Gladman Hearing Statement

Kettering Site Specific Plan Part 2 Examination

Matter 4: Delivering the housing requirement
MATTER 4 – DELIVERING THE HOUSING REQUIREMENT

Questions 1. Does the Plan deliver the housing requirement of the JCS (for 10,400 dwellings net) and its timescale for delivery?

1.1.1. Gladman welcome the Council’s commitment to deliver the housing requirement set out in Joint Core Strategy. The full delivery of this requirement is critical for ensuring that the housing needs of communities within Kettering are met.

1.1.2. However, noting figures contained in Table 16.1 of the Submission Plan, Gladman have some concern over the reliance made by the Council on the SUEs. SUEs in general often are delayed in coming forward. The Home Builders Federation (HBF) always suggest that an appropriate buffer of up to 20% additional dwellings above the housing requirement should be allocated in Local Plans to ensure that the overall requirement is met or superseded. This is particularly relevant where an authority is relying on SUEs to deliver a large proportion of the housing requirement.

Question 2 Is it appropriate to apply a flexibility allowance? What is the justification for the plus 10% flexibility allowance and is it effective? Was consideration given to a higher or lower allowance? Should the allowance be applied across the board (including the rural areas)? Will the housing requirement plus the 10% allowance be met in the urban areas?

1.1.3. It is appropriate to apply a flexibility allowance and Gladman have previously suggested that this flexibility could be built into the current plan through a number of Main Modifications before the Part 2 Local Plan is adopted.

1.1.4. Firstly, there is the need to allocate further land through the Part 2 Local Plan. Gladman consider that an additional supply of up to 20% (above the residual housing requirement) should be planned for subject to compliance with other policies of the NPPF. This approach aligns to the recommendations of the HBF and LPEG and would provide greater certainty that the minimum requirements of the Local Plan can be met in full. It would also ensure that the Local Plan is more adaptable to change which may be experienced during the remaining years of the plan period.

1.1.5. Secondly, the Council should adopt a flexible and positive policy framework for the determination of applications submitted on sites which are not allocated for development
within the Local Plan. Such a policy would provide scope for proportionate and appropriately scaled development to come forward on unidentified sites beyond the settlement boundary, provided they are well related and adjacent to existing specified settlements, and subject to meeting other local and national planning policy requirements. The adoption of this approach would prove a boost to sustainable housing delivery.

1.1.6. Such a policy has been prepared, amongst others, by Ashford Council through Policy HOU5 of the Ashford Local Plan 2030. The policy text (as modified) reads:

1.1.1 “Proposals for residential development adjoining or close to the existing built up confines of [listed] settlements will be acceptable.. provided that each of the following criteria is met:

a. The scale of development proposed is proportionate to the size of the settlement and the level, type and quality of day to day service provision currently available, and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development, in liaison with service providers;

b. The site is within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services;

c. The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affect the character of the surrounding area;

d. The development is located where it is possible to maximise the use of public transport, cycling and walking to access services;

e. Conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality; and

f. The development (and any associated infrastructure) is of a high-quality design and meets the following requirements:

   i) It sits sympathetically within the wider landscape;

   ii) It preserves or enhances the setting of the nearest settlement;
iii) *It includes an appropriately sized and designed landscape buffer to the open countryside;*

iv) *It is consistent with local character and built form, including scale, bulk, and the materials used;*

v) *It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents;*

vi) *It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and national protected sites in line with Policy ENV1.*

Gladman believe that a similarly worded policy should be applied in Kettering SSP2. Within the policy, safeguards relating to size, location and impacts would ensure that the overall spatial strategy as defined in the JCS would be safeguarded and reflected in decision making. The policy would enable additional development to come forward which would not otherwise provided by the development plan, ensuring that sustainable housing delivery in maximised within the borough.

**Question 4. Is the housing trajectory at Appendix 1 of the Plan realistic? Does it demonstrate a supply of deliverable sites and developable sites that would meet the JCS housing requirement for Kettering? What progress has been made on the Sustainable Urban Extensions (SUEs) allocated in the JCS and how has this been monitored? What assumptions have been made in relation to delivery rates and are these justified?**

1.1.2 Gladman believe that the assumptions made by the housing trajectory risks the deliverability of the plan and will lead to further land supply problems in the future given the delivery of the SUEs to date. The tests of soundness required by paragraph 35 of the Framework outline that the SPP2 must be found to be positively prepared, justified, effective and consistent with national policy. Gladman have significant reservations regarding the ability of the Council’s Sustainable Urban Extensions (SUEs) to deliver at the new suggested rates.

1.1.3 Gladman consider the Council’s assumptions made in respect of the housing trajectory risks the deliverability of the SPP2 (and the local plan as a whole) and will inevitably lead to further housing land supply problems in the future. A comparison between the Council’s position contained in the NNJCS, SPP2 and intervening AMR reports reveals a significant shift in the Council’s position on all assumed delivery. The Council’s position demonstrates a shift in the
anticipated delivery rates of the NNJCS and have now been increased in the later years of the plan period from those shown in the previous NNJCS housing trajectory. In addition, the AMR reports published in the intervening period also show that anticipated delivery on site has shifted each year. Indeed, it is noted that the delivery of Desborough North and Rothwell were expected to commence in 2015/16 and 2016/17 respectively.

1.1.4 Given that the definition of ‘deliverable’ has been updated as part of changes to the NPPF. The NPPF now places the onus on local planning authorities to demonstrate that sites within their housing land supply are capable of coming forward within the next five years. It is therefore apparent that clear evidence is required to demonstrate that committed sites are deliverable, can deliver homes in the next five years and will come forward as anticipated.

1.1.5 The delivery on SUEs in Kettering is falling below 75% of the NNJCS trajectory and requires immediate action from the LPA to correct it. Indeed, given the strategic scale and specific nature of many of the proposals within the Council’s commitments, it will be vitally important for the Local Plan to provide a clear contingency against its overall requirement to take into account the fact that such proposals will invariably deliver at a slower rate than originally envisaged through the examination of the NNJCS as demonstrated above. Accordingly, Gladman reiterate the need for additional policies to be included by way of modification that take a responsive and flexible approach to sustainable development at the edge of sustainable settlements to ensure positive action can be taken where monitoring indicates that a five year housing land supply is unlikely to be maintained. The inclusion of a meaningful contingency is common practice in plan making and would greatly assist in supporting the demonstration of the plan’s soundness at examination.

**Question 5. Is there sufficient range and choice of sites allocated in the Plan in terms of location, type and size to provide adequate flexibility to meet the JCS housing requirement for Kettering?**

1.1.6 There is not currently a sufficient range and choice of sites allocated in the plan to provide flexibility to meet the JCS housing requirement.

1.1.7 As outlined in our answer to Question 2 Gladman believes a solution to this would be a higher flexibility allowance of 20% which in conjunction with a more flexible policy wording as suggested in question 4 would provide more certainty of the plan meeting its housing requirement.
Question 7. Overall will the Plan realistically deliver the dwellings required over the plan period? What contingencies are in place should housing delivery fall below expectations? Are there any risks associated with the over-supply of land for housing? How have these been addressed?

1.1.8 As outlined above, Gladman have concerns that any further slippage of the SUEs would result in the Plan failing to deliver the required number of dwellings over the plan period. The Housing Trajectory contains insufficient headroom to ensure the delivery of the minimum housing requirement over the remainder of the plan period. Gladman are of the view that allocations within local plans should build in a flexibility contingency to the overall Housing Land Supply to ensure that it is positively prepared and suitably responsive to rapid changes in circumstance that can arise over the plan period, including delays and reduced delivery rates as a result of the issues raised in response to the previous questions. In plan-making, it is essential that the housing requirement is treated as a minimum rather than a maximum ceiling. In the case of Kettering, the Local Plan is highly dependent on sustained housing delivery across the strategic sites. As such, greater headroom is required here than in circumstances where there is more diversity within the housing trajectory. As set out in our previous representations to the Local Plan, Gladman are of the view that there is a need to provide a contingency of sites at the upper end of the HBF’s suggested range (20%).