



Ref:

Coventry Local Plan Review Regulation 19

Proposed Submission (Publication) Stage
Representation Form
(guidance note below)

(For official use only)

**Name of the
Plan to which
this
representation
relates:**

**Coventry Local Plan Review – Regulation 19 Proposed
Submission (Publication)**

Please return to Coventry City Council in writing or electronically by 23:59 03 March 2025 email to planningpolicy@coventry.gov.uk, via our consultation portal <https://coventrycitycouncil.inconsult.uk/system/home> or by post to Planning Policy Team, PO Box 7097, Coventry, CV6 9SL

Please refer to the following data protection/privacy notice:
www.coventry.gov.uk/planningpolicyprivacynotice

Please also note that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and the Programme Officer. and that your representation(s) will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Coventry City Councils website (personal details will be redacted in line with the Privacy Notice).

This form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s).

Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title

Ms

First Name

Jane

Last Name

Vlach

Job Title

(where relevant)

Organisation

The Planning Bureau

(where relevant)

Address Line 1

100 Holdenhurst Road

Line 2

Bournemouth

Line 3

Line 4

Post Code

BH8 8AQ

Telephone Number

E-mail Address

Part B – Please use a separate sheet for each representation

Name or Organisation: McCarthy Stone & Churchill Living

3. To which part of the Local Plan Review does this representation relate?

Paragraph Policy

4. Do you consider the Local Plan Review is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="x"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="x"/>	No	<input type="text"/>

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

We welcome Policy H8 as a supportive policy encouraging the delivery of Older Persons' Housing (OPH). We note that the HEDNA (November 2022) shows a shortfall by 2032 of 612 market OPH with support and 360 market OPH with care.

HEDNA

Table 4.6 Specialist Housing Need 2022-32 – Coventry

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/ surplus (- ve)	Addition- al demand to 2032	Shortfall /surplus by 2032
Housing with support	Market	40	462	970	508	104	612
	Affordable	93	1,168	2,274	1,106	245	1,350
Total (housing with support)		133	1,630	3,244	1,614	349	1,963
Housing with care	Market	21	210	514	304	55	360
	Affordable	27	855	653	-202	70	-131

Policy H8 does however, require, where relevant, 10% of proposed dwellings to meet M4(3) standards.

It is common for Local Authorities to conflate the needs of 'wheelchair users' with the needs of older people in the community as has been the case here. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable and accessible housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing. Older people's housing and particularly extra care housing should therefore be incorporated into the emerging Local Plan separately to adaptable and accessible housing and not confused with it.

Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets.

This is an area that does not appear to have been tested in the Viability Assessment for OPH, despite our previous response, and the PPG is clear that requiring enhanced levels of accessibility must be tested through the viability testing process.¹ It is therefore not possible to show whether this is viable for this typology. M4 (3) Housing has a significant cost implication as modifications are required with respect to fixtures and fittings, services and controls and room dimensions that are around 30% larger than M4 (2) housing. These additional costs impacts the ability to deliver schemes and affects the affordability of market dwellings, all additional factors that should be considered through a viability study.

It is not right to purely rely on a viability study submitted with a planning application as Paragraph 008 of the PPG Viability requires that when a viability assessment is submitted at the development management stage, reference is taken from the plan wide viability assessment underpinning the policy requirement and the applicant is required to set out what changes have taken place since the plan wide viability assessment was undertaken.

If older person's housing is found to be not viable M4 (3) requirements must be removed.

(Continue on a separate sheet /expand box if necessary)

¹ [Housing for older and disabled people - GOV.UK](#) (paragraph 009)

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Recommendation

The requirement for OPH to provide 10% of dwellings meeting M4(3) standards should be removed unless this is shown to be justified through the Local Plan Viability Report.

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

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Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

Please add any further comments relating to the SA report in the box below.

(Continue on a separate sheet /expand box if necessary)

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To provide further context to the comments submitted.

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Part B – Please use a separate sheet for each representation

Name or Organisation: McCarthy Stone & Churchill Living

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In our earlier submission on the Reg 18 Consultation we reminded the Council of the increased emphasis on Local Plan viability testing in Paragraph 59 of the NPPF and that the PPG states that *“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan”* (Paragraph: 002 Reference ID: 10-002-20190509).

We are therefore disappointed to see that the viability of Older Person’s Housing still does not appear to have been tested in the Viability Report by Aspinall Verdi dated October 2024, despite an addendum to the viability study from which Older Persons’ Housing is excluded.

The viability of specialist Older Persons’ Housing is more finely balanced than ‘general needs’ housing and we are strongly of the view that these housing typologies should have been robustly assessed in the Local Plan Viability Report. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG on viability which states that. *“A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period”*.

It is noted that when CIL viability testing was undertaken by the council and DSP in 2019², the conclusions of that analysis were that older persons housing proposals only possessed marginal viability and certainly could not accommodate a CIL charge at that time. This analysis suggested there was a viability concern at that time which in our view warrants appropriate testing as part of the emerging local plan. This is particularly the case where the local plan now proposes higher accessibility and sustainability standards to those in place in 2019.

Without the evidence of a viability assessment that has tested for OPH, Policy H6 should be amended to make it clear that older person's housing is exempt from all types of affordable housing to ensure that the plan is deliverable, justified and consistent with national policy. The respondent's position is representative of our experience elsewhere on site specific assessments where it is commonly agreed that this typology cannot provide full percentages of affordable housing. More and more local planning authorities are acknowledging this position within local plans, based on Viability Assessments, and exempting specialist housing for older people from providing affordable housing. This is the correct approach.

We would draw the Council's attention to Paragraph 5.33 of Policy HP5: Provision of Affordable Housing in the now adopted Fareham Borough Local Plan which advises that:

5.33... The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HP5 does not apply to specialist housing or older persons housing.

Similarly, policy in Swale exempts older persons housing from affordable housing in light of viability constraints and emerging policy in BCP, Birmingham and Charnwood also exempt older persons housing from the provision of affordable housing.

BCP

The Local Plan viability assessment indicates that for greenfield sites we can continue to seek 40% affordable housing provision on site. For brownfield sites we will seek 10-15% affordable housing, but due to viability, this will not apply in Bournemouth and Poole town centres, or for specialist forms of housing (e.g. build to rent, student housing, care/nursing homes (Use Class C2) or for retirement housing (sheltered housing) and extra care (assisted living) housing (both Use Class C3).

Birmingham

Due to the specific viability challenges of delivering older persons' housing, the evidence suggests on the basis of the market research, appraisal inputs and policy requirements, Older Person's Housing is exempted from Affordable Housing provision.

Charnwood

Our viability evidence shows that neither sheltered housing nor extra care housing developments are likely to be viable if a contribution towards affordable housing is sought.

It is clear that in this case, a similar exemption should be examined to enable the typology to come forward.

The benefits of specialist older persons' housing extend beyond the delivery of planning obligations as these forms of development contribute to the regeneration of town centres and assist Council's

² [CIL viability reports – Coventry City Council](#)

by making significant savings on health and social care as well as the added benefit of enabling housing 'rightsizing'.

If an exemption is not made, or the Viability Assessment not re-run for OPH, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about other policy areas such as M4(3) requirements, which are wholly inappropriate when considering such housing need.

Recommendation

The Council must re-run the viability study to include the older person's housing typology. If older person's housing is found to not be viable an exemption to affordable housing must then be provided.

(Continue on a separate sheet /expand box if necessary)

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Recommendation

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As stated in our previous consultation response, it is our view that any requirement for residential development relating to Climate Change Adaption should be 'stepped' in line with Government targets and the proposed changes to the Building Regulations. This is more desirable as there is considerable momentum from Government in preparing enhanced sustainability standards and it is clear that the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. Aligning the Council's requirement for carbon neutral development with those of Government would therefore be pragmatic, more achievable, and affordable without adding additional cost through carbon off-set.

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Aligning the Council's requirement for carbon neutral development with those of Government.

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It is our view that any requirement for new buildings in relation to Energy Infrastructure should be 'stepped' in line with Government targets and the proposed changes to the Building Regulations. This is particularly so in relation to the use of fossil fuels and connection to the gas grid.

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Energy Infrastructure should be 'stepped' in line with Government targets and the proposed changes to the Building Regulations

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