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Development Plans
Milton Keynes City Council
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Via email: ncp.engagement@milton-keynes.gov.uk

2nd December 2025

Dear Sir / Madam

McCARTHY STONE AND CHURCHILL LIVING CONSULTATION RESPONSE TO THE MILTON KEYNES DRAFT LOCAL PLAN (REGULATION 19)

Thank you for the opportunity to comment on the Milton Keynes Local Plan. McCarthy Stone and Churchill Living are the leading providers of specialist housing for older people. Please find below our comments which specifically address the need for specialist housing for older people and the benefits such housing can bring.

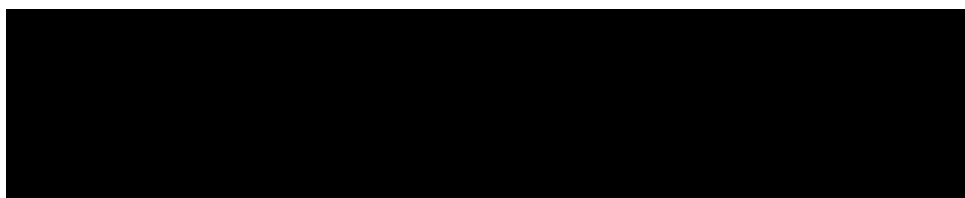
The following representation provides details as to the approach the Council should take towards meeting the specialist housing needs of older people and sets out recommendations for the Council to consider when setting policies to ensure the needs of older people are fully considered within the emerging Local Plan.

Policy HQH1 Healthy homes

We responded to the regulation 18 consultation and there appears to have been no amendment made to policy HQH1 as a result.

The policy requires that *proposals resulting in the creation of ten or more new homes must provide at least 5% of all new market homes built to Building Regulations Part M4(3) wheelchair accessible standard.*

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) Housing has a cost implication and may serve to reduce the number of dwellings and reduce viability. The cost of providing such housing was not included within the Viability Study supporting the draft viability study and it is unclear at what level it has been included in the Residential Update Note that has been published alongside this regulation 19 consultation. Our objection therefore still remains.



Policy HQH2 Affordable homes

We responded to the regulation 18 consultation and there appears to have been some slight amendments to the affordable level targets however, this still requires these affordable housing levels from specialist housing for older people. However, if the viability study was re-run using the assumptions advised in our regulation 18 consultation response it is likely that the typology would be found to be less viable than mainstream housing and a different level of affordable housing should be set in the policy for specialist housing for older people. This has not been done.

This policy requires proposals resulting in the creation of ten or more new homes, (including older persons' housing, as confirmed in Policy HQH3 'Supported and Specialist Homes') to provide affordable homes in accordance with the requirements set out below:

- i. In Housing Viability Area 1 at least 40% of new homes;
- ii. In Housing Viability Area 2 at least 20% of new homes;
- iii. In Housing Viability Area 3 at least 15% of new homes;

The policy specifies that where *'the required provision of affordable homes would make the development unviable, a robust viability assessment must be submitted to determine the maximum provision of affordable homes that could be delivered.'*

To support the affordable housing requirement the council has undertaken a Viability Study entitled 'Milton Keynes Whole Plan Viability Study', AECOM/HDH, June 2024. Based on this analysis, the report states at Paragraph 10.62 that specialist older people's housing is likely to be able to bear affordable housing across the formats tested.

Whilst we welcomed that the Council have tested sheltered and extra care housing across the areas in accordance with the PPG on Viability, we highlighted that we had some concerns with regard to some of the assumptions that have been used and if amended in line with the following recommendations, would be likely to make sheltered and extra care housing considerably less viable. As such, we recommended that the Viability Study should be re-run for sheltered and extra-care housing using the assumptions recommended. This has not been undertaken with the assumption that specialist housing for older people can be assessed for viability at the application which also would then come with a corresponding review mechanism. (see para 6.7 of the Milton Keynes Whole Plan Viability Study Residential Update Note, AECOM / HDH, October 2025).

We also note at paragraph 10.63 of the viability study that the assessors state:

When considering these results, it is timely to note that paragraph 10-007-20180724 of the PPG specifically anticipates that the viability of specialist housing schemes will be considered at the development management stage. It is therefore not considered proportionate to develop a specific set of policies in this regard.

This was reconfirmed in para 6.7 of the Viability Study Update.

We consider this to be a misrepresentation of the PPG in this regard. This paragraph of the PPG is referring to nonstandard typologies which may not have been tested as part of the plan wide study. In this case, the assessors have taken the trouble to specifically test the typology and a specific policy should result from the conclusions once feedback from stakeholders has been included.

We directed 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 at <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 therefore provided 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. We recommended that 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 and likely to show that either the typology should be exempt from affordable housing or a reduced requirement should be introduced.

Authorities such as BCP, Birmingham, Charnwood and Fareham recently developed bespoke affordable housing policy in respect of housing for older people having correctly assessed the viability of housing for older people at the development management stage. Fareham's approach has been found sound by the Planning Inspectorate indicating that the assessor's interpretation of paragraph 007 is incorrect.

For example, Churchill Living recently secured planning on a site in Newport Pagnell for retirement living accommodation. As part of the application, a viability negotiation was submitted and agreed in advance of the planning appeal which subsequently took place. This found that it was unviable to provide affordable housing on the site and a small commuted sum was agreed equating to less than 2% affordable housing equivalent. This demonstrates that the findings of the plan wide study should be updated and reflect the above standardised assumptions.

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 0.5 hectare site for both the Sheltered and 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 uses the following unit sizes:

- 1 bed sheltered 50 sq. m
- 1 bed extra care 65 sq. m

The 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

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. Whilst the Viability Study follows this mix of units for extra care units it incorporates a 50/50 split for sheltered (retirement) 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. We note that the Viability Assessment has used 20% and 30% respectively.

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 8%.

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 rather than the 3 months used within the study.

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. We note that a cost of £4,500 has been applied to cover the sales period, but this is not enough to cover all costs.

External build costs

From our experience external build costs tend to range from 8% to 15% of base build costs on flatted schemes within urban areas and we therefore feel that an allowance is 10% of base build cost should be used for external build costs for brownfield sites rather than the 5% used in the Viability Assessment.

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 17.5% used within the study.

Policy costs –BNG

Since the price of statutory BNG units have been published it has enabled it to be determined how much BNG may cost and this needs to be incorporated into the viability assessment at a realistic level. In addition, brownfield site BNG costs are often more substantial than Greenfield, but this very much depends on the site characteristics. For example, if an older persons' housing scheme consisting of 50 units on a 0.5 hectare site needed to purchase one off-site statutory credit, if this was for the cheapest low quality habitat type this would cost £84,000 or £1,680 per unit given that 2 credits are needed per unit. Older Persons housing schemes are ideally located on small windfall sites close to local facilities and it will most likely be that BNG requirements will need to be met largely or entirely off site by contribution.

Policy cost – M4 (3)

Despite the draft plan requiring 5% of older persons housing to be built for M4(3) it appears that a £0 additional cost has been incorporated into the Viability study. However, the council should note that any M4(3) requirement needs to be considered on top of M4(2) and would include additional costs for fixtures and fittings, services and controls and additionally room

dimensions and layout which include up to 30% more floorspace and corresponding reduction in density, sales values and affordability of such housing'. While some value may be secured for larger units this is unlikely to mitigate the overall loss of units across the proposal as a result of the requirement.

In this respect, we would highlight appeal decision **3327682 for a site in Penketh, Warrington** that specifically addresses M4(3) housing within retirement living apartments. This considers the provision of Wheelchair dwellings in detail in para 19 to 39, with the Inspector concluding that it was not viable for the scheme to deliver a proportion of M4(3) housing. This specifically states at para 37 that:

'37. As I consider that it would be most likely to be necessary to increase the size of the six apartments to enable M4(3) compliance, it follows that the cost of such provision may well be greater than the Council's assessment of £30,000, which did not allow for increases in apartment size. This is because an increase in the size of a number of apartments at the development would reduce the total number of apartments provided and hence may affect the development's overall value.

The inclusion of a requirement for older persons' housing to deliver affordable housing in line with policy HQH2 will create an unrealistic over aspirational policy requirement that would no doubt result in protracted discussion at the decision-making stage. This would potentially be adversarial, requiring protracted negotiations with Council officers and their commissioned consultants, and result in difficulties with decision makers expecting policy compliancy. As a minimum, the policy should therefore be amended to make it clear that older person's housing is more challenging in viability terms with respect to affordable housing to ensure that the plan is deliverable, justified and consistent with national policy.

We would draw the Council's attention to relevant Local Plan policies within Swale and Fareham Borough Councils. Based on detailed viability evidence, both have adopted Local Plans that exempt older people's housing schemes from affordable housing. Furthermore, Fareham exempts older people's housing from their Community Infrastructure Levy charge. Similarly, Maidstone BC has recently adopted a plan that has a lower affordable housing requirement for class C3 retirement housing and exempts housing that falls into the C2 use class from delivering affordable housing. Charnwood, Leicestershire, are towards the latter stages of their Local Plan examination and have recently consulted on main modifications that exempt specialist housing for older people from affordable housing, as well as removing the requirement for M4(3).

Recommendation:

Viability testing should be updated for this typology to correctly assess the viability of housing for older people as set out within this submission. A further opportunity for the industry to engage on viability matters should be allowed to ensure that the assessments undertaken reflect current best practice and site-specific agreement. Subject to the findings of the updated appraisals, an exemption or reduction in affordable housing target may be appropriate.

The following should be acknowledged in any case.

Add the following text to Policy HQH2: Affordable Homes

'Specialist housing for older people is more challenging in terms of viability and may struggle to deliver policy compliant levels of affordable housing.'

Policy PFHP1 Delivering Healthier Places

We responded to the regulation 18 consultation and there appears to have been no amendment made to the plan as a result.

This policy requires a Health Impact Assessment to be submitted alongside residential development (Use Class C3) of 50 homes or more and Residential Institutions (Use Class 2, including care) to be occupied by 25 or more persons.

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.

Recommendation:

For the plan to be both in line with national policy and effective, the following wording should be added in respect of points 2 and 4 of policy PFHP1 to recognise the health benefits of older persons housing.

Health Impact Assessment

B. A Health Impact Assessment (HIA) must be submitted alongside development proposals for:

2. Residential development (Use Class C3) of 50 homes or more. **(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)**

4. The following development within Use Class C2:

i. Residential Institutions (including care) to be occupied by 25 or more persons. **(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 CEA1 Sustainable Buildings

Policy CEA1 requires development to undertake an embodied carbon assessment. As such 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). The introduction of an embodied carbon policy must not be so inflexible that it deems sites unviable and any future policy needs to ensure this to make sure it is consistent with NPPF/PPG and can be justified by the council. The viability of specialist older persons’ housing is more finely balanced than ‘general needs’ housing and we are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment.

Additionally, 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. The council also need to verify that embodied carbon figures are available to developers from suppliers through an Environmental Product Declaration as in our experience this is not yet readily available from the majority of suppliers.

Policy CEA1 Sustainable Buildings

The policy requires developments to meet a number of sustainable construction requirements / targets including net zero, embodied carbon, carbon reduction beyond building regs, whole lifecycle carbon requirement, electricity generation and monitoring of energy use,

overheating, and indoor air quality in 10% of all dwellings for the first five years of occupation to assess any disparity between the 'as designed' and 'as built' building performance.

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'.

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). The introduction of an embodied carbon policy must not be so inflexible that it deems sites unviable and any future policy needs to ensure this to make sure it is consistent with NPPF/PPG and can be justified by the council. The viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment which must also cost the policy requirements correctly.

In addition, the council should not introduce monitoring of the requirement for the first 5 years. For example, Part O of the Building Regulations is clear in its requirements to prevent overheating of properties. The building regulations are introduced to ensure that all buildings meet a certain standard and if a building is 'signed off' as meeting these requirements additional monitoring, that has a cost implication, not just in the actual monitoring but in the fee the council is likely to ask for through a section 106 agreement at their end, that is unlikely to be within included in the viability study and should not be introduced.

Deleting the policy and aligning the Council's requirement for carbon neutral development with those of Government would therefore be pragmatic, more achievable, deliverable and consistent with national policy.

Recommendation:

- That the policy is stepped in line with emerging government targets or
- The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations or
- Ensure that the policy requirement for net zero is correctly incorporated into any forthcoming viability assessment and if this renders housing schemes unviable, the requirement should be removed.

CEA9 Biodiversity and Habitats Network

We responded to the regulation 18 consultation and there appears to have been no amendment made to the plan as a result.

We noted that Policy CEA9 states that development proposals that provide a higher than 10% net gain in biodiversity will be strongly supported. Whilst this is a commendable aspiration the Council should not set a higher biodiversity net gain (BNG) requirement for development than the 10% stipulated in the Environment Act 2021. Requiring BNG above 10% does not meet the tests for planning obligations set out in paragraph 57 of the NPPF which requires them to be 'necessary to make the development acceptable in planning terms'; and 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF).

The Council should also note that the recently finalised Planning Policy Guidance on Biodiversity Net Gain at paragraph: 006 Reference ID: 74-006-20240214 confirms that '*Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented*'. Therefore a 10% requirement should be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF) and consistent with national policy guidance.

The Council should also reconsider the additional wording it proposes with regard to BNG to ensure the policy is in line with the guidance and statutory instruments that the government have recently updated / published regarding statutory Biodiversity Net Gain and not too onerous. The Council should then amend the draft plan so that it is consistent with any updated guidance and regulations.

Although we recognise that the 10% is a minimum it should be for the developer to decide whether to go beyond this figure not the Council. It is important to remember that that it is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known and consequently what is required to achieve a 10% net gain. On some sites this may be achievable on site with no reduction in developable area, for others it may require a large proportion of it to be addressed offsite or it may result in a significant reduction in the

developable area – a far more expensive option that could render a site unviable without a reduction in other policy requirements.

The council should therefore not require a BNG of greater than the 10%.

Recommendation

For the policy to be consistent with national policy and legislation the Council should:

- **Only seek a minimum of 10% Biodiversity Net Gain**

Policy CEA11 Urban greening, trees and woodland

The policy area requires all development to meet an urban greening factor score as detailed in the policy.

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.

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 note that all the policy 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 should therefore reconsider the policy requirement and ensure it is realistic and viable.

The policy also includes at point C that major development within settlement boundaries to meet an Urban Treen Canopy cover standard of at least 19%.

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.'

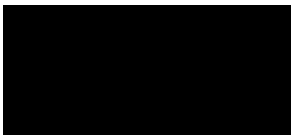
Requiring an *average green cover of 19% in the applicable residential neighbourhood*, especially for small brownfield sites is not deliverable or realistic and could compromise sustainability development and is therefore contrary to NPPF. Any requirement would also need to be fully evidenced and the 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.

Thank you for the opportunity for comment. We request that once the above comments have been factored into updated viability testing for the older person's housing typology, further opportunity to provide comment on the updated findings is extended to stakeholders.

Yours faithfully



Senior Planning Associate