



**Representation on behalf of Minton (CdeB) Ltd to
the Solihull Local Plan Review Draft Submission
Plan 2020 (Regulation 19 Consultation) in relation
to**

Site HA2, Oak Farm Catherine de Barnes

DEC 2020

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| CONTENTS | PAGE |
|--|-------------|
| 1. INTRODUCTION | 3 |
| 2. REASONS THE POLICY IS UNSOUND | 3 |
| 3. MODIFICATION REQUIRED | 5 |
| | |
| Appendix 1 – Three Dragons Viability Assessment | |

1. INTRODUCTION

- 1.1 I am instructed by Minton (CdeB) Ltd to make representations to the Solihull Local Plan Review Draft Submission Plan 2020 (“DSP”).
- 1.2 This representation provided relates to Site HA2 and Policy H4 of the DSP.
- 1.3 Whilst we support the inclusion of Site within the DSP we do not support the requirement in Para 172 that 40% of C2 schemes should be affordable. We consider the policy to be unsound and can find no evidence of viability testing. We further consider the policy will thwart delivery of good quality care schemes.

Reasons the Policy is unsound

- 1.4 The policy has not been tested in viability terms and needs to be refined to differentiate between C2 schemes that provide communal facilities and those that don’t.
- 1.5 A detailed planning application for a care scheme at HA2 has been through the S78 planning process, being dismissed at appeal only on Green Belt grounds. The layout is included in the DSP Master Plan document at page 69.
- 1.6 Based on that detailed scheme we have measured the total area of communal space, with and without the corridors, and excluding vertical circulation. The figure with corridors is 2631 m2 (13.85%) and without 2208m2 (11.62%) of the total GIA 18994m2.
- 1.7 By way of a comparison, Minton are progressing a 60 unit extra care scheme for McCarthy & Stone in Dartmouth. This is their Mac Stone Plus model which in addition to their retirement living model offers a

restaurant, lounges, laundry, wellness suite together with provision of 24 hr on site care and support. Mid Devon LPA accept the scheme is C2. The communal space extends to 481m² (8.55%) of the total GIA at 5,623.89m². Mac Stone's retirement living model on average provides communal space at around 4% of the total GIA.

- 1.8 Given the variation in communal areas between C2 schemes, we need to be careful setting a defined %. A recent village approval in Scotland, which has half as many again apartments as Oak Farm, delivers communal areas (7.36%) at a similar level to Oak Farm. Given the Oak Farm scheme delivers pretty much everything in terms of communal facilities including pool, wellness spa, restaurant, coffee shop, bar, library etc... it would be difficult to know what other communal space could be provided to increase the communal offering.
- 1.9 Using Oak Farm as a bench mark, as the retirement village gets smaller then so does the communal provision – but not at the same rate – until one reaches a size when a pool ceases to be viable. The omission of a pool and associated requirements (changing rooms, toilets, therapy rooms etc) makes a substantial difference.
- 1.10 Affordable housing provision on a C2 scheme, delivering extra care/assisted independent living units, will deliver a lower residual land value than residential when you also consider the payment of CIL and the provision of extensive communal areas. The Three Dragons on behalf of Retirement Housing Group, deals with exactly this point and is attached as **Appendix 1**.
- 1.11 In order to ensure that genuine C2 schemes can be delivered in a policy compliant manner, C2 residual land values need to be competitive alongside C3 land values. CIL, provision of extensive communal facilities and affordable units will not achieve this.

- 1.12 We do not consider a policy focusing on viability is the answer, given that it gives no certainty of delivery to (a) local authority (b) land owner and (c) care operator/developer.

Modifications required

- 1.13 Change paragraph 172. We believe the correct policy wording to allow certain C2 schemes with community facilities to be exempt should read as follows:

Dwelling units classified as C2 will be exempt from the policy where the units directly benefit from communal facilities comprising 5% or more of the total gross floor space.'

- 1.14 The wording has been adopted by Bedford Council in connection with their adopted CIL charging schedule, as per the attached. Bedford has adopted a minimum threshold of 10%. However, this relates solely to whether CIL is paid or not. On Oak Farm, the proposed C2 care village already attracts CIL. Therefore, a 10% minimum threshold in addition to CIL will be a significant barrier to entry for many C2 providers and will certainly not deliver the quality care provision much needed in this Borough.