Kettering Site Specific Part 2 Local Plan Examination – Matter 4 Statement (Delivering the Housing Requirement)

Date: September 2020
For: Persimmon Homes (Midlands) Ltd
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.

Q1: Does the Plan deliver the housing requirement of the JCS (for 10,400 dwellings net) and its timescale for delivery?

1.1.1 For the reason set out in Persimmon’s Regulation 19 representations, we agree with the Inspector that neither the JCS housing requirement nor five year housing land supply should be re-tested through this examination. In relation to delivering the housing requirement of the JCS, the starting point must be that existing completions and commitments already exceed the housing requirement for Kettering Borough to 2031. However, for the reasons explained in our Matter 2 Statement further land allocations, particularly in Rothwell, are necessary in order to deliver the JCS strategy especially that in relation to the distribution of development over the plan period.

Q2: 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?

1.1.2 We consider a flexibility allowance to be a sensible way to ensure that the housing requirement in the JCS is delivered and apportioned according to its spatial strategy articulated in Policy 29 of the JCS. Application of the allowance on top of commitments and completions results in a very modest surplus in Rothwell, Desborough and Burton Latimer and so would not result in excessive levels of growth over and above the minimum housing requirement plus a proportionate buffer to ensure flexibility. Whilst Kettering would experience a considerable surplus, it would not be reasonable for the housing numbers needed in Market Towns should be absorbed by Kettering as such an approach would not deliver the spatial strategy in the JCS.

1.1.3 It is necessary to emphasise that notwithstanding the 10% allowance, Rothwell is the only identified settlement that will not meet its minimum housing apportionment without further land allocations in that there are only commitments and completions to deliver 1,053 dwellings against a minimum requirement of 1,190.

1.1.4 We note the commentary in paragraph 5.4.7 of the Sustainability Appraisals [SA1] that a higher flexibility allowance has been discounted as an unreasonable alternative. This is on the basis there would be already a Borough-wide surplus of 1,584 above the minimum requirement plus 10% allowance and there is no evidence
to suggest higher levels of delivery are necessary to achieve the JCS targets or secure a five-year supply of housing. However, it is important to also consider the effectiveness of planned housing delivery at a settlement level as well as on a Borough-wide basis and a lower allowance than 10% would risk non-delivery of the JCS particularly as regard to its targets for housing in Market Towns.

Q4: 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?

1.1.5 Persimmon has secured outline planning permission for the Rothwell North SUE and Reserved Matters Approval (RMA) for Phase 1 comprising 227 dwellings as well as the Strategic Link Road (SLR), a key element of infrastructure connecting the A6 to the B576. A pre-application submission for Phase 2 will be lodged before the end of 2020 which will comprise a further 140 units. Work has commenced on site and the first completions are expected in the latter half of 2020. It is anticipated that circa 16 dwellings will have been completed by the end of the calendar year followed by around circa 100 dwellings per year thereafter. Technical work continues in relation to bringing forward the later phases. Persimmon’s build programme and delivery intentions align with the Council’s housing trajectory for Rothwell North. The site is fully deliverable within the JCS plan period and the Council’s housing trajectory is realistic.

1.1.6 The rate of delivery assumed by the Council is supported by Persimmon’s rate of completions on other sites, including the Kettering East SUE. Persimmon achieved 67 completions at Kettering East in the second half of 2019, which supports the assumed delivery rate at Rothwell North of about 100 dwellings per annum. Whilst it is acknowledged that SUEs can take longer than anticipated to deliver, Rothwell North has commenced development and completions are expected imminently. Now consents are in place, it is reasonable to expect the site to deliver at a much greater pace and we would observe this is true of the SUEs in Kettering Borough generally.

1.1.7 Persimmon also controls Land to the West of Rothwell, which has a draft allocation in the Part 2 Plan for up to 300 dwellings. Persimmon has undertaken high-level work in respect of ecology, highways, archaeology and masterplanning. The results of this work is summarised in the Site Delivery Statement submitted at Regulation 19 stage, which shows that the site is both technically deliverable and viable. In addition to this, Land to the West of Rothwell will be supported by the services, facilities and infrastructure in the wider town and those forthcoming as part of the Rothwell North SUE. Given that the draft allocation at Land West of Rothwell will be accessed through the Rothwell North development, it is reasonable to expect this site to come forward in the latter part of the plan period but a significant rate of completions at the Rothwell North SUE will support the town’s housing need in the meantime.

Q5: 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?

1.1.8 Yes, although the range and choice of sites will necessarily be constrained by those that are appropriately located and deliverable. As set out in Persimmon’s Regulation 19 representations, we note from the Council’s site selection evidence that there are limited suitable alternatives in and around Rothwell. For the reasons set out in Persimmon’s Matter 2 statement, it is essential for plan soundness that additional allocations are made at Rothwell to deliver upon the JCS spatial strategy. In addition,
as the Inspector has already acknowledged, there is no requirement *per se* for the plan to identify a deliverable five year supply of housing sites so ensuring delivery early on the in the draft Plan’s lifespan is unimportant provided an adequate supply of deliverable housing sites have been identified to meet the JCS requirement to 2031.