

Normally these types of facilities are located near to the town centre to optimise easy access for people to socialise, shop and participate in recreational activities. Accessing the town via a road without footpaths would be unsafe or via a footbridge over the rail track would not be physically easy, particularly if residents had limited mobility due to their age or care needs.

When considering what it would be like to be a resident living on this site, the proposed redevelopment must be questioned. Tisbury residents will be living on an isolated small industrial/business park site within 50-60 metres of a busy, noisy mainline railway with poor pedestrian links, little if any gardens/amenity space and no sense of community. Is this really a vision for village living in the 21st century⁶⁰?”

C 11.18. The current application from Intelligent Land offers no evidence as to new strategies or technologies which could mitigate the problems which it raised in 2017, and which could therefore render the current proposal acceptable in planning terms.

C 11.19. The Parish Council considers that the isolation of the care home’s location to be a very important matter. The Council agrees with Dr. Smith and with Intelligent Land that this isolation results both from the lack of amenity afforded by the site’s design (which in turn results from the principle of development as set out in Appendix B) and from the proposed access scheme (whose defects are set out in Appendix A).

C 11.20. As a result of these factors, as pointed out both by Dr. Smith and a number of public representations, the Parish Council considers that the location of a three-storey residential care home on the Station Works site, in conjunction with the other elements which form part of the appellant’s proposal, would have a significant impact on the residents of the care home by depriving them of the opportunity to integrate with and feel part of the main community of Tisbury, with consequent harm to their physical and mental well-being.

C 11.21. In the Parish Council’s view these harms cannot be mitigated by condition as they relate to the principle of development which is the subject of the current application.

⁵⁸ Kent County Council, [“Older People’s Care Home Design Principles”](#), 2015 (C13)

⁵⁹ House of Commons Select Committee, Communities and Local Government Committee, Housing for older people, 2018 paragraph 19

⁶⁰ Representation to the Qualifying Body from Jane Piper, Director of Planning, Intelligent Land, dated 8th September, 2017

Out-commuting

- C 11.22. Based on the scale and quality of employment offered by the proposed care home the Parish Council considers that there is persuasive evidence that development would significantly increase levels of commuting to and from Tisbury for the following reasons:
- the low salaries, narrow skills base, reliance on part-time roles and vertical profile of the care home employment offer would mean that a relatively small number of roles will be filled by the local community, leading to in-commuting;
 - the evidence provided in Aecom's Housing Needs Assessment set out in Appendix B indicates that many few members of the care home work force could afford to both live and work in Tisbury;
 - the failure to bring forward a balance of commercial and housing development would mean the majority of new residents of the development would need to commute elsewhere to work; and
 - the closure of existing businesses on the site, combined with the lack of compensating employment, would mean that most of the 29 current FTE who live in Tisbury would need to commute out of the area.
- C 11.23. The Council notes that since at least 2002, Wiltshire Council has established a clear link between levels of employment opportunity in Tisbury and levels of out-commuting:
- in 2002, Wiltshire Council's Economic Development Officer reported "*The rate of housing development in Tisbury has not been matched in recent years by employment opportunities. Tisbury also falls within the South West Wiltshire Rural Development Area because of the narrow employment base and low incomes. Therefore any further reduction in employment land and opportunities would reduce Tisbury's sustainability by increasing the need for commuting to places of work.*"⁶¹
 - in 2019, the Tisbury Parish Housing Needs Survey found that 56% of 248 residents surveyed travelled more than ten miles to their place of work,⁶² stating "*distance travelled to work can also be a good measure of the sustainability of local housing development, as more people working locally can indicate an ongoing need for local housing. These results suggest a mixed level of sustainability for new housing development in Tisbury, indicated by the survey respondents' access to local sources of employment.*"
- C 11.24. This conclusion is confirmed by the 2011 census data for Tisbury, which shows that Tisbury residents travel significantly longer to work than in Wiltshire as a whole.⁶³ Appendix H presents a chart showing the average distance travelled to work in the Neighbourhood Plan area compared with Wiltshire.
- C 11.25. The census data shows the average distance travelled to work in the Plan area was 25 km compared with an average of 18.9 km for Wiltshire as a whole and 13.8 km in Trowbridge.
- C 11.26. Appendix G gives a projection of the commuting distance which would be driven by residents of the proposed development, based on the percentage of Tisbury's population in 2011 who drove a van or car to work, the percentage of the population who worked and the average commuting distance.

⁶¹ Officer Report, Planning Application PL/2002/1367 (B10)

⁶² Tisbury Parish Housing Needs Survey February 2019, Table 1 (C14)

⁶³ Source: ONS Census Data 2011, Table QS702EW

- C 11.27. This projection shows the effect of locating 86 dwellings, of the types proposed by the appellant, at the Station Works site without balancing housing with provision of attractive local employment. The commuting distance travelled by residents of Station Works is then compared with that travelled by residents of a more sustainable development located at Trowbridge.
- C 11.28. Euro 6 target emission standards for vehicles are then used to calculate the emissions which would be generated by this additional vehicle use.
- C 11.29. The calculation shows that each year, the additional “location cost” resulting from placing development at Tisbury compared with Trowbridge would result in:
- **388,191** additional vehicle miles in out-commuting;
 - **50** tonnes of additional CO2 emissions;
 - **23** kg of additional NO2 emissions;
 - **1.9** kg of additional particulate emissions.
- C 11.30. The Parish Council considers that the scale of this difference is a material consideration and that as a result redevelopment of the Station Works site for residential use only, as proposed by the appellant, would result in a clear conflict with both Wiltshire Core Strategy and National Planning Policy as set out above.
- C 11.31. The Parish Council cannot see a way in which these harms can be mitigated by condition in a way which would make the proposed development acceptable in planning terms.

Loss of Strategic Economic Potential

- C 11.32. The Parish Council considers that the Neighbourhood Plan, when read as a whole, is clear that the Station Works site is considered a strategic site, with an important role to play in sustaining Tisbury’s future commercial and economic development, as reflected in Section 4 above.
- C 11.33. In the Parish Council’s view the Neighbourhood Plan sets out a coherent and rational group of policies to guide the site towards uses which would maintain its and Tisbury’s economic potential, recognising:
- that whilst the form of commercial activity is always changing, the Station Works site is nevertheless Tisbury’s only remaining large site capable of supporting light industrial and commercial uses; and
 - that the site’s location alongside the railway gives significant potential in terms of economic and environmental sustainability, and that this advantage will become greater with enhancement of the railway at Tisbury to dual track operation.
- C 11.34. The Council considers that the objectives of the Wiltshire Core Strategy and Neighbourhood Plan to retain the site, at least in part, for broad-based business use are therefore closely aligned with the objectives of sustainable development set out in National Planning Policy.
- C 11.35. The Parish Council notes that this perspective has been held consistently by Wiltshire Council for some 20 years and that both Officer Reports submitted in respect of previous planning applications stated *“This large site and the loss of available land for employment/industrial use are of significant importance.”*⁶⁴

⁶⁴ Officer Reports S2002/1367 Recommendation 1 and S2003/2547 Recommendation 1 (C11)

- C 11.36. Whilst commercial uses change and require continual re-investment in premises, skills and technology, the Parish Council's view is that no evidence has emerged which would invalidate the fundamental judgement of Wiltshire Council's officers.
- C 11.37. The Council notes the greater contribution that commercial uses would make in driving economic growth compared with the residential use offered by the proposed care home in terms of:
- greater spread of risk between multiple business organisations, meaning that failure of one business would not lead to collapse of all employment at the site;
 - greater versatility, meaning that a commercial or office space released by a business operating in one field would be suitable for re-use by a range of businesses operating in a variety of sectors; and
 - greater economic turnover, resulting in a more useful indirect benefit to the wider economy, in terms of subcontractors, suppliers and logistics.
- C 11.38. The Council considers that the Station Works site, as the largest commercial employment site remaining in Tisbury has a role in providing room for growth, through phased development, as set out in Neighbourhood Plan policy BL.7, so that it is capable of sustaining Tisbury's modest growth as a local service centre for a significant period of time.
- C 11.39. In the Parish Council's view, no evidence has been offered to support the view that substitution of a single care home for the more varied commercial use contemplated by the Neighbourhood Plan would achieve this objective.
- C 11.40. On the basis of the evidence presented in this paper, the Parish Council considers that changing the proposal site's use to that promoted by the appellant would permanently sacrifice the site's strategic economic potential and in particular:
- it would involve dependency on a single business model, with the failure of that model leading to the collapse of all employment at the site;
 - it would replace a diverse employment offer with a much narrower offer, tied to a single sector, a narrower skills base, and with a high dependency on low paid, part-time roles;
 - it would offer no room for growth, to accommodate future expansion in Tisbury's business and commercial activity, and therefore hinder its economic sustainability;
 - it would deliver a building, in the form of the proposed care home, significantly less versatile than other alternatives should the care home business model fail; and
 - there is no evidence that the proposed use would deliver equivalent indirect economic benefit compared with commercial uses.

Impact of business failure

- C 11.41. In the event of a failure of the care home business model, the Parish Council understands that both the design of the proposed care home building and the incentive given by the planning system itself, would mean that few alternative uses would be viable other than conversion to dwellings, because:
- the proposed care home building, because of its built form and design, could not be used to provide modern office or commercial space; and
 - the planning system would create an incentive towards conversion of the care home building into dwellings.

- C 11.42. The planning incentive arises because where planning consent for development involving two uses (for example residential dwellings and residential care home) has been granted, the General Permitted Development (England) Order 2015⁶⁵ grants permission for *“Development consisting of a change of use of a building or other land from a use permitted by planning permission granted on an application, to another use which that permission would have specifically authorised when it was granted.”*
- C 11.43. The Parish Council considers:
- that this permitted right means that the developer need accept no risk in the event that the care home proposition is not deliverable and that instead, the building currently identified as a care home would simply be deployed to offer apartment dwellings without requiring any further planning consent;
 - that this risk is very high given the lack of evidence of need, deliverability and viability for the care home proposal referred to elsewhere in this document;
 - that in this case a site with significant employment potential would be entirely and permanently lost to both commercial and employment use, despite the policies of the Neighbourhood Plan and the Wiltshire Core Strategy to ensure that housing is matched by employment and commercial activity;
 - the impact would be to undermine the strategic policies of the Wiltshire Core Strategy and the policies of the Neighbourhood Plan to ensure that housing development in Tisbury is matched with employment.
- C 11.44. The Parish Council considers this to be a material consideration because the loss of the business and commercial potential of the Station Works site could not be recovered and its effect will be to impose a severe constraint on Tisbury’s future growth and economic sustainability.
- C 11.45. Frustrating economic growth in this way would, in the Parish Council’s view, also frustrate the principles of sustainable development set out in National Planning Policy and make it less rather than more likely that the village could support significant housing development in the future.

12. Conclusions and Next Steps

Reasons for rejection of the proposed scheme

- C 12.1. Taking everything into account it is the Parish Council’s conclusion that the evidence submitted to support the appellant’s alternative scheme for the Station Works site is patchy and inconclusive, with the available evidence pointing to the contrary proposition; in particular:
- that there is very limited, if any, evidence of local need for a second residential care home in Tisbury, and that to the contrary;
 - the care home proposal would have limited, if any, employment benefit, substituting 29 existing FTE roles spread across a range of skills and industries, with 31 FTE roles in the social care sector of which:
 - 22 would be direct care or ancillary roles at or about the national living wage;
 - 18 would be part-time;

⁶⁵ General Permitted Development) (England) Order 2015, Schedule 2, Part 3, Class V



- the proposal for a care home, some 400 metres walking distance from an existing residential care home in a rural location, would not satisfy any demonstrable local need and in practice would result in older people being forced to move further away from their homes and relatives to move to Tisbury;
- the proposal for “medical facilities” does not show how it could be used in practice given the statement from the GP practice that a satellite medical facility would be impractical to administer.

C 12.2. At the same time the Parish Council concludes that there is compelling evidence pointing to the significant harms caused by such a proposal; in particular:

- the setup of a residential care home as an independent project, rather than through planned intervention progressed jointly with (and with the agreement of) the Integrated Care Board, Wiltshire Council and other local care providers, would result in significant risk of harm to local social and health infrastructures and on the service provided by the local GP surgery;
- a location at the edge of a residential estate, some distance from Tisbury village centre and with poor pedestrian access to Tisbury village and its facilities, is not an appropriate location for a residential care home and would result in a harmful sense of isolation for its residents, discouraging their active participation in and integration within the community;
- the development of 86 homes without any additional sources of local employment, other than the proposed care home, would lead to significant additional out-commuting by motor vehicle (from residents of the development) and in-commuting by vehicle (from workers at the proposed care home), frustrating the objective of sustainable development set out in national planning policy and leading to an unacceptable impact on the local road network and on local air quality within an Area of Outstanding Natural Beauty;
- development would result in the permanent loss of Tisbury’s only large site with room for growth, capable of supporting future commercial and light industrial expansion, thereby frustrating the strategy set out in the Neighbourhood Plan to secure the Tisbury’s future economic growth and its ability to service the needs of surrounding villages;
- the creation of a residential care facility would frustrate a key objective of national and local policy to promote housing which offers older people the opportunity to retain their independence for longer, and Wiltshire’s strategic policy to focus care establishments on larger settlements with better access;
- the substitution of a residential care facility for commercial with residential uses would significantly reduce the indirect benefits to the local economy in terms of sub-contractors, materials and logistics, which derive from commercial activity, without offering any compensating economic gain; and
- the substitution of a single care home for a variety of commercial and light industrial uses, combined with the lack of versatility of the proposed care home building and the ease with which it could be converted into dwellings through permitted development rights, would represent an undue concentration of risk on a single business type, with a resulting risk to the vitality and viability of Tisbury as a local service centre.

C 12.3. Underlying all these matters are concerns about the deliverability of the appellant’s proposal and the viability of its proposed care home scheme. The Parish Council concludes that the applicant’s proposal offers little or no evidence of the presence of an established care home operator willing to take over management of the facility on

completion, who can provide an authoritative view as to the viability of the scheme and its employment offer.

- C 12.4. The Parish Council considers that the presence of a 19-bed residential care home no more than 400 metres from the proposal site, in a rural location, given the relatively sparse pattern of residential care homes across South Wiltshire would weigh heavily as a consideration for any potential operator.

This concern is reinforced by the evidence of Intelligent Land from its own engagement with leading specialist providers of housing for older people referred to above, who have indicated that the proposed site is unsuitable.⁶⁶

- C 12.5. The Parish Council has concluded the matter of deliverability is a significant material consideration because:

- the care home proposal has been promoted as a material benefit arising from development; and
- failure of the proposal would result in the permanent loss of all employment at the proposal site.

- C 12.6. As to the absence of alternative proposals, the Parish Council has concluded:

- that no evidence has been presented to indicate that the appellant has made a genuine attempt to investigate alternatives, to seek ways in which the existing commercial uses of the site can be developed, to consult with the Qualifying Body or other stakeholders about alternative uses, or to do anything other than promote the proposal which is the subject of the current appeal;
- that even if new evidence were to come forward, allocation of the Station Works site for development is dependent on the Neighbourhood Plan allocation, which has promoted it, and a significant change in the allocation policy is therefore rightly a planning policy matter for the Qualifying Body, which will need to ensure it is based on robust evidence and has community support;
- that the proposition that other alternative uses could not meet the affordable housing requirement of 30% set out in Core Policy 43, as suggested by the Case Officer, is of limited weight in the light of:
 - the fact that the proposed affordable housing level of 12% offered by the appellant's proposal is itself substantially below the 30% level;
 - the limited benefits and significant harms associated with the proposed scheme;
 - the absence of evidence on alternatives and the view of the former landowner that a one-third allocation to commercial use was viable;
 - the evidence that much higher levels of affordable housing, exceeding those promoted by Core Policy 43 can be delivered at alternative sites in Tisbury;
 - the view that whilst policies on affordable housing may be varied by decision at application-level, based on a variety of factors, allocation of the Station Works site for commercial use is a spatial planning matter, which can only be resolved through the plan-making process.

⁶⁶ Representation to the Qualifying Body from, Director of Planning, Intelligent Land, dated 8th September, 2017 (S13)

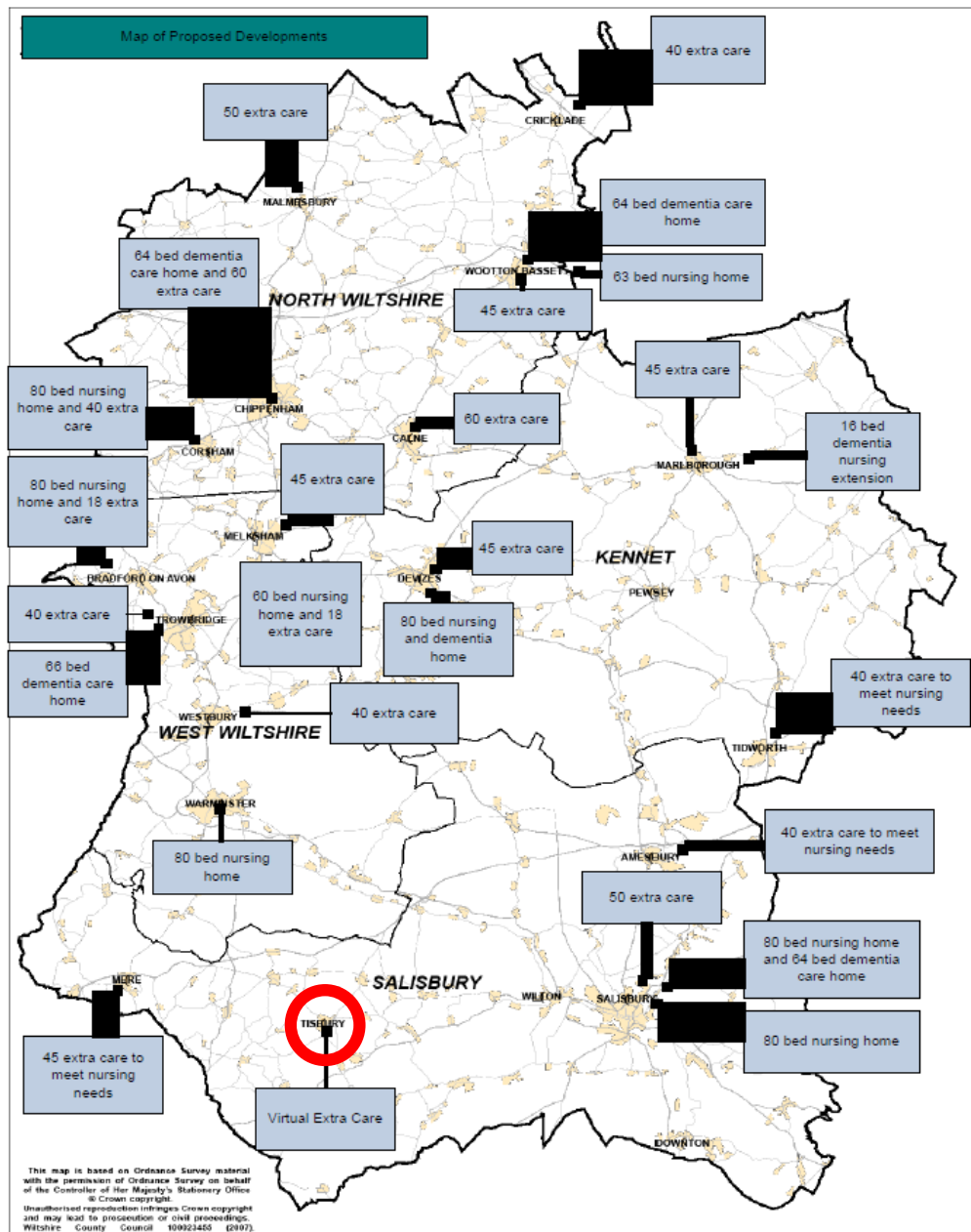
The Parish Council's proposal

- C 12.7. As with the matters of access and built form, the Parish Council acknowledges that the proposal site has challenges. The Qualifying Body recognised these challenges when seeking to promote the Station Works site for allocation and the first objective of the Neighbourhood Plan is to overcome them.
- C 12.8. In this process, the Qualifying Body benefited from the positive engagement of the former landowner between 2013 and 2018.
- C 12.9. Whilst the Parish Council considers the alternative proposal of a care home put forward by the appellant is most definitely not the answer, that does not mean that every alternative option is unworkable and the community, through the Neighbourhood Plan and the Qualifying Body, have a joint responsibility, with the appellant, to see that the site is brought forward in a way which is sustainable and meets the community's aspirations.
- C 12.10. The Parish Council considers that the Neighbourhood Plan continues to be an important tool in promoting this objective, and is committed to keeping the Plan up-to-date and responsive to new evidence as it becomes available.
- C 12.11. It looks forward to working with the appellant, as it did with the previous landowner, to achieve a secure future for the site.

Appendix A – Wiltshire Care Home Strategy

The map below is reproduced from the Wiltshire Older People Accommodation Development Strategy, which informs Wiltshire Core Policy 46.

Tisbury is assigned “virtual care” or “Community Extra Care”, but not more residential care in line with Wiltshire Council’s policy to concentrate residential care home settings in better connected locations within Principal Settlements and Market Towns. The Strategy included a plan to remodel the existing sheltered housing scheme at Nadder Close in Tisbury into a community extra care scheme during 2011 as part of its aim to convert an additional 29 homes in Tisbury to ‘extra care’ accommodation by 2026.



Appendix B – Local Care Home Need in 2040

Local Care Home Need - 2040 Projection

| | MEASURE | | SOURCE |
|---|--|--------|---|
| 1. Mean number residents from Tisbury local area - 2020 | | | |
| A | Mean number of Care Home Residents in residence at any one time who were funded by Wiltshire Council and who had been resident in the Tisbury local area before going into care - 2020 | 7 | Wiltshire Adult Social Services calculation based on data from Wiltshire Council's Social Care system (Liquid Logic) analysed using the start and end dates of each individual's package of care. |
| B | % of Local Authority Funded Residential Care Home Residents in SW England 2021-2022 of the Total Number of Residential Care Home Residents | 59.50% | ONS - Care homes and estimating the self-funding population, England: 2021 to 2022 |
| C | Mean number of Care Home Residents in residence at any one time who had been resident in the Tisbury local area before going into care - 2020 | 12 | Calculated A / B x 100 |
| 2. Increase in population of care homes 2020-2040 | | | |
| D | % increase in populaton of care homes in South West England 2020 to 2040 | 64.40% | Projecting Older People Population Information system developed by the Institute of Public Care. Calculated from (ONS) 2011 Census, DC4210EWL, adjusted by applying percentages of people living in care homes/nursing homes in 2011 to project population figures. |
| 3. Mean number of residents from Tisbury local area - 2020 | | | |
| E | Mean number of Care Home Residents in residence at any one time who were funded by Wiltshire Council and who had been resident in the Tisbury local area before going into care - 2040 | 19 | Calculated C+(C x D) |

Appendix C – Existing Employment

The table below shows current employment at the six businesses currently operating from the Station Works site, based on an on-site assessment conducted for the Parish Council on 22nd November,



2022. In each case, business representatives were asked about both their current workforce and their assessment of future potential.

Station Works – main

| Employer Name | Business Description | FT | Part time FTE | Interviewed | Future potential |
|---|--|-----------|--|-----------------------------------|--|
| Wessex Building Products www.wessexbps.co.uk/ | Manufacturer of building products | 18 | | John Conlin (owner) | Employs up to 40-50 FTE depending on orders. Currently subcontracting out due to uncertainty of tenure at Station Works. Currently operates under Licence at Station Works |
| Rural Storage Ltd www.storagesalisbury.co.uk/ | Storage | 2 | 3.2 FTE (4 PT working on average 80% per week) | Morley Green (owner and director) | Currently operating under Licence at Station Works. |
| Morley Green Transport https://morleygreen.com/ | Removals and transport | 2 | 1.5 FTE (3 PT subcontractor drivers) | Morley Green (owner) | Currently operating under Licence at Station Works. |
| AeroElvira Ltd www.aeroelvira.co.uk/ | Builders of Optica and Sprint aircraft | 3 | | | Currently operating under Licence at Station Works |
| Totals FTEs | | 25 | 4.7 | | |

Land occupied by the Cookery School (held under separate ownership)

| Business | Description |
|---|--------------------------|
| Tisbury Cookery Studio https://www.tisburycookerystudio.co.uk/ | Cookery school |
| Compton McRae https://www.comptonmrae.com/ | Delicatessen pantry |
| Mackaness Loyd https://www.mrsmacks.uk/ | Makers of salad dressing |

Appendix D – Local Care Home Capacity

The table below shows care home capacity within a 10 mile radius of Tisbury, based on published Care Quality Commission data interrogated on 11th December 2022. Vacancies are shown as at the date of the most recent CQC inspection. The overall vacancy rate is 27%.

| Name | Town/City | County | Postcode | Distance from Tisbury | Beds | Vacant |
|---------------------------------|-------------|-----------|----------|-----------------------|------------|------------|
| Albany House | Tisbury | Wiltshire | SP3 6JP | 200 metres | 19 | 4 |
| Hays House Nursing Home | Shaftesbury | Dorset | SP7 9JR | 4.3 miles | 43 | 5 |
| St Denis Lodge Residential Home | Shaftesbury | Dorset | SP7 8BS | 6.1miles | 21 | 0 |
| The Cedars Nursing Home | Shaftesbury | Dorset | SP7 8DF | 6.2 miles | 31 | 5 |
| Fern Brook Lodge | Gillingham | | SP8 4QD | 7.9 miles | 75 | 43 |
| The Malthouse Care Home | Gillingham | Dorset | SP8 4EW | 8.2 miles | 34 | 4 |
| Sutton Veny House | Warminster | Wiltshire | BA12 7BJ | 8.6 miles | 28 | 3 |
| Sursum Limited Bramley House | Mere | Wiltshire | BA12 6JN | 8.6 miles | 42 | 10 |
| Longbridge Deverill House | Warminster | Wiltshire | BA12 7DJ | 8.6 miles | 80 | 25 |
| Mulberry Court | Gillingham | Dorset | SP8 4RE | 9.1 miles | 12 | 1 |
| The Mellows Care Home | Gillingham | Dorset | SP8 4RE | 9.1 miles | 45 | 15 |
| | | | | TOTAL | 430 | 115 |

Appendix E – Integrated Care Board

First Representation – June 2021

The communication below was sent by the Clinical Commissioning Group (now Integrated Care Board) following its first meeting with the appellant's representatives to discuss the current proposal. It is reproduced in full.⁶⁷

Concerns and impact on surgery

- 1. The GP practice highlighted that a 70 bedded nursing home would put significant pressure on an already small over capacity practice which currently serves a 19 bedded residential home and jointly looks after nursing home with a nearby surgery caring for around 15 patients.*
- 2. Tisbury surgery are the only GP practice within the immediate vicinity, therefore; the support and Primary Care provision to service this growth would be meet by this practice*
- 3. The practice felt as at their current service model and premises they didn't feel it could support the growth if the model is unchanged, therefore; a modelling would need to be developed to determine what the model would need to look like*
- 4. Clinical staffing was raised as a concern, current the shortage of GPs and clinicians across the system are in short supply, added to this is attracting the staff to join the geographical location*
- 5. It was felt that together with the staffing and service model, a premises solution would be needed to enable this to be achieved. The premises currently is land locked and too small to be extended*
- 6. Other healthcare services such as the Acute hospital, community services etc. will need to be consulted on to determine the impact to their services and how this will be managed*
- 7. There are 2 financial elements to healthcare provision with population growth (i) capital and (ii) revenue, both these have an impact on the the GP practice and their ability to be able to deliver the Primary Care Service*
- 8. The enhanced health care service needed to be delivered to nursing homes tends to be more labour intensive due to the complexity of care and patient needs, therefore; the capacity to meet this demand is considerable more than that of regular housing growth although as mentioned by Victoria during the meeting, younger families who may live in these houses will bring their own challenges, (such as mental health issues etc).*

Next steps:

- 1. ICB and GP to undertake a high level service and capacity modelling to accommodate the primary care provision to serve the increased population from the 86 unit homes and the circa 70 bedded residential nursing home*
- 2. ICB to contact Richard Hughes at Wilts Council regarding this consultation and understand how we formally respond*

⁶⁷ Statement of Community Involvement, paragraph 4.13 (S10)



3. ICB and GP to undertake a high level service and capacity modelling to accommodate the primary care provision to serve the increased population from the 86 unit homes and the circa 70 bedded residential home, will take circa 12 months

4. Rosie to establish if the premises are still available next the fire station and what the plans are Rosie emailed about this yesterday.

5. ICB/GP to establish from Wilts council other premises available
In summary, the GPs are happy to be collaborative with this project and are aware of the necessity to develop health and social care provision.

However, this has to be tempered with currently available facilities (be they Practice accommodation and/or staff) and on the basis of our experience, we would contend that such a home would be largely occupied by those who do not live in this area and would thus be of limited benefit to the local population.

Kind regards,

Teresa.

Teresa Wallace

Senior Estates Manager BSW

NHS Bath and North East Somerset, Swindon and Wiltshire Clinical Commissioning Group

Second Representation – November, 2021

The communication below was sent by the Integrated Care Board to Wiltshire Council and published by the Council on 12th November, 2021:

The response is on behalf of the commissioners and to support Tisbury Surgery, which will set out the demands on healthcare infrastructure and why the 86 dwellings and 40 bedded care homes for this development scheme will impact on demand for services. NHS BSW (BaNES, Swindon and Wiltshire Clinical Commissioning Group (ICB) currently commissions Primary Care Services across BaNES, Wiltshire, Swindon and Shrivenham.

Swindon locality also commissions a full range of the health care services for this population which includes hospital, community and other health support services.

NHS BSW ICB have found more recently further increasing pressure from developments that are situated in and around Tisbury which share surgeries and patients across geographical patches, counties and healthcare boundaries.

This is putting further pressure on all healthcare premises, service capacity including the planning and sourcing of GP resources and provision within their own regions. The size, location and configuration of delivery additional health infrastructure is determined by taking into account various

Department of Health policies, NHS, Public Health England and LMC guidelines which includes the NHS 10-year plan on prevention, national strategic agendas, various guidance regulations relating to the provision of Primary Care facilities including local strategic priorities.

The delivery of the additional service will be subject to the inclusion and availability of funding and developer contributions and looking for an innovative solution in conjunction with the Wiltshire Council. The impact of non-recurrent (capital) and recurrent (service provision) infrastructure costs as a direct result of new housing development are very significant and is recognised in the emerging health infrastructure strategies, delivery plans and support for developer contributions.

1. Primary Care and Health Care Service

1.1 Tisbury Surgery forms part of the Sarum West Primary Care Network (PCN) a network of GPs that work closer together and often have a shared vision for delivering patient care

1.2 Tisbury Surgery in Tisbury is the GP practice that has this proposed housing and care home growth within their contractual boundary, therefore; the population growth of 198 plus the 40 from the care home (based on 2.3 patients per dwelling) would automatically expect this practice to provide their Primary Care (GP) service needs

1.3 This practice has seen a significant growth in patient list size over the last 5 years due to constant housing growth and as a result are currently at a short fall of internal floor area for the size of its current patient list. Therefore, these practices do not have sufficient capacity within the practice premises to increase to meet the demand of this anticipated growth and further growth required for Primary Care

1.4 The practice and their PCN currently have a premises capacity gap which equates to circa 744m² which could accommodate circa 8,000-patient list size

1.5 In addition to the above, increased access to other services provision including Children's Services, Mental Health Services, Community Services, and Acute Services including patient bed capacity will need to be factored in, many of these services are at capacity due to insufficient workforce and/or insufficient premises capacity to host the workforce

1.6 There is one District General Hospital – Salisbury Foundation Trust Hospital which is already experiencing significant pressure in terms of demand and capacity on services as a direct result of the existing population growth across Wiltshire.

2. Workforce

2.1 Tisbury Surgery along with all GP surgeries across the country are experiencing significant and growing strain with struggling to recruit staff and patients having to wait longer for appointments. Additional increase in patients without having the appropriate staffing model in place together with insufficient premises space will put the staff under severe pressure and will impact on already long wait times for appointments.

2.2 Care homes require additional primary care service which can entail home visiting services where the patients cannot get to the surgery, these services often put extra demand on services because the clinicians are off site. The care home service is vital to hospital admissions avoidance, therefore; the workforce to support the care home is key.

2.3 Over the last decades, the demand on health services has risen dramatically. This, in part, can be attributed to a growing and ageing population, as well as advances in medicine and technology that have enabled a wider range of healthcare services to be provided. Tisbury Surgery have adapted to meet these changes also to increase staff in response to safe staffing guidelines. In some cases, the NHS has been unable to keep pace with the increased demand for staff by managing the inflows and retention of its workforce, gaps have appeared.

2.4 Alongside some long-term trends, GPs have been at the forefront of the NHS's response to the COVID-19 pandemic whilst maintaining non-COVID care for patients throughout. This has also entailed the GP practices supporting community and the hospital services significantly more to enable them concentrate on acutely ill patients and more services being by GPs.

2.5 *Tisbury Surgery has seen its' GP workforce shrink for various reasons including a retiring workforce and a lack of new recruits coming through, this has and continues to impact on the service delivery model and leaves the practice over stretched.*

2.6 *Nursing staff in GP practices has as equally seen a shrinking workforce with over one-third of staff are over 55 years old, therefore this will leave the practices challenged with workforce.*

3.0 Summary

3.1 *Based upon the above, to maintain good care and sufficient adequate capacity to meet the future demands on the existing GP population this housing growth and care home beds would put too much pressure on the GP service without adequate support. It should therefore be acknowledged that developer contributions will be a key source to enable the healthcare infrastructure delivery to meet the healthcare needs of the population increase.*

3.2 *The impact of non-recurrent (capital) and recurrent (service provision) infrastructure costs as a direct result of new housing development are very significant. It is therefore, expected that developer S106 contributions will be secured to deliver this additional capacity for Primary Care.*

3.3 *The ICB is currently supporting and working with PCNs and other health care services to work through the planning and support for demand and capacity. This is being done through various policies, strategies, and plans.*

Appendix F – Senior GP Practitioner

Public Meeting – 16th November, 2021

The following closing remarks were made by Dr. Adam Smith, the senior practitioner at Tisbury GP surgery at the public meeting held on 16th November, 2021:

“So to summarise it would have a profound effect on our ability to deliver care, overnight. challenges which would normally take five or ten years to be able to plan for and slowly build upon, and I don’t think any provision has really been made for the local health needs of the population whatsoever.”

Representation to Wiltshire Council

The following representation was submitted by Dr. Smith on 17th November, 2021 at the time of the planning consultation on the appellant’s proposal:

I wish to express my great concern about the planned development at Station Works.

Firstly I consider the proposed access to the site particularly unsuitable. Recent floods in Tisbury have highlighted how vulnerable this area is to flooding by the River Nadder and the navigation of this particular area by means of traffic lights for vehicles with the other side under the bridge being used for pedestrian access seems ill thought out and dangerous. I am concerned about the speed of access for emergency vehicles, such as ambulances and fire engines. The site seems inappropriate for a 40 bed care home. There is inadequate parking provision and I feel isolation for patients/residents would be a real issue.

I should also be interested to know how this proposal ‘ticks the box’ for added employment in the area. I am very aware that care home staff are incredibly difficult to recruit – as can be evidenced by the residential home we already have in Tisbury and I believe the number of jobs lost by development of the site would far exceed those that might possibly be gained.

I also have considerable concerns about the necessity for a care home of this size. Such an enterprise would put tremendous additional strain on an already extremely pressurised G.P. practice. Tisbury surgery currently has over 4100 patients and this care home, together with the residents in the proposed number of new homes could add almost 10% to the practice list – and patients in a care home demand significantly more medical intervention.

A vague promise to include a ‘limited medical facility’ as outlined in the developer’s application is meaningless and bearing in mind the decision by the developer not to include funds for educational purposes one might well cast doubt on such a nebulous undertaking.

There is no capacity to extend the surgery building to allow for employment of more staff – even assuming more G.P.s could be recruited – of which there is a well publicised national shortage. We have already had to convert non clinical rooms/areas in the surgery for blood taking and other clinical work. The workload from the care home alone would mean a commitment of around a full day per week from a G.P.

This proposal would not only impact severely on the practice’s ability to provide good care to the new residents and those in the care home, but also our capacity to look after those patients currently registered with us – and this at a time of every increasing demand from those concerned for their health following the pandemic as well as many vulnerable patients with chronic medical conditions.

Whilst development of the site, which is an eyesore, is to be recommended I feel strongly that the number of houses should be reduced, that some light industrial units be included - as originally outlined in the neighbourhood plan, and that access is totally altered for the safety of residents - whether trying to access the village by vehicle or on foot. A proposal more in keeping with the village itself would be welcomed with the emphasis on affordable houses on a fully decontaminated site with appropriate access to the village.

Letter to Tisbury Parish Council – 28th November 2022

The letter below from Dr. Adam Smith, senior practitioner at Tisbury GP surgery was received by Tisbury Parish Council on 28th November, 2022:

“STATION WORKS, TISBURY

I have already expressed my thoughts about the planned development at Station Works in Tisbury, but would like to reiterate the following.

Firstly the proposed access to the site seems very unsuitable – especially for the elderly and parents with young children. Recent floods in Tisbury have highlighted how vulnerable this area is to flooding by the River Nadder – indeed the road under the bridge was impassable only last week. Navigation by means of traffic lights for vehicles on one side of the bridge, with the other side being used for pedestrian access seems ill thought out and dangerous and I am concerned about the speed of access for emergency vehicles, such as ambulances and fire engines.

I believe the site is totally inappropriate for a 40 bed care home. Tisbury Surgery currently looks after residents and patients in both a local nursing home and a residential home in the village. I would be interested to know what studies have been undertaken (apart from those relating to the developer’s financial interests) to determine the requirement for a care home of this size.

The plans indicate inadequate parking provision and I feel isolation for patients/residents would be a real issue.

I’m also interested to know how this proposal ‘ticks the box’ for added employment in the area. I am very aware that care home staff are incredibly difficult to recruit and I imagine the number of jobs lost by development of the site could well exceed those gained.

Such a development would put tremendous additional strain on an already extremely pressurised G.P. practice and its ability to provide good and safe care to its patients. We now have over 4200 patients – twice as many as 20 years ago - but care is still delivered from the same building. Our ‘weighted’ list size (after NHS England’s adjustment for age, medical conditions etc. of patients) indicates that the list is in excess of 5000.

The proposed care home, together with the residents in the proposed number of new homes would likely add almost 10% to the practice list. Patients in a care home demand significantly more medical intervention. A vague promise to include a ‘limited medical facility’ as outlined in the developer’s application is meaningless (and bearing in mind the decision by the developer not to include funds for educational purposes one might well cast doubt on such a nebulous undertaking). This proposal would not only affect our ability to provide good patient care to the new residents and those in the care home, but would also be detrimental to how we are able to look after our current patients - many of whom are vulnerable and elderly and suffering from chronic medical conditions.

There is no capacity to extend the surgery building to allow for employment of more staff to meet any additional demands on our service – even assuming more G.P.s could be recruited. We have already converted all our non clinical rooms/areas in the surgery for blood taking and other clinical work. We have today audited G.P. appointments relating to the nursing home (i.e. not including the residential home) which requires approximately 475 G.P. appointments annually – this extrapolates to a conservative estimate of over 1000 G.P. appointments based on a 40 bed care home. In order to deliver such care, a major investment in staff and premises would be required.

I understand that the feeling within the village is that whilst development of the site, which is an eyesore, is to be recommended, the number of houses should be reduced, that some light industrial units be included - as originally outlined in the neighbourhood plan, and that access is totally altered for the safety of residents - whether trying to access the village by vehicle or on foot. I am sure that a proposal more in keeping with the village itself would be welcomed with the emphasis on affordable houses on a fully decontaminated site with appropriate, safe access to the village.

If permission is to be considered for a care home, I strongly feel that input is vital - both from the Wiltshire Integrated Care Board (formerly the ICB) and all the local health services.

*Dr. Adam Smith
GP Partner
Tisbury Surgery*

Appendix G – Out-commuting Calculation

The calculation below shows the projected number of residents of the Station Works site who would out-commute by driving a car or van and the distance they would travel each year. Data uses census tables for 2011 and is based on the average percentage of the population who were economically active, and of these the average percentage driving to work and the average distance travelled to work. The table compares the outcommuting level projected for Station Works with that for the same number of residents at an equivalent development in Trowbridge.

Economically active population, method and distance of travel to work

TRANSPORT IMPACT AND AIR QUALITY CALCULATION (2011 Census Data)

STATION WORKS, TISBURY SP3 6QU- APPLICATION PL/2021/09778

QS702EW - Average Distance Travel to Work (Km)

| | Tisbury built-up area | Trowbridge built-up area |
|--|-----------------------|--------------------------|
| Tisbury Built-up Area | 24.1 | 13.8 |
| Additional distance to commute - Tisbury vs Trowbridge | 10.3 | 0 |

QS701EW Method of Travel to Work

| Residents 16-74 | Tisbury Parish | Trowbridge | | |
|---------------------------------------|----------------|------------------------|------------------------|-------------------------------------|
| Those in work - % by method of travel | E04011839 | E05008404 E05008407 | E05008403 E05008406 | E05008402 E05008405 E05008408 |
| Work mainly at or from home | 10.54% | 3.78% | | |
| Underground, metro, light rail, tram | 0.48% | 0.06% | | |
| Train | 8.22% | 3.58% | | |
| Bus, minibus or coach | 1.06% | 2.02% | | |
| Taxi | 0.19% | 0.36% | | |
| Motorcycle, scooter or moped | 0.87% | 0.88% | | |
| Driving a car or van | 61.80% | 63.38% | | |
| Passenger in a car or van | 3.38% | 7.26% | | |
| Bicycle | 0.68% | 3.03% | | |
| On foot | 11.41% | 15.26% | | |
| Other method of travel to work | 1.35% | 0.39% | | |
| | 100.00% | 100.00% | | |

Working Population (LC6107EW & QS103EW)

| | Tisbury Parish | | Trowbridge | |
|--|----------------|---------------|------------|---------------|
| | % | Total | % | Total |
| Population 0 to 15 | 16.97% | 379 | 19.97% | 6450 |
| Population 16 and over | 83.03% | 1854 | 80.03% | 25854 |
| Total Population | | 2233 | | 32304 |
| Population 16 and over comprises: | | | | |
| Economically Active | 47.20% | 1054 | 49.99% | 16148 |
| Economically Inactive | 32.69% | 730 | 26.72% | 8631 |
| Economically Active, but unemployed | 3.13% | 70 | 3.33% | 1075 |
| Total | | 1854 | | 25854 |
| % of Total Population Economically Active and in work | | 47.20% | | 49.99% |

Economically active population, method and distance of travel to work

Travel to Work from Station Works Estate

| | Tisbury Built-up Area | Trowbridge |
|---|-----------------------|------------|
| Number Working Days per year | 222 | 222 |
| Average One-way Journey per person (Km) | 24.1 | 13.8 |
| Station Works Development | | |
| Total Estate Population | | |
| Dwellings (as shown on Planning Statement) | | |
| Occupancy Levels based on Saved Salisbury District Local Plan Appendix IV | | |
| | Occupai | Total |
| 2 x 1-bedroom flats | 2 | 4 |
| 10 x 2-bedroom flats | 3 | 30 |
| 42 x 2-bedroom houses | 3 | 126 |
| 29 x 3-bedroom houses | 4 | 116 |
| 3 x 4-bedroom houses | 5 | 15 |
| Total | 291 | 291 |
| Economically Active Estate Population | | 137 |
| Economically Active Driving a Car or Van to Work | | 85 |

Distance and Air Quality Calculation

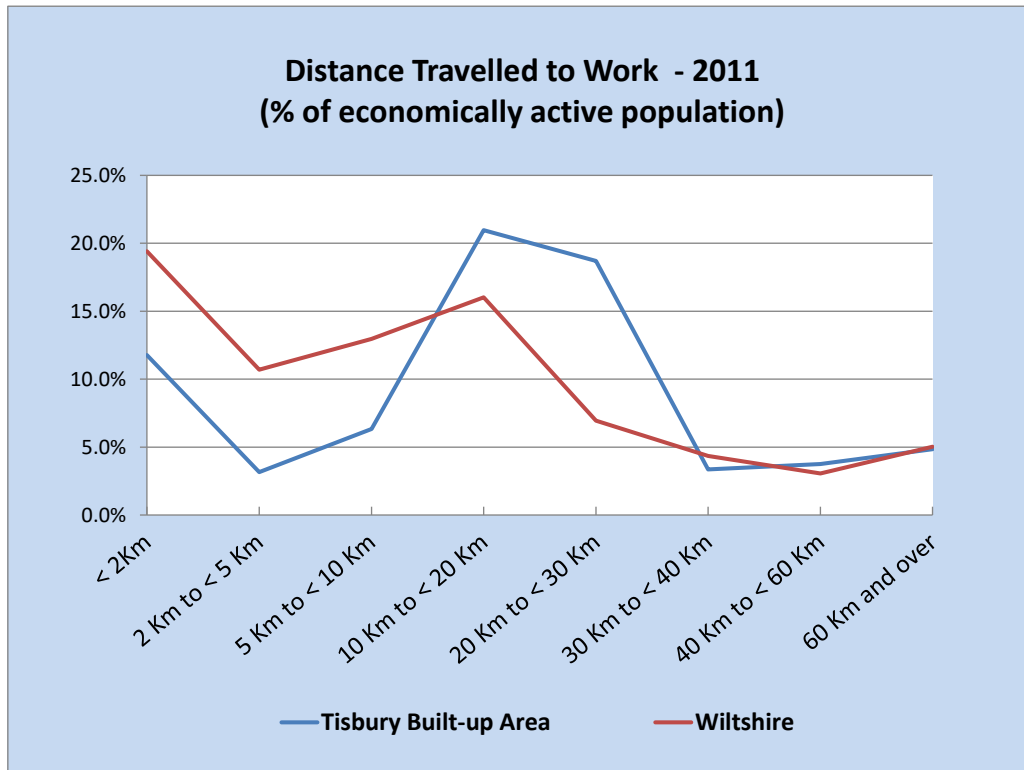
Additional Distance Travelled (Location Cost)

| Measure | Station Works SP3 6QU | Development of same size in Trowbridge |
|-----------------------------------|-----------------------|--|
| Km Driven per person per day | 48.2 | 27.6 |
| Km Driven per person per year | 10,700 | 6,127 |
| Number of Drivers | 85 | 85 |
| Total Kilometres Driven per year | 908,291 | 520,100 |
| Difference (Tisbury - Trowbridge) | 388,191 | 0 |

Additional Emissions (Location Cost)

| | Grams/Km | | Grams |
|--|----------|-----------------|-------------|
| CO2 (EU Target for all new vehicles ## <i>Based on EU target of 130g CO2 per Km for new vehicles 2015 onwards</i>) | 0 | 50,464,821.72 = | 50.5 tonnes |
| NO2 (Euro 6 target) <i>Based on EU Euro6 target of .06g NO2 per Km</i> | 0 | 23,291.46 = | 23.3 kg |
| Particulate Matter (Euro 6 target) <i>Based on EU Euro6 target of .005g PM per Km</i> | 0 | 1,940.95 = | 1.9 kg |

Appendix H – Average Travel Distance to Work



Appendix I – Care Home Viability Assessment

The calculation below, prepared for Tisbury Parish Council, shows the viability of a residential care home in the Tisbury area, based on four alternative models:

- With the appellant’s proposed staffing of 40 part-time and full-time staff and 75% occupancy (compared with the local average of 73%)
- With lower levels of staffing and occupancy of 75%, 70% and 65%.

| Carehome viability at Station Works Tisbury | | | | | Notes | |
|---|-----------------------------|------------|-----|-----|-------|---|
| Occupancy and Workforce | | TCH | | | | |
| | Occupancy Rate | 75% | 75% | 70% | 65% | Average occupancy, residential care homes 2021 - 77.8% (ONS - Care homes & estimating the self-funding population, England: 2021 to 2022) |
| | FTE (Full-time Equivalents) | 27 | 31 | 27 | 27 | Average occupancy, residential care homes in Tisbury 10 mile radius cluster 73% illustrating good existing provision;TCH model requires 90% constant occupancy to be viable |
| | Manager | 1 | 1 | 1 | 1 | |
| | Full-time workforce | 22 | 27 | 22 | 22 | England average 54% 2021.(Skills for Care - Care homes without nursing in the adult social care sector 2021) |
| | Part-time workforce | 8 | 8 | 8 | 8 | England average 46% 2021.(Skills for Care - Care homes without nursing in the adult social care sector 2021) |



| | | TCH | | | | Notes |
|---|----------------|-----------------|-----------------|-----------------|--|---|
| Occupancy Rate | 75% | 75% | 70% | 65% | | Average occupancy, residential care homes in Tisbury 10 mile radius cluster 73% illustrating good existing provision;TCH model requires 90% constant occupancy to be viable |
| Viability Model | | | | | | |
| Resident fee income | 1,013,760 | 1,013,760 | 946,176 | 878,592 | | Based on published national average fee rates. |
| Manager costs | 30,000 | 30,000 | 30,000 | 30,000 | | Local data from job vacancy advertisements |
| Full time staff costs | 549,120 | 673,920 | 549,120 | 549,120 | | minimum wage @£10.90 per hour X 37.5 hours per week X 20 FTE |
| Part time staff costs | 106,496 | 106,496 | 106,496 | 106,496 | | minimum wage @£10.90 per hourX 20 hours per week X 8 part time |
| Catering | 23,400 | 23,400 | 23,400 | 23,400 | | three meals per day per resident plus 1 meal for staff at £3 per meal |
| Energy | 50,000 | 50,000 | 50,000 | 50,000 | | conservative estimate in today's energy market |
| Rent/mortgage | 75,000 | 75,000 | 75,000 | 75,000 | | rent estimated at 5 % of capital value of building (1.5m) |
| Building maintenance | 25,000 | 25,000 | 25,000 | 25,000 | | Based on Local rates for similar |
| Consumables +IT + holiday relief | 50,000 | 50,000 | 50,000 | 50,000 | | estimate and includes "bank" staff for sickness cover and holiday relief |
| Repay set up loan @6.5% | 27,025 | 27,025 | 27,025 | 27,025 | | Based on set up loan of 200K repaid over ten years@6.5%, reflecting an average term of 10 years on fixed assets before renewal. |
| Profit expectation@15% | 152,064 | 152,064 | 141,926 | 131,789 | | minimum profit expectation of 15% |
| TOTAL COSTS + PROFIT | 1,088,105 | 1,212,905 | 1,077,967 | 1,067,830 | | |
| CASHFLOW MARGIN(%) | 8 | N/A | N/A | N/A | | |
| VIABILITY GAP | -74,345 | -199,145 | -131,791 | -189,238 | | Profit expectation shortfall; does not meet minimum profit expectation to justify risk |
| Cash Flow (assuming nil profit) | 77,719 | -47080.9 | 10135.1 | -57448.9 | | shows actual negative cashflow if income falls to 70% occupancy |
| Given the proximity to another home this business would have to show a 35% margin at normal (75%) occupancy rates to justify the capital investment risk | | | | | | |

| Standard Assumptions | | |
|----------------------------------|------|--------|
| FTE hours | 37.5 | |
| Number of Bed Spaces | 40 | |
| Average Monthly Fee | 2816 | |
| Number of Full-time | 22 | 23 |
| Number of Part time | 8 | |
| Part time hours | 20 | |
| Wage + NI+ pension | 12.8 | |
| Residents to cater | 0 | |
| Cost of meals | 3 | |
| Profit margin | 0.15 | |
| Setup/Fitout Cost, plus interest | | 270249 |
| Pension costs full take up | | 1 |



Prepared by the TisPlan Steering Group for Tisbury Parish Council

December, 2022

