

Greater Cambridge
Planning Policy Team
By email only

Churchill House, Parkside
Christchurch Road, Ringwood
Hampshire BH24 3SG
Telephone 01425 462372
Fax 01425 462101

16th October 2025

Dear Planning Policy Team,

CHURCHILL RETIREMENT LIVING AND MCCARTHY STONE RESPONSE TO THE GREATER CAMBRIDGE PLANNING OBLIGATIONS SPD

Introduction

Churchill Living and McCarthy Stone are independent and competing housebuilders specialising in sheltered housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. These companies are therefore well placed to comment on planning policy insofar as it impacts the delivery of this specialist housing typology.

Please find below our comment on the draft policies within this consultation insofar as they impact the delivery of specialist accommodation for older persons.

Viability Considerations

Having reviewed the draft SPD¹, we feel that it is important to provide comment in respect of the possible cumulative impact of planning obligations on development viability. We have concerns about how these rates impact on specialist housing proposals for older people and the lack of clarity at present as to how the cumulative impact of these requirements impact on the viability of housing for older people in particular.

The PPG sets out the following requirements:

Where should policy on seeking planning obligations be set out?

Policies for planning obligations should be set out in plans and examined in public. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land.

Such policies should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability. This evidence of need can be standardised or formulaic (for example regional cost multipliers for providing school places. See the guidance from the Department for Education on Securing developer contributions for education). However, plan makers should consider how needs and viability may differ between site typologies and may choose to set different policy requirements for different sites or types of development in their plans.

¹ [Greater Cambridge Planning Obligations Supplementary Planning Document draft for re-consultation autumn 2025](#)

It is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not be subject to examination. Whilst standardised or formulaic evidence may have informed the identification of needs and costs and the setting of plan policies, the decision maker must still ensure that each planning obligation sought meets the statutory tests set out in [regulation 122](#). This means that if a formulaic approach to developer contributions is adopted, the levy can be used to address the cumulative impact of infrastructure in an area, while planning obligations will be appropriate for funding a project that is directly related to that specific development.

Planning obligations assist in mitigating the impact of development which benefits local communities and supports the provision of local infrastructure. Local communities should be involved in the setting of policies for contributions expected from development.

See related guidance: [Viability](#) and [Plan-making](#)

Paragraph: 004 Reference ID: 23b-004-20190901

Revision date: 01 09 2019 See [previous version](#)

The Draft SPD states at paragraph 2.48 that:

Planning obligations are a necessary cost of development and it will be expected that the likely cost of obligations, including requirements for affordable housing provision, will be factored into the development cost from an early stage. Furthermore, both Local Plans have been informed by evidence of infrastructure and affordable housing need and supported by a proportionate assessment of viability that took into account all relevant policies, and local and national standards including the cost implications of planning obligations. Therefore, if a developer is seeking to raise viability concerns regarding the obligations due, the onus will be on the developer to provide robust information regarding the viability of an individual scheme.

It is noted that the draft SPD is accompanied by a Costing Report dated July 2025 which sets out specific and current rates for the provision of various planning obligations.

Given that the costings associated with the draft SPD requirements post-date any plan wide viability assessment on the council website, it would be beneficial if the councils might reconfirm that the cost expectations have been accurately assessed within the Greater Cambridge plan wide viability study.

We cannot locate the results of any plan wide testing which demonstrates that the viability of older persons housing remains unchallenged which would put the SPD at odds with the requirements of the PPG as referenced above.

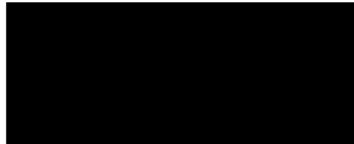
It is imperative that each typology is accurately assessed in terms of viability and the reasonable S106 ask applied to demonstrate these proposed obligations do not put delivery at risk. The SPD creates an expectation that any S106 ask should be viable but in reality, most brownfield sites experience viability constraints. This is particularly the case in respect of specialist housing proposals (e.g. housing for older people) which possess different viability characteristics.

In our view it is premature to adopt the SPD without first clearly addressing the requirements of the PPG and ensuring that the 'asks' are financially viable. It should not be left to site specific viability testing to ensure that this requirement is met as the PPG is clear that the primary role for viability testing should be at the plan making

level². By simply introducing these requirements without addressing the PPG viability requirement, the expectation of decision makers is that such requirements are always viable and deliverable. Paragraph 2.53 already refers to viability 'disputes'.

We would be grateful if you could inform us of future opportunities to comment on the emerging SPD including any viability evidence base produced to support this document.

Yours faithfully,



Damien Lynch
BSc (Hons), MSc, MRICS
Associate Director
Planning Issues Ltd

² Paragraph: 002 Reference ID: 10-002-20190509