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Shropshire Local Plan

Examination in Public

Hearing Statement

The Planning Bureau on behalf of
McCarthy & Stone Retirement Lifestyles Ltd.

September 2024

Development Management Policies Matter 27

General housing policies, including affordable housing (policies DP1, DP1A, DP2, DP3, DP4, DP5, DP6, DP7, DP8)

Issue Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards the provision housing and affordable housing.

Proposed new Policy DP1A - Housing Provision for Older People and those with Disabilities and Special Needs (see MMs33-35)

1. Is the policy justified, effective and consistent with national planning policy?
2. Are the policy requirements clear?
3. Is the policy flexible enough?
4. Has the policy been viability tested to ensure it does not prevent development coming forward?

Policy DP3 – Affordable Housing Provision

1. Is the policy justified, effective and consistent with national planning policy, including the 2021 Framework (Paragraph 4.53 of the explanation to the policy refers to the 2019 Framework)?

1.0 Proposed new Policy DP1A - Housing Provision for Older People and those with Disabilities and Special Needs (see MMs33-35)

1.1 For clarification, it is noted that the council held a consultation in May 2024 on a paper entitled 'GC25: The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation' and then published without consultation a document in July 2024 entitled 'Schedule of Proposed Modifications'. The modifications paper changes the policy referencing from GC25 to DP1A **Housing Provision for Older People and those with Disabilities and Special Needs** and introduces Main modification MM033 to MM035. These main modifications introduces GC25 and its justification into the plan without much alteration despite objections. We consider its length and lack of clarity in our answer to question 2 below.

2.0 Question 1: Is the policy justified, effective and consistent with national planning policy?

2.1 New Policy DP1A is not positively prepared, effective justified or consistent with national policy and will not be effective with respect to delivering much needed specialised housing for older people as identified within Table 64, page 90 of the Shropshire Council Strategic Housing Market Assessment Report, Part 2, 2020, Shropshire Council. (EV097.02, 'SHMA'). We have particular concern with paragraph 6 of the policy that requires specialist housing for older people to deliver 100% of houses to the M4 (3) standards of the building regulations. The Council cannot justify this approach and as it has not tested specialist housing for older people as its own typology for Viability nor have they tested any housing, whether mainstream or older persons housing, for 100% M4 (3) housing it is also not consistent with national policy.

2.2 To note, we also have concern with other elements of the policy which we detailed within our representation dated 11th June 2024, Part A reference 203, which we have not repeated here, but suggest that a new replacement policy that is much more concise and understandable than the confusing way that policy DP1A is currently drafted may be the right approach. This may be a more coherent and easier way to introduce a policy relating to specialist housing for older people rather than amending the current policy.

2.3 National Policy and Guidance

2.4 The PPG Optional Technical Standards at Paragraph: 002 Reference ID: 56-002-20160519 makes clear

Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their [Local Plans](#).

2.5 In respect of the Plan's requirement for specialist older persons housing to deliver 100% M4(3), the Council has not done so but rather taken an unsupported position that all older people will require such housing.

2.6 The PPG on Viability confirms at para 'Paragraph: 002 Reference ID: 10-002-20190509 that:

*'The role for viability assessment is **primarily at the plan making stage**. Viability assessment should not compromise sustainable development but should be used to ensure that **policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan**.....Policy requirements, particularly for affordable housing, should*

*be set at a level that takes account of affordable housing and infrastructure needs and allows for the **planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.***

- 2.7 Paragraph 004 Reference ID: 10-004-20190509 of PPG confirms what is meant by a typology approach to viability:

*'A typology approach is a process plan makers can follow to ensure that they are creating realistic, **deliverable policies** based on the type of sites that are likely to come forward for development over the plan period.....*

In following this process plan makers can first group sites by shared characteristics such as location, whether brownfield or greenfield, size of site and current and proposed use or type of development.....

*Average costs and values can then be used to make assumptions about how the viability of each type of site would be affected by all relevant policies. **Plan makers may wish to consider different potential policy requirements and assess the viability impacts of these. Plan makers can then come to a view on what might be an appropriate benchmark land value and policy requirement for each typology.***

*Plan makers will then engage with landowners, site promoters and developers and compare data from existing **case study sites to help ensure assumptions of costs and values are realistic and broadly accurate.....Plan makers may then revise their proposed policy requirements to ensure that they are creating realistic, deliverable policies.***

- 2.8 The PPG on Housing for older and disabled people considers if plan making bodies should set minimum requirements for accessible housing and at Paragraph: 009 Reference ID: 63-009-20190626 confirms that *'Where an identified need exists, plans are expected to make use of the optional technical housing standards (footnote 46 of the National Planning Policy Framework) to help bring forward an adequate supply of accessible housing'*. The same paragraph then confirms that *'Planning policies for accessible housing need to be based on **evidence of need, viability and a consideration of site-specific factors**'*. The need to consider viability with respect to accessible and adaptable housing is re-confirmed in para 007-Ref ID56-007-20150327 of the government guidance on 'Housing Optional Technical Standards'

2.9 **Local Plan Viability Testing**

- 2.10 We submitted a statement to Matter 8 (attached at Appendix 1 for completeness and length of time since this was submitted) of the Examination Public in June 2022. This highlighted that the Viability Study supporting the plan by HDH Planning & Development (Examination Ref: EV115.01) (LPDVS) had not included an assessment of the viability of specialist housing for older people, namely Sheltered housing and extra-care housing. This position is confirmed at paragraph 4.78 of the LPDVS. Within our Matter 8 statement we noted that *'We would note therefore that not testing the viability of specialist older persons' housing typologies is now atypical, particularly of HDH Planning & Development who have undertaken testing of sheltered and extra care housing typologies as part of the evidence base for many Local Plans'* and within these other Local Plan Viability assessment HDH acknowledge the different cost assumptions that older persons housing holds. This was submitted on the back of our responses to the regulation 19 consultation that highlighted our concerns with policy DP1

bullet 4 that had a similar M4 (3) requirement for specialist housing and still maintain our objection to this.

- 2.11 In the 2 years since we submitted our Matter 8 statement the Council have not sought to test the older persons housing typology.
- 2.12 The viability of specialist older persons' housing differs from mainstream housing and is more finely balanced than 'general needs' housing and we are strongly of the view that the older person's housing typologies should be robustly assessed separately for this reason in a similar way that may Local Planning Authorities are. It differs from a standard model of development because, as confirmed within the PPG (Paragraph: 010 Reference ID: 63-010-20190626) it generally has additional facilities such as extensive communal areas to socialise and in respect of Extra Care typologies, care related facilities such as a wellbeing centre, restaurant, as well as a care service with 24 hour access to support services and staff, meals are also often available. This enables residents to live much more independently than they would otherwise.
- 2.13 The Retirement Housing Consortium has published a paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note') available from <https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf>). This establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods and significantly variable benchmark land values. They generally add addition cost.
- 2.14 Therefore, without any evidence of viability or need, it would be inappropriate for the council to apply generic or additional policy requirements to older persons housing. This together with viability considerations is likely to necessitate a bespoke affordable housing and other policy requirements with a reduced policy rather than an increased requirement if tested for viability.
- 2.15 **Local Plan Viability testing and cost / requirement for 100% M4 (3) housing**
- 2.16 We note that an updated 'Viability Update Note June 2024' (ref GC24) ('LPDVS') ('Viability Note') has been produced by HDH planning for the council. This was published after the May 2024 consultation had ended. This does not seek to test schemes delivering specialist housing for older people for viability however, the note confirms at paragraph 1.3 that it considers costs and values and at para 1.5 whether the council can still rely on the 2020 LPDVS (ref: EV115) . It concludes at para 7.7 that '*whilst an update to the 2020 LPDVS would inevitably derive different appraisal results, it is unlikely that the conclusions of the study would be materially different*'.
- 2.17 The Viability Note then at para 4.4 to 4.6 considers M4(2) and M4 (3) housing specifically. At para 4.5 this confirms costs for M4(3) housing and confirms that '*The costs associated with these requirements were set out at paragraph 8.12 of the 2020 LPDVS. **The cost of a wheelchair adaptable dwelling based on the Wheelchair Housing Design Guide for a 3-bed house, is taken to be £10,111 per dwelling. The cost of Category 2 is taken to be £521 (this compares with the £1,097 cost for the Lifetime Homes Standard).** Through the February 2020*

consultation it was suggested that these costs be indexed as they are somewhat dated. This has been done, uplifting these costs by 17%.’

- 2.18 Para 4.6 then confirms ***‘If the requirements for mandatory M4(2) are introduced nationally, in Shropshire the requirement would be increased from 70% to 95% (the remaining 5% is assumed to be M4(3)). Across a scheme, this is likely to add about £1.50 per sqm (at indexed costs) or about 0.1% to the cost of development. This is a small cost and beyond the Council’s influence’.***
- 2.19 **It is clear therefore, given evidence from the Council’s viability consultant, that the cost of delivering housing built to M4(3) standards has a substantially higher cost and that a higher requirement for 100% M4(3) is not considered within the LPDVS or the update note. This only considers a 5% M4(3) requirement for general market housing. The council therefore have no evidence or justification for requesting such a requirement.** Additional costs for M4(3) housing come about because M4 (3) housing includes costs for fixtures and fittings, services and controls, additional room dimensions and layout which include up to 30% more floorspace and corresponding reduction in density, sales values and affordability of such housing. While some value may be secured for larger units this is unlikely to mitigate the overall loss of units across the proposal as a result of the requirement.
- 2.20 The cost impact of requiring M4(3) standards on older persons housing development was discussed at a recent planning appeal in Penketh in Warrington in February 2024 (appeal reference 3327682). The inspector in this case confirms that the implications of requiring M4(3) standards would include additional development cost **and** a required increase in unit size and communal space dimensions. The impact of increased unit sizes and larger communal space will impact on the density of development achievable on constrained brownfield development as well as impacting on Viability.
- 2.21 We also note that a number of other Council’s more recent viability studies have included costs for M4(3) housing. This ranges from £10,000 per unit to £14,000 per unit (for example South Kesteven Viability Study, HDH, 2024, London Borough of Enfield Viability Study, HDH and Horsham Viability Study, Dixon Searle) for specialist housing for older people and shows the recognition in the industry of the additional cost that such a requirement brings per unit. This would result in additional costs of between £500,000 to £700,000 per 50-unit scheme. This is substantially more than the approximately £521 plus 17% per unit (£30,478 per 50 unit scheme) included within the Shropshire Viability Study and identifies why the requirement cannot be included within the Local Plan without additional viability work being produced to support the plan.

2.22 The Council’s response to our representations

- 2.23 The Council has considered our representation on the then policy GC25 with respect to 100% M4(3) within the document ‘Draft Shropshire Local Plan Further Consultation: Response Summary’. They Council dismiss our objection and their response states that:

‘Shropshire Council would be very surprised if it was suggested achievement of the M4(3) (wheelchair user dwellings) standard constitutes an additional cost for specialist housing specifically designed for older people or those with disabilities and special needs. It is expected achievement of this standard is a default design requirement for any such housing, to ensure it meets the current/future needs of intended occupiers. Particularly as Government is proposing to require M4(2) accessible and adaptable standards as a minimum requirement

for all dwellings. It is also important to recognise that much of this form of housing benefits from economies of scale in achieving these design requirements. Finally, the Council would note that this proposed requirement already formed part of the submission version of the draft Shropshire Local Plan'

2.24 McCarthy and Stone is the largest provider of specialist housing for older people in the county. We design our developments to meet the NDSS and M4(2) requirements as standard (we cannot answer for specialist disabled housing operators) but with the additional costs of M4(3), as expressed within para 8.12 of the 2022 LPDVS of £10,111 per dwelling plus inflation, such additional costs, on top of those already described in para 2.12 and 2.13 above would deem schemes even less viable and restrict delivery. The Council are wrong in their assumption that M4(3) is a default design for specialist housing for older people. If the Council do not accept this position it would be interesting to learn about the 'economies of scale' that could be applied to such housing advocated by the council come about. In addition although we note that the requirement for M4(3) 100% housing was included within the submission version of the plan within policy DP1 bullet 4 we expressed our objection at the time to this and still maintain this objection. We are therefore concerned as to the council's approach to older persons housing and M4(3) housing and viability.

2.25 **Conclusion**

2.26 The council have provided no housing needs evidence which shows that 100% of older person's housing in Shropshire needs to be built to M4(3) standards and no viability evidence provided that assesses older persons housing (and the additional costs it entails) that includes further cost that M4(3) brings. The requirement for 100% M4(3) housing is therefore unsound and not justified and **point/paragraph 6 of policy DP1A should be removed from policy DP1A as a minimum.** M4(3) Housing has a large cost implication and will serve to reduce the number of dwellings that can be delivered on a site, affecting affordability and further reduce viability. Given the additional large cost of M4(3) such a requirement will have a negative impact on delivering the substantial amount of specialist housing for older people required in Shropshire. It is therefore contrary to para 35 of the NPPF and not consistent with national policy.

2.27 Our response to Matter 8 – Infrastructure and Delivery, Monitoring and viability already highlighted our concern with the fact that '*no viability appraisals were undertaken for specialist older persons*' housing typologies – namely Sheltered Housing and Extra Care accommodation and that this is contrary to both best practice and the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG.

2.28 The council are clearly aware of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG at Paragraph: 002 Reference ID: 10-002-20190509. Indeed, contrary to PPG the Council has not tested the specialist housing for older people and a separate typology and then has not tested the policy requirement of older persons housing, or any type of housing, to deliver 100% M4 (3) housing within the Viability Study. However, the Council should note that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that the older person's housing typologies should have been robustly assessed separately within the Local Plan Delivery and Viability Study, HDH, July 2020 (Viability Study) that informed plan and this should have tested the relevant affordable housing requirements and other policy costs including 100% M4 (3) housing.

- 2.29 A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person's housing. If 100% M4(3) housing was required, this would impact upon the viability of specialist housing for older people and be likely to prevent delivery.
- 2.30 The policy requirement for asking for all specialist housing for older people to meet M4 (3) standards is therefore not justified, or supported by evidence of viability it is therefore not consistent with national policy and point 6 of the draft policy should be deleted as follows:

~~**6. All specialist housing for older people or those with disabilities and special needs will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations and must also be designed to be 'friendly' to those with dementia and to those with disabilities and special needs**~~

3.0 Question 2: Are the policy requirements clear?

- 3.1 Notwithstanding our concerns with regard to specific elements of draft policy GC25 discussed below, initially given the requirement of the NPPF at paragraph 15 and 16 d and f that requires plans to be succinct and written in a positive way, that meets housing needs and to contain policies that are clearly written and unambiguous and serve a clear purpose, avoiding unnecessary duplication we feel that draft policy DP1A (MM033) and its supporting text MM034 should be reconsidered. As currently written, it is far too long, muddled, repeats national policy at points and could be cut down and re-written substantially. It is currently not clear. Much of the text is purely justification that could or should be within evidence documents supporting the plan rather than within the plan itself. A much simplified policy could be incorporated that, given the very significant need identified, supports specialist housing for older people without unnecessary barriers to delivery.

4.0 Question 3: Is the policy flexible enough?

- 4.1 No, although the policy may be flexible it is far too long, muddled, difficult to understand and repeats national policy. It should be re-written to be clear and concise and deleting the requirement for older persons housing deliver 100% M4(3) as that is not justified.

5.0 Question 4: Has the policy been viability tested to ensure it does not prevent development coming forward?

- 5.1 No, the policy has not been Viability tested. As currently written it will prevent specialist housing for older people from coming forward due to the large additional policy requirements as discussed in our answer to Question 1.

Policy DP3 – Affordable Housing Provision

6.0 Question 1: Is the policy justified, effective and consistent with national planning policy, including the 2021 Framework (Paragraph 4.53 of the explanation to the policy refers to the 2019 Framework)?

- 6.1 No. Policy DP3 requires the delivering of between 10% and 20% affordable onsite for housing sites that are larger than 0.5 hectares or 10 dwellings or more. This currently includes specialist housing for older people. As set out in paragraphs 2.10 to 2.14 above as well as our

previous submissions, the council have decided not to examine the viability of housing for older people as part of their plan wide viability analysis electing instead to examine the viability of such proposals at the development management stage, despite additional costs that the housing typology experiences and the approach being contrary to national policy and as discussed in para 2.4 to 2.8 above.

- 6.2 Meanwhile, there is no justification for seeking affordable housing and other policy requirements within local plan policy. This approach is completely at odds with the approach applied by other local planning authorities around the country. We would draw the Examiners attention to relevant Local Plan policies within Swale and Fareham Borough Councils. Based on detailed viability evidence, both have adopted Local Plans that exempt older people's housing schemes from affordable housing. Furthermore, Fareham exempts older people's housing from their Community Infrastructure Levy charge. Similarly, Maidstone BC has recently adopted a plan that has a lower affordable housing requirement for class C3 retirement housing and exempts housing that falls into the C2 use class from delivering affordable housing. Charnwood, Leicestershire, are towards the latter stages of their Local Plan examination and have recently consulted on main modifications that exempt specialist housing for older people from affordable housing, as well as removing the requirement for M4(3).
- 6.3 The respondents are of the view that similar conclusions would be made in this case in respect of housing for older people whereby a reduced or even zero affordable housing requirement would be more appropriate given that in some areas only 10% affordable housing is viable for mainstream housing.
- 6.4 As a housing typology which the draft local plan clearly assigns priority to as it addresses a housing need, it should be tested as part of the plan wide viability study to ensure it is deliverable and the policy requirements applied do not make it unviable over the plan period.
- 6.5 With no viability evidence base in place to support asking for affordable housing from specialist housing for older people is not justified for the council to expect housing for older people to provide affordable housing. As such we would recommend that the following wording is added to the policy:

Specialist housing for older people is exempt from providing affordable housing.

APPENDIX 1 – McCarthy & Stone Matter 8 hearing statement

The Planning Bureau Limited

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01st June 2022

By email: Programme.Officer@Shropshire.gov.uk

Dear Sir/Madam,

McCARTHY STONE RETIREMENT LIFESTYLES LIMITED AND CHURCHILL RETIREMENT LIVING HEARING STATEMENT TO SHROPSHIRE LOCAL PLAN 2016-2038

MATTER 8 – INFRASTRUCTURE AND DELIVERY, MORNITORING AND VIABILITY

This supporting statement has been prepared on behalf of McCarthy Stone and Churchill Retirement Living, two independent and competing housebuilders specialising in housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing.

The affordable housing targets set out in *Policy DP3: Affordable Housing Provision* are informed by *The Local Plan Deliverability & Viability Study* (2020) undertaken by HDH Planning & Development (Examination Ref: EV115.01).

In reviewing EV115.01 we note that no viability appraisals were undertaken for specialist older persons' housing typologies – namely Sheltered Housing and Extra Care accommodation.

Justification for not testing the viability of specialist older persons' housing typologies is provided in paragraphs 4.78 of the Viability Study which simply advises:

4.78 *Shropshire has an aging population and does attract both sheltered and Extra Care developments however it is beyond the scope of this project to test this sector as they will be subject to a viability assessment at the point of a planning application.*

This is contrary to both best practice and the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "A *typology approach* is a process plan-makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period."

The respondents endeavour to provide representation to emerging Local Plans nationally and as such are well acquainted with the work of consultants who typically undertake such works. We would note therefore that not testing the viability of specialist older persons' housing typologies is now atypical, particularly of HDH Planning & Development who have undertaken testing of sheltered and extra care housing typologies as part of the evidence base for many Local Plans, including in the past year:

- Charnwood Borough Council
- Enfield Borough Local Plan
- Mole Valley Local Plan
- Portsmouth Local Plan

Indeed, it is the respondents experience that EV115.01 is the only Local Plan Viability Assessment which HDH Planning has undertaken which does not test specialist older persons' housing typologies. To this end we would like to bring the Examiner's attention to the Pre-Consultation Draft of *The Local Plan Deliverability & Viability*

4th Floor, 100 Holdenhurst Road, Bournemouth, Dorset, BH8 8AQ

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Study issued in February 2020. This document has not been submitted by the Council as part of the Examination Library however we have provided a copy for your reference.

The content of the Pre-Consultation Draft of EV115.01 refers to viability modelling of specialist older persons' typologies in paragraphs 4.77 (pg. 71), 9.18 (pg.126) 10.66 (pg. 141).

To this end we respectfully question the omission of viability testing for specialist older persons' housing typologies in the final version of EV115.01.

The NPPF and the PPG are clear that the role for viability assessment is primarily at the Plan making stage:

Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force (paragraph 58.)

Council Members, Officers and the general public will assume that applications for sheltered or extra care housing will be able to support a policy compliant level of affordable housing. Burdening specialist forms of accommodation with an unrealistic affordable housing requirement on the presumption that viability will be considered on a site-specific basis, but not making this clear to either developers or Council Officers in the wording of the policy creates both uncertainty and a significant opportunity for conflict. It is also surprising as the Council has acknowledged viability constraints for older people's housing on recent actual schemes e.g. Bridgnorth (Churchill Retirement)

Indeed, rather than acknowledging that affordable housing contribution for older persons' housing typologies will be determined on a site-by-site basis, sub-clause 2) of Policy DP3 advises that:

- 2. The provision of reduced rates of affordable housing due to viability concerns on otherwise sustainable schemes will be considered in exceptional circumstances where evidence is clearly presented and agreed by the Council. In these circumstances an overage clause will be sought in order to secure the potential for future contributions towards affordable housing.*

This is an inappropriate method for setting policy and creates unrealistic expectations for Council Officers and Council Members. It is wholly contrary to Paragraph 58 of the NPPF. It is particularly concerning as the NPPF and the PPG both make it clear that the weight attributed to a viability assessment is to at the discretion of the decision maker.

Moreover Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).

*These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. **Policy requirements should be clear so that they can be accurately accounted for in the price paid for land.** To provide this certainty, affordable housing requirements should be expressed as a single figure rather than a range. **Different requirements may be set for different types or location of site or types of development.***

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Paragraph: 001 Reference ID: 10-001-20190509 (NPPG Viability)

By not testing the typology, no certainty is provided for developers of housing for older people in acquiring sites and undermining the delivery of these much needed forms of housing.

To this end the Local Plan is considered unsound on the grounds the affordable housing targets are not justified, positively prepared or effective.

In the event that Financial Viability Appraisals for specialist older persons' housing typologies are presented to the Examiners at Examination in Public, then the respondents are strongly of the view that these should be made publicly available for comment.

The PPG makes it clear that Local Plan process is a collaborative process stating that *'It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers* (Paragraph: 002 Reference ID: 10-002-20190509).

To that end the respondents would like to formally state an interest in reviewing and commenting on any financial viability appraisals for specialist older persons' housing typologies if these are prepared during EIP.

Yours sincerely,

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