WRITTEN STATEMENT IN RESPECT OF THE KETTERING SITE SPECIFIC PART 2 LOCAL PLAN EXAMINATION

MATTER 4- DELIVERING THE HOUSING REQUIREMENT

On Behalf of The Boughton Estate

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INTRODUCTION

1.1 This Written Statement is made on behalf of our client, The Boughton Estate (the Estate), in respect of the forthcoming examination (EIP) of the Kettering Site Specific Part 2 Local Plan.

MATTER 4 - DELIVERING THE HOUSING REQUIREMENT

Issue: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards the supply and delivery of housing land to meet the JCS requirement for Kettering.

The JCS sets the housing requirement for Kettering at 10,400 dwellings in the period 2011-2031. It also sets out how it will be distributed in line with the spatial strategy and sets out housing requirements for Kettering, Burton Latimer, Desborough, Rothwell and the Rural Areas. The JCS allocates strategic housing sites of 500+ dwellings. The Plan allocates smaller scale sites to meet housing requirements. The Sustainability Appraisal recognises that without planning for additional housing development (by making site allocations) there is sufficient supply from committed and completed developments of at least 11,355 dwellings. This exceeds the 10,400 set out in the JCS. However, in order to allow for a degree of choice and flexibility the Council has chosen to provide a greater supply of land to ensure that needs are met in the Plan period. This is to ensure that housing targets are met across the borough, particularly in Rothwell and the Rural Areas. The Council has therefore applied a 10% flexibility allowance above the housing requirement for each settlement set out in the JCS (but not to the Rural Areas). The housing target for the rural areas will be met through housing allocations and a windfall allowance.

Revising the housing requirement is not within the scope of this Plan. Discussions at the hearings will therefore focus on ensuring the Part 2
Plan allocates sufficient housing land to deliver the housing requirement as set out in the adopted JCS. This principle also applies to the provision of a five year housing land supply and whilst I will need to satisfy myself that the proposals in the Plan are such that the aims of the JCS will be met and development delivered in accordance with it, it is not necessary for me to consider whether the Council has a five year housing supply as part of this examination.

(See Initial Question 12 and the Council's response)

In responding to the following questions, the Council should seek to identify and address specific concerns raised in the representations.

Questions

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

2.1 There are some concerns that the plan does not deliver the housing requirement (see response to question 2 and 3 below regarding windfalls and flexibility). Specifically, we are concerned that the rural area requirement in the JCS is unlikely to be met.

The SSP2 should be providing 528 dwellings in Rural Areas (JCS requirement of 480 homes plus 10% flexibility allowance). With completions and commitments of 223 homes this leaves a residual requirement of 305 homes to be provided by the SSP2.

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?

2.2 The 10% flexibility allowance should be applied in the rural area as in our view SSP2 will not adequately guard against under delivery in the rural areas unless a 10% flexibility allowance is also allowed for. The likely
housing supply from Neighbourhood Plans over allocating, rural exceptions sites, and self-build plots (taken from paragraph 4.7 of the Plan as the reasons for not applying an allowance) is likely to be very limited and would form part of the windfall allowance which has already been taken into account in the supply figures. This is not therefore an effective contingency measure in the event allocated rural sites or rural windfalls do not deliver.

3. Is the expected contribution from windfalls realistic and justified by evidence? What is the approach to windfalls in the urban area? Is there an undue reliance on windfalls to meet the rural housing requirement? How will the approach to housing in the Rural Areas meet the JCS requirement for 480 homes?

2.3 Having regard to the evidence base for rural windfalls (Housing Land Supply Background Paper October 2019), the rate of 12 dwellings per annum appears optimistic and is reliant upon a major development coming forward.

2.4 The average rate of windfalls from minor developments historically is 8 dwellings per annum (excluding monitoring year 2008/09 which appears to be a unique exception as there were 65 completions in one year), and therefore lower than 12. The likelihood of a major windfall site coming forward within the rural area is considered very limited as only one has happened in the past 10 years (14 dwellings at Braybrooke), and given the very tightly drawn settlement boundaries.

2.5 On this basis, and in the absence of any flexibility allowance, the rural area requirement in the JCS is unlikely to be met. The Plan should therefore be allocating more sites within the rural area. Representations have been submitted in respect of land at Newton which is controlled by the Boughton Estate and which it is seeking to be allocated for 4 dwellings (see Matter Statement 13).