


Planning Policy,
Cannock Chase District Council
by email only



18th March 2024

Dear Sirs,

CHURCHILL RETIREMENT LIVING RESPONSE TO THE CANNOCK CHASE LOCAL PLAN PRE-SUBMISSION (REGULATION 19) CONSULTATION

Churchill Retirement Living is an independent housebuilder specialising in retirement living housing for older people.

We respond to the policies of the consultation insofar as they impact the delivery of specialist accommodation for older persons.

POLICY SO3.2: HOUSING CHOICE

The *Cannock Chase Local Plan* (Regulation 19 Consultation) is one of an alarmingly limited number of emerging Local Plans that have set a differential affordable housing rates for areas across the borough and for brownfield sites in *Table D: Affordable Housing Provision per Site*. This is, of itself, highly commendable and suggests a greater focus on viability at the Plan making stage.

The affordable housing targets set out in *Policy SO3.2* are informed by the *Local Plan and CIL Viability Assessment* (LPCVA) (2022) undertaken by Aspinall Verdi. We note that the LPCVA has assessed the viability of older persons' housing typologies, which is welcomed.

The results of the viability modelling for older persons' housing typologies are provided in *Table 6.5 - Viability Appraisal Summary Typologies BP - BS - Age Restricted / Sheltered Housing*.


This concludes that:

6.14 *All of these typologies are unviable with 20% affordable housing and £0 CIL.*

6.15 *The appraisal results show that all four typologies are quite significantly unviable at 20% affordable housing. The deficit per acre ranges between £1,460,000 and £9,800,000. The largest deficits are for the two typologies for Rugeley and Cannock (BR and BS) as a result of the lower GDV in both. In all of the typologies (BP - BS), the sensitivity tables show that there is no green coming though indicating scenarios where affordable housing could be delivered.*

This aligns with the experience of the respondent in delivering sheltered / retirement living housing in the district.

The Council's decision to not to set a lower affordable housing requirement for specialist older persons' housing .is not justified in the wording or supporting text for Policy SO3.2. The requirement for affordable housing contributions from specialist



older persons' housing typologies is therefore speculative and not based on the evidence base.

The guidance in the NPPF and the PPG is 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 57.)

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 (10 - 30%) of affordable housing. This would however be at odds with the viability evidence underpinning the Local Plan.

We are strongly of the view that it would be more appropriate to set a nil affordable housing target for sheltered and extra care development, at the very least in urban areas. This approach accords with the guidance of the PPG which states that 'Different (affordable housing) requirements may be set for different types or location of site or types of development' (Paragraph: 001 Reference ID: 10-001-20190509).

To that end, we would like to draw the Council's attention to Paragraph 5.33 of *Policy HP5: Provision of Affordable Housing* in the emerging Fareham Borough Local Plan which advises that:

5.33 ... The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HP5 does not apply to specialist housing or older persons housing.

A nil affordable housing rate could facilitate a step-change in the delivery of older person's housing in the Borough, helping to meet the diverse housing needs of the elderly as detailed in *Policy H2: Housing for Older People and People with Disabilities*. The benefits of specialist older persons' housing extend beyond the delivery of planning obligations as these forms of development contribute to the regeneration of town centres and assist Council's by making savings on health and social care.

POLICY SO8.2: ACHIEVING NET ZERO CARBON DEVELOPMENT

The Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions by 2050 is commendable.

We consider that the wording of any forthcoming policy should encourage developers to maximise opportunities to reduce greenhouse gas emissions, but not mandate enhanced standards above those in Part F and Part L of the Building Standards.

There is considerable momentum from Government in preparing enhanced sustainability standards through The Future Homes Standards and it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. Realistically by the time a new Local Plan is adopted, the Building Regulations will require all new housing to be 'net zero ready'.

This will be a considerable challenge for the house-building industry who will require time to develop the materials and the skills necessary to build zero carbon homes in the volumes required to meet housing need.

On a more practical level we note that many Local Plan policies that stipulate technical requirements for carbon reduction technologies or measures tend to date badly. In most cases these requirements are superseded by the Building Regulations, but in some cases, they contradict it.

Aligning the Council's requirement for carbon neutral development with those of Government would therefore be welcomed.

Thank you for the opportunity for comment.

Yours faithfully

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