Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

Comment ID 152
Response Date 12/02/20 09:33
Consultation Point Policy HOU2 Older Persons Housing (View)
Status Processed
Submission Type Email
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Tests of Soundness

Do you consider the Local Plan is sound in terms of being:

- Justified . No
- Effective . No
- Positively prepared . No
- Consistent with National Policy . No

Legal and Procedural requirements

Do you consider the Local Plan has been prepared in line with legal procedural requirements? Yes

Duty to Cooperate

Do you consider the Local Plan to be compliant with the Duty to Cooperate? Yes

Reasons

Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.

Under Policy HOU2, on sites of 50 or more dwellings, the Council will seek the provision of a proportion of dwellings that are suitable to meet the needs of older people. The precise proportion, type and tenure will be determined by taking account of the viability of the scheme; evidence of local need; and the scale and location of the site. It is not necessary for the SSPP2 to re-address issues dealt with in the adopted NNJCS. Any local detail set out in the SSPP2 should not duplicate policies adopted in the NNJCS. Policy 30 : Housing Mix and Tenure of the adopted NNJCS sets out the strategic approach for provision of a mix of dwelling sizes and tenures to meet the housing needs including specialist forms of housing for older people. New development on allocated SUEs and strategic sites are also
encouraged to make specific provision for specialist housing requirements for older persons including sheltered and extra care accommodation. Policy HOU2 is repetitive. All households should have access to different types of dwellings to meet their housing needs. The Council's focus should be ensuring that appropriate sites are allocated to meet the needs of specifically identified groups. The SSPP2 should ensure that suitable sites are available for a wide range of types of development across a wide choice of appropriate locations. Furthermore, the 2019 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). The Council's proposed policy approach on the proportion, type and tenure of older persons housing is somewhat vague, which causes uncertainty for developers. If the policy is to be effective, the Council should provide further clarification of its requirements, which should be justified by supporting evidence on the housing needs of older people.

Proposed Actions/Changes

Please explain what changes or actions are needed to make the Local Plan legally compliant.

Before the SSPP2 is submitted for examination, Policy HOU2 should be amended or preferably deleted.

Attendance at the examinations hearings

If you are seeking to change the Plan, would you like to attend the examination hearings? Yes

Notifications

Do you wish to be notified? When the Plan is submitted for independent examination?
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When the Inspector's Report is published?
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When the document is adopted?