



Rugby Borough Council

Matter 6

Issues 6a: Housing Mix (Policy H1)

Issue 6b: Affordable Housing (Policy H2)

Issue 6c: Rural Housing (Policies H3, H4 and
H5)

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Issue 6a: Housing Mix (Policy H1)

1. Is Policy H1 justified and consistent with national policy in its approach to delivering a mix of size of market housing in new residential development in the borough? In particular:

a. Does the SHMA provide a robust and up to date assessment of the mix of size of market housing required in Rugby borough over the Plan period? If not what alternative evidence is available to inform the mix of market housing sizes on future developments?

1.1 The 2013 Coventry and Warwickshire Joint Strategic Housing Market Assessment (LP06) undertaken at the housing market area level identifies the mix of size of market housing utilising data sources consistent with the National Planning Policy Framework (NPPF) and the national Planning Practice Guidance.

1.2 Policy H1 and the supporting text provide site promoters and developers with details of the mix of market housing required on new developments within the Borough to ensure it is clear what considerations need to be made when designing a scheme. It is intended that this approach will accelerate the application process by providing greater certainty and eliminating risk for applicants.

b. Do the criteria in Policy H1 provide sufficient flexibility to vary the mix of sizes of market housing according to site specific circumstances? If not what other factors should be taken into account?

1.3 Policy H1 includes sufficient flexibility to deviate from the mix in the SHMA by setting out in the third paragraph of the policy the specific circumstances in which an alternative mix from the SHMA would be considered by the Borough Council.

1.4 The Borough Council considers that the inclusion of the breakdown of the recommended market housing mix of size from the 2013 SHMA in the supporting text (paragraph 5.10) provides flexibility as it is not in the policy itself.

1.5 Policy H1 includes reference to “the latest Strategic Housing Market Assessment” acknowledging that the mix will change over the life of the Local Plan.

c. Does Policy H1 make adequate provision for self-build development as part of the housing mix in the borough?

- 1.6 Paragraphs 10.89-10.95 of the Coventry and Warwickshire Joint Strategic Housing Market Assessment (2013) (LP06) considers the demand and potential for custom and self-build opportunities across Coventry and Warwickshire. This section of the Joint SHMA identifies the market as a “niche sector” which tends to see greater demand within smaller, more rural settlements and that serviced style plots as part of larger developments are often rare and difficult to bring forward due to issues around demand and finance. Paragraph 10.95 concludes that “In policy terms there is potential to encourage through policy developers of larger schemes to designate parts of these schemes as serviced plots which can be developed as self-build.” It is also noted that it is difficult to demonstrate concrete evidence of demand at a local level but that there is potential to develop self-build registers to support evidence of demand.
- 1.7 Since the preparation of the 2013 SHMA the Self-build and Custom Housebuilding Act 2015 has been enacted which places duties on local authorities to keep a register of individuals and associations of individuals who wish to acquire serviced plots of land to bring forward self-build and custom housebuilding projects, and to have regard to those registers in carrying out planning and other functions.
- 1.8 Rugby Borough Council currently has 58 entries on the Self-build and Custom Housebuilding Register. The majority of entries specify preferable locations but these are frequently multiple locations or not place specific e.g. “north” or “village” which means it is difficult to identify need by specific location. Similarly, the type of plot is primarily self-build but multiple types of plot are specified. The majority of entries specify detached properties but again there are multiple types of properties specified by many of the respondents. All of these entries have stated that they could progress within three years. This information has identified a demand for self-build in Rugby which is dispersed throughout the Borough. Further research is required to more clearly identify the specific requirements of the entries on the Register and to identify how these can be met.
- 1.9 The Council considers that the scale of demand demonstrated by the Self-build and Custom-build Register makes it unnecessary to make specific provision for self-build or custom-build plots on small scale sites as these can come forward as part of general housing development in accordance with all other policies in the Local Plan and the NPPF. Self-build and custom-build sites can also come forward through Neighbourhood Plans.

- 1.10 The approach taken in the Local Plan is to encourage large development proposals to make provision for self-build. This reflects the conclusions of the 2013 SHMA.
- 1.11 Given that this remains an emerging policy area there is also further opportunity in the future to provide supplementary guidance in relation to self-build and custom house-building in the Housing Needs SPD.
- 1.12 In relation to the supporting text to the Policy H1 the text related to self-build development was incorrectly inserted at the end of the housing chapter as paragraph 5.47. It is therefore proposed that this paragraph is moved to follow paragraph 5.12.

Issue 6b: Affordable Housing (Policy H2)

- 1. Is Policy H2 justified and consistent with national policy in its approach to the provision of affordable housing in new residential developments in the borough? In particular:**
 - a. Does the SHMA provide a robust and up to date assessment of the need for affordable housing in Rugby borough over the Plan period to support the proposed targets and tenure mix?**

2.1 Section 6 of the 2015 updated joint Coventry and Warwickshire Strategic Housing Market Assessment (SHMA) (LP08) details the affordable housing need within Rugby Borough up to 2031. The 2015 SHMA uses the definition of affordable housing sets out in Annex 2: Glossary of the National Planning Policy Framework (NPPF). It applies the affordable housing need model as set out in the Planning Practice Guidance and uses several different secondary data sources. It is considered robust and up to date.
 - b. Are the proposed targets of 20% on brownfield sites and 30% on greenfield sites and the tenure mix supported by viability evidence?**

2.2 The Borough Council commissioned consultants Dixon Searle to undertake the Local Plan and Community Infrastructure Levy (CIL) Viability Assessment (LP22).

The proposed affordable housing targets contained within Policy H2 are supported by LP22.

- 2.3 A range of scenarios, including the influence of varying site characteristics and land values were undertaken to arrive at the most viable targets. Paragraph 1.6.16 of LP22 confirms that no scenario assumed affordable housing will be sought from schemes of 10 or fewer dwellings (subject also to maximum gross floor space requirements – at 1,000 sq. m new development).
- 2.4 The assessment approach applied sensitivity testing to policy costs including a range of affordable housing proportions and at different thresholds combined with allowances for meeting the requirements for other optional housing standards including access to and use of buildings, water efficiency and space standards.
- 2.5 LP22 demonstrates that 30% is a viable target across the Borough on greenfield sites, whilst the lower target of 20% is appropriately viable on brownfield sites brought forward for residential development.
- 2.6 Paragraphs 3.4.55 – 3.4.56 of the LP22 provide the context for the scenario testing undertaken to arrive at the provisions contained in Policy H2, the results of which demonstrate that the policy should not burden residential sites coming forward through the plan period.
- 2.7 Paragraph 2.5.8 of the Local Plan Viability Assessment (LP22) confirms that the tenure mix identified in Figure 55 of the 2015 SHMA for Rugby Borough of 16% intermediate and 84% social/ affordable rented was applied in all the affordable housing scenario tests.

c. Should a single target for affordable housing be applied across the borough or should there be flexibility for more locally determined targets? If so what robust evidence is available to support this and how would this be expressed in Policy H2?

- 2.8 The Local Plan Viability Assessment (LP22) provides robust evidence through the application of scenario testing of greenfield and brownfield sites as detailed in answer to Question 1b above that a single borough wide target for each type of site is viable and therefore appropriate.
- 2.9 LP22 does not present evidence for more locally determined targets for affordable housing across the borough.

d. Is the range of affordable housing tenures set out in the supporting text to Policy H2 consistent with the latest definition of affordable housing in national policy?

2.10 The current definition of affordable housing is set out in Annex 2 to the National Planning Policy Framework (NPPF, 2012). The Publication Draft Local Plan was drafted within the context of Section 159 of the Housing and Planning Act 2016 which sets out an amendment to the definition of affordable housing to include starter homes. However, this Section of the Act has not been enacted and in February 2017 the Government's Housing White Paper – "Fixing our broken housing market" marked a shift from starter homes to delivering a wider range of affordable housing. The Housing White Paper set out a proposal to amend the NPPF to introduce a policy expectation that housing sites of 10 units or more will deliver a minimum of 10% affordable home ownership products.

2.11 Paragraphs 3.6.1 – 3.6.5 of the Local Plan Viability Assessment (LP22) explains the approach taken to starter homes in the viability testing.

2.12 Paragraph 3.6.1 states:

"Based on our current understanding, it appears likely that the inclusion of homes assumed to produce revenue on the basis of discounted market sale would, as a worse case, not reduce overall viability outcomes. As a more likely scenario, the changes could improve or provide additional support to overall viability, potentially enabling a greater proportion of non-full market sale housing to be sought overall, or an increase in the scope for maintain or expanding the proportion of much needed rented affordable housing within overall mixes."

2.13 Although the Borough Council acknowledges potential changes to the definition of affordable housing in the draft revised NPPF that is currently subject to consultation, it is considered that the range of affordable housing tenures set out in paragraph 5.13 of the Publication Draft Local Plan (LP01) is consistent with the current definition of affordable housing in the NPPF.

e. What further requirements for affordable housing will be contained in the Housing Needs SPD and will this be consistent with the provisions for supplementary planning documents set out in paragraph 153 of the NPPF?

2.14 Policies CS19 and CS20 of the adopted Rugby Core Strategy are supported by a Housing Needs Supplementary Planning Document. This SPD has successfully supported the implementation of these policies. The Borough Council is mindful of the recent High Court case (William Davis Ltd v Charnwood Borough Council 2017 EWHC 3006) that quashed Charnwood Borough Council's new housing mix policy on the basis that it should have been adopted as part of a Development Plan Document, requiring examination by the Secretary of State, instead of a Supplementary Planning Document which only requires consultation. The Borough Council considers that a Housing Needs SPD, that does not seek to change policy in the Local Plan or add any additional costs to a residential development beyond that set out in the Local Plan, is still required to provide detail to enable smoother decision making and delivery of housing schemes in the Borough.

2.15 It is envisaged that the Housing Needs SPD will provide assistance to applicants in relation to the following matters:

- approach to negotiations on affordable housing provision;
- financial contributions in lieu of provision;
- design and layout of affordable housing;
- draft Section 106 agreement; and
- the Council's preferred Registered Providers.

2.16 The Borough Council considers that this information should be contained in an SPD rather than a guidance note as it represents supplementary guidance specifically to assist in the delivery of the housing strategy as contained within the Local Plan. If it were contained in a guidance note or something similar it would not carry the weight as a material consideration in the determination of planning applications.

2.17 The Borough Council considers that this approach is consistent with paragraph 153 of the NPPF.

Issue 6c: Rural Housing (Policies H3, H4 and H5)

1. Is the approach to rural workers dwellings set out in Policy H3 and the supporting text justified and consistent with national policy? Will it be effective in managing the essential need for dwellings to support rural

businesses? In particular, are the terms ‘functional need’ and ‘unit’ adequately defined in the policy or supporting text?

- 3.1 Paragraph 55 of the NPPF requires local planning authorities to avoid new isolated homes in the countryside unless there are special circumstances such as the essential need for a rural worker to live permanently at or near their place of work in the countryside. Policy H3 sets out the circumstances in which a new house in the countryside required for rural business is acceptable.
- 3.2 In order for an isolated house in the open countryside to be acceptable the second bullet point under paragraph 55 of the NPPF requires that there is an “essential need for a rural worker to live permanently at or near their place of work in the countryside”. As drafted Policy H3 requires a “functional” need to be established as opposed to an “essential” need. Paragraph 5.24 seeks to clarify the term functional need by stating: “In assessing such proposals the Council will seek to establish whether it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times.” For clarity the Council proposes that a modification is made to replace the word “functional” with “essential” in bullet points a) and d), and the first sentence in the second paragraph of Policy H3.
- 3.3 In respect of the term “unit” in Policy H3 for clarity the Council proposes that the following modifications are made:
- replace the term “unit and the activity” in bullet point a) with “agricultural unit or rural enterprise”;
 - replace the term “unit” in bullet point d) with “agricultural unit or rural enterprise”; and
 - replace the term “unit” in the second sentence in the second paragraph with “agricultural unit or rural enterprise”.
- 3.4 The Council considers that the use of the term agricultural unit is clearer as it is defined in the Town and Country Planning (General Permitted Development) (England) Order 2015. In recognition of the fact that rural businesses can also be non-agricultural, for example forestry or equestrian, it is also considered appropriate for the term rural enterprise to be included in Policy H3.
- 3.5 The Council’s proposed modified Policy H3 is as follows:

“Policy H3: Housing for rural businesses

Proposals for a permanent dwellings, either by new build or conversion, for occupation by a person engaged in an agricultural operation, or another form of use that can only reasonably be located in the countryside, will only be supported if all of the following criteria are met:

- a) There is a clearly established ~~functional~~ **essential** need for a dwelling;
- b) The need relates to a full-time worker, or one who is primarily employed in the activity to which the application relates;
- c) The **agricultural** unit **or rural enterprise** ~~and the activity~~ concerned, are currently financially sound, and have a clear prospect of remaining so; and
- d) The ~~functional~~ **essential** need could not be fulfilled by another existing dwelling on the **agricultural** unit **or rural enterprise**, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned.

The size of any such rural workers dwelling should be commensurate with the established ~~functional~~ **essential** requirement. Dwellings that are unusually large in relation to the needs of the **agricultural** unit **or rural enterprise**, will not be permitted.

Any permission granted will be subject to an 'occupancy' condition. The variation or removal of such a condition will only be granted if it is clear that its original purpose is obsolete and no longer required".

Proposals for the removal of occupancy conditions would only be permitted if the applicant can demonstrate that long term need for a Rural Workers Dwelling has ceased, and the Council is satisfied that the dwelling has been sufficiently marketed.

2. Does Policy H4 apply to sites adjacent to rural settlements within the Green Belt and if so would it be consistent with national policy on development in the Green Belt?

4.1 Neither Policy H4 nor the supporting text explicitly state that Policy H4 applies to sites adjacent to rural settlements within the Green Belt. However, paragraph 5.30 of the Publication Draft Local Plan (LP01) states that Policy H4 is applicable to land outside but adjoining the development limits of Main Rural Settlements and

Rural Villages. Policy GP2: Settlement Hierarchy lists the Main Rural Settlements and sets out the development that will be permitted in the Main Rural Settlements and Rural Villages. At Main Rural Settlements “Development will be permitted within the existing boundaries if all Main Rural Settlements”. At Rural Villages “Development will be permitted within existing boundaries only, including the conversion of existing buildings where national policy permits.” Both Main Rural Settlements and Rural Villages have defined settlement boundaries. Policy H4 therefore applies to sites adjacent to Main Rural Settlements and Rural Villages in both countryside and Green Belt locations.

4.2 The policy approach contained within Policy H4 is consistent with the fifth bullet point of paragraph 89 of the National Planning Practice Framework which states:

“A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan: ...”

4.3 The development of affordable housing that meets the needs of local people, as stated in Policy H4, is considered to comply with the above exception to the construction of new buildings in Green Belt. Given that such development is an exception to national policy it is important that the accommodation provided does directly address the identified need. The Borough Council considers that Policy H4 sets out adequate safeguards to ensure it can be demonstrated that the development does directly address the identified need and that it will remain affordable in perpetuity.

4.4 It is however the view of the Borough Council that the implementation of Policy H4 would be assisted by clarifying that the policy is applicable within the Green Belt by adding an additional paragraph to the supporting text after the existing Paragraph 5.35. The following modification is proposed:

“Policy H4 covers all rural parts of Rugby Borough. These include areas outside of the urban areas, the Main Rural Settlements and Rural Villages. Where a proposal is located within the green belt, however, particular controls need to apply. Whilst national planning policy recognises that rural housing granted under this policy may be appropriate in green belt locations, it is important that the

proposal is consistent with the function of the green belt by not significantly undermining any of the objectives of green belt land set out in national planning policy.”

In addition, for clarity it is proposed that the following text is add to the start of the last sentence of Policy H4 as follows:

“In locations outside of the green belt, in ~~in~~ some circumstances a small proportion of open market housing may be allowed where it can be shown that the scheme will deliver significant affordable housing and viability is a key constraint.”

3. Is Policy H4 justified and consistent with national policy on rural exception sites?

5.1 Policy H4 is considered consistent with Paragraph 54 and Annex 2 of the National Planning Policy Framework. Paragraph 54 states:

“In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.”

5.2 Policy H4 makes provision for the inclusion of small numbers of market housing consistent with Paragraph 54 and Annex 2 of the NPPF. The definition of a “rural exception site” in Annex 2 states that “Small numbers of market homes may be allowed at the local authority’s discretion”.

5.3 Policy H4 is considered justified by the Borough Council in response to the affordable housing need within Rugby Borough up to 2031 set out in section 6 of the 2015 updated joint Coventry and Warwickshire Strategic Housing Market Assessment (SHMA) (LP08).

4. Is Policy H5 consistent with national policy on replacement dwellings in the Green Belt and the countryside?

- 6.1 The Council considers that the preparation of Policy H5 is consistent with the correct approach to specifically assessing proposals for replacement dwellings in the context of national policy. In-particular it should be noted that the development plan should be read as a whole. It should be further recognised that the submission Local Plan does not contain a contemporaneous policy with equivalent criteria to Policy H5(a) in relation to residential extensions in the Green Belt. Policy H5 does not itself provide for the full sequential process to assess any individual proposals. Policies SDC1 and GP3 provide the wider criteria for the assessment of the merits of individual proposals in terms of seeking high quality design in terms of the appropriateness of massing, height, landscaping and layout as well as impact upon amenity. Policy GP3 makes wider provision to secure sustainable outcomes for proposals seeking to re-use previously developed land.
- 6.2 However, the Council feels that specific policy provision is required to assess proposals for replacement dwellings. Criteria (a) and (b) of the policy as drafted closely reflect the terminology of the NPPF (in-particular bullets 4 and 6 of NPPF Paragraph 89). However, the Council recognises that in reality proposals for replacement dwellings in the Borough may arise within and outside Green Belt locations. Furthermore, the Council considers it important to provide clarity and consistency to the application of national policy and assessment of proposals. With regards proposals in the Green Belt, criteria (a) of Policy H5 provides the logical interpretation of ensuring against disproportionate additions which the NPPF states are inappropriate development.
- 6.3 The NPPF provides substantial support for the re-use of previously developed land (e.g. Paragraph 17 Bullet 8 and Paragraph 111 as well as Paragraph 89 itself). Paragraph 55 does not, however, contain express reference to the terms *replacement* or *curtilage*. The use of terminology is instead related to redundant or dis-used buildings. Most proposals for replacement dwellings relate to existing, habitable premises. This illustrates that a very great deal depends on the assessment of scale and siting of proposals for replacement dwellings. This follows the definition of previously developed land within Annex 3 of the NPPF, in-particular that it should not be assumed that the whole of the curtilage of land occupied by previous structures should be developed. Criteria (b) of Policy H5 as submitted is consistent with undertaking assessments on this basis and allows identification of where aspects of development (including the relocation of building

footprint) may indicate a significantly greater impact on landscape or local character. In accordance with NPPF Paragraph 55 the Council may consider that in such circumstances development would amount to providing new isolated homes in the countryside.

- 6.4 In relation to proposals within the Green Belt, the drafting of Policy H5 is consistent with NPPF Paragraph 89 (bullet 6) to ensure that proposals remain situated on previously developed and the assessment of specific details illustrates these will have no greater impact on openness.
- 6.5 Criteria (a) of the policy particularly relates to aiding the interpretation of NPPF Paragraph 89 (bullet 6) for proposals in the Green Belt. Consideration of the volume of replacement floorspace provides specific direction for the assessment of effects on openness which is likely to be affected by the mass and scale of new development. This also provides scope to consider the effect on local character and implications for the stock of existing dwellings. To inform this assessment the Council regards the ability to identify proposals providing up to a 30% increase on original volume as an appropriate indicator of acceptable outcomes for replacement schemes. This takes account of a generous provision for equivalent additions likely to be realistically provided under Permitted Development Rights (i.e. dormers and extensions) whilst managing a material overall increase in the size of development.
- 6.6 The Council considers that criteria (c) of the policy is consistent with national policy to satisfy the requirements for previously developed land and in relation to NPPF Paragraph 89 ensure proposals replace buildings in the same existing use. The development plan provides other policies to assess proposals for development (including conversion) affecting non-residential buildings.
- 6.7 The Council proposes the following modification in order to clarify the policy wording to reflect and avoid potential confusion regarding terminology of policy for the Green Belt (in particular the reference to exceptional circumstances in criteria (b)), and to emphasise that material considerations (rather than dictation through national policy) will guide application of the 30% threshold for increase:

Policy H5: Replacement Dwellings

Proposals for the replacement of dwellings in the Countryside and Green Belt will be only be

acceptable in line with national policy and provided all of the following criteria are met:

- a) The replacement dwelling is not materially larger than the building it replaces and for Green Belt locations is of no more than a 30% increase on the original volume unless **material considerations indicate otherwise** ~~national policy dictates~~;
- b) ~~Unless exceptional circumstance dictates,~~ The siting of the replacement dwelling should have no greater impact on landscape than the original. In Green Belt locations, the replacement dwellings ~~must not~~ **that would** have a greater impact on the openness of the Green Belt than the original **will be regarded as inappropriate development**; and
- c) Residential is the lawful use of the existing building and the use has not been abandoned.

The removal of permitted development rights by condition may be included in any approval.

Issue 6d: Specialist Housing (Policy H6)

1. Is Policy H6 justified, effective and consistent with national policy? In particular:

a. Is it justified and will it be effective in securing housing to meet the needs of older people on large developments?

7.1 Policy H6 as currently drafted is a positive policy encouraging the provision of housing needs for older people on large developments. The Council also considers that the approach outlined through Policy H6 represents an appropriate response to support the wider, diverse opportunities that may exist to support the delivery of specialist housing for older people over the plan period.

7.2 The Council notes through preparation of the SHLAA and Housing Background Paper (LP11) that there are relatively few opportunities to provide for additional development within the Rugby urban area. The policy approach does not therefore

allocate specific sites for the delivery of specialist housing, and to do so may have further effects on the overall delivery of development given that some sites have a recent history of non-implementation. This allows for greater flexibility and supports the maximum opportunities to meet housing needs.

- 7.3 However, Policy H6 provides an overall framework to support suitable opportunities subject to developer interest and the relevant criteria (such as access to services and public transport) aim to ensure effective and sustainable outcomes when seeking to meet the needs of older people looking to live independently. Where development is approved in these circumstances it is also appropriate to seek controls on future occupation through use of conditions.
- 7.4 The Council considers that it is appropriate, in terms of providing a guide to masterplanning and taking into account the typical parameters and land uses demonstrated by the pattern of large-scale development in the Borough, that such schemes should support opportunities to provide for specialist housing. Policy H6 does not contain prescriptive criteria or a specific requirement to deliver a given proportion of specialist housing. The Council does not consider it would be appropriate to provide such specific targets. Both the NPPF and NPPG recognise there exists a wide cohort of needs and formats of supply within the spectrum of specialist housing provision. Furthermore, the Local Plan should be read as a whole and other policies (such as H1: Housing Mix) may influence the type of units provided, some of which may be considered more suitable the needs of older people (see LP01 5.7, 5.40 and 5.44).
- 7.5 However, the characteristics of such schemes and the overall spatial strategy and distribution for development provides justification for the assessment required by Policy H6.
- 7.6 Support for large scale development at the Rugby urban edge and new Main Rural Settlement at Lodge Farm village reflects a focus on strategic opportunities that the Council considers are compatible with accommodating (and should therefore seek to provide for) wider housing needs. Policy H6 provides a guide to ensure such schemes support mixed and balanced communities and provide for housing pathways to meet the different needs of residents over the plan period. Large scale developments offer opportunities to support the critical mass typically associated with specialist housing schemes (including 'Extra Care' and traditional care home models). They also offer opportunities to bring forward such facilities in close

proximity to new designated centres, capitalising and improvements to public transport and the relationship with new service provision (e.g. retail and healthcare). The Council is confident that the forecast infrastructure investment and delivery of planning obligations as part of major development will ensure the sustainability of these opportunities is enhanced.

7.7 The Council acknowledges that the role of Policy H6 must be supported by ongoing monitoring of implementation and outcomes. The Council also considers that specific guidance on the opportunities that could be secured might be provided through an anticipated future Supplementary Planning Document covering 'Housing Needs'. This process would also encourage working with developers as part of preparing Design Codes and detailed proposals for individual phases of development as well as marketing of schemes.

b. Should C2 residential care institutions count towards the borough's housing requirement? If not should proposed modification LP54.65 to delete paragraph 5.46 from the RBLP be treated as a 'main modification'?

7.8 It is the Council's position that any provision of C2 residential care institutions should not count towards the borough's housing requirement. Modification LP54.65 should be considered as a Main Modification.

7.9 The evidence for this position and chronology leading to the abovementioned modification can be considered based on the findings of the Coventry and Warwickshire Joint Strategic Housing Market Assessment (2013) (LP06) – see Paragraphs 10.4 to 10.37. The outputs from the exercise undertaken within the SHMA (to assess the characteristics of older persons' households) are provided at Table 89 and incorporated into the supporting text of the submission Local Plan (LP01) (after Paragraph 5.41). As highlighted, these requirements are to be regarded as 'indicative' and provide a basis for future monitoring.

7.10 It is important to note the timing of the SHMA and also the nature of the assessment exercise and its findings. The 2013 SHMA (LP06) pre-dates the subsequent content of the published NPPG (in-particular, Paragraph ID: 3-037-20150320) related to assessing the housing needs of older people. The SHMA places an emphasis on the provision of 'Extra Care' accommodation as being able

to provide for a range of changing circumstances and care needs. To this end, paragraph 10.29 states the conclusion that the majority of additional housing moving forward is expected to be in the 'Extra Care' format. It is nevertheless acknowledged that there is a large amount of personal choice in the type of accommodation sought, and a large existing stock of models such as sheltered housing. Paragraph 10.29 also recognises that *"a proportion of new admissions to residential care are now also being diverted to Extra Care Housing"*.

7.11 Paragraph 10.30 of the 2013 SHMA (LP06) highlights that this assessment *"inherently assumes that there is no requirement for increases in the stock of other types of specialist housing"*. This contrasts to some extent with NPPG Paragraph ID: ID: 2a-021-20160401 that assessments of need should set out the need for residential institutions (Use Class C2) and those characteristics of general housing (e.g. bungalows) that may allow people to stay in their own home.

7.12 Against this background the Council's proposed Modification LP54.65 is justified particularly because the proposed text for deletion includes specific reference to development provided through residential institutions.

7.13 Policy H6 recognises the range of different development types for development of specialist housing and provides the basis for assessing the suitability of different proposals. The policy text itself does not refer to Use Class, and the Council highlights that paragraph 5.45 of the supporting text is not proposed for Modification. This anticipates the future role of the Housing Needs Supplementary Planning Document to identify the appropriateness of development to meet certain requirements.

7.14 The format of 'Extra Care' housing provision encompassed within the SHMA recommendations does not itself provide the basis for identifying all future supply as contributing towards housing requirements. Definition of the Use Class of development provided is often determined by the type of accommodation and level of care available – in some instances falling under Use Class C2 ('residential institutions'). The Council acknowledges that Extra Care housing is sometimes used as an alternative to care homes/nursing homes and that the distinction between these housing types is blurred. The SHMA does not, however, provide a figure for the growth in institutional populations or need for care home spaces as a separate component of the housing requirement (Table 89 of LP06 presents Extra Care housing requirements as a proportion of the need derived from the

household projections). There is no other document within the evidence base to provide a separate estimate in the growth of institutional populations.

7.15 It would not therefore necessarily be correct or appropriate to calculate provision under Use Class C2 (including residential care homes) towards the housing requirement. It is accepted that a certain proportion of delivery, particular from 'Extra Care' format schemes, would provide for accommodation needs of those identified within the housing requirements; however, an unknown proportion could be taken up by those whose needs are not covered by the household projections.

7.16 Further understanding the pattern of delivery and potential release of general market housing as a proportion of new bed spaces provided are matters that could be reflected in the review of the Local Plan, informed firstly by work to prepare the Housing Needs SPD. The Council highlights, however, that schemes contributing development under Use Class C2 are a very small component of current activity – only the Warwickshire College Site (R14/2229) in the 'Current' housing trajectory provide for 0.4ha Use Class C2 development alongside provision of 131 dwellings (only the dwellings are identified as contributing to the housing requirement).

7.17 Policy H6 provides for a more comprehensive and effective approach to support a wide-range of specialist housing provision, much of which will fall under Use Class C3, applied alongside the Local Plan as a whole. The plan makes sufficient provision to meet the overall housing requirement and Policy H6 seeks to encourage provision of specialist housing as a proportion of total supply. Policy H6 is sufficiently flexible to support different types of provision not explicitly covered by the SHMA requirements and provides a basis for monitoring future outcomes and changes to housing stock.