Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

Comment ID 44
Response Date 31/01/20 13:59
Consultation Point Policy HOU2 Older Persons Housing (View)
Status Processed
Submission Type Email
Version 0.3

Representation
Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
Policy HOU2: Older Persons Housing

Tests of Soundness
Do you consider the Local Plan is sound in terms of being:

- Justified . No
- Effective . No

Positively prepared

Consistent with National Policy

Legal and Procedural requirements

Do you consider the Local Plan has been prepared in line with legal procedural requirements? Yes

Duty to Cooperate

Do you consider the Local Plan to be compliant with the Duty to Cooperate? Yes

Reasons

Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.
2.5 Draft Policy HOU2 relates to older persons housing. It specifies that on sites of 50 dwellings more, or over 1.6ha, the Council will seek the provision of a proportion of dwellings that are suitable to meet the needs of older. In determining the precise proportion, type and tenure, the Council will take account of the scheme’s viability, evidence of local need, and the scale and location of the site.

2.6 Persimmon Homes Midlands objects to this policy as it is not justified nor is it The effect of the policy is to leave negotiation of the type and scale of older person's housing on qualifying developments to the planning application process. This gives insufficient certainty to stakeholders including developers as well as decision-makers. It is similarly unclear how the threshold relates to any identified quantitative need for such housing or why such a need could not be met by existing policies in the NNJCS or positive policies in the SSP2 LP such as Draft Policy HOU3, which stipulates that retirement housing will be supported where it's well-located in respect of services and facilities.

2.7 Where the policy references evidence of local need in its unclear how such need will be measured or how it will be considered as part of the planning application process. Similarly, the policy states that the scale of the site will be considered where the threshold for the policy becoming applicable is clearly stated.

2.8 The policy is supported by 2017 study which came to several conclusions regarding annual Borough-wide housing need for older persons. However, as referenced above, the policy measures proposed are not clearly related to the need figure identified. In addition, the 2017 made several recommendations in terms of how to increase the supply of older persons’ dwellings in the county. Support for windfall sites, allocation of redundant commercial uses, and the use of brownfield registers figure among these recommendations and it is considered that these are positive, proactive, practical, and proportionate ways of increasing the supply of older persons’ homes. These would be proportionate ways of addressing demand for this sort of housing. Requiring all developments above the qualifying threshold to incorporate an unspecified level of older persons’ housing to meet an unspecified need is not a sound approach and needs to be rethought.

**Proposed Actions/Changes**

Please explain what changes or actions are needed to make the Local Plan legally compliant.

2.9 In order to make the plan as a whole sound Persimmon Homes Midlands would suggest the deletion of Policy HOU2 or it being rephrased so it encourages sites at or above the threshold to incorporate older persons’ homes in common with the approach of Policy 30 of the NNCJS in respect of the

**Attendance at the examination hearings**

If you are seeking to change the Plan, would you like to attend the examination hearings?  

Yes

If Yes, please outline the reason(s) why, below.

Persimmon Homes Midlands is an active developer in Kettering Borough and has several concerns in relation to plan’s soundness vis-à-vis certain detailed development management policies as well as a single criterion of Policy ROT3 Land West of Rothwell. These issues will need to be tested at examination and Persimmon Homes Midlands wishes to be party to these discussions.

**Notifications**

Do you wish to be notified?  

- When the Plan is submitted for independent examination?  
- When the Inspector's Report is published?  
- When the document is adopted?