Comments

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

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Consultation Point Policy HOU4 Self-Build and Custom Build Housing
(View)
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Representation
Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
Policy HOU4: Self-Build and Custom Build Housing

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

- Justified No
- Effective
- 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.

2.10 Policy HOU4 requires that housing developments incorporating 50 dwellings or more or 1.6ha or more provide at least 5% of plots as self-build or custom build serviced plots. The policy also says that the provision of the plots will take account of evidence of local need, the nature of the development proposed, and the viability of the development.

2.11 Persimmon Homes objects to Draft Policy HOU4 on the basis that it is not soundly evidenced or justified. There is a disconnect between the threshold and the scale of provision sought when compared to the scale of the identified need for self and custom build plots. The information in the Self and Custom Build Background Paper states that as of March 2019 there were 31 individuals on the self-build register. This is particularly good evidence of the likely scale of demand and the threshold and percentage requirement of the policy seems to far outstrip the likely need for custom and self-build plots.

2.12 The information presented in the background paper breaks down demand for custom and self-build plots by location in the Borough. Most of the demand is in the rural area, but this is the place least likely to deliver custom and self-build plots given that developments which exceed the threshold of 50 dwellings are not likely to come forward in this location. Other locations have virtually no demand for custom or self-build plots particularly in Rothwell where there is zero.

2.13 It's noted that based on the background paper the Council does not recognise the register as a true reflection of demand and that a report by Three Dragons has provided additional sources of evidence to quantify demand uncaptured by the Council's self-build register. This covers a 10-year period from the 2017/18 monitoring year. The paper projects a demand for 66 dwellings per year from years 1 to 5 raising to 72 dwellings per year from years 6 to 10. From the figures reported in the 2017/18 monitoring year to the year immediately following this represents a 229% increase. Whilst the demand for custom and self-build housing might be higher than what is reflected in the register, there is no evidence to account for such a substantial increase in demand within such a short time.

2.14 Policy HOU4 states that the policy is subject to a local assessment of need. However, the likely scale and distribution of need should be considered at the plan-making stage rather than at the application stage and given the information which forms part of the custom and self-build register, it is not considered that the case for 5% custom and self-build has been made out.

2.15 Persimmon Homes retains its fundamental objection to the principle of delivering custom and self-build housing through large-scale housing developments. The logistics of delivering such developments are complex and having a proportion of custom and self-build on the plots adds to that complexity and thus slows down delivery. Complications include contractors working outside of specified hours, uncompleted dwellings lying next to those which have already been completed and occupied resulting in consumer dissatisfaction, materials stored outside of designated areas, and the potential for dwellings to remain uncompleted for many years. The Council's background paper states that the average lead-in time for the delivery of custom and self-build plots is approximately 3 years which is a significant lag and only serves to underline the difficulties in delivery that these types of units cause on large-scale.

Proposed Actions/Changes

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

2.16 For the above reasons, draft policy HOU4 should be deleted for plan soundness as it is not justified.

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?