

Exeter Plan 2021-2041

Publication Stage (Regulation 19)

Representation Form

Ref:

**(For official
use only)**

Name of the Local Plan to which this representation relates: Exeter Plan 2021-2041

Please return to Exeter City Council, Local Plans Team, Paris Street, Exeter, EX1 1JN, upload onto our consultation portal at <https://exeterplanpublication.commonplace.is/> or email to planning.policy@exeter.gov.uk by **11:59 pm on 6 February 2025**.

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A: Personal details

1. Personal details*

*If an agent is appointed, please complete only the Title, Name and Organisation (if application) boxes below but complete the full contact details of the agent in section 2.

Title

Mr

First Name

Damien

Last Name

Lynch

Job Title (where relevant)

Associate Director

Organisation (where relevant)

Planning Issues Ltd on behalf of Churchill Living and McCarthy Stone

Address Line 1

Churchill House

Line 2

Parkside

Line 3

Ringwood

Line 4

Post Code

BH24 3SG

Telephone number

E-mail address

2. Agent's details if applicable

Title

As above

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

Part B – Representation

Please use a separate sheet for each representation

3. To which part of the Exeter Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes

No

4 (a). If yes, and you wish to support the legal compliance of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

4 (b). If no, please give details of why you consider this part of the Exeter Plan is not legally compliant. Please be as precise as possible.

(Continue on a separate sheet if necessary)

The draft policies (H8 and H9) provide dedicated policies supporting the delivery of housing for older people which is welcome. These comments focus on housing for older people and not a wider range of supported housing as described in H9.

The NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, type and tenure of housing needed for different groups in the community and this 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." In addition, para 012 Reference ID: 63-012-20190626 confirms that *'Plans need to provide for specialist housing for older people where a need exists. Innovative and diverse housing models will need to be considered where appropriate'*.

The 2024 LHNA concludes that specialist housing (excluding care homes) for older people aged 75 years or more represents 7% of Exeter's local housing need, of which around 20% comprises a need for housing with care (e.g. extra care housing) and around half derives from people in need of affordable housing. Policy H8 supports the provision of good quality specialist homes for older people to help address this need (paragraph 6.45).

There is need therefore to ensure that policies are fully supportive, and without restriction to allow delivery of housing to meet this identified need. However the range of sustainability requirements together with S106 and other requirements means that in our view, the policy basis as drafted is not fully supportive.

Both policy H8 and H9 set out that in the case of self contained homes for older people, policy H4 (affordable homes will apply). This requirement has been shown to be unviable within the council's viability evidence base and therefore should not be a requirement.

As set out within the responses to policy H8, the role for viability assessment is primarily at the plan making level according to the PPG. Viability discussions at the development management stage should refer back to the plan wide viability study therefore creating a layer of uncertainty and delay for older person housing proposals in Exeter.

We would also comment that typical older person housing developments range from 40-60 dwellings. 15% affordable housing would yield 6-9 affordable units on that range of development where viable. No registered provider will take such a small number of affordable units as part of a mixed management scheme, particularly where the proposal is a specialist age restricted proposal. Affordable tenures are far more likely to be delivered by specialist registered providers where they can control service charges and ensure affordability for residents in the long term and achieve sufficient economies of scale (typically at least 25+ units in our experience).

4 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the Exeter Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

The Council delete criteria f (H8) and g (H9).

Both policies should state that such proposals will be 'strongly supported' in light of identified need.

Both policies should state that

The council will work with providers of both market and affordable specialist housing to deliver a range of tenures with appropriate and sustainable management arrangements.

5. Do you consider that this part of the Exeter Plan is Sound?

Yes

No

x

5 (a). If yes, and you wish to support the soundness of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

5 (b). If no, please give details of why you consider this part of the Exeter Plan is unsound. Please be as precise as possible.

(Continue on a separate sheet if necessary)

The policy ignores the requirements of national policy and the viability PPG to test viability on a typology basis and prepare policy in view of the findings of this evidence base. The council's evidence base is clear that the proposed infrastructure requirements in respect of zero carbon standards cannot be delivered on housing for older persons proposals together with the full range of other requirements.

The policy fails to acknowledge how a range of tenures may be delivered in practice and must be expanded to strongly support private and registered affordable providers in bringing forward proposals to address a range of needs in sustainable management arrangements.

5 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan sound, in respect of any soundness matters you have identified at 5(b) above.

You will need to say why each modification will make this part of the Exeter Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

The Council should re-consider the Policies H8-H9 as above.

6. Do you consider that this part of the Exeter Plan complies with the Duty to Co-operate?

Yes

N/A

No

N/A

6 (a). If yes, and you wish to support this part of the Exeter Plan's compliance with the duty to co-operate, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

N/A

6 (b). If no, please give details of why you consider this part of the Exeter Plan fails to comply with the duty to co-operate. Please be as precise as possible.
(Continue on a separate sheet if necessary)

N/A

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

7. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.
(Continue on a separate sheet if necessary)

N/A

8. If you would like to make representations on the Habitats Regulation Assessment (HRA) please provide your comments here, stating to which part of the HRA your comments relate.
(Continue on a separate sheet if necessary)

N/A

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

9. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

☒

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

10. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
(Continue on a separate sheet if necessary)

The delivery of housing for older people represents a critical need as set out within national planning policy and guidance. Our client's represent two of the largest providers operating across the UK and are well placed to advise on policies which will ensure this typology is delivered successfully across the plan period.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For more information on how we use your data – please read our privacy notice at the following website: <https://exeter.gov.uk/media/5750/planning-policy-privacy-notice.pdf>