

The Planning Bureau Limited

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Greater Cambridge Local Plan

Via email: localplan@greatercambridgeplanning.org.

30th January 2026

Dear Sir / Madam

McCARTHY STONE & CHURCHILL LIVING RESPONSE TO THE GREATER CAMBRIDGE LOCAL PLAN REGULATION 18 CONSULTATION.

Thank you for the opportunity to comment on the Greater Cambridge Local Plan consultation.

McCarthy Stone (MS) and Churchill Living (CL) are independent housebuilders specialising in specialist housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. Both operators are therefore well placed to provide comment on the policy barriers that may have the potential to restrict supply within the sector.

Please find below our comments on the draft local plan insofar as they impact the delivery of specialist accommodation for older persons. These comments are intended to assist the council in formulating approaches which are both workable in practice and avoid stymying the delivery of a housing typology which the PPG describes as 'critical' in terms of addressing housing need.

Policy CC/NZ: Net zero carbon new buildings

Whilst Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets. 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 approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from [Written statements - Written questions, answers and statements - UK Parliament](#)) released on 13th December 2023. The ministerial statement confirms that with respect to the net zero goal...

'The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale' and 'To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one'.

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The council should also note that while little weight can be attached to the current consultation on the NPPF careful attention will need to be given to the outcomes of the consultation and the final document that is adopted. With regard to standards related to carbon emission and energy efficiency standards consideration will need to be given to PM13 which states that other than standards for accessibility, water efficiency and nationally described space standards local plans should not cover matters already addressed in building regulations. Once adopted the NPPF would also replace the 2023 Written Ministerial Statement (WMS) 'Planning – Local Energy Efficiency Standards Update'. As such If PM13 remains both NZ2 and NZ3 would be inconsistent with national policy from the point at which the new NPPF is adopted with limited weight being given to these policies with decision making.

As such the council should consider deleting the policy and aligning the Council's requirement for carbon neutral development with those of Government would therefore be pragmatic, more achievable and consistent with national policy. We would recommend this approach to the whole policy area including embodied carbon as new development will often be far more sustainable in many circumstances including building fabric by use of modern methods of construction but also extending beyond that, such as sustainability through optimisation of use of a site. .

Recommendation:

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

Policy BG/GI: Green and blue infrastructure

Amongst other areas the policy introduces the concept of an urban greening factor.

The council should note that it is often expensive to deliver 'Urban Greening' including green walls and roofs, as well as being costly and difficult to maintain. Without good management practices, these features can suffer and become a visual amenity issue rather than a benefit. There can therefore be viability issues with urban greening as there can be significant costs for the installation of green features such as green walls and roofs that is not included in the viability study.

The council should note that the Urban Greening requirements in London have severely impacted on the delivery of housing in London since the London Plan was adopted in 2021, to the degree that the government has recently announced an emergency package of measures aimed at accelerating housing building in London given slow delivery which in our view has been caused by the viability challenges

The Council will be aware 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). The evidence underpinning the council's policy requirements should therefore be robust and be used to form deliverable and realistic policies.

The council should therefore reconsider the policy requirement and ensure it is realistic and viable.

Policy BG/Tc: Improving tree canopy cover and the tree population

Policy BG/Tc requires development proposals to deliver a minimum future canopy cover of 30% on site.

NPPF para 16. identifies that 'plans should b) be prepared positively, in a way that is aspirational but deliverable'. Para 136 provides guidance specifically associated with trees and states '*Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-led, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right*

places, and solutions are found that are compatible with highways standards and the needs of different users’.

Requiring a 30% tree canopy cover especially for small brownfield sites is not deliverable or realistic and could compromise sustainability development and is therefore contrary to NPPF. Any requirement would also need to be fully evidenced and the requirement incorporated into the viability study.

Recommendation: The council should therefore reconsider this element and ensure any such policy approach introduces more flexibility or is deleted.

Policy WS/HD: Creating healthy new developments

The policy requires the submission of a Health Impact Assessment for planning applications for major development over 100 dwellings and a rapid health assessment for schemes of between 20 and 100 units.

The Council should note that there is a common misconception that older person’s housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person’s schemes to show that there is capacity in healthcare systems and to show that the scheme will not have a health impact, the policy should instead recognise the health benefits that delivering older people’s housing can bring to individuals.

Older Persons’ Housing produces a large number of significant 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.

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.’

In addition, 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.

We note the currently consultation on the NPPF at DM2 discussed additional information requirements states ‘*Local validation lists should only include additional information requirements if there is a policy in the development plan requiring a specific further assessment. Any such additional information requirements should not be applied equally to all applications but should be proportionate to the scale of development and its potential impact. Where appropriate, the requirements should clearly distinguish between what is required for major, medium and other types of development proposal.*’ Therefore exempting older persons housing from having to submit a health impact assessment at the planning application stage would be a proportionate response.

Recommendation:

For the plan to be in line with national policy and effective the following wording should be added the policy to recognise the health benefits of older persons housing.

Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment

Policy H/AH affordable housing

Policy H/AH requires all major developments for housing to provide at least 40% of new homes on site as affordable housing.

We note that the consultation is supported by the Greater Cambridge Local Plan Viability Report, Aspinall Verdi, October 2025. However, we have concerns with respect to this report and how it has tested specialist housing for older people and also appears to be confused with that respect.

Section 10 of the Viability assessment at Appendix 3 looks specifically at specialist housing for older people and para 10.5 specifically states '*In this respect, it is important to note that we have only modelled the Sheltered / Age Exclusive / Retirement Housing schemes which are more likely to be developed by the private sector and are most similar to C3 Use housing*'. Whilst section 7 at the conclusion states at 7.48 that '*The Older Person Extra Care appraisals test two 60 unit scheme providing specialist flats for older residents*'. It appears that only an Extra care older persons housing has been tested and not a sheltered housing scheme. Outside of that the study appears confused with section 10 of Appendix 3 discussed Integrated Retirement Communities at detail rather than sheltered or extra care housing. IRC's in themselves are very different to extra care and sheltered housing both of which are defined in para 10.3 of Appendix 3 of the viability study.

Notwithstanding the confused nature of the Viability Study that should be re-run for specialist housing for older people including both sheltered and extra-care housing, the Council should note that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing. Specialist housing schemes for older people are different to mainstream housing or flats and tend to be based around communal facilities and community living and delivered on smaller sites. The facilities are different depending on what type of older person housing is being proposed. Older persons housing therefore differs from a standard model of development because, as confirmed within the PPG (Paragraph: 010 Reference ID: 63-010-20190626) extra care in particular generally has additional facilities such as extensive communal areas, such as space to socialise, a wellbeing centre as well as a care service with 24 hour access to support services and staff, meals are also often available. This enables residents to live much more independently than they would otherwise. However, the facilities do take up floorspace and there are other additional costs which make the viability of such schemes much more challenging. and we are strongly of the view that these the older persons housing typologies should be robustly assessed in the Local Plan Viability Assessment. 'This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "*A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.*"

The PPG on viability, Paragraph: 001 Reference ID: 10-001-20190509 confirms that '*policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that **takes into account all relevant policies, and local and national standards**, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. To provide this certainty, affordable housing requirements should be expressed as a single figure rather than a range. **Different requirements may be set for different types or location of site or types of development.***'

Whilst we welcome that the Council have tested extra care housing on brownfield and greenfield sites in accordance with the PPG on Viability and we feel this should be widened to include sheltered housing, we have some concerns with regard to some of the assumptions that have been used and if amended would be likely to make sheltered and extra care housing not viable. As such the Viability Assessment should be re-run using the assumptions recommended below.

We would direct the Council towards the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note') available from <https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf>. The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods and significantly variable benchmark land values. We are also aware that the RHG Briefing Note is being updated and indeed we are informing that process. We therefore have the following comments on the assumptions that should be used within the Viability Assessment with respect to extra care and sheltered housing as defined by the PPG on housing for older and disabled people Paragraph: 010 Reference ID: 63-010-20190626. If the Viability update was re-run using these assumptions extra-care and sheltered housing would be likely to be shown to be even less viable in terms of delivering affordable housing.

Unit numbers / GIA / Density

We note that the Viability Assessment has modelled a unit density of 120 dwellings per hectare resulting in a 60 unit scheme being modelled on a 0.48 hectare site for Extra-Care typology. However, a typical sheltered housing / retirement living scheme would consist of 45 dwellings on a gross site area of 0.45 hectares creating a density of 100 units per hectare. Extra care housing tends to have a lower density and a typical scheme would consist of 60 units on a 0.75 hectare site at a lower density of 80 units per hectare. Therefore, a scheme of 50 units should be modelled for sheltered housing and a scheme of 40 units should be modelled for extra care, both on a site of 0.5 hectares.

Unit Size

The Viability Study should amend the 1 bedroom apartment sizes as follows. These have evolved in recent years with the National Space Standards and M4 (2) requirements and allow for additional storage and circulation space to facilitate downsizing:

- 1 bed sheltered 55 sq m
- 1 bed extra care 60 sq m
- 2 bed sheltered 75 sq m
- 1 bed extra care 80 sq m

It appears that the study has tested extra care housing with apartment sizes of 55sqm for a 1 bed and 70 sq m for a 2 bed which as can be seen is substantially smaller than required in order to ensure accessibility requirements.

Unit mix

A typical scheme provides 1 and 2 bedroomed apartments using a mix of 60% 1 bed and 40 % 2 bed units on a development. This is the case for both sheltered (retirement) and extra care (retirement living plus) schemes.

Non-chargeable / communal space

Older persons' housing has a larger communal and non-saleable areas such as residents lounge, laundries, guest rooms, managers office and wellness rooms. Extra care housing also includes additional facilities such as a restaurant area. For sheltered schemes the non-chargeable space used should be 25% and for extra care schemes this should be 35% of GIA.

Professional fees

Given that a large number of specialist housing for older people is delivered on brownfield sites, in our experience these often involve more professional advisors associated with contamination, legal fees, drainage, air quality, overheating, sunlight, noise amongst other areas. We would therefore recommend that a 10% of build cost figure is used for brownfield sites for professional fees rather than 6.5%.

Sales and marketing costs

As detailed within the RHG Briefing Note sales and marketing costs for older persons housing schemes are typically 6% of GDV and this should be used within the older persons modelling rather than the 3.5% level for general housing.

Sales periods

As discussed in the RHG Briefing Note, sales periods of older persons' housing schemes are typically longer for retirement and extra care housing than general needs housing. There is a typical 18 month build period before sales can commence. Sheltered and Extra care schemes cannot be phased but must be fully operational and completed from month 1 of sales / occupation. As detailed within the RHG Briefing Note, once sales commence a rough guide is that 40% of units will be sold at the end of the first year of sales, 30% during the second year of sales and 30% during the third period. This should be considered within the viability modelling. These longer sales periods should therefore be incorporated into the Viability Study. It is not apparent what sales period has been used.

Empty property costs

It is recommended that a standard allowance of £5,000 per unit is assumed as a typical average empty property cost – to cover Council Tax liability on unsold units and service charges (which will be applicable to the whole building from day first resident moves in). This increases to £10,000 for extra care accommodation to reflect higher costs particularly in maintaining care, communal and catering facilities, staff and services and reflecting a slower sales rate than Retirement Living.

External build costs

We agree with the 15% used for external build costs.

Developer Return

PPG sets out that 'For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers. However, for specialist housing for older people there is a clear precedent for a return of not less than 20% of gross development value primarily because of the risks associated with such developments. This is consistent with the Inspector's conclusions for appeals such as McCarthy Stone proposal at Redditch (Appeal Ref: 3166677), Churchill Retirement Living proposal at Cheam (Appeal Ref: 3159137) and the Churchill Retirement Living scheme at West Bridgford (Appeal Ref: 3229412) in 2019. 20% profit should therefore be assumed for specialist housing for older people rather than the blended amount used of 15.93%

Sales values

We have concern with regard to the sales values used in the study. This has been derived from the asking price of a number of schemes currently for sale, the majority of which are very high-end schemes which artificially inflates the sales values. In addition, given the confusion as to whether sheltered or extra care has been tested, it should be noted that Uplands Place, Cambourne is a sheltered housing scheme whilst Jacobs Place is an Extra care scheme, with the remaining 3 schemes considered being high end extra care schemes or integrated retirement communities. It should also be noted that these are asking prices, not actual sale price taken at a point in time. The housing market is currently challenging and it is unlikely that asking prices are achieved.

As a result of Appendix 3 section 10 using incorrect schemes informing the value assumptions, this has resulted in very inflated prices. For example, the only sheltered housing scheme looked at has an asking price of £4,672 per sq m, whilst the study has concluded at table 10.6 that a value assumption of £5,600 to £6,100 per sq me should be used for such schemes.

A 25% uplift has then been applied to the above value assumptions and in table 10.7 results in a value assumption of £6,562 to £6,909 per sq m for extra care schemes, substantially more than the only extra care scheme considered in table 10.2 that has a range of £4,768 to £5,569.

Sales values are therefore greatly inflated for both extra care and sheltered housing and these should be reconsidered in line with the RHG Briefing Note.

Recommendation / conclusion

In conclusion, although the Viability study attempts to test older persons housing, this is confused and it is not clear which type of older persons housing has been tested. Notwithstanding the confusion, the majority of the assumptions then used are incorrect and if specialist housing for older people was tested properly in line with the RHG briefing note, this would probably result in specialist housing for older people being found to be unviable and which point an exemption from affordable housing. should be provided within the plan.

Policy H/SS: Residential space standards and accessible homes

The council should note that open space needs of older people are much less than for mainstream housing. For older people the quality of open space either on site or easily accessible for passive recreation is much more important than formal open space. The Local Plan, if the council decide to set a minimum size for residential outdoor amenity open space, should provide an exemption for older people's housing schemes but consider the quality and function of the amenity space instead. With respect to flats and maisonettes it should be noted that there are often other planning issues that restrict the incorporation of a balcony on flats such as overlooking and this should also be noted with the policy

For the plan to be consistent with national policy and effective the following text should be added to the end of policy DC1:

Older person's housing schemes are exempt from the above requirement so long as high quality amenity space suitable for older people is provided on site.

The policy also requires 10% of affordable units and 5% of market homes on sites of more than 20 homes to be built to part M4(3). In this respect we support the comments of the HBF that note that *'This is on the basis of the statement in paragraph 11.105 of the Housing Needs of Specific Groups report. However, the overall need for such homes in table 11.14 outlines that the need for such homes is 968 across Greater Cambridge – just 2% of overall housing need over the plan period. Based on the new sites allocated in this local plan and the fact that sites allocated for development from previous pan the number of accessible homes is likely to substantially exceed what is needed leaving developers with homes that are difficult to sell on the general market. HBF recognises that there is need for some market homes to be built for wheelchair users however this must be based on evidence with a reasonable chance that these will be bought by those who needed them.'*

Policy H/SH: Specialist housing

Paragraph 1 of the PPG Housing for Older and Disabled people 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. 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".

Paragraph: 001 Reference ID: 63-001-20190626

The delivery of a suitable level of specialist older persons' housing will be a substantial undertaking over the Local Plan period and unless action is urgently taken the Council will struggle to address this need.

This draft policy requires applications for specialist housing to respond to the need of such housing and to provide evidence to support such need.

It is well documented that the UK has an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to 5 million (ONS mid 2018 population estimates).

It is generally recognised (for example, within the Homes for Later Living Report September 2019). That there is a need to deliver **30,000 retirement and extra care houses a year** in the UK to keep pace with demand.

The Housing Needs of Specific Groups in Cambridge and South Cambridgeshire, August 2015, Icen identifies a large amount of need for specialist housing for older people at table 11.9 and 11.10 including around 1,300 market units of housing with support (sheltered housing) and a similar number of extra care housing units.

It is therefore clear there will be a significant increase in older people and the provision of suitable housing and care to meet the needs of this demographic homes should be a priority of the emerging Local Plan.

Benefits of Housing for Older People

Older Persons' Housing produces a large number of significant 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.’

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.

Consultation draft NPPF

The council should note that the draft NPPF currently being consulted on at HO9 includes a decision making policy with regard to specialist forms of accommodation and this includes specialist housing for older people. The council should therefore consider deleting the whole policy as it is likely that once the plan is adopted the NPPF will take precedence over this policy area and will therefore not be relevant.

Conclusion

Developers of older person's housing schemes should therefore not be required to demonstrate need given the significant need identified and the many benefits that such developments bring. Given also that such developments "**help reduce costs to the social care and health systems**" (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided and this element should be removed from the policy.

The council should also consider removing the policy area from the draft Local Plan given draft policy HO9 within the consultation draft NPPF.

Thank you for the opportunity for comment.

Yours faithfully



Natasha Styles
Senior Planning Associate