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Dear Sirs,

**CHURCHILL RETIREMENT LIVING
RESPONSE TO CONSULTATION ON THE SOUTH STAFFORDSHIRE COUNCIL
DRAFT LOCAL PLAN REVIEW (REGULATION 19) CONSULTATION**

Policy HC3: Affordable Housing

Policy HC3: Affordable Housing sets a flat affordable housing requirement of 30% across the district.

The wording of *Policy HC3* makes it clear that off-site and non-policy compliant level of affordable housing will only be allowed in 'exceptional circumstances.'

'...Planning applications that comply with up-to-date policies in this plan will be assumed to be viable. Consideration will not be given to reducing the affordable housing contribution on the grounds of viability unless the applicant can first demonstrate to the satisfaction of the council that particular circumstances justify a viability assessment at application stage, as per the PPG.'

It is clear from the wording of the policy and its justification that the Local Authority is cognisant of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF. Given the Council's stance towards developer contributions and affordable housing, we find aspects of the evidence base underpinning these policies to be of concern.

The affordable housing targets set out in *Policy HC3: Affordable Housing* of the *South Staffordshire Council Local Plan Review (Regulation 19) consultation* are informed by the *South Staffordshire Local Plan Viability Assessment (LPVA)* by Dixon Searle Partnership (October 2022).

We note that the LPVA has assessed the viability of older persons' housing typologies, which is welcomed.

In reviewing the methodology for assessing specialist older persons' housing, we note that many of the inputs align with the methodology detailed in the Briefing Note on Viability Prepared for the Retirement Housing Group (hereafter referred to as the RHG Briefing Note) by Three Dragons, although a number do not. Our concerns are that the Viability Assessment has overplayed the viability of older persons' housing.

Mindful of the guidance in the PPG that is the responsibility of site owners and developers to engage in the Plan making process. Churchill Retirement Living have provided commentary and supplemental evidence and their own viability appraisal in a separate document entitled '**Review of Local Plan Viability Assessment for Sheltered Housing**'.

All the scenarios tested result in substantial negative residual land value. The extent of the deficit is such that it clearly demonstrates the existing framework of planning obligations and policy requirement places an unacceptable burden on specialist older persons' housing in the area

It is also noted that the Local Plan Viability Study was issued in October 2022, with much of the evidence underpinning its contents dating back to early 2022 when the market was buoyant. It does not therefore reflect the uncertainty in the property market at present given the Bank of England changes to base lending rates in September 2022 and forecast further increases in 2023 to curb rates of inflation. It is forecast that the knock-on impact on mortgage affordability and wider cost of living issues at present will put an end to the inflation seen in house price growth seen over the last few years. In general, market commentators are forecasting house price reductions across the market during 2023

The immediate outlook therefore is for costs to continue to inflate with some uncertainty in relation to open market sales values beyond 2022.

In light of the above we would suggest that the Council ensure there is sufficient headroom in the viability of developments and that its policy requirements are robustly tested.

Policy HC5: Specialist Housing Schemes

Paragraph 1 of the PPG Housing for Older and Disabled people states:

“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking”.

Paragraph: 001 Reference ID: 63-001-20190626

The age profile of the population can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 27,238 persons aged 65 and over in 2018, accounting for 24% of the total population of South Staffordshire.

This age range is projected to increase by 8,934 individuals, or 33%, to 36,172 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 30% of the total population of the Borough by 2043.

In 2018 there were 7,095 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 5,628 individuals, or 79%, to 12,723 persons between 2018 and 2043.

Meeting the diverse housing needs of older people over the Local Plan period is substantial undertaking unless action is urgently taken the Council will struggle to address this need. The inclusion of a positively worded policy, strongly supporting the delivery of specialist older persons' housing will assist in this regard.

Policy HC17: Open Space

Policy HC17 stipulates a requirement for sites of 33 dwellings or above to provide 60m² of multi-functional, centrally located open space per dwelling.

It is problematic when Local Planning Authorities seek to impose generic design standards on specialist older persons' accommodation as they rarely consider the specific needs of the intended residents and disregard the expertise of specialist providers in providing these types of development.

Typical purchasers are 78-year-old widows who typically move into retirement living accommodation prompted by an 'event' such as the death of a partner, or a serious trip or fall. Residents tend to be frailer, or mindful of increasing frailty. Residents therefore tend to use the communal garden space in a passive way and mainly involves sitting out.

Housing designed for a range of potential occupiers, in particular families, require a greater amount outdoor space to accommodate space for children's play, space for light exercise and socialising. This is not however the case for retirement living apartments.

Specialist older persons' accommodation also incorporates internal communal facilities for the benefits of residents, such as a communal lounge or coffee bar. This is a highly valued space, which helps promote social interaction and facilitate a sense of community. Residents value this amenity space far more than large, grassed areas and is usable all year round.

We are therefore of the view that a requirement for 60m² per dwelling substantially exceeds the needs of residents of older persons' housing. Appeals by developers of specialist older persons' housing contesting refusals by Councils on the grounds of non-compliance with amenity space standards have consistently been determined in favour of the appellant.

RECOMMENDATIONS

Specialist housing, particularly older persons' housing, should be exempt from the requirement to provide 60m² per dwelling with the level of amenity space determined on a case-by-case basis.

Given the importance placed on achieving efficient use of land, as set out in para 122 of the NPPF, the level of amenity of all housing developments near town or district centres should be determined on a case-by base basis. This will allow for the most efficient use of land in the most sustainable locations.

Thank you for the opportunity for comment.

Yours faithfully

Ziyad

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