1. Introduction

1.1 This written statement has been prepared on behalf of Inspired Villages Group (IVG) in response to Matters 1 and 4 of the Wealden Local Plan Examination.

1.2 IVG intends to participate in the Examination hearing sessions for matters 1 (in relation to the HRA) and 2 (in relation to Spatial Vision and Air Quality Considerations) where they will be represented by Ecology Solutions. Ecology Solutions have prepared and submitted separate Statements in relation to the ecology matters to be addressed during those sessions.

1.3 IVG does not intend to appear at the sessions in relation to matter 4 and instead relies upon its earlier representations and this statement.

1.4 IVG is promoting a ‘continuing care retirement community’ on land at Little Mount Farm, Benhall Mill Road in the Parish of Frant. Although this site is on land within Wealden District, it is functionally and physically related to the settlement of Tunbridge Wells.

1.5 Inspired Villages Group is an operator and developer of retirement housing, established in 2017 with Legal & General ("L&G") following L&G’s acquisition of English Care Villages and Renaissance Villages.

1.6 The Inspired Villages portfolio now consists of over 1,100 apartments and cottages in seven existing village schemes, including:

- Austin Heath, Warwickshire
- Bramshott Place, Hampshire
- Durrants Village, West Sussex
- Gifford Lea, Cheshire
- Great Alne Park, Warwickshire
- Leeds Village, Kent
- Millbrook, Devon

1.7 Inspired Villages is responsible for developing entire communities – securing environments where people can enjoy and explore, be free and independent, yet receive tailored, flexible and supportive care around the clock all within the privacy of their own home, whether a one or two bedroom apartment or cottage. This enables individuals to remain independent in their homes for longer – and in most cases life.

1.8 Inspired Villages provide a range of specialist purpose-built accommodation choices to suit different needs and budgets, together with appropriate facilities and services in a low rise residential setting. The village allows residents flexibility to transfer between the different types of accommodation e.g. from the Independent Living Units to the Close Care Units, without the major and often distressing upheaval of physical relocation.
1.9 IVG is therefore keen to ensure that the Wealden Local Plan makes appropriate provision for the needs of the ageing population which the Council acknowledges to be present in the District (as set out in the Submission version Local Plan at paragraph 3.26, the Vision and Spatial Objectives).

1.10 In summary, IVG’s position is that while the Submission version of the Local Plan may set out the overall housing requirement and include a Policy (HG 4) relating to Extra Care Housing and a number of references to an ageing population, it does little or nothing to provide for this group of the community.

1.11 IVG is aware that this Local Plan is to be examined having regard to the 2012 version of the National Planning Policy Framework in accordance with the transitional arrangements set out in paragraph 214 of Annex 1 in the NPPF versions published in July 2018 and February 2019 and as such this statement is provided on that basis.
2. **Response to Matter 1 Questions**

2.1 This section provides a response, on behalf of IVG to the questions for Matter 1 (and should be read alongside the Ecology Solutions Statement for Matter 1 which addresses relevant ecology issues.

**Q8:** Have all reasonable alternatives been considered in terms of strategy, policies and sites? Have these reasonable alternatives, including those set out within the Sustainability Appraisal Addendum 2019, been considered on a like for like basis? Is the evidence on which the scenarios are predicated consistent? Are there any policies, or strategies, where there were no reasonable alternative options to consider? If so, what is the justification?

2.2 We have reviewed the Sustainability Appraisal Addendum 2019 (Document A8) and the previous versions of the Sustainability Appraisal from 2017. At no point has the LPA considered an alternative policy approach for meeting the needs of the ageing population in the District. The 2017 version of the SA considered Policy H11 on accessible housing, but that adopted a broadly similar approach.

2.3 So far as IVG can establish, Wealden District Council has only ever considered the following alternative approaches:

- To allow social housing providers and market housing providers to make provision for special needs housing in accordance with their own wishes;
- To ensure that a specific proportion of new residential development is built to meet Category 2 and Category 3 standards; and
- New residential developments should include specific minimum proportions of Categories 2 and 3 dwellings to meet the needs of the elderly and those with specific disabilities. The specific proportions will be subject to more detailed work in relation to Wealden population projections and viability assessment.

2.4 The LPA does not appear to have considered alternative approaches such as identifying the quantum of housing / care accommodation to be provided in the District over the Plan period, or the allocation of sites for such purposes. IVG consider that these should be considered as ‘reasonable alternatives’ for the purpose of the Sustainability Appraisal.

2.5 In addition, IVG consider that a ‘reasonable alternative’ would be that Policy HG 4 could refer to a wider range of accommodation typologies than extra care housing. This broader approach would reflect the multitude of housing and accommodation types available and the varying needs of older people, some of which may wish to retain their independence, others may be looking to downsize, others may need accessible housing and others may be in need of care.

2.6 Extra Care Housing is just one form of accommodation designed to meet the varying and changing needs of this group of the community.

2.7
2.8 No justification appears to have been provided for the narrow approach adopted in Policy HG 4 and for not considering alternatives which plan for a quantum of housing / care accommodation, allocate sites for such uses, or provide for a broader range than ‘Extra Care Housing’.
3. Response to Matter 4 Questions

3.1 This section provides a response, on behalf of IVG to the questions for Matter 4.

Q54. **Is the level of housing planned appropriate? Should it be increased or decreased? If so, to what level and on what basis?**

3.2 The evidence base in support of the emerging Local Plan has consistently acknowledged the presence of an ageing population in Wealden District.

3.3 For example the Strategic Housing Market Assessment (2016) states that:

- “The ageing nature of the population is reflected in the percentage change between age categories in 2001 and 2013, with 8% and 15% reductions in the proportion of the 0-15 and 30-44 age groups respectively, and with the second highest increase (behind the 31% increase in the 16-29 age group) for the 60+ category, which increased by 27%.” (paragraph 4.7)

- “There is a national trend towards an ageing population, but this trend seems to be occurring at a greater extent in Wealden than nationally.” (paragraph 4.11)

- “The ageing population trend in Wealden is likely to lead to significantly increased pressure on health & social care, aids and adaptations and sheltered accommodation (although many older people want to remain in their own homes). This will have implications for the requirement for appropriately sized homes that are built to good accessibility standards as well as a propensity towards an increasing level of under-occupancy among older people with more bedrooms than they require. This can also exacerbate the pressure for family housing. Provision of more small units could provide more flexibility within stock for residents, allowing people to downsize, and freeing up larger units for others who require them.” (paragraph 4.13)

- “Households aged 75 and over are relatively evenly spread across the District.” (paragraph 4.15)

- “The ageing nature of the population across Wealden is clear.” (paragraph 4.32)

- “The District has a relatively old population, therefore with a high proportion of retirement. The ageing nature of the population is projected to increase over the projection period (reflecting national and regional ageing trends), and the influential nature of domestic migration on population growth suggests the likelihood that Wealden will continue to attract a high level of retirement migration from within the UK.” (paragraph 10.5)

3.4 The SHMA (2016) set out a series of conclusions at paragraph 10.107 in relation to older peoples’ housing, namely that:

- “In line with regional and national trends, Wealden is projected to experience an increase in the number and proportion of the population aged 65+, increasing by approximately 19,967 over the projection period (2013 – 2033). There will be a total of 11,684 (48%) additional households where the head of the household is aged 65+, increasing from 24,258 households in 2013 to 36,211 households in 2033. The projections indicate that by 2033 4,599 of these households (39%) will be single person households and 4,749 of these households (41%) will be couple households with no dependent children.”
• “The POPPI data identifies that from 2014 to 2030 the number of older people living in a care home is projected to increase by approximately 68%, and the number of both those unable to manage at least one domestic task on their own and those unable to manage at least one self-care activity on their own is projected to increase by 50%. This highlights the importance of providing appropriate retirement and adapted/custom build accommodation which is suitable for housing ageing residents living in a couple as well as single person households (2 – 3 bed units). This should be tempered with policies encouraging downsizing of the elderly population into smaller properties, releasing capital for owners as well as much needed larger stock for other residents. This will facilitate flexibility and churn in Wealden’s housing market, but will be dependent on a focus in parts of the District which are both desirable and affordable for new residents.”

3.5 It is therefore abundantly clear that the evidence base prepared for this Local Plan identifies that as part of the expected demographic changes that there would be significant increases in the population aged over 65 and older people who are in need of care. These are important considerations which impact not only on the quantum of housing and other forms of accommodation to be planned for in the District during the Plan period but also, crucially, this evidence is also fundamental to the matter of the type of accommodation required.

3.6 In IVG’s submission, the test of soundness involves not simply an assessment of whether it plans, numerically, for the objectively assessed needs of the area. As the Framework (2012) states (paragraph 7) that the ‘economic’ role requires the planning system to ensure there is sufficient land of the right type available in the right places and at the right time.

3.7 In order to be sound, a Plan must be ‘positively prepared’ and seek to meet objectively assessed development and infrastructure requirements. Regardless of whether the Local Plan provides for the OAN for housing generally, (or the OAN results in the appropriate figure) it is clear that the ageing population and the need for housing and care accommodation to meet the needs of this group of the community is a fundamental component of the assessed needs of the area.

3.8 Paragraph 50 of the NPPF (2012) requires that local planning authorities should:

“plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)”

3.9 Although the Submission version of the Local Plan includes Policy HG 4 and various references to the ageing population in Wealden, it does not proactively plan for the needs of this group of the community nor offer any positive policy support for such development.

3.10 Spatial Objective 1 of the Submission version of the Local Plan explains that “Housing development will meet the needs of the ageing population in terms of form, function and location. It will provide for downsizing in our towns and villages as well as specialist accommodation to help those in need have accommodation fit for their lifetime.”
3.11 Policy HG 4 indicates that the development of extra care housing with care and support on site will be supported within development boundaries. In the absence of suitable sites within those boundaries, then development outside of and adjacent to development boundaries will be supported subject to certain criteria.

3.12 Policy HG 4 is a broadly permissive policy. However it does not plan for such development and instead only sets out a series of considerations which will be taken into account if and when proposals for such forms of development come forward. If such proposals are not forthcoming then no specific provision for the ageing population will be made.

3.13 The Submission version of the Local Plan does not allocate any sites specifically to meet the needs of this group of the community despite the clear evidence of an ageing population and an increase in the number of older people who are likely to require care and support. If the Plan did make such allocations then there would be a greater degree of certainty that accommodation designed to meet the needs of the ageing population will be forthcoming.

3.14 Given the nature of the text and policies within the Plan, it therefore fails to positively address Spatial Objective 1.

3.15 IVG do not consider that the Wealden Local Plan should be amended simply to secure housing/care accommodation as part of general housing sites to be allocated. This approach would fail to have regard to any implications which might arise in relation to the deliverability or viability of those allocations and their suitability to accommodate development.

3.16 However IVG does consider that it would be a positive step for the Wealden Local Plan to be amended (via policies) in order to provide greater clarity on the level of accommodation that is to be planned for in order to meet the needs of the ageing population.

3.17 This statement does not relate to any modifications to the housing requirement overall. However IVG do consider that it is essential that the housing policies in the emerging Local Plan such that it provides and plans for the delivery of housing and other forms of accommodation which will meet the changing needs of the District’s population.

3.18 IVG encourage the Inspector to have specific regard to this matter during the course of the Examination.
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