



Housing

Background Paper

November 2024



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1. Introduction and policy context

This background paper on Housing sets out the context and reasons for the policy position the Council is taking on housing as part of its 'Regulation 19' (Proposed Submission) consultation. It sets out how this has been influenced by the 'Regulation 18' (Issues and Options) consultation by summarising the key issues raised by respondents at the Issues and Options stage and by setting out the new evidence that has emerged.

The context for assessing housing need and supply in plan-making is set out in the National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance (PPG). In compliance with the Planning and Compulsory Purchase Act 2004, plans must identify strategic policies and non-strategic policies, which deal with more detailed matters. Given the nature of identifying housing supply and ensuring future housing meets Coventry's needs, this chapter of the local plan combines a mix of both strategic and non-strategic policies.

The first stage of the Local Plan Review process was undertaken in summer 2023 when the 'Regulation 18' ('Issues and Options') consultation was held between 18th July and 29th September. It should be noted that at this time the NPPF was the version published on 20th July 2021, and it was this version under which the consultation documents had been prepared.

Since then, further versions of the NPPF have been launched, in September and December 2023. Then also at the time of writing a new NPPF was being consulted on, released in July 2024. The Regulation 19 Plan has been prepared under the December 2023 NPPF, however, regard has been had to any potential forthcoming changes which might have implications for plan-making and this is also referenced in the narrative set out in this paper.

Paragraph 60 of the December 2023 NPPF and 61 of the July 2024 NPPF consultation states, "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are

addressed and that land with permission is developed without unnecessary delay.” Section 5 of the NPPF provides the framework for delivering this objective, and the housing policies of the Local Plan have been reviewed in this context, along with the National Planning Practice Guidance which provides further elaboration.

Paragraph 69 of the December 2023 NPPF and paragraph 70 of the July 2024 NPPF consultation talks about planning policies needing to identify a sufficient supply and mix of housing, which has been informed through the preparation of the HELAA, assessing the availability, suitability and achievability of sites.

In December 2023, new text was added to paragraph 60, clarifying that the overall aim of local authorities, in the context of delivering homes, should be to “meet as much of an area’s identified housing need as possible”. This has been updated further in the July 2024 NPPF consultation, which removes the wording “as much of” and “as possible” from that sentence to emphasise the Government’s aim for LPAs to meet their housing need. The fundamental principles of delivering homes remains unchanged in the NPPF, including to significantly boost the supply of homes, to address the needs of groups with specific requirements and to plan for an appropriate mix of housing types. One significant change in the July 2024 NPPF consultation is the removal of paragraph 62, in relation to the standard method’s uplift to the largest cities and urban centres

Within the context of established need in the NPPF, paragraph 63 requires the size, type and tenure of housing need for different groups in the community to be assessed and reflected in policy. These groups should include (but are not limited to) those who require affordable housing; families with children; looked after children, older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.

In terms of affordable housing, where a need is identified, the NPPF says planning policies should specify the type of affordable housing required. Paragraph 63 and 64 have been added to in the July 2024 NPPF consultation to emphasise the need for social rented homes. Paragraph 65 of the NPPF is explicit that the provision of

affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas.

The December 2023 NPPF required major housing developments to provide at least 10% of the total number of homes to be available for affordable home ownership, except in exceptional circumstances such as, where it would prevent an identified need being met; where it would exceed the level of affordable housing in an area; and where it is a specialist type of housing such as build to rent, PBSA, self-build or community led housing. The July 2024 NPPF consultation removes this requirement from paragraph 66, instead requiring a mix of affordable housing to be provided that meets identified local needs, across affordable housing for rent and affordable homeownership tenures. The July 2024 NPPF consultation is also updated proposing to remove the requirement to deliver a minimum of 25% of affordable housing as First Homes, as set out in 'Affordable Homes Update' Written Ministerial Statement dated 24 May 2021. Delivery of First Homes can, however, continue where local planning authorities judge that they meet local need.

In addition, the review has taken into account the importance of addressing climate change in line with the Climate Change Strategy (currently draft) and in line with Council priorities as set out in the adopted [One Coventry Plan](#).

2. Policies to be reviewed

By virtue of the changes in national policy and the Coventry context since the current Local Plan was adopted in 2017 and to respond to the findings of the HEDNA, all housing policies were considered to need reviewing. Updates were suggested to all housing policies as part of the Regulation 18 consultation. These included introducing standards such as Nationally Described Space Standards (NDSS), changes to densities around the city, an updated approach to PBSA developments and the inclusion of potential new policies around the relatively new housing models of build to rent, co-living and self and custom build and community-led housing.

For this Regulation 19 stage, the Local Plan policies have been reviewed and retained in the order in which they appear in the current Local Plan. Additional policies, which are proposed as part of the housing section, have been added in to follow on at the end of the current policies. There is a natural order to the policies with strategic matters appearing first and more localised policies following on.

3. Issues and Options consultation: the evidence base

One Coventry Plan

Housing needs to be delivered in line with the corporate priorities in the One Coventry Plan. Health and good quality housing are intrinsically linked with the latter being so important to the health and wellbeing of residents. In line with the One Coventry Plan, the Local Plan will promote the building of both high-quality affordable housing and a range of size and type of housing to meet demand in the city, which also includes social housing. The Local plan will align with the corporate aim of the One Coventry Plan to deliver more social housing to those that need it most, which is also community led and has community involvement at its heart. This means that, for housing, Regulation 19 has incorporated the following priorities:

- The continued provision of high-quality affordable housing
- Working with registered providers, charities, and community organisations to deliver more social housing for those who need it most including options around community-led housing projects
- Addressing the needs of those on low incomes with affordable access to quality housing, heating, and insulation

Climate Change Strategy

The five development pathways in the Council's Climate Change Strategy, which was in draft form at the time of the Issues and Options consultation, seeks to improve the energy efficiency of the City's housing stock, create a more resilient city that better responds to the risks of climate change and extreme weather events such as flooding, heatwaves and droughts and seeks the lowering of overall emissions. The Local Plan will align with these corporate housing objectives by promoting the following development:

- Low emission development
- Nature-based development
- Equitable and people centred development
- Resilient development
- Circular economic development

Housing and Economic Development Needs Assessment (HEDNA)

As set out in the Housing Topic Paper 2023 the Housing and Economic Development Needs Assessment (HEDNA) 2022 provided a key evidence base at this stage of the review. Commissioned by Local Authorities across Coventry and Warwickshire, the HEDNA was prepared in accordance with the NPPF and associated guidance to provide an assessment of the need for housing, economic growth potential and employment land. It considered the overall scale of housing need, the demand for various types of homes, the dynamics within different sectors of the housing market, as well as the specific housing requirements of different population groups. Following a pause in the project, which allowed capture of initial Census data released on 28th June 2022 to inform demographic analysis and housing need modelling, the report was finalised in Autumn 2022.

Housing and Economic Land Availability Assessment (HELAA)

The Housing and Economic Land Availability Assessment (HELAA), which is updated at least once a year, provides the database of available land for development over the plan period up to 2041. It includes information from the call for sites exercises carried out over the last two years, which also contributes to the housing allocations in the Local Plan, plus sites which have been taken from a range of sources including the latest Authorities Monitoring Report and the previous database from 2016 (which was known as the Strategic Housing Land Availability Assessment (SHLAA)).

Gypsy and Traveller Accommodation Assessment (GTAA)

The Coventry City Council Gypsy and Traveller Accommodation Assessment (GTAA) published in February 2023 provides the latest available evidence identifying the needs of Gypsies and Travellers across the city. The GTAA indicated that over the longer plan period there will be a shortfall of 6 pitches and an inadequate supply of negotiated stopping points to address unauthorised encampments. The GTAA also provided recommendations for new amenity provision and standards for potential future residents of Gypsy and Traveller sites.

4. Suggested approach at Issues and Options and the evidence base

Policy H1 – Housing Land Requirements

Since the adoption of the Coventry Local Plan in 2017 the government introduced the Standard Method, a standardised way of calculating the minimum housing need. The population projections utilised for this method are based on the 2014 Mid-Year ONS Estimates, which have been proven unreliable for Coventry. A more credible data source is the 2021 Census. So, the HEDNA reworked the Standard Method, using the more reliant figures. However, Coventry City Council also disputed the 35% uplift applied to the 20 largest authorities, of which Coventry is one, included in the Standard Method, arguing that it was arbitrary and lacked justification. Growth needs were consulted on in Chapter 3 of the issues and options consultation, with this covered in greater detail in a separate background paper.

Policy H1 is specifically about how an appropriate level of growth can be developed in order that the Council can meet its housing need within its administrative area and so it was this that was consulted on. Question 27 of the issues and options consultation invited suggestions on how the Council could meet its housing need, which included through site submissions, ideas for densification, and ideas for sites that could come forward as well as other comments.

In line with the NPPF, effective densification in some areas of the city could provide an opportunity to accommodate shortfalls whilst maintaining high quality living, and so views were sought on this at the issues and options stage.

Policy H2 – Housing Allocations

The table of sites in Policy H2 was at this stage supported by evidence from the Housing and Employment Land Availability Assessment (HELAA). This used information taken from the Call for Brownfield Sites undertaken in Summer 2022, as well as the latest Authorities Monitoring Report (AMR), and the previous database from 2016: The Strategic Housing Land Availability Assessment (SHLAA). The table of sites

were those allocated in the adopted local plan with an update on the current status of them.

Policy H3 – Provision of New Housing

Given the current housing market in Coventry and the evidence contained in the HEDNA, it was considered that a greater emphasis on different housing types should be included in the Local Plan, particularly on new and emerging models, and this was to be addressed in Policy H3. The HEDNA explored Build to Rent and Co-Living and so new policy was suggested and was to be consulted on at the issues and options stage. Build to Rent (BTR) housing is supported in Paragraph 65 of the NPPF and defined in the glossary as ‘Purpose built housing that is typically 100% rented out.’

Due to the growth of the privately rented housing sector in recent decades, BTR housing has developed into a housing approach that is backed by National Government. The development of the BTR model reflects housing supply issues, the challenge of owning a home, and the need for stable, high-quality housing, particularly for families. The NPPG sets out that where it is assessed that there is a need for BTR, policy must develop a clear approach to its provision. The HEDNA report identified a market for Build-to-Rent (BTR) in Coventry, noting that target tenants are present, and several schemes have already been developed. Consequently, it recommended the creation of a specific policy for BTR.

The HEDNA report identified a non-prescriptive target market for BTR housing to be the younger demographic, with a general unit size of 1, 2 or 3 bedrooms. The report also highlighted that the NPPFs definition of BTR schemes offering tenancy agreements of three or more years, and typically being managed stock in single ownership and management control, is appropriate for the Council to adopt. However, the HEDNA recommended consideration of a specific affordable housing policy due to differing viability of BTR. Finally, the HEDNA endorsed the 20% benchmark for the provision of affordable private rent homes, managed in perpetuity, as stated in the National Planning Practice Guidance (NPPG). This is alongside the minimum rent discount of 20% for affordable private rent homes relative to local market rents.

Following the adoption of the Coventry Local Plan in 2017, and after first emerging in London, co-living accommodation has gained interest as a growing housing sector in a selection of major cities in England. Co-living is a specific form of accommodation that is modelled on high density housing with shared communal space and additional services and facilities to encourage social interaction and foster communities. The iterations of the NPPF that have been published since the Regulation 18 consultation began have not specifically cited co-living, but they have continued to emphasise the need for local plans to provide for the delivery of a range of dwelling types that meets the needs of the community.

The HEDNA report indicated that there is a potential market for co-living in Coventry owing to the existence of the target demographic that is evidenced by a large base of unrelated adults sharing homes in the city currently. The HEDNA report also explored the low graduate retention rate in Coventry. Although, co-living accommodation is not exclusively for the younger generation, the young professional demographic is particularly affected by the affordability of the housing market, and co-living could help to address this need by providing accommodation which might specifically appeal to this demographic. Consequently, these factors highlighted the need to introduce policy on this matter into the Local Plan through the Coventry Local Plan Review. The HEDNA provided several recommendations for Co-Living policy and observed that it might be prudent to limit the number of Co-Living developments in the city.

The HEDNA report also considered Self-Build and Custom Housebuilding in line with the NPPG and legal definition in the Self-Build and Custom Housebuilding Act 2015. The HEDNA recommended that the Council develop a policy on this matter as well as considering demand and whether it is appropriate to require percentages of large sites to deliver self and custom build plots. Given the constrained nature of Coventry, it was considered that the latter was not suitable, however, a separate policy reflecting national policy and guidance was considered appropriate at this time. In relation to self and custom build, it was also considered appropriate for there to be positive reference in policy to support community-led housing schemes.

The Council considered that the element of Policy H3 that enabled limited infill within existing ribbon developments in the Green Belt had resulted in speculative

development in unsustainable locations. Therefore, deletion of this is needed to be considered to potentially steer self and custom build developments to brownfield sites. The HEDNA proposed that in instances where sites are allocated, or a percentage rule is applied, there needs to be a fallback mechanism for unsold plots after 12 months.

In terms of Residential Development Standards in Policy H3, there was an opportunity to strengthen it using the New Residential Design Guide SPD, the Open Space SPD, and the Householder Design Guide SPD. Moreover, the list of criteria in the policy could be improved and use of the Building for Healthy Life principles was an option. It was considered that amenity should also include living space and configuration and given the need for high density development in Coventry, this needed to be maintained. The Nationally Described Space Standards (NDSS) were therefore suggested as a new standard for developments to meet. Standards were also suggested to proactively address climate change in terms of residential development.

Policy H4 – Securing a Mix of Housing

Minor revisions to Policy H4 were suggested. Policy H4 referenced the Strategic Housing Market Assessment, however, the HEDNA at this point was a more appropriate starting point. Although, the wording in this policy needed to remain flexible to allow the latest evidence to be referred to.

Policy H5 – Managing Existing Housing Stock

Policy H5 aligned with the July 2021 iteration of the NPPF that was available at the issues and options stage. Moreover, further evidence in the Climate Change Strategy, the Housing and Homelessness Strategy and the One Coventry Plan highlighted the importance of utilising existing stock in Coventry as it is a constrained and highly populated city environment. Therefore, suggestions to the strengthening of this policy to better utilise the existing housing stock and include reference to energy efficiency were made.

Policy H6 – Affordable Housing

The HEDNA is the starting point for a review of Policy H6. It provides an analysis of two main outputs, an assessment of the need for social / affordable rented housing

and for affordable home ownership, in line with the NPPF and PPG. The HEDNA adopts a broadly consistent approach to assessing affordable housing need to that identified in the PPG. The PPG sets out that to assess unmet (gross) need for affordable housing Local Authorities need to have estimates of the number of people in temporary accommodation; in overcrowded housing, in unsuitable dwellings, who cannot afford their own homes, either to rent or to own and where that is their aspiration; and concealed households. As a result, the HEDNA considers, for all forms of affordable housing – current need; newly forming households; and existing households falling into need to determine a gross unmet need. It then considers an annual estimate of supply to determine a net need.

Looking at the Social / affordable rent and affordable home ownership separately, the analysis in the HEDNA concluded that the need for the city is as follows:

Social / Affordable Rented Housing

(Please see below Tables 8.13 and 8.15 from the HEDNA)

- Annual net need for Social / Affordable Rented housing is 1,887dpa. This is after taking into account the supply from annual lets, so is additional need on top of what is already let through the Homefinder register.
- When existing households are removed the net need for social / affordable rented housing is 941dpa.
- The group in the biggest need and who will be unable to afford market housing to privately rent is newly forming households, with an annual need of 1,667pa.

The modelling in the HEDNA contains a category in the projection of '*existing households falling into need*'; these households already have accommodation and hence if they were to move to alternative accommodation, they would release a dwelling for use by another household – there is no net need to provide additional homes. The modelling also contains '*newly forming households*'; these households are a direct output from the demographic modelling and are therefore already included in the overall housing need figures. The '*current need*' group will be similar to the existing households already described (in that many are already living in accommodation) although it is possible that a number will be households without housing (mainly concealed households) – these households are not included in the

demographic modelling and so are arguably an additional need, although uplifts for market signals/affordability (as included in the Government's Standard Method) would be expected to deal with such households.

Table 8.13 Estimated Need for Social/Affordable Rented Housing by local authority (per annum)

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Coventry	495	1,667	653	2,816	929	1,887

Table 8.15 Estimated Need for Social/Affordable Rented Housing by local authority (per annum) – excluding existing households

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Coventry	203	1,667	0	1,871	929	941

Affordable Home Ownership (AHO)

(Please see below Tables 8.25 and 8.27 from the HEDNA)

- The estimated gross annual need for affordable home ownership is 633.
- The annual net need for affordable home ownership is 149, which equates to 7% of the overall affordable housing need. This takes into account the supply from AHO re-sales and 50% of the lower quartile open market sales.

Table 8.25 Estimated Gross Need for Affordable Home Ownership by local authority (per annum) – Coventry & Warwickshire

	Current need	Newly forming households	Existing households falling into need	Total Gross Need
Coventry	92	403	138	633

Table 8.27 Estimated Need for Affordable Home Ownership by sub-area (per annum)

	Total Gross Need	Supply	Net need
Coventry	633	484	149

Affordable housing split need

The total affordable housing need per annum for Coventry is 2,035, 93% of which is for social/affordable rent and 7% of which is for AHO (Table 8.45)

Table 8.45 Estimated annual need for affordable housing split between rented and affordable home ownership – Coventry & Warwickshire

	Rented affordable need	Affordable home ownership need	Total annual need	% as AHO
Coventry	1,887	149	2,035	7%

The HEDNA indicated the importance of affordable home ownership being genuinely affordable and so the council has considered how this will be achieved to allow it to be flexible given changing market circumstances and government and local priorities.

The proposed mix was suggested based on the national planning guidance/NPPF stating that a minimum of 10% of any major development should be AHO (overall – with some exceptions), and that a minimum of 25% of the affordable housing requirement should be First Homes. Therefore practically, with a 25% affordable housing requirement in local policy, it was considered that policy could not require less than 40% (of the 25% affordable housing requirement) to be AHO, as this would be equivalent to 10% of the overall development. There is no evidence in the HEDNA that the amount / percentage of AHO should be increased over the minimum required by national guidance.

In terms of size for social or affordable rent properties, the HEDNA identifies the biggest need for 1-, 2- and 3-bed properties at 30%, 35% and 25% respectively, with 4-bed properties being 10%. When this comes to affordable home ownership, this has been determined as 20% 1-beds, 45% 2-beds, 25% 3-beds and 10% 4-beds.

Moreover, the Homefinder Register provided a vital piece of evidence to inform Policy H6 and enable it to respond to the need for social rented homes at a given time. It also shows that while the largest demand for social or affordable rent is 1 and 2 beds, the

people on the waiting list the longest are those waiting for larger family housing, including 4-beds.

Policy H7 – Gypsy and Traveller Accommodation

A new Gypsy and Traveller Accommodation Assessment (GTAA) was completed in February 2023 and highlighted that Policy H7 needed updating to reflect current circumstances. The GTAA indicated that over the longer plan period there will be a shortfall of 6 pitches. The GTAA also provided requirements to increase resilience over the plan period including recommendations for new amenity provision and standards for potential future residents of Gypsy and Traveller sites. It was also recommended that the Council develops a negotiated stopping point policy to address unauthorised encampments, however, the Council's viewed this to be outside the scope of the Local Plan.

Policy H8 – Specialist Housing including Specialist Housing with Elements of Care, Older Persons accommodation and hostels

The HEDNA explored a range of data sources and statistics to consider the characteristics and housing needs of the older person population and those with some form of disability in relation to Policy H8. It included an assessment of the need for specialist accommodation for this demographic as well as potential requirements for housing to be built to M4(2) and M4(3) housing technical standards.

The HEDNA identified a need for around 1,960 housing units with support (sheltered / retirement housing in Coventry, mainly affordable and a need for around 230 additional housing units with care (e.g. extra care) in Coventry – focused on make housing.

Due to a projected aging population, Coventry needs to increase the supply of accessible and adaptable dwellings and homes suitable for wheelchair users. The HEDNA identifies the estimated need for wheelchair user homes pa in Coventry to be around 180 dwellings pa (meeting technical standard M4(3), which equates to 12.6% of the housing supply. When broken down into tenure, the estimated need for wheelchair user homes was 10% for market housing and 26% for affordable housing. As a result, the HEDNA recommended that the Council could consider requiring all

dwellings to meet the M4(2) standards and 10%-15% of all new market homes to meet the M4(3) standards.

These figures reflect that not all sites would be able to deliver homes of this type, with consideration of a different approach for market housing and affordable homes. In the market sector these homes would be M4(3)(A) (adaptable) and M4(3)(B) (accessible) for affordable housing. The HEDNA identifies the viability challenges of requiring certain housing schemes to be M4(2) and M4(3) compliant. This is particularly relevant for M4(3)(B) standards. These make properties accessible from the moment they are built and involve high additional costs that could in some cases challenge the feasibility of delivering policy targets. The HEDNA therefore recommends that any policy in relation to this should be applied flexibly and that the council should consider if a different approach is prudent for market housing and affordable homes, recognising that Registered Providers may already build to higher standards and that households in the affordable sector are more likely to have some form of disability.

The HEDNA also highlighted that the Council will need to address the matter of locational requirements and where the need is around the city. It also recommends the council have consideration for the different use classes of accommodation (i.e. C2 v C3) and requirements for affordable housing contributions, linked to viability as well as practical issues associated with mixed tenure developments.

Policy H9 – Residential Density

Given the government's 'brownfield first' approach, Policy H9 was considered up to date at this stage of the review. However, there was an opportunity to examine the potential of setting density minimums outside of the ring road, in certain locations, to maximise capacity. At the time, this was in line with the current version of the NPPF, which in Section 11 indicated the importance of promoting an effective use of land to meet the need for housing and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Further information on Policy H9, and its evolution from regulation 18 to regulation 19 of the local plan review is available in a separate density background paper.

Policy H10 – Student Accommodation

The HEDNA addressed student housing needs and highlighted despite growth of the student population, student numbers would remain static for the next 2-3 years. There was a significant volume of purpose built student accommodation (PBSA) for students on the ground and in the pipeline, however this was to be closely monitored and managed with liaison with the Universities and their growth plans to deliver a balanced housing market.

Policy H10 actively supports Purpose Built Student Accommodation (PBSA). The consultation proposed a more nuanced approach where applications were considered on their merits and in line with revised assessment criteria.

Minimum standards for student accommodation was also suggested, which included matters of design, amenity, sustainability and mechanisms to ensure that it is truly inclusive for all students including the potential need for developer contributions to secure affordable housing.

The Council commissioned evidence in regard to Homes in Multiple Occupation (HMOs) and the need for an Article 4 Direction on HMO development in certain areas of the city. PSBA presents an opportunity to reduce pressure on HMO conversions and so the emerging HMO Development Plan Document could ensure housing was better regulated in the future.

Policy H11 – Homes in Multiple Occupation (HMOs)

The Issues and Options consultation proposed to delete Policy H11 given the HMO Development Plan Document (DPD) will soon be adopted, having gone through examination and which will be the most up to date position on HMO development in the city. It was proposed to make sure the local plan cross references to the HMO DPD.

5. Summary of key issues raised by respondents at Issues and Options

Policy H1 – Housing Land Requirements

The Council received 52 site submissions proposing development, on brownfield and greenfield and greenbelt land. In terms of the densification aspect ‘gentle densification’ was felt to be appropriate to the edges of the ring road, around transport hubs and in relation to City Centre South.

There were general comments given in the request for other suggestions to meet the City’s housing need. They reflected people’s views on whether Green Belt should or should not be used for development, varying views on PBSA including locational needs (close to campus), opinions on the housing needs of various groups, and comments on levels of growth. Some expressed concern over the need to be careful with densification and the need to incorporate open space within this. Comments also highlighted that some brownfield sites may have high biodiversity value. Comments given are expanded on further within other policies below.

Policy H2 – Housing Allocations

Responses were received seeking sites to be both removed from the allocations and also confirming commitment to delivering allocated sites. Other comments were more general relating to net zero, viability, the need to ensure allocations are delivered before allocating new sites, views on the Green Belt and appropriate levels and location of growth.

Policy H3 – Provision of New Housing

There was a mix response to the questions asked at Issues and Options for Policy H3. Generally, responses from the development industry commented that standards were already set by Building Regulations (including incoming further regulations), and there were concerns about viability. Some also commented that in covering standards in this chapter / policy there would be confusion / duplication as the issue is also being addressed through the environmental management chapter. Several respondents

made comments about the need to address climate change and net zero providing examples e.g. insulation, energy, water technology.

Some respondents questioned whether this was the right place for introducing new policy on amenity, suggesting that the residential design guide was more appropriate. There was a proposal that 'sustainable neighbourhood standards' or 'liveable neighbourhoods' might be a better term than 'amenity' and there were several suggestions as to what this might mean in practice including housing types, streetscape, green and blue infrastructure. Comment was also made on what this might mean for employment sites e.g. mix of employment, landscape buffers, lighting etc. (examples were provided of sites considered to have been well designed in this context). There was a suggestion that the views of Age UK and Disability Rights should be sought.

There were varied views on developments required to demonstrate how they taken the Building for Healthy Life principles into account. Some respondents were clearly in favour with the comment that reference should also be made to the Town and Country Planning Association's work on planning and healthy place-making. Other respondents objected, most stating a requirement to comply would be too onerous. Others offered a range of views, some felt that undertaking a full assessment would be inappropriate, a number felt these should be used as best practice guidance rather than a requirement. Others thought that the principles could cause confusion or issues of clarity when applying. It was commented that design codes could be used instead to set parameters. It was also commented that these should link to the health policies and Health Impact Assessment.

There was clear support for adopting the National Described Space Standards (NDSS) although some caveated their support by saying there may be occasions where greater flexibility is needed. Some representors objected outright to the proposals, citing lack of evidence, impact on viability, would reduce density and may well be dealt with by Government through the new Development Management policies. Several made more general comments / expressed concerns such as the need for viability testing and evidence, that the council should focus on good design instead, the impact

upon affordability and choice, the different budgets and aspirations and, if implemented the need to have transitional arrangements.

There was overall support for introducing a specific policy which supports Build to Rent (BTR) in Coventry in principle with comments generally relating to how this might be implemented. The main comments were in regard to viability and evidence and the level and nature of the affordable housing element and how this would be managed and delivered. One comment advised that BTR tends to have a different size mix to other developments (e.g. studios). The need for accommodation on a short term let was mentioned in relation to university needs e.g. for visiting staff. While there was support for this providing a good accommodation option for young people it could also help those on low incomes, or older people too. The need for energy efficient buildings was commented on.

The majority of comments expressed support in principle for a specific policy which supports co-living in Coventry, although many caveated this, citing the need for more evidence including information on viability, the importance of not confusing this with 'co-housing' and being clear on definitions, the need to be flexible on affordable housing contributions, not to over-rely on it as it would impact on the delivery of other types of accommodation, the need for energy efficiency, the need to widen the target groups of potential residents and the importance of not over-densifying.

Some respondents did not support the potential new policy feeling this would enable more PBSA, not being convinced graduates would want to stay (and, conversely concerns about the reference in the consultation text to a low graduate retention rate), concerns how such developments would be managed and run, concerns about climate change and the 'heat island effect' resulting from living in small spaces, and potential 'oversupply' of small homes when people need family homes and gardens.

A number of comments advised that a limit on how much co-living should be allowed was pointless as there is little / no co-living in the city at this point, that the markets would limit through supply and demand, monitoring and review is the most appropriate approach. Other expressed concern over community cohesion, especially where tenancies were short term and the impact upon neighbourhoods and the health of the

residents themselves. One respondent felt that a site or sites could be allocated to de-risk the process. An SPD was also proposed.

There was some support for the principle of introducing a policy on custom and self build housing as respondents felt the Council should be proactive and the HEDNA identifies a need. In terms of the content of such a policy there was no clear consensus with some feeling this should be criteria based, others suggesting there should be plots as parts of wider development and others disagreeing with that approach (impacts on viability and deliverability logistics). Some did not feel a policy was necessary as the demand is low and 'niche' and in any case should be considered through the planning application process. Others made more general comments: people can be added to multiple Custom and Self Build registers so they do not reflect true need, people prefer sites in the countryside, if allocated as part of large sites there should be a fallback mechanism if not developed within a specific timeframe.

The majority of responses supported the deletion of the part of Policy H3 which supports limited infill for self and custom build housing in the Green Belt due to it being contrary to National Green Belt policy. It was commented that in the NPPF the exception relates to villages. A couple of respondents objected to the proposed removal of the text saying that this would prevent windfall contributing to the housing supply and there needs to be some greenfield to address the aspirations of self-builders. One respondent felt that rural exception sites were needed to support the rural parts of Coventry.

Most respondents felt allocating brownfield sites specifically for self and custom build was a good idea, citing examples (Cherwell, parts of the Netherlands) and saying that the council should use its enabling powers to deliver. Three respondents opposed the suggestion stating that market forces would deliver, and asking whether the council had ever been asked the question before and whether it was an issue at all.

All respondents supported the inclusion of support for Community-Led housing in a proposed new Policy H3. Further comment was made in terms of a possible need to review the Affordable housing SPD, more information on delivery and viability, and the need for high build standards.

Policy H4 – Securing a Mix of Housing

The majority of respondents supported the change to Policy H4, with none objecting to updating the reference from the Strategic Housing Market Assessment (SHMA) to the Housing and Economic Development Needs Assessment (HEDNA). While some comments related to the application of the HEDNA more widely, others were supportive of the flexibility the policy offered.

During issues and options, the council undertook several workshops with hard to reach groups and charitable organisations and the people that use their services. Comments raised at these workshops in regard to housing mix was to do with the lack of appropriate and affordable housing for large families and single men, particularly for those men who have recently arrived in the UK and are seeking support from the various migrant and asylum seeker organisations. Due to the lack of supply in certain parts of the city, this means that families or people who have just moved to the UK are forced to move far away from their support networks. It was also felt that it was all too easy for large properties to be converted to HMOs and student accommodation, which doesn't always address the need in certain areas of the city. Because of this pressure on the right type of housing, many comments were in favour of developing brownfield land and increasing density in the city to address these issues in certain parts of the city and in order to endure greenfield / green belt stays undeveloped.

Linked to housing, it was felt that there needs to be a stronger emphasis on new housing developments providing affordable community halls/facilities and is particularly pressing when combined with groups finding it difficult to acquire permission to extend existing community premises given the impacts on existing local areas of increased people.

Policy H5 – Managing Existing Housing Stock

There were mixed responses regarding the strengthening of Policy H5 to include reference to energy efficiency. Some comments highlighted concern that reference to energy efficiency duplicates other areas of the plan. There were suggestions for the application of a cost/benefit approach, and the setting of a high bar for demolition and

rebuild. There were also further general comments on the need for increased housing, energy efficiency, more sustainable neighbourhoods and the achievement of net zero.

Policy H6 – Affordable Housing

Consultation on the preference for social rent as opposed to affordable rent drew varied responses. Some respondents agreed with the proposal due to concern that other models were unaffordable despite the definition. A few disagreed arguing that needs will fluctuate throughout the plan period and so a rigid policy would not accommodate evolving demand. However, most responses covered a variety of points, with some questioning evidence and justification, and others suggesting using the HEDNA to determine a mix of tenures. There were also comments with regards to flexibility, the need for more homes to deliver sufficient affordable housing and the need to provide housing for key workers explored in a study by PWC (July 2019).

There was a range of comments on proposals regarding affordable home ownership. Several comments were general and highlighted the need to comply with national policy and guidance as well as supporting the principle of affordable home ownership and suggesting that affordable homes should remain as such and be of good quality. It was proposed that the policy should be based on a threshold level for purchase, and this could be reassessed annually to reflect house prices alongside income patterns. It was also proposed that the approach should be defined on account of the housing waiting list, prevailing market price and average household level. Further comments suggested evidence could be provided by Shelter and affordable housing providers, that local criteria for First Homes should be provided and that discount market sale should be used. There was also comment that definitions should be included like the approach in The London Plan, and that the policy wording should reflect the needs of Build to Rent, and this should be affordable rent rather than social rent. A further suggestion was that affordable home ownership needs to include a range of property sizes so that people do not become trapped in small homes that do not meet their needs. Many people consider the lack of affordable housing, particularly Council (social) housing in the right places is displacing communities and that deprived areas are getting further left behind the wealthier parts of the city and the city centre with all the regeneration money that is being spent.

The consultation question seeking feedback on the review of this policy, specifically concerning issues and evidence related to viability, received a range of general comments emphasising the importance of conducting viability assessments. There were also comments that there are too many constraints resulting in sites being rendered unviable, and others referring to the scale and nature of the affordable housing need. Further comments were made on older persons' housing and the need to assess this in the viability work, which focused on a report by Three Dragons (May 2013 – briefing note on viability prepared for Retirement Housing Group).

Policy H7 – Gypsy and Traveller Accommodation

Responses to the consultation question concerning the review of Policy H7, because of the completion of the Gypsy and Traveller Accommodation Assessment, were varied in terms of transit need. This is because some felt that negotiated stopping is suitable whereas others suggested that temporary pitches are more appropriate. Alongside this there were general comments about the need for good accommodation and management provision for Gypsy and Traveller communities.

Policy H8 – Specialist Housing including Specialist Housing with Elements of Care, Older Persons accommodation and hostels

Consultation concerning the potential requirement for houses to be built to the M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards) were varied. Several comments expressed support for the initiative whilst others emphasised the need for more evidence, and the need for viability testing, if the councils wish to introduce these additional standards. There was concern that adapted housing can fail to provide onsite care, support and companionship and highlighted that it is important not to automatically categorise wheelchair users as the elderly. There were also calls to focus on adjustments to existing properties and to ensure that all care homes comply with the standards and provide disabled parking. Moreover, one comment recommended using the Three Dragons 2013 report produced for the Retirement Housing Group, while another questioned how the HEDNA has accounted for the needs of those aged over 85.

A further question invited further comments on the Policy H8 (Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation) and received varied responses. Some felt that a criteria-based policy was suitable whilst other comments suggested the importance of flexibility regarding policy that encourages specialist accommodation, especially as new models might emerge during the plan period. Again, viability testing was cited alongside the need for sustainable neighbourhoods and high standards of energy efficiency for this sector.

The consultation workshop with DEAP highlighted the long waiting list for housing for people with disabilities and that housing developments should consider from the outset that all community facilities and open spaces provided are inclusive and able to be used and accessed by all abilities.

Policy H9 – Residential Density

This question of the consultation invited comments on residential density and whether the policy is up to date or if there is an opportunity to increase minimum density levels outside of the ring road. There was a divide between those who thought the policy was up to date and others that felt it needed to be updated. While some suggested that various areas outside the ring road could be appropriate for densification, others thought that the current 200dph figure within the ring road is too high. Others highlighted the importance of guaranteeing that housing needs are met and the importance of taking a flexible approach due to the wide array of factors that can influence the delivery of a minimum density.

Policy H10 – Student Accommodation

Responses were mixed to the consultation question that asked whether a more nuanced approach should be taken to PBSA development in terms of them being decided on their own merits and in line with revised assessment criteria. Most responses supported the updating of policy H10 in this way in principle but for different reasons. For example, some commented that there is too much PBSA, and even suggested a moratorium until need is understood, whereas others supported PBSA development to reduce the demand for HMOs. Other comments suggested that the need for PSBA should be assessed separately to housing and that it must be clear

from the beginning if a needs assessment is required to supplement a planning application. In terms of assessing applications comments indicated that there was support for assessment based on merit. Comments also focused on the policy criteria, requesting clarification on 'directly accessible' and critiquing the '15 minutes' walk time' as impractical, citing it as a limiter on development occurring in sustainable locations which are accessible by public transport. As a result, it was suggested that a 'university quarter' boundary should be created.

Comments varied on the 'monitor and manage' approach that was suggested. There was some support for the approach, however, others felt that there is already too much student accommodation and as a result its growth should be stopped and other housing prioritised. It was also commented that design guides prepared by the universities could assist the 'monitor and manage' approach.

There were several suggestions relating to other policy areas and evidence that could be used to develop planning policy to ensure the development of high quality PBSA. These referenced the ANUK and UK Code of Practice, Residence Life Programmes and management practices and Building for Healthy Life Standards. Comments also suggested that further engagement with the universities could be beneficial and that there is a need to address climate change, net zero and student wellbeing. It was also cited that PBSA developments should be accompanied by viability assessments.

Other comments included the need for flexibility, good design, the location of PBSA and potential PBSA allocations, the need to help students with dependents, affordability and the need to provide suitable accommodation for graduates remaining in the city.

Policy H11 – Homes in Multiple Occupation (HMOs)

There were mixed responses to the issues and options consultation question regarding the proposal to delete Policy H11 and cross reference the Local Plan with the HMO development document. Most comments were supportive of the approach, although were clear in highlighting the importance of flexibility to cross reference the

documents. Comments also included more general views on the type, standard and number of HMOs.

6. Summary of new evidence

Since the Regulation 18 consultation, the Council commissioned new evidence linked to housing. These comprised a Purpose Built Student Accommodation (PBSA) Market Study, carried out by Cushman and Wakefield, and a whole plan viability assessment, carried out by Aspinall Verdi.

The PBSA market study assessed the demand and supply of student accommodation in Coventry. It identified the supply position in the city and developed the City Council's understanding of the market. In particular, it identified future levels of supply, future levels of demand, locational requirements and where PBSA should ideally be delivered. The report concluded that city wide, the market is showing signs of saturation. Breaking this down into areas of the city, signs of saturation was particularly acute in the city centre, whereas looking at the area around Warwick University Campus in isolation, the concentration of PBSA was not as high. The report also concluded that by virtue of the number of PBSA developments in the city and particularly the number of high-quality developments, those PBSA buildings that are older and have not been upgraded with modern amenities students now look for or those PBSA buildings in periphery locations are likely to see demand drop and could potentially result in owners seeking changes of use for them. It was also demonstrated that the number of studio PBSA units in the city had now risen above the national average and it was concluded that the long term sustainability of this quantum of studios was questionable and that the council may wish to rebalance the PBSA stock to encourage more cluster bedrooms.

The recommendations from the report were as follows:

1. Locational approach to future PBSA development and discouraging further development in inappropriate peripheral locations.
2. Proof of evidence should accompany future planning applications to demonstrate demand.
3. Presumption against all studio developments.
4. Design guide for future development, to ensure only the right room types and sizes and high-quality, affordable and innovative products are delivered.

5. Engage the universities in a more active role in the planning process – to better understand the universities requirements and which room types are most popular with students.
6. Council should prepare for continued significant demand for HMO accommodation as there is little evidence that intensive levels of PBSA development are making inroads into the HMO market.
7. Given the pressure on occupancy, the Council will likely see an increase in applications for change of use from PBSA, particularly in peripheral locations.
8. Monitoring should be ongoing given the changeable sector and market uncertainty.
9. The Council would potentially benefit from restricting student car parking to discourage private car use which often causes overspill parking in residential areas and encourage cycle use and storage within PBSA.

The local plan viability study, assessed the viability of affordable housing on different housing types and within all areas of the city. This included the general housing stock and PBSA as well as the emerging accommodation markets of build to rent and co-living. The viability assessment concluded varying degrees of viability in relations to the different housing types and in relation to different parts of the city, which included the city centre, inner urban transition zone and the suburbs. The viability evidence as well as the need highlighted in the HEDNA has guided the policy wording on affordable housing.

Outside of the planning department, the Council has also published its Climate Change Strategy, which has been taken into account for all policy areas in the local plan.

In addition to the above commissioned evidence, the Council has also considered the recent trends in the market. The Council has seen an increasing number of applications for the conversion of PBSA housing blocks to other forms of residential and hotel type accommodation, particularly co-living and serviced accommodation. It is anticipated that this will increase as the sector develops, reinforcing the need for effective policy regarding future PBSA developments and these emerging accommodation types.

7. Policy changes to address the evidence and comments received

Policy H1 – Housing Land Requirements

Having considered the representations and, where applicable produced new and updated evidence and undertaken detailed assessment as part of the HELAA and the Council's annual monitoring, the Council has determined that the most appropriate figure with which to proceed is the local need figure set by the HEDNA (less the 35% uplift), i.e. 1,455 per annum or 29,100 over the plan period. It has been assessed that this should be a minimum starting point and that this could be met with at least a 5% buffer and with no need to release further Green Belt. The July 2024 NPPF consultation proposes to remove the 35% uplift requirement and therefore not including this in the calculation is considered appropriate.

The joint Coventry and Warwickshire HEDNA (2022) and the Coventry update Paper 'Review of Coventry's Housing Need' (2024) confirms that exceptional circumstances exist to justify applying an alternative approach to the national Standard Method for determining housing need. This is in accordance with the NPPF (December 2023 paragraph 61).

Following a thorough consideration of sustainable development principles and in accordance with the NPPF, an assessment of land options through the Call for Sites and the HELAA and a density study informing a strategy of increased densification a capacity of around 31,954 homes has been identified, which provides a degree of flexibility above the local need figure of 29,100.

Whilst the plan review is being prepared under the 2023 NPPF, the Government is proposing a new Standard Method as part of the July 2024 NPPF consultation. This is targeting 371,541 homes a year, up from 305,223, and removes the 35% uplift for urban areas. The method aims to boost housing numbers by pinning targets to existing housing stock (0.8% of the current stock in the area), rather than household projections as the previous method did, and then apply an uplift based on affordability using a three-year average with an increase of 15% for every unit above four. For

Coventry, this results in an annual figure of 1,527 and an average annual net addition of 1,244. The policy position is therefore considered in line with the proposed Standard Method and further justifies the local need figure in the HEDNA.

Policy H2 – Housing Allocations

This policy has been updated to reflect the latest allocated housing land position in the city. Those sites that feature in the adopted Local Plan that have now been delivered have been removed and additional sites that have become available since the adoption of the current local plan have been added. The additional sites include those submitted through the various call for sites exercises and all have been assessed by officers as being suitable and developable for housing based on the Council's own monitoring and officers' desk-based assessment of land in the city.

Policy H3 – Provision of New Housing

Ten questions were asked relating to Policy H3 during the issues and options consultation. Of these, six related to how the Council should approach emerging housing types, namely, build to rent, co-living, self and custom build housing and community-led housing. This reflected the prominence being placed on these forms of housing in national policy, which requires council's to be proactive in supporting these housing types. It also reflects what the Council is seeing emerging in the Coventry housing market and through the planning application being submitted.

Most responses received during Issues and Options were in favour of specific support being given to these emerging housing types. The HEDNA and viability report support separate policies for build to rent and co-living. The nature of these housing types means specific criteria are associated with them that would need to be assessed and secured as part of any planning application. As a result, two new policies specifically in support of build to rent and co-living accommodation have been created. These are policies H12 and H13. Given they are emerging housing products in the Coventry market it has not been proposed to limit either form of accommodation with the evidence base also not requiring this.

Self-build and community-led housing will be supported too, but as part of the updated policy H3. This is due to these housing types being assessed in a similar way to other forms of housing, but given there is specific support for self and custom and build housing in national policy, they are specifically mentioned in the updated Policy H3. This was backed up by the comments received during Issues and Options, where there was no clear consensus on what a specific policy should contain and that a separate policy may not be necessary as the demand is low and 'niche' and consideration should be determined through the planning process.

National policy requires the council to be proactive in supporting self and custom build housing and community-led housing and for local authorities to seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom build housing. The NPPF also states that the development of exception sites for community-led development should be supported.

The Local Plan does not allocate any specific sites for self and custom build homes or community-led housing as given the current modest demand in the city for such housing, it is preferable to let the market deliver, with council support specifically mentioned and provided for in Policy H3 for delivery of these housing types on sites that come forward.

While support for self and custom build and community-led housing is strengthened in the policy, reference to it in regard to supporting limited infill in the Green Belt has been deleted due to it being contrary to national Green Belt policy. Most responses to the Issues and Options consultation agreed with this approach, however, to those responses which thought differently, the numbers would be small and would not significantly contribute to overall housing supply. Also, removing this from the updated Policy H3 would not preclude a case being made in terms of greenfield which would be considered on its own merits through the planning application process.

The update to Policy H3 includes new standards, namely the requirement for Nationally Described Space Standards (NDSS) and accessible and adaptable dwellings. Further reports produced after this consultation on density and viability have

factored in NDSS compliance and the plan is deliverable taking these standards in account. Minimum space standards are essential to ensure quality of life.

The proposed policy wording also requires new developments to consider the amenity impact of existing residential units and the operations of existing business. Current policy H3 does not offer such protection, and therefore this has been added to ensure the plan is in accordance with national policy, including the agent of change principle.

The proximity to services and community amenities was retained in the policy wording, however, the minimum distances were removed as this was not considered to be constructive in the assessment of applications and that an appropriate proximity to such services can be assessed on a case-by-case basis taking into account the proposed development and site context.

Policy H4 – Securing a Mix of Housing

Policy H4 was broadly considered to not need updating, except in relation to reflecting the latest HEDNA evidence and removing reference to the now outdated SHMA. A point was also added in requiring evidence of grant funding to be explored for those developments that are showing as being unviable. This is considered reasonable given the successful track record in the city of grant funding being secured when seeking to achieve the policy required housing mix and tenure.

Policy H5 – Managing Existing Housing Stock

At Issues and Options, the consultation sought views on whether to strengthen the policy to include reference to energy efficiency. Emphasis on the retrofitting of existing properties with features that meet existing climate change requirements has been included in the policy to reflect the Council's climate change strategy, however it does not go into the specifics that the new Environment Management (EM) policies section of the Local Plan does so as not to duplicate energy efficiency and net zero requirements.

Policy H5 has also been updated to offer a level of protections through additional consideration at the planning stage for the existing housing stock that is sought for

demolition or redevelopment, particularly to non-residential uses. This was considered relevant due to the housing need in the city, the pressure on particular types of housing and the climate change impacts of demolition, such as the embodied carbon in existing buildings and to accord with the climate change strategy. The adopted Local Plan does not have a specific policy position on developments that result in a net loss of dwellings or when demolition does not result in replacement dwellings of the same quality, size or type.

The changes to the policy strengthen the consideration given to the housing need of an area, including why any non-residential use that would replace an existing residential use would better meet the needs of the local area and aims of the Local Plan.

Policy H6 – Affordable Housing

Policy H6 has been updated using the latest evidence in the HEDNA and the viability assessment. It has also been informed using the Council's housing need data and the Homefinder register data. While the HEDNA has identified the need, it is important the changes to Policy H6 at Regulation 19 reflects the changes to the NPPF since the Regulation 18 consultation took place. The December 2023 NPPF retained the emphasis on affordable home ownership, requiring at least 10% of the total number of homes to be available for affordable home ownership and First Homes remaining the Government's preferred affordable home ownership model (as set out in the Ministerial Statement of 24 May 2021). The July 2024 consultation version of the NPPF proposes to remove the requirement for a minimum of 10% of the total number of homes to be available for affordable home ownership in favour of proposed wording that requires "a mix of affordable housing to meet identified local needs, across both affordable housing for rent and affordable home ownership tenures." The July 2024 consultation version of the NPPF proposes to retain the references to First Homes and propose to include it in the glossary under the definition for affordable housing.

The proposed policy wording has been updated to ensure it is responding to delivering the housing types and sizes to address the Council's long standing housing need. It no longer requires the delivery of future affordable housing provision to be based on

the concentration of the current affordable housing stock in different parts of the city. The policy now has a single approach across the city, excluding six 'exception areas', these being the city centre, the inner transition zone and three inner city wards. The exception areas have been identified in the policy following the results of the viability appraisal.

The viability appraisal also showed that it would be viable to reduce the proposed development size threshold from 25 units to 10 based on the current 25% provision of affordable housing across the city, save for the exception areas. The policy has been updated to reflect this.

The policy's single tenure approach is a split of 60% social / affordable rent and 40% intermediate provision. This has been based on the need highlighted in the latest HEDNA and Homefinder data and considering the changes to the NPPF, includes those proposed as part of the July 2024 consultation. The evidence set out in the above sections shows the pressing need for social / affordable rent, hence the majority split for this tenure, and that intermediate housing needs to be set at a level that takes into account First Homes and affordable home ownership requirements. In recognition of the need for social rented housing, highlighted in the HEDNA and the Homefinder data, the policy now includes that of the social and affordable rent provision a minimum of half should be social rent. This would also accord with the emphasis in the NPPF.

While the housing size mix will be expected to be guided initially by the need identified in the HEDNA, the policy now states that positive weight will be given to a housing mix that is also informed by the latest Homefinder data to ensure the delivery reflects the most up to date need and circumstance in the city. Policy H6 now also seeks for consideration to be given to affordable housing provision to reflect the overall housing mix of the application site.

The policy reflects national policy including the latest affordable housing products. The policy also reflects the HEDNA and the viability appraisal by including specific requirements for specialist housing - PBSA, build to rent and co-living accommodation. The specialist housing requirement is broken down as follows:

Housing Type	Unit threshold	AH percentage	Type of contribution	Tenure
All housing non-specialist	10	25%	Onsite	60% social / affordable rent & 40% Intermediate
PBSA	25	20%	Commuted sum	N/A
Build to Rent	10	10%	Onsite	Affordable Private Rent
Co-living	25	25%	Onsite	Affordable Private Rent

PBSA has provided a significant portion of residential development in the city in recent years, and in line with Policy H10, any PBSA which is delivered outside of the defined university campus / city centre boundary areas will need to contribute to the delivery of affordable housing in the city. Beyond the campus areas of the universities, PBSA is competing for residential land, much of which is required to deliver the urban-focused spatial strategy of the reviewed Local Plan. Should PBSA be permitted by virtue of the exceptions approach of Policy H10, it should contribute to the delivery of affordable stock, which could potentially support retaining recent graduates and to attract other young professionals to the city, ensuring they have affordable options available to them to live.

Given the viability position in the city and reducing the unit threshold to 10 units, it has been accepted that a reduction in the requirement of policy EM11 in relation to energy efficiency measures for new dwellings, maybe presented for assessment in order to maximise affordable housing delivery.

Policy H7 – Gypsy and Traveller Accommodation

Policy H7 has been updated to reflect the Gypsy and Traveller Accommodation Assessment (GTAA), which was published in February 2023. To address the latest standards and provision of pitches the new policy wording incorporates the recommendations in the GTAA, which includes standards around the health and welfare of occupiers of the sites and the provision of onsite amenities that meet best practice for modern travellers. The new policy wording also supports proposals for transit and stop over areas where they meet an evidenced need following the GTAA

recommending that the council should plan for transit sites / negotiating stopping points.

Policy H8 – Specialist Housing including Specialist Housing with Elements of Care, Older Persons accommodation and hostels

Paragraph 63 of the NPPF requires local authorities to assess a local need for retirement and care housing provision, which reflects a specific concern identified by the Government about a sufficient housing supply for an ageing population. Policy H8 retains support for the provision of specialist housing, including retirement and care housing and has been updated using the evidence contained in the HEDNA, viability assessment and following discussions with the Council's Adult Social Services and Housing team. The policy is updated to better reflect the city's need in terms of the type of accommodation required, affordability and location of different specialist housing. The updated policy requires development proposals to demonstrate a local need and that positive weight will be given to proposal that provide accommodation that meets the most pressing need in the city, which in line with data from the Council's Adult Social Services Team, includes private rental opportunities that are affordable for those who do not meet social care eligibility criteria.

The policy has been expanded to take more account of the needs of the sector. To ensure flexibility it does not seek to be over prescriptive, but it does emphasis the need to ensure residents can live with the maximum level of independence that considers their changing needs. The policy is specific regarding the requirement for all units to meet M4(2) standards and for 10% of dwellings to meet M4(3) standards, as evidenced by the HEDNA and as set out in the explanation of Policy H3.

Policy H9 – Residential Density

Policy H9 has been updated to reflect the evidence in the Urban Design Study which undertook a review of recent development precedents of density across the city. The study sought to inform if the current policy is in alignment to development proposals which have gained approval through the planning process and therefore whether it reflects what is being delivered.

Additionally, the Council has also referred to National best practice examples of residential development, establishing an evidence base that looked at recently consented and constructed residential development in Coventry and looked at emerging residential typologies.

The approach to the density figures is set out in detail in the separate Residential Density Background Paper, but in summary, it was found that planning approvals have been seen to exceed the density minimums set out in the adopted plan policy H9, whilst existing residential housing stock showed a range of development densities, reflecting the wide variety of contexts which are present within the city. The study also identified that the distinction in density areas in the current policy H9 is quite stark, especially those areas that lie outside of the ring road, but are in close proximity to the city centre.

It is therefore considered that the current limited and big distinction of density figures does not deliver a positive policy response to the aims of the NPPF in uplifting density in sustainable locations. The updated density approach, which includes a 'transitional zone' area around the city centre and modifying density expectations in greenfield, brownfield and the city centre is considered to yield a more successful relationship between areas of the city. It is also considered to promote transition in density across the city that better reflects those more sustainable locations, whilst also being more reflective to the prevailing urban character of the area surrounding the defined city centre. This would then deliver a policy with greater alignment to the aims of the NPPF.

The findings of the precedent study have informed the minimum density standards now proposed within the local plan review, whilst maintaining that these minimum standards must be read within the context of other plan policies to ensure contextual compatibility whilst promoting effective use of development land. To further ensure contextual compatibility of residential development, the Local Authority will also be developing Design Codes, to support and guide the highest quality and most contextually responsive development.

Policy H10 – Student Accommodation

Policy H10 has been updated having regard to the responses from the issues and options consultation, which are outlined in the above section of this background paper and which show various responses in terms of the current supply and amenity and standards that should be applied to PBSA, and has been updated in line with the evidence in the student accommodation market study, commissioned following the Issues and Options stage, and incorporates the recommendations of the study.

The PBSA study identified that:

- the PBSA market in Coventry shows signs of being at saturation point.
- The city centre is over catered for.
- The city is dominated by studio accommodation.
- The council should expect more applications to change the use of PBSA to other (residential) uses.

And recommends that:

- any new PBSA developments to only be allowed if evidence is provided to show it is needed.
- restrict the location of PBSA developments.
- Restrict studio only developments.
- The city would benefit from living and amenity standards being introduced.
- Set standards for when PBSA blocks are proposed to partly change use.

Given the clear position of the PBSA market in the city identified by the study, the policy has been updated incorporating the recommendations. This includes changing the emphasis of the current policy, which is one of being supportive of PBSA development across the city to one requiring development to demonstrate a need unless it is being provided on campus. This will be backed up through a monitor and manage approach.

The policy wording has introduced locational requirements in terms of PBSA to be on Campus. For the purposes of 'Campus' within policy H10, this means for Warwick University, the red line area as per the adopted Warwick University Campus

Framework Masterplan SPD, and for Coventry University, the University and Enterprise Area of the City Centre, or future adopted university masterplan Supplementary Planning Document.

Developments that comprise predominantly studio units will be resisted as the Council seeks to rebalance the supply in the city with more cluster units.

In terms of internal and external standards for PBSA these are to be included within a future PBSA SPD or updated residential design guide SPD. Given the number of applications the Council is receiving regarding changing the use of existing PBSA developments, future proofing any new PBSA developments is considered crucial to the sustainability of development in the city. Therefore, the policy includes wording requiring proposals for PBSA to provide evidence to show adaptability to other uses by being designed in such a way that it can be capable of being re-configured through internal alterations to meet NDSS standards to meet general housing needs in the future. And in the event a change of use is proposed to part of an existing student accommodation block to another residential use, the residential use must be self-contained and segmented from the student accommodation.

The updated policy is very much evidence based on the current position in the market and what the Council is seeing by way of planning applications being submitted to change the use of PBSA developments. It is worded to ensure a sustainable approach to future development, while working with the requirements of the universities.

The changed policy has been assessed in the Sustainability Assessment which looked at the outcomes for both retaining existing policy H10 and for requiring PBSA to be located on campus. In terms of rejecting the current policy this was assessed as risking continuing with poorer quality accommodation, contributing to potential under occupation of PBSA and limiting future change of use for alternative occupation. The preferred policy direct was to change it to a more controlled, locational focused policy which was assessed as allowing the student population to be more focused in more sustainable locations and to make more effective use of land for other essential housing needs.

Policy H11 – Homes in Multiple Occupation (HMOs)

Policy H11 has been updated to reflect the adoption of the new Homes in Multiple Occupation (HMO) Development Plan Document (DPD), which will be the sole policy document that will guide the development of HMOs in the city. The DPD is the most up to date policy position with it having been through consultation and examination and is due to be adopted in early 2025.

Policy H11 needs to be retained to provide a policy link to the new DPD as it supplements the Local Plan. This was determined by the HMO DPD examination. As a result, Policy H11 has been reworded to state that all applications for HMOs will be determined in accordance with the Council's Homes in Multiple Occupation Development Plan Document.

Policy H12 – Build to Rent

Policy H12 is one of two new housing policies that provides support for emerging forms of housing. In this case Built to Rent accommodation. It follows recommendations for such a policy outlined in the HEDNA and so the Local Plan accords with national policy.

A separate policy was considered necessary given the specific requirements that determine what makes a Build to Rent product and the specific considerations the Council would have to give it during the assessment of a planning application. These considerations include a common ownership and management arrangement, tenancy lengths and to be self-contained and let separately.

Policy H13 – Co-living

Policy H13 is the other new housing policy that provides supportive for an emerging form of housing. In this case co-living accommodation. It follows recommendations for such a policy outlined in the HEDNA and so the local Plan is in accordance with national policy.

A separate policy was considered necessary given the specific requirements that determine what makes a co-living product, particularly the communal amenity provision, and the specific considerations the Council would have to give it. These

considerations include ensuring the accommodation is under single management and that minimum facilities and room sizes are provided that secure a high quality co-living residential environment.

The Regulation 18 consultation illustrated the necessity of thorough research to develop a co-living policy which can ensure that future co-living developments differ from HMOs, encompass all requirements to provide good quality residential accommodation, support the Council's objectives for creating sustainable and healthy neighbourhoods and contribute to meeting the city's housing need.

Further to the HEDNA, several other local authorities' policies on co-living, for example The London Plan Policy H16, have been developed, and this information has been used to help inform the context for Coventry City Council's new Policy H13. Another key resource has been the 'Co-living Key Metrics' data produced by SWAP Architects to inform Birmingham City Councils *'Large Scale Shared Accommodation SPD'*. This report provided extensive data metrics on existing co-living accommodation in cities across England. The cities in the report were located outside of London, and are therefore more comparable to Coventry, which made this a useful informant.

Policy H13 sets out a minimum bedroom size of 25sqm for a single occupancy room, and an internal community amenity space figure of 4.5sqm per bedspace. This is based on current policy and guidance on co-living produced by other local authorities, which includes the core cities research undertaken by SWAP Architects for Birmingham City Council 'Co-living Key Metrics' (data on UK Co-living schemes located outside London). The Council has used this research by virtue of the size and profile of many of the core cities (all being outside London) being comparable with Coventry. An average has been used, which is considered reasonable when taking into account NDSS sizes for bedrooms and self-contained homes and that recommended for PBSA development.

Policy H13 also includes requirements for communal facilities and services, such as access to a kitchen per floor, on an eight resident per kitchen basis, which aligns with council policy on PBSA developments. Policy H13 does not outline a set number of units per development as is the case in other policy and guidance on co-living

produced by other local authorities. This is because policy is trying to capture the variety of unit sizes that there is evidence of applications for in Coventry.

In summary, the conditions set out in Policy H13 are essential to ensure co-living developments are adequate. If these policy requirements are followed, schemes can be supported by the council, due to the various opportunities that this accommodation type could provide to Coventry.

8. Conclusion

In conclusion, all housing policies have been updated to reflect the last evidence in regard to housing targets and supply, housing tenure and size needs, available housing land, established and emerging housing products, density, viability and affordable housing to ensure the Local Plan meets the city's housing need and complies with national policy and guidance. The changes that have been made are generally in accordance with what the majority of respondents said to the Issue and Options consultation and therefore it is considered that the progression to regulation 19 is clear and justified.