Matter 8 – Meeting Housing Needs
Home Builders Federation (HBF)

KETTERING SITE SPECIFIC PLAN PART 2 (SSPP2) EXAMINATION
MATTER 8 – MEETING HOUSING NEEDS

Inspector’s issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission SSPP2 consultation dated 12th February 2020. This representation answers specific questions as set out in the Inspector’s Matters, Issues & Questions document issued 20th July 2020.

ISSUE

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy and the JCS in relation to the provision of housing and whether it adequately address the needs for all types of housing and the needs of different groups in the community (as set out in paragraph 61 of the Framework)

QUESTIONS

HOU2 Older Persons Housing

5. Is the approach to older persons housing justified, effective and consistent with national policy and the JCS? Is there any overlap with JCS Policy 30?

Policy HOU2 – Older Persons Housing is not justified, effective or consistent with national policy.

There is significant overlap with adopted NNJCS Policy 30 - Housing Mix and Tenure, which sets out :-

- (a) the mix of house types within a development should reflect (i) The need to accommodate smaller households with an emphasis on the provision of small and medium sized dwellings (1-3 bedrooms) including, where appropriate, dwellings designed for older people;
- (c) New dwellings must meet Category 2 of the proposed National Accessibility Standards as a minimum and the local planning authority will negotiate for a proportion of Category 3 (wheel-chair accessible) housing based on evidence of local needs; and
- (f) Proposals will be encouraged for market and affordable housing provision to meet the specialised housing requirements of older households including designated, sheltered and extra care accommodation and other attractive housing options to enable older households to down-size to smaller accommodation. SUEs and other
strategic developments should make specific provision towards meeting these needs.

Policy HOU2 is unnecessary and repetitive.

6. Is the threshold of 50 dwellings/1.6 hectares justified? Does it relate to an identified need?

The threshold of 50 dwellings is unjustified and unrelated to any identified need. There is no rationale for the selection of 50 dwellings as the threshold for qualifying development proposals. The relationship between the threshold of 50 dwellings and the identified need for older persons housing is also unclear.

7. What is a ‘proportion’ and should this be specified? Is the desired mix clear and does it take account of local considerations? In determining the proportion, type and tenure, how will local need be evidenced? Does the Policy as drafted provide certainty and is it effective?

The approach of Policy HOU2 to the proportion, type and tenure of older persons housing is unclear and ambiguous. The proposed policy approach defers negotiation of the precise scale and type of older persons housing on all developments of 50 or more dwellings to the planning application process. The vagueness of Policy HOU2 causes uncertainty and means that neither the applicant nor the decision maker know what is expected from a development proposal.

It is unclear how local need will be established. The Council’s supporting evidence set out in the 2017 Study only identifies an annual Borough-wide rather than local housing need for older persons. This data is now also somewhat dated.

The requirement for all developments of 50 or more dwellings to incorporate an unspecified level of older persons housing to meet an unidentified local need is not an effective policy approach. The 2017 Study made several recommendations to increase the sources of supply for older persons housing across Northamptonshire including allocation of redundant commercial use sites, the use of sites on brownfield registers and support for windfall sites. These approaches together with Policy 30 of the adopted NNJCS and Policy HOU3 of SSPP2, which stipulates that retirement housing will be supported where it’s well-located in respect of services & facilities, are all positive, proactive and proportionate ways of meeting need for older persons housing.

Policy HOU2 should be deleted.

8. Is there any evidence that the requirements of the policy would affect the viability or deliverability of housing sites?

Housing delivery on sites of 50 or more dwellings will be delayed whilst applicants and decision makers interpret and negotiate the precise
requirements of Policy HOU2 at planning application stage (see HBF answer to Q7 above).

The viability of housing sites will also be affected because the financial dynamics of older persons housing are different to general housing. Build costs are higher due to specific design criteria suited to the needs of older people, a greater gross to net floor area for non-saleable shared facilities, elongated construction / sales periods and cashflows as no individual units can be occupied until communal areas are completed, which means substantial upfront investment before any return on capital is received. This is not a considered in The Whole Plan Viability Assessment SSPP2 dated December 2019 by Aspinall Verdi.

Policy HOU2 should be deleted.

**HOU4 Self Build and Custom Build Housing**

10. Is the approach to self build and custom building housing justified, effective and consistent with national policy and the JCS? Where is the need for this type of housing established and is this a sound basis from which to seek provision?

The approach to self & custom build housing is not justified, effective or consistent with national policy.

The Council’s supporting evidence is set out in Self-Build & Custom Build Housing Background Paper dated August 2019. As at March 2019, there were 31 entries on the Council’s Register, which increased to 41 entries by July 2019. This indicates a minimal interest in self & custom build, which may not translate into actual take up of serviced plots should such plots be made available on housing sites of 50 or more dwellings.

The level of modelled demand (circa 60 dwellings per annum) in the Three Dragons Report (Custom and Self Build Demand Assessment Framework December 2018 in Appendix 1) represents an aspiration, which should not be considered as a strict target or a primary source in determining demand. There is a significant difference between the number of entries on the Register and the modelled estimation of demand. The Assessment Framework should not be considered a sound basis from which to seek provision.

The HBF contend that the level of actual demand is closer to the level of demand currently shown on the Council’s Custom & Self Build Register rather than the over-estimated assessment contained in the Framework Report.

The Council’s policy approach should not move beyond encouragement as set out in the NPPG. The inclusion of self & custom build housing in the overall housing mix of developments of 50 or more dwellings should be at the discretion of the developer rather than an imposed policy requirement, which is unsubstantiated by supporting evidence of need.
Policy HOU4 should be deleted.

11. Is the 50 dwellings / 1.6 hectares threshold justified? Is the requirement for 5% of plots to be made available for self-build or custom build serviced plots reasonable? How will local need be evidenced?

The 50 dwellings threshold is not justified. There is an absence of rationale for the choice of 50 or more dwellings as the threshold for qualifying developments for the provision of self & custom build housing. This choice of threshold is unduly onerous.

The requirement for 5% of plots to be made available as self & custom build serviced plots is unreasonable. There is a disconnect between the site threshold of 50 or more dwellings and the scale of 5% provision sought compared against minimal identified need for self and custom build housing (see HBF answer to Q10 above).

This disconnect is magnified even more if the preferences expressed by entries on the Register are considered. The Self-Build and Custom Build Housing Background Paper dated August 2019 identified that all entries indicated a preference for individual serviced plots. Of locations sought 34.5% were in Kettering, 17% were in Burton Latimer, 3.5% were in Desborough and 49% were in Rural Area. The policy requirement for 5% self & custom build plots on housing developments of 50 or more dwellings will cause a distributional mismatch of an over-supply of land in the wrong locations (clusters of plots on larger housing sites in urban locations) and minimal demand for single plots in rural locations.

As set out in the NPPG, the Council’s policy approach should be to work with landowners and developers to encourage the provision of self & custom build housing. Policy 30 of the adopted NNJCS provides support and encouragement for self & custom build schemes as well as requiring a percentage of such plots on SUEs and strategic allocations. The SSPP2 supports self & custom build in Policy HOU5 - Single Plot Exception Sites for Custom and Self-Build. It is also understood that between 2015/16 – 2017/18, the demand on the Council’s Register was met by the granting of permissions of single dwelling schemes on an annual basis. The minimal demand for self & custom build housing, supportive policy approaches to encourage such housing and the Council’s windfall site allowance of 621 dwellings as a source of supply mean the imposition of a policy requirement on SSPP2 and KTCAAP allocations not currently benefitting from planning permission or only currently benefitting from outline planning permission is not justified.

Policy HOU4 should be deleted.

12. What does ‘appropriately marketed’ mean in practice and how will prevailing market value be assessed? Why has a 6 months marketing period been chosen and is this justified?

“Appropriately marketed” is not defined by the Council. It is also unclear how an assessment of prevailing market value will be undertaken by the Council
(see HBF answer to Q13 below). The justification for the 6 months marketing period is not specified.

13. Is there any evidence that the requirements of the policy would affect the viability or deliverability of housing sites?

The viability and deliverability of housing sites will be affected.

If demand for plots is not realised due to an over-estimation of need (see HBF answer to Q10 above) and/or a locational mismatch of provision against expressed preferences in demand (see HBF answer to Q11) then plots will be undelivered.

The provision of 5% self & custom build serviced plots on housing developments of 50 or more dwellings adds to the complexity and logistics of developing such sites and slower delivery. The Self-Build and Custom Build Housing Background Paper dated August 2019 states that the average lead-in time for the delivery of self & custom build plots is approximately 3 years. This is a significant time lag behind the development of the wider site and highlights the difficulties associated in delivering self & custom build plots on larger scale housing developments. Such longer lead-in times will mean uncompleted dwellings next to completed and occupied homes resulting in consumer dissatisfaction, construction work outside of specified working hours, building materials stored outside of designated compound areas and dwellings remaining unfinished for many years due to a slower build out rate.

Undeveloped plots should not be permanently left empty to the detriment of neighbouring properties or the whole development. The timescale of 6 months for reversion to the original housebuilder is conditional on appropriate marketing at a prevailing market value presumably to be determined by the Council (see HBF answer to Q12 above). There is potential for disagreement about both the marketing strategy and market value between the developer and the Council. This timescale could extend beyond 6 months. Any delay in developing vacant self & custom build plots presents practical difficulties in terms of co-ordinating their development with construction activity on the wider site especially if the original housebuilder has completed the development and is forced to return to site to build out plots, which have not been sold and completed by self & custom builders.

Permanently vacant undeveloped plots should be removed from the Council’s future housing land supply by the application of a non-implementation rate.

The Whole Plan Viability Assessment SSPP2 dated December 2019 by Aspinall Verdi does not test the financial impact of the provision of 5% self & custom build serviced plots on housing developments of 50 or more dwellings. The Council expects serviced plots to be provided therefore the financial impacts from delayed delivery or non-delivery of self & custom build should be assessed. There may also be a detrimental impact upon the level of affordable housing provision achieved from sites of 50 or more dwellings because self & custom build dwellings are exempt from contributions towards
infrastructure and affordable housing provision as set out in national policy hence a greater burden falls onto fewer market sale dwellings.

Policy HOU4 should be deleted.