

**ELMBRIDGE BOROUGH COUNCIL – LOCAL PLAN EXAMINATION: STAGE 2  
HEARING STATEMENT RESPONSE BY INSPIRED VILLAGES**

This document provides a written response to the Stage 2 Matters Issues and Questions in Relation to the Elmbridge Local Plan Examination. This Hearing Statement is submitted on behalf of Inspired Villages. It responds to the following Matters, Issues and Questions:

- **Matter 2: The approach to housing need**
  - Issue 4: Is the approach to calculating the level of housing need over the Plan period justified, effective and consistent with national policy?
    - Question: 1.1
- **Matter 3: The Vision, Spatial Strategy, and the distribution of growth over the Plan period**
  - Issue 5: Whether the vision and proposed spatial strategy is justified, effective, positively prepared, and consistent with national policy including the proposed distribution of development across the Borough.
    - Questions: 2.8, 2.9
  - Issue 6: Does the Plans spatial strategy expressed within policy SS3 present an appropriate strategy, taking into account the reasonable alternatives?
    - Questions: 2.20, 2.22, 2.31
- **Matter 4: The Housing Requirement**
  - Issue 7: Whether the Local Plan has been positively prepared and whether the approach is justified, effective and consistent with national policy in relation to the housing requirement
    - Questions: 3.1, 3.2
- **Matter 7: Other Housing Matters**
  - Issue 11: the approach to housing mix, density and specialist accommodation including providing for gypsy and travelling show people accommodation as well as that of boat dwellers justified, positively prepared and effective?
    - Questions: 6.6, 6.9

**About Inspired Villages**

Inspired Villages (IV) is an operator of Integrated Retirement Communities (IRCs) in the UK, established in 2017 and majority owned by Legal & General, with a further funding injection in 2021 from Legal & General and NatWest Group Pension Fund. IV currently has over 1,300 residents in over 800 extra care units across nine communities, being:

- Austin Heath, Warwick, Warwickshire

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# Inspired Villages

The *best* years of your life?

- Bramshott Place, Liphook, Hampshire
- Durrants Village, Faygate, West Sussex
- Gifford Lea, Tattenhall, Cheshire
- Great Alne Park, Great Alne, Warwickshire
- Millbrook Village, Exeter
- Ledian Gardens, Leeds, Kent
- Elderswell, Bedfordshire
- Millfield Green, Bedfordshire

IV has a further three villages under construction (Chandlers Ford, Hampshire; Albourne, Mid-Sussex and Horndean, Hampshire), with plans for 34 operational villages in the next ten years (equivalent to approximately 5,000 C2 units).

Inspired Villages is a member of the Associated Retirement Community Operators (ARCO). ARCO is the main body representing the retirement community sector in the UK. ARCO was formed in September 2012 and its members include both private and not-for-profit members, comprising about half of the integrated retirement community sector operators. As a condition of membership, all ARCO members have signed up to, and pledged adherence to ARCO's standards and compliance framework including external assessments under their consumer code.

IRCs are typically within the C2 Planning Use Class. Inspired Villages developments fall within the definition of integrated retirement communities. Integrated retirement communities may also be referred to as extra care and housing-with-care, and Figure 1 below is from ARCO's website (<https://www.arcouk.org/>), which highlights the distinction between retirement housing, retirement communities (or extra care), and care homes.

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Figure 1. ARCO Living Options for Older People

 <b>Retirement Housing</b> Also known as: • Sheltered housing • Retirement flats or communities	 <b>Integrated Retirement Communities</b> Also known as: • Extra care • Retirement villages • Housing-with-Care • Assisted living • Independent living	 <b>Care Homes</b> Also known as: • Nursing Homes • Residential Homes • Old People's Home
 Offers self-contained homes for sale, shared-ownership or rent	 Offers self-contained homes for sale, shared-ownership or rent	 Communal residential living with residents occupying individual rooms, often with an en-suite bathroom
 Part-time warden and emergency call systems. Typically no meals provided	 <ul style="list-style-type: none"> <li>• 24-hour onsite staff</li> <li>• Optional care or domiciliary services available</li> <li>• Restaurant / Cafe available for meals</li> </ul>	 24-hour care and support. Meals included
 Typical facilities available: <ul style="list-style-type: none"> <li>• Communal lounge</li> <li>• Laundry facilities</li> <li>• Gardens</li> <li>• Guest room</li> </ul>	 Typical facilities available: <ul style="list-style-type: none"> <li>• Restaurant and Café</li> <li>• Leisure Club including: gym, swimming pool, exercise class programme</li> <li>• Communal lounge and/or Library</li> <li>• Hairdressers</li> <li>• Gardens</li> <li>• Guest room</li> <li>• Activity (Hobby) rooms</li> <li>• Social event programme</li> </ul>	 Typical facilities available: <ul style="list-style-type: none"> <li>• Communal lounge</li> <li>• Laundry facilities</li> <li>• Gardens</li> <li>• Guest room</li> </ul>
 Typically 40 - 60 homes	 Typically 60 - 250 homes	 Sizes vary considerably

Inspired Villages operational and consented developments range in quantum from 85 to 270 units. Inspired Villages typical model is for approximately 150 units providing independent living for residents within their own home (apartment, cottage, bungalow) but with significant on-site communal and care facilities to meet most of the day-to-day needs of occupiers. A typical scheme would provide up to 20% of its total floorspace as communal facilities. This is 'non-saleable' space. Those facilities would usually include: café/bar, small shop, restaurant, meeting space and activity room, hairdressers, treatment room, wellbeing centre including fitness studio, gym and pool.

## Matter 2: The approach to housing need

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Issue 4: Is the approach to calculating the level of housing need over the Plan period justified, effective and consistent with national policy?

Questions:

1.1 In establishing the amount of housing to be planned for, paragraph 61 of the Framework advises that strategic policies should be informed by a local housing needs (LHN) assessment, conducted using the standard method unless exceptional circumstances justify an alternative approach. The Council has followed this guidance and calculated the LNH to be a figure of 647 dpa or 9705 dwellings over the Plan period. Are there any exceptional circumstances which would justify an alternative approach?

Within the evidence base document, the Local Housing Needs Assessment 2020 (Ref. HOU005) it is stated that the number of those aged 65 or over in the Borough of Elmbridge is projected to increase from 25,500 in 2020 to 35,500 in 2035 (see table 5.1 of HOU005). Which represents a 37% increase on 2020 figures. Paragraph 62 of the NPPF identifies older people as a group in the community which should be reflected and assessed in planning policies, given the projected increase, a separate target for older people's specialist accommodation in the Borough could be justified as exceptional circumstances in relation to Paragraph 61 of the Framework and therefore should this target for specialist homes for older people be met, Elmbridge Borough Council could seek to justify a lower LNH for general needs housing via the release of family homes in the borough, however, no justification has been given, nor any allocations made for this form of housing and therefore no exceptional circumstances are demonstrated which could justify a lower housing target. We suggest Elmbridge should review its housing target, proposed allocations, and seek to meet its need in full, with additional targets identified for housing for older people within the Borough.

Paragraph 5.35 of the Local Housing Needs Assessment (HOU005) also states that there is a local need for the following types and tenures of specialist housing for older people within the Plan period:

- an additional 191 sheltered rented units by 2035 (13 units pa)
- an additional 1,077 sheltered leased / market rent units (72 units pa)
- an additional 72 rented Extra Care units (5 units pa)
- an additional 211 leased/market rent Extra Care units (14 units pa)

The requirement for Specialist Housing is made explicitly clear in paragraph 5.35 of the Local Housing Needs Assessment (Ref: HOU005) and Planning Practice Guidance: Housing for older

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and disabled people, Paragraph: 16A Reference ID: 63-001-2019062. The requirement for Specialist Housing is further referred to in Paragraph 5.38 of HOU005 and calculations are made in line with of Paragraph 16A within Paragraph 5.39, which sets out how authorities count specialist housing for older people against their housing requirements. Albeit that as stated in Para 5.41 approximately 64 homes per annum will be freed up by older people leaving their current homes and moving into specialist accommodation. Despite this there has not been any draft allocations for specialist housing for older people made within the submitted Local Plan or an acknowledgement of this need within the conclusions of the LHN.

An indicative figure for various forms of housing for older people has been set out in HOU005 however, notwithstanding there is no acknowledgement of these target figures within any identified draft policies, the methodology used to calculate the types and tenures of housing for older people is out of date. The methodology used in the Local Housing Needs Assessment (HOU005) is SHOP@ (Strategic Housing for Older People Analysis Tool) developed by the Housing Learning and Improvement Network (Housing LIN). The SHOP@ Tool is also referenced in Planning Practice Guidance June 2019 (Paragraph: 004 Reference ID: 63-004-20190626) as an *example* of a number of online tool kits used to forecast housing need, and has since been withdrawn by the Housing LIN.

The SHOP@ Tool provides a response to the question “what would the level of age specific housing requirement be, if either the current level of provision locally was extrapolated into the future, or if in the future the local level of provision was to match the existing levels of provision in England as a whole”. Neither of these constructs provide a true measure of future need, which must take into account the growing need from existing homeowners to secure age-appropriate housing within the tenure which they are both accustomed to, and within which many wish to continue.

This Toolkit has also been confirmed to be an underestimation of need, and to be out of date as confirmed by the Inspector in the Sonning Common appeal<sup>1</sup>, by Inspired Villages in West Oxfordshire District, who stated:

*“44 The Council sought to undermine the Appellant’s need case with reference to earlier data from Housing LIN and the @SHOP tool. This on-line tool is highlighted in the PPG as a basis for calculating need. But the fact is it only provides a figure based on existing prevalence and then*

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<sup>1</sup> Appeal Decision APP/Q3115/W/20/325861

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*seeks to project that forward with a proportion increase based on the increase in the 75+ age group in the District. This is not a measure of need.”*

There are many other alternative measurements and forecasting models which can be used to calculate need with more forward looking and ambitious approaches, The Mayhew Report, published in November 2022, found that with the number of over-65s set to exceed 17 million by 2040, the Government should initiate an accelerated programme of constructing older people’s housing with up to 50,000 new units a year, a significantly higher target than the 7,000 currently built annually. We suggest Elmbridge Borough Council should update the Local Housing Needs Assessment 2020 (Ref. HOU005) to consider the above, and then ensure Local Housing Need figures incorporate this target.

### **Matter 3: The Vision, Spatial Strategy, and the distribution of growth over the Plan period**

**Issue 5: Whether the vision and proposed spatial strategy is justified, effective, positively prepared, and consistent with national policy including the proposed distribution of development across the Borough.**

#### **Questions:**

**2.8 In terms of the SA, what is the reasoning for the scoping in relation to affordable housing (policy HOU4) and Specialist accommodation (policy HOU6) as set out at pages 148 -152? Is this a reasonable approach to take?**

Within the submitted Sustainability Appraisal (Ref: CD002) Appendix 2: SA for draft Local Plan principles page 152/153 refers to the scoping in relation to Policy HOU6. The scoping does not assess the negative impact on SA Objectives 1 and 2.

SA Objective 1 in relation to HOU6 does not specify an upper limit of the amount of specialist housing despite the wording of the commentary on page 153, this conflicts with the wording of the draft Policy itself which restricts the provision of specialist housing for older people without specifying any targets despite the need evidenced within the Local Housing Needs Assessment 2020 (Ref. HOU005). Therefore, the wording of draft Policy HOU6 should be considered to contribute negatively to SA Objective 1, due to the wording of the policy restricting the delivery of specialist housing for older people and therefore this will stop the delivery of sufficient homes which are suitable to people’s needs, through a lack in delivery due to an inappropriately worded policy (HOU6).

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SA Objective 2 is to facilitate the improved health and wellbeing of the whole population, however, the lack of allocations for this type of housing do not ensure any delivery over the plan period, and the negative wording of Policy HOU6 is more likely to restrict development rather than to encourage the delivery of specialist housing which would have a positive impact on the health and wellbeing of not only the future residents of these developments but also the wider community to which these are often open to. Therefore, the wording of draft Policy HOU6 should be considered to contribute negatively to SA Objective 2.

The details of scoping in relation to Policy HOU1 is considered for SA objectives 1-8 and 13-16, however, the Council did not consider it necessary to take the same approach in relation to Policy HOU6 despite the aims of the policies being similar in nature. We would query why the SA objective review approach is inconsistent and request that Policy HOU6 is reviewed against SA objectives 1-8 and 13-16, or justification is provided as to why these objectives are not considered relevant. Policy HOU6's overall conclusion is to limit a 'over provision of some types of specialist accommodation' has not been adequately scoped in regards to the negative impacts on SA objective 1, 4, 6, 7.

## **2.9 Has the SA considered all reasonable options for a spatial strategy that would secure a sustainable pattern of development in the borough?**

Assessing the submitted Sustainability Appraisal (Ref: CD002) Section B1, within Table 7 which shows the SA of 2019 options that it is clear that the only options which are able to fulfil the objectives of providing adequate housing are Option 3 and 5 which both release considerable Green Belt, it is clear that unless the Council releases land from the Green Belt they will not achieve meet their housing need.

Within Table 11A which shows the SA of options 4a, 5a and 6, it is clear that the option chosen by the Council to proceed with for the plan, is the only option which has a negative impact on the number of homes which can be achieved at with only 6,787 homes. Of the eight options for which sustainability appraisals were undertaken the Council proceeded with the option which provided the second least number of homes (Option 4 provided the least).

Notwithstanding the clear need for housing which has been evidenced throughout HOU005, the release of land from the Green Belt would be acceptable in this circumstance due to the need for new homes and as evidenced by the SA that Elmbridge cannot achieve their housing need if they do not release land from the Green Belt. The NPPF paragraphs 140 and 141 would support the release of Green Belt land for housing as throughout the Local Plan it is clear that the Council has explored the use of brownfield sites, optimising density and undertaken

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discussions with neighbouring authorities throughout. Therefore in this case there are exceptional circumstances due to housing need and the need for housing for older people as set out in the Local Housing Needs Assessment 2020 (Ref. HOU005).

Within CD002 'Section B2: Develop the Local Plan' options including reasonable alternatives, no draft allocations for older persons housing have been included within the version of the Local Plan submitted for allocation. When assessing the level of housing need in Elmbridge, there has been a failure to set out a methodology and target for housing need which therefore discredits the ability of the options assessed, as housing for older people has been excluded. Therefore failure to review the appropriate options for older persons housing and therefore failure to allocate site for specialist housing for older people. Therefore the identified need under HOU005 will not be met due to the lack of allocations. Resulting in the under delivery of housing for this group, when there is an identified need and an increase of 37% in those aged over 65 within Elmbridge.

**Issue 6: Does the Plans spatial strategy expressed within policy SS3 present an appropriate strategy, taking into account the reasonable alternatives?**

Questions:

**2.20 Does the Plan present an appropriate spatial strategy and in what way is this supported by the evidence base? In particular, will the proposed distribution of housing help to ensure that sufficient land will be available in the right places to meet the housing needs of present and future generations (paragraph 8 of the Framework).**

Having assessed the spatial strategy within the Draft Elmbridge Local Plan (Ref. CD001) the spatial strategy does not ensure that the proposed distribution of housing helps to ensure sufficient land is available in the right places to meet the housing needs of present and future generations as per paragraph 8 of the NPPF. The Spatial Strategy fails to identify the need for Older Persons housing despite the need being set out within HOU005, the Council has opted to omit the need as part of the spatial strategy and within the Local Plan as a whole. The need which is set out for Older Persons in HOU005 is clear, albeit the methodology used to achieve the numbers is not up to date and underestimates the quantum and type of specialist housing for older people which is needed.

The Local Housing Needs Assessment (REF: HOU005) set out that by 2035 the number of those aged 65 or over in Elmbridge is projected to be 35,500. Which represents a 37% increase on 2020 figures. Despite this the critical need for appropriate specialist housing to meet the

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housing need of the ageing population currently and over the plan period, the Local Plan has failed to identify this within the Spatial Strategy. Therefore the spatial strategy does not consider the evidence base and cannot be found to be appropriate on this basis.

**2.22 Noting that the proposed strategy would not meet the Borough’s objectively assessed housing need, in what way will the proposed spatial strategy support the Government’s objective of significantly boosting the supply of homes (paragraph 60 of the Framework) by providing a sufficient amount and variety of land to come forward? In particular, in what way will the proposed strategy deliver the mix of homes needed? Is the Plan positively prepared in this regard?**

The Plans failure to meet the Borough’s objectively assessed housing need is a failure to be positively prepared and to allow sufficient and appropriate homes to come forward as per paragraph 60 and 8 of the NPPF. The draft Local Plan includes policies such as HOU06 which are worded in such to restrict development within the borough rather than to allow development to come forward in Elmbridge. This will also restrict the number of sites expected to come forward as windfall sites and particularly to meet the outstanding need of the Borough which stands at 2,930 units over the plan period under the submitted spatial strategy and draft housing policies. Elmbridge is a borough which is highly constrained by the Green Belt and the inclusion of heavily restrictive policies over those that are positively prepared in order to facilitate windfall sites within the right places, will amount to the proposed mix of homes not being achieved as the policies do not seek to facilitate development.

#### **Policy SS2 – Sustainable place-making**

**2.31 The Council’s approach to sustainable place making is set out at policy SS2. Is the approach reflective of paragraph 7 of the Framework? Part 2b of the policy refers to delivering homes for all. However the Councils approach to housing will only provide for approximately 69% of the boroughs housing need over the Plan period? Is this policy justified and effective as a result?**

The Council’s approach is not justified and draft Policy SS2, specifically part 2b will fail to deliver homes for all. Providing only 69% of the boroughs housing need is inadequate and without identifying the separate need for older persons housing and allocating housing for specialist housing the local plan is fundamentally unable to comply with paragraph 7 of the NPPF. Without meeting the needs of the Plan period this will compromise the ability of future generations to meet their needs. Within the Sustainability Appraisal CD002 the differing options where set out and appraised on their impacts, the Council opted for a strategy which

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they acknowledged did not meet the housing need over the plan period and without further evidence as to the environmental impacts of the alternative options. When reviewing the alternative options in Table 7 and 11A it is clear that the plan makers have placed a reduced impact on the importance of achieving the housing need and an inflated opinion on the impact on the Environment, otherwise Option 5 would have been taken and the plan would have provided for 9,400 homes.

#### **Matter 4: The Housing Requirement**

**Issue 7: Whether the Local Plan has been positively prepared and whether the approach is justified, effective and consistent with national policy in relation to the housing requirement**

**3.1 The housing requirement for Elmbridge has been calculated at 9705 homes. Policy SS3 sets out that the Plan will deliver at least 6785 net additional homes over the Plan period. This equates to some 453 dpa and will leave an unmet need of some 2920 dwellings over the Plan period. This is a significant shortfall. Is the Plan justified in not meeting the full LHN?**

The Plan is not justified in its approach to Local Housing Need. Paragraph 35 of the NPPF states that in order to be justified an appropriate strategy is to be taken, while taking into account the reasonable alternatives. Having due regard to the evidence base and in particular the Sustainability Assessment (Ref:HOU005) alternative options which delivered a considerably lower shortfall to the housing need where explored and discounted, while a strategy and option was chosen which creates a significant shortfall. The Council has failed in its duty to create a Local Plan which is positively prepared, justified, effective and consistent with national policy.

**3.2 Does the approach demonstrate that the Plan has been positively prepared in accordance with paragraph 35 of the Framework and will it be effective?**

The Plan will not be effective as has been shown through the inability of the plan to achieve the housing requirement. Without a significant uplift in the amount of housing provided with the plan period it is fundamentally unable to meet the area's objectively assessed needs and therefore cannot be found to be sound.

#### **Matter 7: Other Housing Matters**

**Issue 11: the approach to housing mix, density and specialist accommodation including providing for gypsy and travelling show people accommodation as well as that of boat dwellers justified, positively prepared and effective?**

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## Policy HOU3 – Housing Mix

### 6.6 Will the policy as drafted deliver the right homes to address local need as envisaged by the Framework?

Having due regard to the Local Housing Needs Assessment (REF: HOU005) which sets out the needs for the Borough. The needs which are set out in HOU005 fail to use an up to date methodology and therefore the need is underestimated, furthermore the need which was set out in the findings where then excluded from the Local Plan and draft Policy HOU3. HOU3 does not adequately set out an appropriate housing mix and the policy lacks certainty in delivery throughout the plan period. The Planning Practice Guidance: Housing for older and disabled people sets out that type and tenure should also be considered as referenced at Paragraph: 004 Reference ID: 63-004-20190626 *“The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed”*. Whilst Policy HOU3 acknowledges the need for older people to have adequate smaller properties to move into, without the allocation of sites for specialist housing for older people, this need will not be met. Through the adequate delivery of older persons housing, this will allow for the ‘rightsizing’ of older people and the trickle down impact of their under occupied family homes being released back onto the housing market.

The emerging plan should include a specified mix of tenures and types of housing with specific targets based on robust needs evidence following guidance set out in the Planning Practice Guidance: Housing for older and disabled people.

As such, emerging Policy HOU3 is unable to satisfy paragraph 61 of the NPPF which states that *‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes’*

## Policy HOU6 – Specialist Accommodation

### 6.9 The policy states that specialist accommodation will only be permitted where there is clear and robust evidence demonstrating a local need. Is this approach consistent with the Framework?

The approach taken within the Local Plan is not consistent with the Framework and cannot be described as positively prepared. The findings of the drastic increase of over 65s within the

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borough in recent years, and as projected into the Plan period has been set out within the Local Housing Needs Assessment, albeit the methodology set out is not up to date and underestimates the needs over the Plan Period. (Ref: HOU005). This increase should be considered an exceptional circumstance and therefore an alternative approach of allocating specifically for the ageing population should be made, and the size, type and tenure of housing needs for different groups with the community such as Paragraph 62 of the Framework sets out is not going to see the appropriate level of specialist housing delivered within the Borough over the Plan period with the current policy in which clear and robust evidence to demonstrate local need is required. In the context of a national and local ageing population and housing crisis, a more proactive approach to freeing up housing stock and building age appropriate homes within the Borough, must be taken by the Council.

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