

Planning Policy
Gosport Borough Council
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Dear Sirs,

**CHURCHILL RETIREMENT LIVING & McCARTHY STONE
RESPONSE TO CONSULTATION ON THE GOSPORT BOROUGH DRAFT LOCAL
PLAN 2038 (REGULATION 18) CONSULTATION**

Policy D8: Healthy Communities

We welcome the Council's commitment to the health and wellbeing of its residents. As detailed in our representation to *Policy H3: Housing for Older and Vulnerable People*, the demographic profile of the Borough is ageing with a requirement for 1,000 units of specialist older persons' accommodation over the Plan period.

An ageing population inevitably results in an increase in frail individuals and persons with long term health issues. There is a commensurate pressure on care and health services accordingly with many local authorities spending over a third of their budgets on adult social care currently.

It is well established that poor housing can exacerbate health problems in old age, with enormous resultant costs to the NHS and social care. For example:

Falls - Public Health England statistics show that in 2017/18 falls accounted for 335,000 hospital admissions in England of people aged 65 and over.

Cold Homes - Millions of older people in the UK are living in homes that are too cold. A cold home can cause chronic and acute illnesses and lead to reduced mobility, falls and depression.

Social Isolation - 1.5 million people aged 50 and over are always or often lonely, researchers have calculated. Loneliness makes it harder for people to regulate behaviours such as drinking, smoking, and over-eating, which in turn have their own significant negative outcomes.

Specialist older persons' housing has been developed with the needs of the elderly in mind, enabling them to remain independent for longer. These homes are designed to be warm and with features to alleviate the physical impact of ageing (such as level access throughout) and offer opportunities for residents to access support, care, and companionship. The recently published *Healthier and Happier Report* by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year.

The Council's aspirations to improve the health and wellbeing of its residents is commendable and we are strongly of the view that increasing the delivery of specialist older persons' housing is wholly aligned with this objective.

RECOMMENDATIONS

We recommend that the role of specialist older persons' housing in improving the health and wellbeing of the district's elderly residents is acknowledged in the wording of this policy.

As a suggestion we would recommend an additional sub-clause to the policy which reads as follows:

- 8 *Ensure that the needs of the Borough's ageing population are addressed, and that older people have increased access to support, care, companionship, and appropriate accommodation.*

Policy H2: Affordable Housing

Policy H2: Affordable Housing sets a flat affordable housing requirement of 40% across the Borough.

The wording of Policy 2 and its justification makes it clear that a non-policy compliant level of affordable housing will only be allowed in exceptional circumstances stating that:

... In exceptional circumstances the Council will consider a financial contribution being negotiated to make up the full requirement as appropriate. In all cases where proposals fall short of the policy target an open-book approach will be taken and the onus will be on the developer/ landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution. The Council will seek to negotiate a percentage of affordable housing as close as possible to the target level having regard to a site-specific viability assessment.

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. The evidence underpinning the Council's affordable housing requirement should therefore be robust and we would respectfully remind the Council that the PPG states 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*" (Paragraph: 002 Reference ID: 10-002-20190509).

Disappointingly the Regulation 18 consultation is not supported by a Local Plan Viability Assessment (LPVA) publicly available. The respondents sought clarification from the Council on this matter and were advised by the Planning Policy Team via email that the LPVA it is the Council's intention to publish the LPVA alongside the Regulation 19 Assessment.

In the first instance it is surprising that a Planning Authority would choose to publish a Local Plan without having ascertained that the policies within it are deliverable. Secondly by limiting scrutiny of the Local Plan Viability Assessment to the Regulation 19 consultation the Council is reducing the opportunities for comment on this, crucial, element of the evidence base. It is a less robust piece of evidence as a consequence.

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). By limiting the opportunities for comment of the Local Plan Viability Assessment we are of the view that the Council has deviated substantially from national guidance and this could subsequently undermine the soundness of the Plan.

It is our view that the Council should reconsult on the (Regulation 18) Local Plan with the supporting Local Plan Viability Assessment made publicly available for comment at the same time.

We would also like to respectfully remind the Council that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and the respondents are strongly of the view that these housing typologies should be robustly assessed in the LPVA. This would accord with 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."*

RECOMMENDATION

That interested parties are given the opportunity to comment on the Local Plan Viability Study prior to the Regulation 19 Local Plan being published for consultation.

That the viability of older persons' housing typologies is assessed as part of the Local Plan Viability Study.

Policy H3: Housing for Older and Vulnerable People

McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in sheltered housing for older people. Together, we are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing.

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 *Demographic Projections by JG Consulting* and the supporting text to this policy advises that individuals aged 65 and over comprised 20% of the overall population of the Borough in 2018. This demographic is projected to increase by 8,400 and 8,900 individuals over the 18 years to 2038.

It is notable that population aged 85 and over is the demographic with the largest projected increase in the Authority with a projected increase between 2064-2140 people over the Plan period.

Table 4.14 -4.16: *Older Persons' Dwelling Requirements, 2016 to 2036* details the need for specialist older persons' housing by type and tenure over the Local Plan period. This advises that there is a significant requirement for circa 500 units of housing with support (also referred to as retirement living apartments) and 500 units of housing with care (also referred to as extra care). For both types of accommodation, there is a significant requirement for open market units.

We note that the wording of sub-clause 1 of *Policy H3* provides the targets for each specialist older persons' housing typology but states that the level of provision will be 'Up to' each target. This suggests that the targets constitute a maximum level of provision which is wholly contrary to the advice in the *Demographic Projections by JG Consulting* which states in paragraph 4.28 that "*The figures provided above should be treated as indicative as there is no nationally agreed set of prevalence rates.*"

Notwithstanding this, the delivery of 1,000 units of specialist older persons' housing is a substantial undertaking over the Local Plan period and unless action is urgently taken the Council will struggle to address this need.

RECOMMENDATION

We commend the comprehensive manner the housing needs of older people are addressed in the supporting text for *Policy H3*.

We support the inclusion of a dedicated policy for older persons' housing that both acknowledges the need and stipulates the circumstance in which the Local Authority will support the delivery of housing suitable to be adapted to the elderly would be more appropriate.

We do consider that the wording of the targets in sub-clause 1) needs to be amended as it is contrary to the advice given in the evidence base. We request the wording of this policy is amended as follows:

- 1) ... *Provision will be made for the following quantum of specialist housing for older or disabled people:*
 - *A minimum of 500 homes with support (Class C3 sheltered housing or retirement living);*
 - *A minimum of 500 homes with care (Class C2 or C3 enhanced sheltered and extra-care housing);*
 - *A minimum of 750 residential care bed-spaces (Class C2 nursing care).*

Policy DE1: Sustainable Construction

The Council's commitment to meeting both its target of reducing carbon is commendable. Encouraging measures to reduce the energy usage in new development to be a pragmatic approach

Government consulted on interim changes in both Part F and Part L of the Building Standards through the second consultation on *The Future Buildings Standards* and it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. At present it is expected that new homes built from 2022 will need to produce 31% less carbon emission than the current Building Regulations.

This exceeds the requirement in sub-clause 2 b) of Policy DE1 which requires a reduction in carbon emissions of at least 19% compared to the Target Emission Rate of Part L of the Building Regulations.

Rather than looking to set its own targets, it would be more pragmatic for the Council to align its energy efficiency requirements with those of Government.

Finally, we note that sub-clause 2 d) requires all homes over 1 unit to be assessed against the Homes Quality Mark Assessment. The respondents have significant reservations over a mandatory requirement for housing to be accredited by a third-party organization. This will require the assessment of planning applications and discharge of conditions from third party organizations who will not be constrained by statutory timescales. This has the potential to add significant cost and delay to the planning process.

We would respectfully remind the Council that the PPG states 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”

(Paragraph: 002 Reference ID: 10-002-20190509).

RECOMMENDATION

We recommend that the requirement for a reduction in carbon emissions in part 2 b) is aligned with the emerging targets of Government being delivered through the Building Regulations (Part L & F).

The requirement for new housing to be assessed against the HQM should be reconsidered due to the resultant additional delays and costs.

Policy LE7: Protecting and Enhancing Tree, Woodland and Hedge Coverage

The benefits of tree planting and their role in the Government’s target to reach net zero by 2050 has been widely publicised. It is commendable that the Council is looking to engage proactively with this matter in the Local Plan.

We note that there is a requirement for in sub-clause 4 d) of this policy for replacement tree planting at a ratio of 2 new trees for every-one lost.

The aim of tree planting standards is a long-term increase in tree cover, which could be an impediment to building at higher densities on previously developed sites in urban areas. While we appreciate there are benefits to providing trees in urban areas, building at higher densities in these locations reduces greenfield land-take and is a highly sustainable outcome accordingly.

We note, and commend, that the inclusion of a mechanism for proving off-site contributions for tree planting in the wording of the policy however, we respectfully ask that the benefits of building at higher densities in urban areas are taken into consideration.

RECOMMENDATION

Balance the sustainability benefits of efficiently redeveloping previously developed land against those of increasing tree cover in urban areas

Thank you for the opportunity for comment.

Yours faithfully



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