

Planning Policy Team
Telford & Wrekin Council
PO Box 457
Southwater One
TF2 2FH

Via email:

By email: localplan@telford.gov.uk

20th July 2026

Dear Sir/Madam,

CHURCHILL LIVING AND MCCARTHY & STONE RESPONSE TO TELFORD AND WREKIN LOCAL PLAN MAIN MODIFICATIONS

Churchill Living and McCarthy & Stone are national housebuilders specialising in the provision of housing for older people. Combined the companies provide broadly 90% of older persons housing for sale each year. Each company identifies and develops land for the development of much needed housing for older people across the UK. The companies are well placed to advise on policy matters and how such policy might impact aspirations to meet the housing needs of older people in the area.

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.

HO4 – Affordable Housing Requirements

In our earlier representation we recommended that 'schemes delivering specialist housing for older people are exempt from providing affordable housing' based on the Council's Viability Study June 2023 (HDH) which concluded: '*...based on this analysis, market lead schemes of Sheltered Housing and/or extra care housing is unable to bear affordable housing*'. However, despite the conclusions of the Viability Study, and our submission, that the Main Modifications document continues to apply affordable housing policies to specialist older persons housing schemes which means that the policy is still not justified, effective or consistent with national policy.

Instead, the latest changes state that where it has been demonstrated to the satisfaction of the council that particular circumstances justify the need for a viability assessment...any grant of planning permission in these circumstances will be subject to a review mechanism.

We remind the council that the Viability PPG states that in preparing a viability assessment, reference must be taken to the plan wide assessment underpinning the plan in order to justify departure from the policy target. In this case the council's plan wide assessment already shows the typology is unviable and therefore the policy is not effective nor justified in continuing to seek to apply a generic affordable housing target to a typology shown to be incapable of providing affordable housing within the council's own evidence base.

The policy as it stands creates unnecessary uncertainty, expense and delay for providers of older persons housing given that any site-specific viability submission may not be accepted by the council despite the fact the council's own evidence base clearly indicates that the policy targets are not justified.

We would remind the council that Paragraph 001 of the Viability PPG states that different requirements may be set for different types or location of site or types of development. This means that the different viability outcomes concluded within the plan wide viability evidence base should be reflected in the policy.

By way of example of good practice, we note that BCP Council's now withdrawn local plan proposed an exemption in respect of older person's housing following the findings of the plan wide viability study. We have seen similar policies emerging in Birmingham, Charnwood (now adopted), Fareham (adopted), Hyndburn, Teignbridge, Dudley and Great Yarmouth. This is the correct approach in line with the requirements of national policy.

Policy S7 then seeks to introduce a review mechanism to seek to capture future profits up to a maximum of 70% uplift in the value of a scheme or the policy compliant level. This requirement is ambiguous and lacks the clear terms of engagement for review mechanisms required by the PPG. The supporting text to the policy refers to a 'lighter touch' approach to schemes under 50 units but no detail as to how a detailed future review will be assessed. This provides further uncertainty for investors who are likely to be dissuaded by onerous 70% claw back requirements.

As previously submitted, use of review mechanisms is not supported on smaller single-phase developments. This principle has been established on numerous appeal schemes including for example, under Appeal decision reference APP/C4235/W/120/3256972 dated 1st April 2021, where the Inspector noted in paragraph 17 that

'As the development would almost certainly be completed in a single phase with an estimated build time of 12-18 months, it is not the sort of large multi-phased scheme where stronger arguments for a review/clawback mechanism may otherwise exist'.

More recently, inspectors for the South Gloucestershire local plan agreed that such provisions are best suited to longer term multi phased schemes and not to smaller single phase development.

This requirement cannot be applied to specialist housing for older people given that the requirement to provide affordable housing from this typology has been found to be unviable in the first place.

Recommendation:

In order to ensure the plan is consistent with national policy and justified, the following wording should be added to policy HO4 to exempt older persons housing from providing affordable housing:

'Schemes delivering specialist housing for older people are exempt from providing affordable housing'.

Conclusions

Thank you for the opportunity for comment on the emerging plan.

Yours faithfully



Damien Lynch MRICS
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Planning Issues Ltd