

Inspector's Questions 41

Q41 - The Inspector would welcome the Council's observations on the representation from Mr Andrew Boughton of BB Architecture and Planning, on behalf of Inspire Villages Group (1563) to the effect that policy H6 is unsound because it fails to take account of the critical mass required to provide housing with care.

Inspector's Questions 82 (H6)

Q82 - My question 29 (viii) has already asked about one aspect of policy H6. I would welcome the Council's observations on those representations which comment on the soundness of other aspects of policy H6;

Representation Reference	Respondent
1386 1397 1965 and 1970	Chris Cox of Pegasus Group on behalf of Edward Ware Homes
1563 1564 1565 1567 1568 1569 1570 1572 1573 1574	Andrew Boughton of BB Architecture and Planning on behalf of Inspire Villages Group
794	Mark Rose of Define on behalf of Bovis Homes
1183	Michael Wood of Indigo planning on behalf of Lands Improvement holdings plc
1331	J Richards of Dandara Ltd
1345 and 2073	Steven Doel of Nexus planning Ltd on behalf of Gleeson Strategic land and CEG
1541	Richard Purser of DPP Planning on behalf of FI Real Estate Management
1629	Nicole Penfold of Gladman Developments Ltd
1701	Cameron Austin-Fell of RPS Planing and Development on behalf of Richborough Estates
1728 and 1777	Christopher Roberts and Taylor Cherrett of Turley Associates on behalf of Persimmon Homes Ltd and CALA Homes Ltd and Ainscough Strategic Land

Summary of Representations

Mr Andrew Boughton on behalf of Inspire Villages Group (1563 1564 1565 1567 1568 1569 1570 1572 1573 and 1574)

The calculation of need in the HEDNA is incorrect and the figures need to be increased

The plan should be amended to allow for greater owner occupation of extra care dwellings

The minimum viable size for extra-care development is considered to be 60 dwellings or 150 units for CCRC development

a specific policy is necessary to support windfall extra care development adjacent to the major settlements and in less sustainable locations where the characteristics of the scheme and sustainability benefits justify it as development within housing sites will not meet need

Response

The council is confident that the forecast population, households and age groups in the published HEDNA are correct and has planned on the basis of meeting those figures in the VALP. The method utilised is based on government guidance and its conclusions have been accepted in a Section 78 Appeal. The demographic projection figures have also been agreed by the other Bucks districts. The council therefore does not consider that sufficient justification has been offered to show that the conclusions of the HEDNA are incorrect so does not consider that a modification is required

The council is not aware of evidence showing that there is an increased demand of owner occupation in the extra care market. Nevertheless the stipulation of the policy does not prohibit such provision so it will be for applicants for such facilities to seek to agree with one or a number of developers of a large housing sites how they could cooperate to deliver units which may be private or delivered in conjunction with potentially the county council

Our viability evidence suggest that extra care provision is less viable than generic care facilities. We have reflected this in our policy approach for strategic settlements where a 100 dwelling scheme has more of a chance in delivering extra care housing than a 60 dwelling scheme. It is not considered that extra care provision is inherently less viable than ordinary housing developments. Provision is usually at a much higher density than normal housing, sometimes multi storey and often does not have to provide such facilities as vehicle parking, garages, sports provision or play areas. This offsets the provision of the extra facilities that an extra care facility may provide.

Chris Cox of Pegasus Group (1386, 1397, 1965 and 1970)

Requirement for accessible dwellings in Policy H6 is not justified and is not sufficiently flexible to respond to the circumstances of individual sites. It also requires and inefficient and ineffective provision of extra care accommodation due to lack of detail.

Response

Having considered the representations on this matter and the implications for viability it is agreed that It is not viable to make provision for Category 3 wheel chair accessible provision on all developments. Instead AVDC feel that requiring Cat 2 (Accessible and Adaptable Dwellings) of Approved Document M, Volume 1 should be required as a minimum to future proof all dwellings and allow flexibility for future habitation.

Mark Rose of Define on behalf of Bovis Homes (794)

Policy H6, which is considered unsound on the basis that it:

- is not justified in that it is not the most appropriate strategy and has not properly considered reasonable alternative strategies; and
 - is inconsistent with national guidance in that it does not fully reflect the Government's objective to ensure the housing requirements are not prohibitive to the delivery of development.
- evidence to support the imposition of the housing requirements must be provided and the cumulative impact on the viability of sustainable development examined.

Response

AVDC consider that through the viability assessment and its analysis and through the demand generated through the HEDNA that this strategy is appropriate and alternatives are less viable.

This statement is contrary to the evidence shown in the viability assessment whereby Category 2 schemes are viable.

See above and the viability assessment and subsequent addendum looking at the strategic sites to demonstrate both cumulatively and sites specific policy compliant sites within the development strategy are viable.

Michael Wood of Indigo planning on behalf of Lands Improvement holdings plc (1183)

The policy states that all housing should be delivered to meet building regulation standard Category 2 or above (10% of market housing and 15% of affordable housing should meet Category 3). This is unduly onerous. If the Government wanted

all housing to meet Category 2 as a minimum, the building regulations would be amended accordingly, except for 10% to be delivered to M4(3) standards (i.e. all new dwellings will need to exceed building regulations category 1). This is an onerous requirement which exceeds building regulation requirements and which could adversely impact the deliverability and viability of housing coming forward across the District.

We suggest that a more realistic requirement is that 20% of new housing should meet Category 2 and 10% should meet Category 3.

Response

See answer to Q22 and previous answers above. In summary AVDC propose to remove references to category 3 of Approved Document M, Volume 1 within Policy H6. The reason behind this is based on the fact that a request cannot be made for 100% PartM4(2) and PartM4 (3) from the same scheme. AVDC feel that requiring Cat 2 (Accessible and Adaptable Dwellings) of Approved Document M, Volume 1 should be required as a minimum to future proof dwellings for future habitation. The viability evidence suggest that trying to achieve Cat3 over Cat 2 would result in a 10x cost increase.

J Richards of Dandara Ltd (1331)

The Council should ensure that the provision of extra care dwellings is fully taken into account within viability assessments associated with individual sites especially considering other cumulative 'planning gain' requirements such as affordable housing and self / custom build.

H6 requires a proportion of new homes in developments to achieve Category 2 and Category 3 of Approved Document M: Volume 1 (Accessible and Adaptable Dwellings). Whilst such an objective is supported, the Council should again consider any viability implications of such standards

Response

- The viability assessment has taken account of the provision of extra care and has acknowledged the costs of providing 'extra care' over 'care' are increased.
- See also the response to Michael Wood above.

Steven Doel of Nexus planning Ltd on behalf of Gleeson Strategic land and CEG (1345 and 2073)

Amend Policy H6 to make it clear that the requirement for Category 3 market and affordable homes is subject to viability rather than being an absolute requirement

Response

- Please note answers above regarding the removal of Cat 3

Richard Purser of DPP Planning on behalf of FI Real Estate Management (1541)

Requirement for extra care housing may simply be unviable or undeliverable on some large sites.

Neither the 100 or 300 thresholds are appropriate

The requirement by percentage to meet current Building Regulations accessibility standards under Part M is an unacceptable over-reach of planning

Policy H6 will be made sound if paragraphs 2, 3 and 4 are deleted in full

Response

- Please see previous responses above

Nicole Penfold of Gladman Developments Ltd (1629)

Requirements for accessible dwellings is not justified by the HEDNA and the viability of meeting such a provision has not been tested.

Response

The demographic projections from the HEDNA (Chapter 3) show that the Buckinghamshire population is likely to increase by between 63,600 and 75,100 persons over the 20-year period 2013-33. The number of people aged 65 or over is projected to increase by around 53,000 persons, around three-quarters of the overall growth. This includes an extra 18,000 persons aged 85 or over, around a quarter of the total increase. Most of these older people will already live in the area and many will not move from their current homes; but those that do move home are likely to need accessible housing. Given this context, the evidence supports the need for all dwellings (including Older People's housing) to meet Category 2 requirements, providing that this does not compromise viability.

Cameron Austin-Fell of RPS Planning and Development on behalf of Richborough Estates (1701)

This policy expects that all larger developments should provide an element of self-contained extra care dwellings as part of the over mix. Whilst this might be possible on very large sites (500+), this would/may not be possible or appropriate on sites below this general level of site and should either therefore be clarified or omitted from the plan.

Concern is raised in relation to the requirement for all residential developments to meet Category 2 standards for adapted homes with 10% of market homes meeting Category 3 standards. The evidence base for such specific requirements appear

limited and the justification appears lacking, particularly the viability implications of imposing such stringent requirements

Response

- Please see responses above in relation to the viability of extra care housing
- The viability assessment illustrates that our policy in relation to accessible dwellings is viable if the schemes are within cat 2
- Please see previous comment regarding the removal of reference to Cat 3

Christopher Roberts and Taylor Cherrett of Turley Associates on behalf of Persimmon Homes Ltd and CALA Homes Ltd and Ainscough Strategic Land (1728 and 1777)

Proposed Policy H6 is not properly justified, unlikely to be effective and has the potential to impede to delivery of strategic sites because the burdens imposed by the extra care requirement will prevent development by making it unviable.

Response

- Please see appropriate answers to the various elements of this question in relation to justification (through the HEDNA) and viability assumptions.