COVENTRY LOCAL PLAN EXAMINATION

Written Statement on behalf of Hallam Land Management Ltd

1. Overall Housing Need

d) The housing requirement in Policy DS1 is not expressed as a minimum figure as it is in Policy H2. Should it be?

Yes, for consistency the figure should be expressed as a minimum.

2. The Need for Affordable Housing, Students, Older People, Gypsies and Travellers

f) Are the criteria in Policy H6 too prescriptive in setting out the tenure mix and will it become outdated as market conditions change?

Hallam Land Management has not objected to Policy H6, but have queried the use of highly prescriptive requirements within associated housing policies (see matter o) below).

Policies with regard to housing mix and tenure do need to be informed by up to date evidence to ensure they remain current and relevant to the housing market, and to meeting local needs. It is recognised that Local Plan review processes provide opportunities for such policies to be revisited, and for new evidence to be used as the basis for setting affordable and other housing needs. However, by definition housing market and needs data provides a ‘snapshot’ and may not remain appropriate or accurate over the term of a Local Plan.

It would be appropriate for the policy to refer to the potential for new or updated Housing Market information to inform negotiations with regard to the detailed provision through planning applications and/or associated S106 agreements, and to recognise that the details and evidence of housing is very likely to change over time.

o) The supporting text to Policy H8 says that at least 10% of new homes built in the Strategic Urban Extensions (SUEs) at Keresley and Eastern Green should be provided to support Extra Care housing provision. How will this be achieved?

If it is a policy requirement should it be included in the wording of the policy rather than the reasoned justification?
Hallam Land Management Ltd would not support any requirement to provide a specific proportion of extra-care housing being moved from the reasoned justification text to the policy.

Hallam Land Management Ltd has queried the requirement to deliver “at least 10%” of new homes as Extra Care provision at Eastern Green – this is referred to in the Statement of Common Ground between Hallam Land Management Ltd and Coventry City Council. We would prefer to see a less prescriptive approach which reflects the uncertainty in predicting specific local housing needs over the longer-term.

The principle of providing accommodation to meet the needs of older people is accepted as part of the drive to deliver sustainable development which delivers mixed communities, and to ensure a diverse range of housing needs are met. However, the use of such a specific and fixed minimum requirement in a long-term planning policy is queried, as is the justification with regards to the evidence base which has informed the proposed approach. Also, the lack of a clear or consistently applied definition of ‘extra-care’ housing can also be an impediment to setting such specific requirements in policy, and there is scope to meet some of the specific needs often targeted by such policies through other means, including the detail of the housing mix and type across the site.

It is understood that the Council sees the justification for this policy approach as the evidence from the 2012 SHMA (Document LP42) which refers to a potential increase in the elderly population in Coventry of around 30% over the period 2010 to 2030. In the more recent 2015 SHMA Update (Document LP45), the data suggests that growth in the ‘older’ age groups (60-74, and 75 and older) is considerably slower in Coventry City than in other surrounding Districts of Warwickshire. Overall, Coventry is described as having a relatively young population structure compared to many of the other Warwickshire authorities, with strong population growth in many of the youngest age categories. Indeed, the 2015 SHMA refers to “the main population change has been in groups aged under 60” (para 3.17, Document LP45).

In summary, Hallam Land Management Ltd do not challenge the need to make provision for ‘Extra Care’ or other forms of accommodation to meet the needs of older people. We feel the use of ‘at least 10%’ extra care provision is not clearly justified by the supporting evidence. It is considered more appropriate for the proportion of extra-care housing, or other types of accommodation to meet the needs of older people, to be provided at Eastern Green to be agreed by discussion and negotiation in the context of planning applications, and housing market and demographic information available at the time.