

Comment

Agent	[REDACTED] (1335087)
Email Address	[REDACTED]
Company / Organisation	The Planning Bureau on behalf of McCarthy Stone
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	[REDACTED] (1335092)
Email Address	[REDACTED]
Company / Organisation	The Planning Bureau on behalf of McCarthy Stone
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	The Planning Bureau on behalf of McCarthy Stone ([REDACTED] - 1335092)
Comment ID	PS563
Response Date	03/03/23 09:16
Consultation Point	Policy SP 12 Approach to Housing Delivery (View)
Status	Processed
Submission Type	Web
Version	0.2
Bookmark	McCarthy and Stone (Represented by The Planning Bureau)

1. Do you consider the Local Plan Review is legally compliant?

Please see the guidance note for an explanation of what 'legally compliant' means

No

2. Do you consider the Local Plan Review is sound?

Please see the guidance notes for an explanation of what 'soundness' means.

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF).

Please tick all that apply:

Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

Thank you for the opportunity to comment on the West Berkshire Council Local Plan Review 2022-2039 Proposed Submission Reg 19 draft – January 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK.

Policy SP12 identifies that 'Provision will be made for 8,721 to 9,146 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2039; 513 to 538 dwellings per annum. The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development'. Para 11.18 of the Local Plan review identifies that 'The need for specialist housing for older people in the District is estimated to be around 1,710 units over the 2021-39 period (95 per annum) (West Berkshire Local Housing Needs Assessment (LHNA), 2012, Table 5.8)'. Specialist housing for older people therefore makes up between 18.7% and 19.6% of the total housing requirement. This is a significant proportion of the housing requirement, and the emerging plan must emphasise and be more supportive of delivering specialist housing for older people to be in accordance with national policy and effective.

Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.

In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 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. In mid-2016 there were 1.6 million people aged 85 and over; **by mid-2041 this is projected to double to 3.2 million**. 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** (emphasis added)

Paragraph 003 Reference ID: 63-003-20190626 recognises that:

“the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.”

Thus, a range of provision needs to be planned for. Paragraph 006 Reference ID: 63-006-20190626 sets out:

“plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”

Therefore, the Local Plan should, especially given the substantial need identified within para 11.18 of the draft plan, recognise that housing for older people has its own requirements and should be given more emphasis within the Plan. For the Local Plan review to be consistent with national policy SP12 should be amended to include the provision of specialist housing for older people.

Recommendation

For the plan to be consistent with national policy, the following text should be added to para 1 of Policy SP12:

‘This includes the provision of 1,710 units (95 units per annum) to meet the specialist housing needs of older people’.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?

Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.

Yes

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

For the plan to be consistent with national policy, the following text should be added to para 1 of Policy SP12:

‘This includes the provision of 1,710 units (95 units per annum) to meet the specialist housing needs of older people’.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply

The submission of the Local Plan Review for Independent Examination . Yes

The publication of the report of the Inspector appointed to carry out the examination . Yes

The adoption of the Local Plan Review . Yes

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	The Planning Bureau on behalf of McCarthy Stone ([REDACTED] - 1335092)
Comment ID	PS564
Response Date	03/03/23 09:19
Consultation Point	Policy SP 18 Housing Type and Mix (View)
Status	Processed
Submission Type	Web
Version	0.2
Bookmark	McCarthy and Stone (Represented by The Planning Bureau)

2. Do you consider the Local Plan Review is sound?

Please see the guidance notes for an explanation of what 'soundness' means.

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF).

Please tick all that apply:

Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . No

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

Thank you for the opportunity to comment on the West Berkshire Council Local Plan Review 2022-2039 Proposed Submission Reg 19 draft – January 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK.

Given the large amount of specialised housing for older people identified in para 11.18 of the Local Plan review (1,718 units) and the requirements of national policy detailed in our response to SP12 (NPPF Paragraph 62, PPG Housing for Older and Disabled People, paragraph 001 Reference ID: 63-001-20190626 , para 003 Reference ID: 63-003-20190626 and para 006 Reference ID: 63-006-20190626), Policy SP18 should be amended to emphasise and encourage this need.

In addition, it is noted that a change to policy SP18 introduced following the regulation 18 consultation brings into the plan a requirement for M4 (2) (accessible and adaptable) and M4 (3) wheelchair housing. This change to policy SP18 states '*All dwellings should be delivered as accessible and adaptable dwellings in accordance with Building Regulations M4(2). Around 10% of the new market housing and a maximum of 5 units of the affordable sector should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would make the scheme unviable*'.

The Council should note that the 'Viability Assessment Update (2021 -2022) Local Plan Review Autumn 2022, Dixon Searle' states at para 3.1.44 that '*However, although the larger footprints could be designed in at early feasibility stage, the current view of costs associated with M4(3) provision is such that in our view this could have an impact which not all schemes may be able to bear. This could impact more on some schemes on PDL in particular, where there tend to be more constraints*'.

We would like to remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and 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). M4 (3) of the Building Regulations in particular has a cost implication as recognised by the Council's viability assessment and therefore including the requirement for 10% of new housing to be built to M4 (3) is contrary to the findings of the Council's own evidence and will result in schemes not being delivered and should therefore be removed.

The Council should also note that ensuring that residents have the ability to stay in their homes for longer through the provision of wheelchair housing, is not, in itself, an appropriate manner of meeting the housing needs of older people. Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider

community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. 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. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing.

In addition, as M4 (2) is to be incorporated into the Building Regulations this element of the paragraph should also be removed.

Recommendation:

For the policy to be consistent with national policy and in accordance with the Council's own evidence policy Para 1 of SP18 should be amended to emphasise the importance of older people so it reads:

Residential development will contribute to the delivery of an appropriate mix of dwelling tenures, types and sizes to meet the existing and future housing needs of all sectors of the community, including **older people and** those with specialist requirements.

New para 4 should be deleted from policy SP18 as this repeats the Building Regulations and is contrary to national policy and the Council's own viability study:

~~'All dwellings should be delivered as accessible and adaptable dwellings in accordance with Building Regulations M4(2). Around 10% of the new market housing and a maximum of 5 units of the affordable sector should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would make the scheme unviable.'~~

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply

The submission of the Local Plan Review for Independent Examination . Yes

The publication of the report of the Inspector appointed to carry out the examination . Yes

The adoption of the Local Plan Review . Yes

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	The Planning Bureau on behalf of McCarthy Stone ([REDACTED] - 1335092)
Comment ID	PS565
Response Date	03/03/23 09:21
Consultation Point	Policy SP 19 Affordable Housing (View)
Status	Processed
Submission Type	Web
Version	0.2
Bookmark	McCarthy and Stone (Represented by The Planning Bureau)

2. Do you consider the Local Plan Review is sound?

Please see the guidance notes for an explanation of what 'soundness' means.

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF).

Please tick all that apply:

Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . No

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

Thank you for the opportunity to comment on the West Berkshire Council Local Plan Review 2022-2039 Proposed Submission Reg 19 draft – January 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK.

Specialised housing for older people

We note the new wording added to policy SP19 para 10 that allows extra care housing to be considered on a case-by-case basis with regard to affordable housing and states:

'In relation to extra care housing, it is recognised that provision of affordable housing may be particularly difficult to achieve. In such circumstances, the policy will be implemented on a case-by-case basis, and the individual viability assessment will be used to demonstrate an appropriate affordable housing contribution'.

However, we also note that the Viability Assessment Update, Autumn 2022, Dixon Searle (Viability Assessment), when discussing sheltered housing / retirement living advocates a similar position to extra care and states the following:

'3.2.28 Overall, on this development type it may be appropriate for the Council to consider the likely frequency of such schemes and whether that justifies a particular approach. We offer these comments bearing in mind that outcomes seem likely to vary to some extent. For the Council's consideration, we suggest that if there were a little more flexibility built into to the draft LPR policy wording (proposed SP19 scope as understood by DSP at the time of writing) - similar to that set to be provided for extra care housing schemes (which we often see developed on a broadly similar format) - then this may assist in respect of any potential viability issues. In our view this need not dilute too much the overall expectations / LPR approach and starting point'

The NPPF now has an increased emphasis on Local Plan viability testing at Paragraph 58 and 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).

Therefore, to ensure that the plan is realistic, deliverable, justified and consistent with national policy para 4 of policy SP19 should be amended to also include sheltered housing and retirement living.

First Homes

Para 6 of Policy SP19 identifies that 25% of affordable housing should be delivered as First Homes. However, the Local Plan should clarify that certain specialist housing schemes such as those meeting

the needs of older people should be exempt from providing First Homes and Starter Homes on site. This is because specialist housing for older people is often delivered on smaller sites of up to 50 units in central locations where it would not be viable to deliver on site First Homes, Starter Homes and Discount Market Sales. In addition, it would not be appropriate to mix First Homes, Starter Homes and general Discount Market Sales in specialist housing schemes for older people which by their very nature are based around communal facilities and communal living. This would ensure the Local Plan is consistent with NPPF para 66 which provides exemptions to such schemes providing affordable home ownership.

Net zero

It is also noted that policy SP19 para 11 asks that '*Affordable homes will be built to net zero carbon standards to help meet objectives on sustainability and climate change. The affordable units will be appropriately integrated within the development*'. Although the Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions by 2030 is commendable, it appears that the Council is going to achieve net zero through having mandatory standards for affordable housing from adoption of the plan that go beyond government targets. However, it is our view that any requirement should be 'stepped' in line with Government targets. This is more desirable as there is considerable momentum from Government in preparing enhanced sustainability standards as it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. Aligning the Council's requirement for net zero development with those of Government would therefore be pragmatic and more achievable.

Para 11 of the policy should therefore be deleted.

Recommendation:

In order to ensure the Plan is consistent with national policy, justified and effective the following amendments should be made to Policy SP19:

Amend Policy SP19 para 10 as follows:

*In relation to extra care, **sheltered and retirement living** housing, it is recognised that provision of affordable housing may be particularly difficult to achieve. In such circumstances, the policy will be implemented on a case-by-case basis, and the individual viability assessment will be used to demonstrate an appropriate affordable housing contribution'. **Such schemes will be exempt from delivering First homes.***

Delete *Policy SP19* para 11

~~Affordable homes will be built to net zero carbon standards to help meet objectives on sustainability and climate change. The affordable units will be appropriately integrated within the development.~~

4. Proposed Changes

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Recommendation:

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Amend Policy SP19 para 10 as follows:

*In relation to extra care, **sheltered and retirement living** housing, it is recognised that provision of affordable housing may be particularly difficult to achieve. In such circumstances, the policy will be implemented on a case-by-case basis, and the individual viability assessment will be used to demonstrate an appropriate affordable housing contribution'. **Such schemes will be exempt from delivering First homes.***

Delete *Policy SP19* para 11

~~Affordable homes will be built to net zero carbon standards to help meet objectives on sustainability and climate change. The affordable units will be appropriately integrated within the development.~~

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply

- | | | |
|--|---|-----|
| The submission of the Local Plan Review for Independent Examination | . | Yes |
| The publication of the report of the Inspector appointed to carry out the examination | . | Yes |
| The adoption of the Local Plan Review | . | Yes |

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	The Planning Bureau on behalf of McCarthy Stone ([REDACTED] - 1335092)
Comment ID	PS566
Response Date	03/03/23 09:27
Consultation Point	Policy DM 19 Specialised Housing (View)
Status	Processed
Submission Type	Web
Version	0.2
Bookmark	McCarthy and Stone (Represented by The Planning Bureau)

2. Do you consider the Local Plan Review is sound?

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Please tick all that apply:

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Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . No

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

Thank you for the opportunity to comment on the West Berkshire Council Local Plan Review 2022-2039 Proposed Submission Reg 19 draft – January 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK.

Policy DM19 seeks to support schemes that are providing for new specialised forms of housing. However, given the substantial need for specialist housing for older people within the District as identified in our response to SP12 and detailed in supporting text to the policy at para 11.18 ((1,710 units (95 per annum) over the plan period), the policy should be amended to emphasise the importance of older people's housing. It is additionally clear that the policy is mainly aimed at supporting the delivery of housing to meet the needs of older people and those with disabilities and therefore emphasising older people's need would make the policy clearer.

Older person's housing also produces a large number of significant economic, social and environmental benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

Economic

A report '*Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living*' by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- . 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- . Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- . On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.'

Each person living in a home for later living enjoys a reduced risk of health challenges, contributing fiscal savings to the NHS and social care services of approximately £3,500 per year (*Homes for Later Living September 2019*). More detail on these financial savings is set out within the report.

A further report entitled *Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing* (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.

As recognised by the PPG, retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "*Chain Reaction*" *The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)* reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

Social

Retirement housing gives rise to many social benefits:

- . Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder
- . Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns.
- . The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

Environmental

The proposal provides a number of key environmental benefits by:

- . Making more efficient use of land thereby reducing the need to use limited land resources for housing.
- . Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- . Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.

Given the need for specialist housing for older people already identified within the plan at para 11.18 and benefits such schemes bring, the policy should be amended to make it clearer that it specifically supports the delivery of specialist housing for older people. In addition, developers should not be required to demonstrate older person's housing need given the substantial need identified in the District and this point should therefore be deleted from the plan to ensure it is justified and effect.

Recommendation

In order for the Local Plan to be effective, justified and consistent with national policy the following amendments should be made to policy DM19:

The provision of new specialist forms of housing designed to meet the needs of those with identified support or care needs **including schemes delivering specialist housing for older and disabled people** will be supported where:

- 1 ~~Housing meets a proven locally identified need in the District for the specific housing product being proposed; and~~
- 2 The location is appropriate, in terms of design, layout, and accessibility of facilities, services and public transport

Specialist **accommodation housing meeting the needs of older people development** will be sought as an integral part of the mix from the strategic housing allocations at Sandleford Park and North East Thatcham.

Please give reasons for your answer

Recommendation

In order for the Local Plan to be effective, justified and consistent with national policy the following amendments should be made to policy DM19:

The provision of new specialist forms of housing designed to meet the needs of those with identified support or care needs **including schemes delivering specialist housing for older and disabled people** will be supported where:

- 1 ~~Housing meets a proven locally identified need in the District for the specific housing product being proposed; and~~
- 2 The location is appropriate, in terms of design, layout, and accessibility of facilities, services and public transport

Specialist ~~accommodation~~ **housing meeting the needs of older people development** will be sought as an integral part of the mix from the strategic housing allocations at Sandlesford Park and North East Thatcham.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply

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Comment by	The Planning Bureau on behalf of McCarthy Stone ([REDACTED] - 1335092)
Comment ID	PS567
Response Date	03/03/23 09:28
Consultation Point	Policy DM 4 Building Sustainable Homes and Businesses (View)
Status	Processed
Submission Type	Web
Version	0.2
Bookmark	McCarthy and Stone (Represented by The Planning Bureau)

2. Do you consider the Local Plan Review is sound?

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Please tick all that apply:

Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . No

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

Draft Policy DM4, requires all new residential and commercial development to achieve the 'Target Emission Rate' set by the Future homes Standards once it is confirmed, but in the meantime to 'achieve 63% reduction in carbon emissions is achieved by on-site measures as compared to the baseline emissions rate as set by building Regulations Part L 2021 (SAP10.2)'. Although the Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions by 2030 is commendable, currently it appears that the Council is going to achieve this through having mandatory standards from adoption of the plan that go beyond government targets until the Future homes Standards come in. However, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations. This is more desirable as there is considerable momentum from Government in preparing enhanced sustainability standards as it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years as the Future homes Standards come into effect. Aligning the Council's requirement for carbon neutral development with those of Government would therefore be pragmatic and more achievable.

Recommendation:

- . That the policy is stepped in line with emerging government targets and requirements
- . The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations.

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recommendation:

- . That the policy is stepped in line with emerging government targets and requirements

- . The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply

The submission of the Local Plan Review for Independent Examination . Yes

The publication of the report of the Inspector appointed to carry out the examination . Yes

The adoption of the Local Plan Review . Yes