**Policy Threshold**

I know that in our previous withdrawn plan, we had a threshold of 0.5ha or 15 units for both our affordable housing policy and our older persons housing policy. However, since we prepared this plan, planning practise guidance has given new advice on planning obligations. This gives a threshold of 10 units before planning obligations should be sought. We are now likely to use a standardised threshold of 10 units for these policies in the light of this advice (with no size threshold) and you might wish to do the same with your policy to achieve standardisation. The paragraph number on planning obligations where this is covered in planning practise guidance is: Paragraph 008 Reference ID: 23b-008-20140306 <https://www.gov.uk/guidance/planning-obligations#contents>

**Optional Building Standard**

Unfortunately, Government policy does not allow neighbourhood plans to require optional building regulations standards or any alternative access standard in neighbourhood plans. A requirement for this optional access standard can only be applied through a Local Plan. The Government’s policy advice on this can be found on the following link:  <https://www.gov.uk/government/speeches/planning-update-march-2015>.

This means you will have to remove the section of the policy which states ‘Where it can be demonstrated that this requirement would undermine the viability of the scheme, either in terms of financial viability or lack of market demand for these products, then as an alternative, we will require at least 10% of the total units on the site to be consistent with optional access standards’. This is contrary to Government guidance, and is unlikely to be successful at a Neighbourhood Planning Inquiry.

Instead, I think it is worth trying to include something along the following lines:

‘In meeting this requirement, we encourage developers to build suitable properties to Building Regulations Requirement M4 (2) (accessible and adaptable dwellings).

Where it can be demonstrated that the requirement of this policy would undermine viability, either in terms of financial viability or lack of market demand for these products, we encourage developers, as an alternative, to ensure that at least 10% of units within the site are built to Building Regulations Requirement M4(2)’.

**Potential Policy**

A potential policy based on the above recommendations might look like this, should you choose to go down this route:

**To contribute towards meeting the need of the parish’s ageing population we will require 10% of private and inter-mediate housing on sites of 10 units or more which, in relation to design and house type, increase the housing options of older people. Appropriate house types considered to meet this requirement include:**

**• Level access flats;**

**• Bungalows;**

**• Sheltered Housing or Extra Care Schemes; or**

**In meeting this requirement, we encourage developers to build suitable properties to Building Regulations Requirement M4 (2) (accessible and adaptable dwellings).**

**Where it can be demonstrated that this requirement would undermine the viability of the scheme, either in terms of financial viability or lack of market demand for these products, we encourage developers, as an alternative, to ensure that at least 10% of units within the site are built to Building Regulations Requirement M4(2)’.**

**Policy Justification**

I think it will be helpful, and necessary for the Inspector to be clearer about the evidence you are using to support your policy. You can identify your own topic paper as source evidence and also any County Council evidence that you want to cite.  However, I do appreciate it is very difficult to get all relevant evidence you might like from data sources that do not match the boundary of your neighbourhood planning area. I have made a few suggestions in red with respect to your topic paper which may be helpful. I have also attached a link to a range of parish information on Witton Gilbert which may be helpful to you: <http://rsnonline.org.uk/observatory/neighbourhood-planning> (select Durham and then select Witton Gilbert in the drop down box giving a selection of parishes).

You are entitled to share any evidence in the public domain that is published by the County Council. Significant relevant evidence is included in the County Durham, Issues and Options Stage, Strategic Housing Market Assessment (Part 1) 2016. The document is on the web page which can be found through the link:  <http://durhamcc-consult.limehouse.co.uk/portal/planning/cdpev/>. References in the document that are likely to be relevant to justifying requirements for older people’s housing in neighbourhood plans are included in the attached Appendix.

Given that the policy relates to private and inter-mediate housing, I think you need to highlight in the reasoned justification that the majority of older people in the village are owner occupiers. If the majority of bungalows are social, it would also be relevant to highlight the mismatch in the existing stock between social and private bungalows, emphasising that older owner occupiers who might want to downsize are in a significant majority but have particularly few market options. I have suggested some related proposed changes and additional evidence to your proposed paper on older persons housing in the attached, assuming you intend to use this as justification (suggestions are highlighted in red).

It would also be sensible to make reference in the reasoned justification to the fact that Government Policy does not allow Neighbourhood Plans to require new development to be built to optional Building Regulations Requirement M4 (2) (accessible and adaptable dwellings). You could highlight that this standard is aimed at ensuring that housing built is accessible to older people and the disabled or can be adapted to their needs in the future. You could state that under these circumstances the parish council will strongly encourage developers to build the housing required by this policy to this standard.

Hope this is helpful and if you have any further queries, just give me a ring.