Comments

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

Comment ID 177
Response Date 12/02/20 11:25
Consultation Point Policy HOU2 Older Persons Housing (View)
Status Processed
Submission Type Letter
Version 0.2

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? No

Duty to Cooperate

Do you consider the Local Plan to be compliant with the Duty to Cooperate? No

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.

4.4 Policy HOU2: Older Persons Housing
4.4.1 The above policy requires provision of a proportion of dwellings that are suitable to meet the needs of older people on all sites of 50 dwellings or more or 1.6ha.
4.4.2 In principle, Gladman support the Council's efforts to ensuring suitable provision is made to meet the needs of older people over the plan period. However, it is entirely unclear how the Council has arrived at the decision of all sites of 50 dwellings or more to provide a proportion of dwellings for older people.
4.4.3 Despite the need for older persons accommodation, there are challenges to those in this development sector and the economics of this type of accommodation are substantially different from that of general needs housing. In summary, the differences are higher build costs associated to
specific design requirements and features to better suit the needs of older people, the requirement to provide a significant floor area for shared facilities, which are not saleable, and a lack of phasing and other sales issues such as no units can be sold until communal areas are complete which means substantial capital outlay before any return is received.

Proposed Actions/Changes

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

A requirement for all housing developments above 50 dwellings to accommodate older person risks jeopardising the delivery of sustainable development opportunities to meet housing needs. Accordingly, it is recommended that greater flexibility is provided, and the following wording is put forward for the Council’s consideration:

“The Council will seek to encourage the provision of a proportion of dwellings that are suitable to meet the needs of older people.”

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?