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04th November 2022

Dear Sirs,

CHURCHILL RETIREMENT LIVING WRITTEN STATEMENT TO THE BASSETLAW LOCAL PLAN 2020-2038 EXAMINATION IN PUBLIC

Matter 8 – Meeting Housing Needs of different groups in the community

8.1 a) In Policy ST29 is the 20%/25% (brownfield/greenfield) affordable housing requirements justified, and will it be effective in helping to maximise affordable housing and not undermining deliverability?

The *Bassetlaw Local Plan 2020 - 2037 (Regulation 19 Consultation)* is one of an alarmingly limited number of emerging Local Plans that have set a differential affordable housing rate, with a 20% affordable housing requirement for brownfield sites and a 25% requirement for greenfield sites. This is, of itself, highly commendable and suggests a greater focus on viability at the Plan making stage.

The affordable housing targets detailed in the above policy are informed by the *Bassetlaw District Council Whole Plan & Community Infrastructure Levy Viability Assessment* (hereafter referred to as the Viability Study) undertaken by NCS in April 2022.

In assessing the Viability Study, we note that no viability appraisals were undertaken for specialist older persons' housing typologies – namely Sheltered Housing and Extra Care accommodation. This is disappointing and considered to be 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 *Bassetlaw Housing and Economic Development Needs Assessment (2020)* and *Policy ST31: Specialist Housing* of the draft Local Plan details a requirement for 3,000 units of specialist older persons' housing (and a further 603 care home spaces) over the Local Plan period, and unless action is urgently taken the Council will struggle to address this need. It is therefore clear that viable sites bringing these forms of development forward will be required over the Plan period.

Having reviewed the Viability Study, we note that the viability appraisal results (pages 38 -40) for residential development show that apartment developments are unviable with the lowest requirement of affordable housing tested: a 10% affordable housing and s106 contributions of £1,750 per dwelling. Brownfield sites are less viable than greenfield sites.

The viability of specialist older persons' housing is more finely balanced than that of 'conventional' apartments for several reasons.

- Build costs for are higher for supported housing, with the most recent BCIS build costs rebased to Bassetlaw 20% higher than estate housing and 5% higher than flats.
- Communal floorspace accounts for between 25% and 35% of the Gross Internal Area for specialist older persons' housing, compared to 15% for flats and 0% for houses.
- Sales rates for older persons' housing are currently under 1 unit per month with the nearest retirement living scheme, Eliot Lodge in Ashbourne, selling at a rate of 0.7 units per month.

While specialist older persons' housing can typically achieve an uplift on sales values compared to 'conventional' apartments, this uplift is less pronounced in lower value areas. Given the more challenging economic climate, it is likely that the 'premium' for specialist older persons accommodation will be further reduced.

The viability appraisal results do show that flatted developments, which would include the retirement living and extra care apartments provided by the respondents, are unviable in the authority. This would reflect the experience of Churchill Retirement Living who have struggled to bring forward specialist older persons' housing within Bassetlaw historically.

We are therefore strongly of the view that it would be more appropriate to set a nil affordable housing target for flatted 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).

As a suggestion we would recommend an addition to *Policy ST29: Affordable Housing* which is as follows:

Policy ST29: Affordable Housing

3) *Contributions will not be sought from self-build, custom housebuilding developments and flatted developments including sheltered and extra care accommodation.*

b) Is there convincing evidence to justify the proposed tenure split for affordable housing units? Would this accurately reflect the requirements for affordable housing in the Housing and Economic Development Needs Assessment and Addenda (SS-010, SS-007 and SS-024)?

No comment

c) Is Policy ST29 sufficiently clear in the approach to be taken for off-site and/or financial contributions in lieu of on-site provision?

We note and commend the Council for recognising the difficulties in providing mixed tenures 'in block' within specialist accommodation in sub-clause 6 b) of the supporting text to *Policy: ST29*.

Supported and specialist accommodation can fall within either Use Class C3 or C2 due to the varying level of facilities and care provided on-site. Sheltered housing, as is referenced in the wording of the policy, can frequently sit within Use Class C3.

To avoid confusion, we would recommend the omission of 'Use Class C2' from the wording of this paragraph.

d) Are the suggested main modifications to ST29 and the supporting text necessary for soundness?

No comment

8.3 a) Are the requirements of ST31 relating to the provision of homes that comply with M4(2) of the building regulations justified by evidence relating to need and viability?

The provision of homes built to Part M4(2) is justified by the aging demographic profile of the Authority.

We note that an uplift in Build Costs was allowed for in Appendix 2 of the *Bassetlaw District Council Whole Plan & Community Infrastructure Levy Viability Assessment* which is supported.

b) Does ST31 provide an effective framework to ensure the needs for specialist housing over the plan period will be met? Will the criteria ensure such housing is provided in appropriate locations?

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

We both note and commend the way the housing needs of older people are addressed in the *Policy ST31*. We consider the overview of the matter given in the supporting text to be comprehensive and the inclusion of dedicated policy for older persons' housing to be positive as it both acknowledges the need and stipulates the circumstance in which the Local Authority will support its delivery.

The locational criteria stipulated in clauses a) to d) generally reflect those which Churchill Retirement Living use when selecting sites for their retirement living apartments. Sites are, generally, located within 0.5 miles of a town or neighbourhood centre which contains sufficient shops and services for residents to meet their day-to-day needs, which facilitates greater independence in later life.

Yours faithfully

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