



# Planning for an Ageing Population

Local authority provision for retirement living and care homes





## Contents

- 4 2017 vs. 2019
- 8 Key Findings
- 10 Local Authorities by Grade
- 19 Key Contacts

Two and a half years ago, we investigated how well nationwide local plans provided for the needs of our ageing population.

We've revisited this to see how much improvement there has been from the lowest-graded local authorities.



# 2017 vs. 2019

## 2017 survey of 329 local authorities

Grade	Number of LAs	Percentage
A	32	9
B	72	22
C	22	7
D	203	62

## 2019 survey of the local authorities rated as Grade D in 2017

Grade	Number of LAs	Percentage
A	12	13
B	15	36
C	29	16
D	147	45

45% of the UK's local authorities are still not planning ahead for elderly persons' housing.

Two and a half years ago, our Planning team decided to investigate how well nationwide local plans provided for the needs of our ageing population.

Our motivation was simple. When helping clients pursue applications for care homes, we found local authority after local authority to be lacking local planning policy to steer where they should be located – and often no site-specific allocations for such homes.

Our perception was that the level of planning for care homes and retirement housing was woefully inadequate.

We wanted to test that perception. We hoped that we were wrong. Sadly, we weren't.

We looked at the local plans of all 329 local planning authorities to see if they had either a useful policy to allocate or give criteria for where care homes should be located, or had made site-specific allocations. We graded these accordingly.

## The ranking system explained

<b>A</b>	<b>Grade A:</b> clear policy indicating details of required number of dwellings/care home beds, how this will be achieved, and specific site allocation.
<b>B</b>	<b>Grade B:</b> a clear policy as above but no land or site allocations.
<b>C</b>	<b>Grade C:</b> site allocations given, but no clear elderly policy.
<b>D</b>	<b>Grade D:</b> neither credible policy nor site allocations, with a policy at most confined to generalisations. For example 'we will make provision for housing for all types of people, including the elderly and disabled'.



Too many councils are still not making adequate provision in their local plans for retirement housing or care homes through having both defined clear policies and allocating sites.

The fact that 147 out of 329 local authorities are still a Grade D with neither a clear policy nor site allocations is even worse and worrying news. This is despite the fact that it has been well publicised that the number of people in the UK aged 60 or over is expected to pass 20 million by 2030.

Our findings are evidence of the appalling failure of local authorities to plan for such a demographic shift, which isn't only foreseeable, but has been foreseen and commented on.

**Carl Dyer**  
Partner and Head of Planning



Our findings were widely reported. Only 32 authorities – less than 10% – scored an A grade. There were 72 B grades and 22 C grades. Most alarmingly, 203 local authorities (62%) had neither a policy nor any site allocations. The approach, if that's what it can be called, was found in platitudes like: “We will provide housing for local residents, including the elderly, students, and disabled” or similar.

Not one local authority has since challenged our findings and suggested that their grade was inaccurate.

Two and a half years later, we decided to repeat the exercise to see if there'd been any improvement from those D-graded local authorities. The answer is very little.

We found that out of the 203 Grade D authorities, only 12 have improved to become a Grade A, while 15 have achieved a Grade B, and 29 have achieved a Grade C. 147 councils remain Grade D.

So, overall 45% of local councils are still not making provision in their local plans for care homes or retirement housing for our ageing population.

As the country still operates a plan-led system, the consequence on the ground is that the planning applications for retirement housing and care homes are far harder than they need to be. Applicants need to show that there are material considerations which justify departure from local plan policy.

## The problem goes further

There's an absence of specific policies providing appropriate provision for the elderly and the infirm in the form of retirement accommodation and care homes. Those who wish to provide these must compete with mainstream housebuilders, who can often afford to bid more for a site because of their access to “help to buy” funds and/or the freedom from the need to build, staff, and maintain a major care facility in its entirety before the first residents move in.

One of the clearest demographic changes in our country is the ageing of the population. This isn't going to change – people don't suddenly start getting younger. The number of people in the UK aged 60 or over is expected to pass 20 million by 2030. This is exactly the sort of long-term demographic trend that the planning system should be capable of planning for, and we aren't doing it.

It's time for both central and local government to take the demographic shift seriously and start planning at the very basic local plan level for our ageing population.

# Key Findings

## Disappointing levels of improvement

Out of the 203 local authorities that achieved a Grade D in the last study, less than 6% changed to an A. The 12 boroughs that did make the stellar rise included Aylesbury Vale, Brent, St Albans, Stevenage, Wakefield and Wellingborough.

## Some slight improvements

Of the Grade D authorities in 2017, 15 are now Grade B, and 29 have achieved a Grade C. Over 72% remained a Grade D.

## Poor performance in capital

London fared poorly with 19 boroughs remaining in the D category including Ealing, Enfield, Harrow, Islington, Wandsworth and Merton – unless this changes many people will be driven out of the capital as they age and their health deteriorates.

## Continued lack of planning

45% of the UK's local authorities are still not planning ahead for elderly persons' housing.

## Geographic spread

Local authorities graded A were fairly evenly spread across the UK and tended to be found in urban rather than rural districts.

## Wealth has little impact

There seems little correlation between wealth in a borough and readiness to plan for an ageing population. Two years on and boroughs in the D category include Bromley, Cambridge, Cheltenham, Kingston-upon-Thames, Oxford, Westminster, and Windsor and Maidenhead.





# Local Authorities by Grade

Local Authority	Change from 2017?	2019 Grade
Adur	No	D
Amber Valley	No	D
Ashfield	No	D
Ashford	No	D
Aylesbury Vale	Yes	A
Barking and Dagenham	No	D
Barnet	No	D
Barnsley	No	D
Barrow-in-Furness	No	D
Bassetlaw	No	D
Bedford	Yes	B
Bexley	No	D
Birmingham	No	D
Blaby	No	D
Blackburn and Darwen	No	D
Bolton	No	D
Bournemouth	No	D
Bracknell Forest	Yes	C
Bradford	No	D

Local Authority	Change from 2017?	2019 Grade
Breckland	Yes	C
Brent	Yes	A
Bristol	Yes	C
Broadland	No	D
Bromley	No	D
Broxburne	Yes	C
Broxtowe	No	D
Bury	No	D
Calderdale	No	D
Cambridge	No	D
Cannock Chase	No	D
Canterbury	Yes	C
Carlisle	No	D
Castle Point	No	D
Charnwood	No	D
Cheltenham	No	D
Cheshire East	Yes	C
Chesterfield	No	D
Chichester	No	D
Chiltern	Yes	C
Chorley	No	D
Christchurch	No	D
City of London	No	D

Local Authority	Change from 2017?	2019 Grade
Colchester	Yes	C
Copeland	No	D
Corby	Yes	B
Cornwall	Yes	C
County Durham	Yes	B
Craven	Yes	C
Darlington	No	D
Dartford	No	D
Daventry	No	D
Derby	No	D
Doncaster	No	D
Dover	No	D
Dudley	No	D
Ealing	No	D
East Hertfordshire	Yes	A
East Lindsey	Yes	C
East Northamptonshire	Yes	C
East Riding of Yorkshire	Yes	C
Eastleigh	Yes	C
Enfield	No	D
Epping Forest	Yes	C
Epsom and Ewell	No	D
Erewash	No	D

Local Authority	Change from 2017?	2019 Grade
Exeter	No	D
Fenland	No	D
Forest of Dean	Yes	C
Fylde	Yes	B
Gateshead	No	D
Gedling	No	D
Gloucester	No	D
Gosport	No	D
Gravesham	No	D
Greenwich	No	D
Halton	Yes	B
Hambleton	No	D
Hammersmith and Fulham	No	D
Harborough	No	D
Haringey	No	D
Harlow	No	D
Harrow	No	D
Hart	Yes	C
Hartlepool	No	D
Hastings	No	D
Havering	Yes	B
Hertsmere	Yes	C
High Peak	No	D

Local Authority	Change from 2017?	2019 Grade
Hillingdon	No	D
Hinckley and Bosworth	No	D
Huntingdonshire	Yes	C
Hyndburn	No	D
Ipswich	No	D
Isles of Scilly	No	D
Islington	No	D
Kensington and Chelsea	Yes	C
Kettering	No	D
King's Lynn and West Norfolk	No	D
Kingston upon Thames	No	D
Kirklees	No	D
Knowsley	No	D
Lambeth	No	D
Lancaster	No	D
Leeds	Yes	C
Leicester	No	D
Lewes	No	D
Lewisham	No	D
Lichfield	No	D
Mansfield	No	D
Medway	No	D
Melton	No	D

Local Authority	Change from 2017?	2019 Grade
Mendip	No	D
Merton	No	D
Mid Suffolk	No	D
Mid Sussex	No	D
Middlesbrough	No	D
Milton Keynes	Yes	B
Mole Valley	No	D
New Forest	No	D
Newark and Sherwood	No	D
Newcastle upon Tyne	Yes	C
Newcastle-under-Lyme	No	D
Newham	No	D
North Dorset	No	D
North Lincolnshire	No	D
North Norfolk	Yes	A
North Somerset	No	D
North Tyneside	No	D
North West Leicestershire	No	D
Northampton	No	D
Nuneaton and Bedworth	No	D
Oadby and Wigston	No	D
Oldham	No	D
Oxford	No	D



Local Authority	Change from 2017?	2019 Grade
Peak District National Park	No	D
Pendle	No	D
Peterborough	No	D
Portsmouth	No	D
Purbeck	Yes	C
Redditch	No	D
Ribble Valley	No	D
Richmond upon Thames	No	D
Richmondshire	No	D
Rochdale	No	D
Rochford	No	D
Rossendale	Yes	C
Rother	Yes	C
Rotherham	No	D
Rugby	No	D
Runnymede	Yes	C
Rushcliffe	No	D
Rutland	No	D
Selby	No	D
Sevenoaks	No	D
Sheffield	No	D
Shropshire	No	D
Solihull	No	D

Local Authority	Change from 2017?	2019 Grade
South Derbyshire	No	D
South Holland	No	D
South Kesteven	Yes	C
South Northamptonshire	Yes	B
South Ribble	No	D
Southampton	No	D
Southwark	No	D
St Albans	Yes	A
St Edmundsbury	No	D
St Helens	No	D
Stevenage	Yes	A
Stockport	No	D
Stoke-on-Trent	No	D
Suffolk Coastal	Yes	A
Surrey Heath	No	D
Swale	Yes	A
Swindon	No	D
Tameside	No	D
Tandridge	Yes	A
Test Valley	No	D
Tewkesbury	No	D
Three Rivers	No	D
Thurrock	No	D

Local Authority	Change from 2017?	2019 Grade
Tonbridge and Malling	No	D
Tower Hamlets	Yes	B
Tunbridge Wells	No	D
Uttlesford	Yes	C
Wakefield	Yes	A
Wandsworth	No	D
Warrington	Yes	A
Waveney	Yes	C
Waverley	Yes	B
Wealden	Yes	B
Wellingborough	Yes	A
West Berkshire	No	D
West Devon	Yes	C
West Somerset	No	D
Westminster	No	D
Wigan	Yes	B
Winchester	No	D
Windsor and Maidenhead	No	D
Wolverhampton	No	D
Worthing	Yes	B
Wycombe	Yes	B
Wyre	Yes	B

# Key Contacts



## Guy Sackett

Partner and Head of Retirement Living

+44 (0)124 381 3164

+44 (0)7795 482 879

[guy.sackett@irwinmitchell.com](mailto:guy.sackett@irwinmitchell.com)



## Carl Dyer

Partner and Head of Planning

+44 (0)1293 742888

+44 (0)7775 950 513

[carl.dyer@irwinmitchell.com](mailto:carl.dyer@irwinmitchell.com)

Expert Hand. Human Touch.

B-RE-1006-B

 0370 1500 100

 [irwinmitchell.com](http://irwinmitchell.com)

 @IrwinMitchell

Irwin Mitchell LLP is authorised and regulated by the Solicitors Regulation Authority.



Official Legal Partner