

Consultation Comments on Coventry Local Plan Review Regulation 19

An Overview and Analysis

Introduction

I want to focus on two specific areas of the Local Plan:

Affordable Housing.

Provision of Adapted residential housing & parking

Background

The Local Plan is an important document that guides future development in the city and is used by developers when planning their sites and by planners/planning committee members when deciding whether to give approval to development plans.

Affordable Housing (Policy H6)

One of the most prominent needs in the country, including Coventry, is the need for adequate housing and balanced development. The importance of building affordable housing units to cater to the city's existing population, along with any increased population, is critical to improve living standards to promote community cohesion.

The Local Plan is an instrument that can be used to maximise the provision of all types of Affordable Housing and to make sure that it is truly affordable to local residents. When some of the housing targets are achieved through the very specific and developer led Build to Rent programme it is even more important that the Affordable Housing element of development schemes are maximised.

It could be argued that a 25% Affordable Housing provision of sites with 10 or more units is insufficient to meet local housing needs. Something more ambitious could be considered such as the London Fast Track approach for sites with 35% Affordable Housing provision and 50% where public or industrial land is used. Obviously, the eventual value of properties is lower in the West Midlands than in London but that does not mean that we cannot achieve the maximum possible for our local residents. Once the 25% provision is broken down into its different elements there is actually very little housing being built to benefit those on the lowest incomes in our community. 40% if the affordable housing is to be provided as Intermediate Housing which is usually Shared Ownership, of the 60% rented provision half can be at "Affordable Rent" – which at 80% of record high private rents is unaffordable to many leaving only the other half at Social Rent which at 50-60% of private rents is more manageable financially. On a development of 100 homes only 6-7 would be at Social Rent. Once set against the estimated annual need for 2,816 Affordable Rent/Social Rent each year only the very tip of housing need is addressed.

See <https://www.coventry.gov.uk/downloads/file/44022/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna-final-report>).

I would like the Local Plan to commit to maximising Affordable Housing much more robustly and to ensure that when developers ask for viability issues to be taken into consideration an Open Book approach is used with experienced external consultants to interrogate viability assessments.

Another concern is the affordability of properties. Some local authorities have included tiers of income in their Affordable Housing SPDs such as any shared ownership provision being designated as affordable to people in different income brackets. The Research Briefing into “What is Affordable Housing” published in July 2023 encompasses these issues and lays bare the very real issues of affordability.

See <https://researchbriefings.files.parliament.uk/documents/CBP-7747/CBP-7747.pdf>

Specialist Housing (Policy H8)

I would like the Local Plan to give further thought to different types of housing provision for older people. The “old fashioned” sheltered housing schemes have limited appeal. Whilst demand is still strong for very good schemes or very located ones up and down the country councils are struggling with hard to let properties. More work could maybe be carried out to look at what older people want to (& expect to provide a range of housing solutions). One possible housing option for a minority of people could be co-living, although with rolling tenancies rather than the 12-month suggested for younger people. Adult social care is a difficult area for local and national government to work through but it is the key for many people and for housing policy but there is little mention of it in the Local Plan.

Wheelchair Adapted Housing (Policy H3)

A small point – I note that significant developments are required to include 10% of properties to meet Part M4 (3) Wheelchair standard. However Appendix 6, 2.8 notes that 5% of parking provision on new residential developments needs to meet the needs of Blue Badge holders. There could be occasions when providing 10% of units to full wheelchair standard could lead to a need of more than 5%, especially one the needs of visitors to the development are factored in. Could Appendix 6 be reviewed to see if it will cover these eventualities?

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