



Planning Policy
South Oxfordshire District Council

Date: 2 November 2020

Our Ref: M15/0904.29

Your Ref:

By email only: planning.policy@southoxon.gov.uk

Dear Sir/Madam

RE: Consultation on proposed Main Modifications to emerging Local Plan

I write on behalf of my clients, Retirement Villages Ltd, in respect of the previous representations and Matter 3 statement, including the oral representations made at the subsequent hearing sessions. This submission focuses solely on the proposed MM27 that relates to the proposed approach to seeking affordable housing on all new developments.

I do not seek to replicate matters raised in our previous representations on the emerging local plan, however I would merely again draw specific attention to the following sections of the National Planning Practice Guidance relating to viability testing:

- Paragraph: 002 Reference ID: 10-002-20190509;
- Paragraph: 004 Reference ID: 10-004-20190509; and
- Paragraph: 007 Reference ID: 10-007-20190509

We welcomed the Inspectors suggestion that the council should consider amendments to the policy to adopt a different approach to the request for affordable housing provision from such schemes. Unfortunately, the proposed modifications to the policy fail to adopt this approach and effectively seeks to require applicants to demonstrate viability for each development.

We have provided alternative viability evidence to demonstrate that the councils evidence base has failed to consider any alternative forms of development to deliver retirement villages/extra care other than those contained within the viability assessment on behalf of the council. Furthermore, the council have failed to further engage despite the strong representations prepared on behalf of my clients, Retirement Villages Ltd, and for Inspired Villages (prepared by DLP consultants) who are two of the leading developers in the field of retirement villages/ extra care schemes across the country.

In this case that information has been provided at the plan making stage and disregarded by the council in favour of their own evidence base that fails to consider the alternative approach. This therefore provides no certainty that there would be any different outcome at an application stage, likely resulting in the difficulty to ensure delivery of suitable specialist housing for older people as raised by the Inspector in the discussion over the emerging policy. This would represent a significant failing given that the council accept that there is a need to increase the delivery of such specialist accommodation given the approach in emerging policy H13.

Respectfully, we therefore maintain the position that the approach to seek 40% affordable housing from such specialist C2 retirement village/extra care developments is unjustified by the council due to the failure within its evidence base to demonstrate that this will not affect viability and thus deliverability of such schemes.

We therefore urge the Inspector to find proposed MM27 unsound and strike out the requirement that such specialist C2 retirement village/extra care proposals are liable to provide 40% affordable housing.

Yours sincerely



IAIN WARNER BSc(Hons) DipTP MRTPI
DIRECTOR

For and On Behalf Of
TETLOW KING PLANNING