

1) Please confirm which document this representation relates to.

Schedule of Proposed Main Modifications

2) Please confirm which part of the document this representation relates to? (If your representation relates to multiple sections and/or documents, please add separate comment(s) to the relevant section on this event page)

If Main Modification (please quote number e.g. MM1):

MM 217 & MM218

Chapter and (if applicable) subheading:

Policy/ Paragraph number:

3) Do you consider the Main Modification/ document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038):

Yes No

Legally Compliant

*

Sound

*

4) Please give details of why you consider the Main Modification/ document not to be legally compliant or sound. Please be as precise as possible and provide evidence to support this. Or if you wish to support the legal compliance or soundness of a main Modification/ document, please also use this box to set out your comments.

McCarthy Stone (MS) and Churchill Living (CL) are independent housebuilders specialising in specialist housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. Both operators are therefore well placed to provide comment on the policy barriers that may have the potential to restrict supply within the sector.

McCarthy Stone previously submitted a Stage 3 Hearing Statement to the EIP in respect of Matter 8 Issue 3 – 'Housing for Older People and People with Disabilities' and some comments are repeated as appropriate. The following comments focus on Main Modification MM217 - Housing for Older People and People with Disabilities, MM215 and MM216– Affordable Housing and MM218 Policy H6 Housing for Older People and People with disabilities.

The proposed main modification includes:

*Extra care accommodation or housing with care is self-contained, with associated facilities, providing 24-hour access to **care and** emergency support, as well as on-site facilities such as a residents' lounge, laundry room, and meal provision facilities.*

This proposal is contrary to National Planning Practice Guidance (PPG) on housing for older and disabled people which provides a definition of Extra care housing that includes:

*“Residents are able to live independently with **24 hour access to support services and staff**, and meals are also available”^[1].*

^[1] Paragraph: 010 Reference ID: 63-010-20190626

We support MM218 in the introduction of the wording ‘**unless impracticable or unviable due to site specific factors**’ in relation to the provision of 5% M4(3) housing.

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5) If you do not agree with the proposed Main Modification/ document please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified in question 4 (above) where this relates to legal compliance or soundness. Please be as precise as possible.

Recommendation:

The PPG definition does not require 24-hour access to care, and moreover the proposed modification does not define what is meant by ‘care’ and will therefore not be effective. The proposed modification should either not be accepted as it is not consistent with national policy, or be amended in line with PPG so that it reads ‘**24-hour access to support services and staff**’

MM217 proposes the following additional text to Policy H6 which is more supportive of retirement housing and is welcomed.

The Council is also supportive of proposals for other types of retirement housing, such as retirement living or sheltered accommodation, which can help to broaden the choice of good quality homes for older people, provided proposals are consistent with other relevant policies in the Plan.

7) Please tick this box if you wish to be kept informed about the Inspector's Report and/ or adoption of the Local Plan.

Yes, please keep me informed