Kettering Site Specific Part 2 Local Plan
Examination – Matter 8 Statement (Meeting Housing Needs)

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 and the JCS in relation to the provision of housing and whether it adequately addresses 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)

Q5: 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?

1.1.1 The approach to older persons housing is unsound. Draft policy HOU2 states that on sites of 50 dwellings/1.6ha in area or more the Council will seek a proportion of dwellings that are suitable to meet the needs of older people. However, the ultimate proportion will be dictated by “evidence of local need” amongst other things. In order for the policy to be justified, the need must be demonstrated through the plan’s evidence base and the draft policy should clearly respond to that identified need taking into account other factors, including committed schemes. The fact that local need will be re-considered at the planning application stage indicates that need has not been fully considered at the plan-making stage.

1.1.2 The policy is not effective because in addition to re-testing need on an application-by-application basis, the precise type and proportion of older persons housing is not specified which adds considerable uncertainty for applicants, stakeholders and decision-makers.

1.1.3 Draft policy HOU2 also contradicts the approach of Policy 30 of the JCS, which expressly encourages developments to meet the needs of older households whilst requiring such provision to be made at the SUEs. Draft policy HOU2, by contrast, requires contributions towards older persons housing provision in non-strategic development thereby effectively overruling the JCS approach, which is not the role of a Part 2 plan.

1.1.4 For the above reasons, Policy HOU2 should be deleted for soundness. Notwithstanding the above and as a minimum, we would suggest greater clarity in the policy as to the proportion and type older person’s accommodation the Council will seek. For instance, we note from the October 2019 Provision of Category 3 and Housing for Older Person’s Background Paper [HOU3] that the Council would accept Category 3 homes and bungalows as contributions towards the need for older persons housing. This should be made clear in the policy.

Q6: Is the threshold of 50 dwellings/1.6ha justified? Does it relate to an identified need?

1.1.5 We note that the mainstay of the evidence relating to need in this area is contained in what is now quite a dated study from 2017 entitled “Study of Housing and Support Needs of Older People across Northamptonshire.” [HOU15] This identifies a
“potential target” for older person’s housing in Kettering of 92 units per year. According to the Background Paper [HOU3] this figure excludes projected need arising for care home spaces which the Council states will be met through existing commitments (paragraph 4.15). The Background Paper [HOU3] also states that older persons housing can include bungalows and homes constructed to the Category 3 enhanced accessibility standards. Policy 30 of the JCS already allows the Council to negotiate a proportion of Category 3 dwellings according to local needs and bungalows may come forward on a variety of sites throughout the remainder of the plan period anyway. It unclear how these factors have been accounted for in fixing the threshold or how the threshold identified in the policy relates to the 92 units per year target figure. As such we do not consider the threshold to be justified.

Q7: 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?

1.1.6 We consider that a proportion should be specified and properly evidenced according to the overall needs arising that should be determined through the plan-making process. The desired mix is not clear. For example, in the supporting text the Council states that C2 care homes will be considered towards meeting the targets for older person’s provision. Whilst this makes sense on its face, the Background Paper [HOU3] states the Council has met its identified need for care homes through commitments and therefore it would be logical for this policy respond towards retirement housing only rather than specific care provision. This point should be addressed in the policy, as should the types and tenures that the Council will accept as meeting the needs of the older demographic including Category 3 homes and bungalows. A clear and evidenced policy would avoid the need for lengthy debates about local need, proportion, location and viability at the planning application stage.

1.1.7 Draft policy HOU2 is not sound as drafted and should be deleted for plan soundness.

Q10: Is the approach to self-build and custom build 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?

1.1.8 No. Evidence underpinning draft Policy HOU 4 has been set out in the Self-Build and Custom Build Housing Background Paper [HOU2]. This states that, as at March 2019, there are 31 individuals on the Council’s Self-Build Register. The locational preference of these individuals skews highly in favour of rural locations (almost half) followed by Kettering. There is very low demand in other named settlements. There is practically no requirement for self-build plots in Desborough and no demand whatsoever for self-build in Rothwell. This indicates a very low demand for custom and self-build plots generally which calls into question the need for draft Policy HOU 4 particularly when it will result in custom and self-build plots being brought forward in mainly urban locations.

1.1.9 The Background Paper [HOU2] correctly identifies the Planning Practice Guidance’s (PPG) advice that the starting point for assessing need for custom and self-build is the register. However, the PPG also states this can be supported as necessary by additional data from secondary sources. Such secondary data has been provided in the form of the Three Dragons Demand Assessment Report, which dates from April 2018 (The Assessment Report).

1.1.10 The Assessment Report looks at individual planning permissions for single-dwellings as these are assumed to be indicative of demand for custom and self-build more
generally. Paragraph 10.4 of the Background Paper states that demand here as illustrated by the register is met by the historic trends of the Council granting planning permission for single-dwelling schemes. This would indicate that demand for custom and self-build as set out on the register is already being met.

1.1.11 The Assessment Report however, also uses a model to predict future demand. The essence of the model is to look at the national profile of custom and self-builders and compare this to the profile of the local population. Then, a “drop-out-rate” is applied (again using national data) to account for the availability of finance and the result is an annual local demand figure that in Kettering’s case ranges from 66 to 72 dwellings per year. This is a stark contrast to the level of demand revealed by the register that over a three-year period amounts to 8 dwellings per year and significantly in excess of past trends in delivery of 9 dwellings per year (again over a three-year period). Given the astronomical difference between the modelled demand on one hand and historic trends in delivery and the self-build register on the other, we do not accept that the model is presenting a realistic picture of the situation.

1.1.12 The PPG is clear that demand data should be derived from the self-build register but supported where necessary by additional data. The model presented in the Assessment Report extrapolates national demographic trends and applies these to the local demographic profile. This approach does not appear to factor in the self-build register at all. There is no explanation provided at all why circumstances are such in Kettering that the register is so significantly underestimating the “true” level of demand.

1.1.13 Although the register indicates that it is unlikely to be as high as assumed by the Council, we accept that there might be some demand for self and custom build in Kettering Borough but that this need should not be met through a blanket threshold applied to large housing sites. The reasons for this are outlined in our Regulation 19 representations.

1.1.14 For the above reasons we consider draft Policy HOU 4 to be unsound for lack of justification and that it should be removed.

Q11: Is the 50 dwellings/1.6 hectare threshold justified? Is the requirement of 5% of plots to be made available for self-build or custom build serviced plots reasonable? How will local need be evidenced?

1.1.15 For the reasons explained above, we do not consider the threshold or the requirement to be justified or reasonable. In relation to local need, the Background Paper [HOU2] has analysed the locational requirements for custom and self-build plots as per the register and concluded that in some locations (such as Rothwell) there is virtually no demand. We consider that the locational requirements as shown on the register is good evidence of local need and this should be made explicit in the text of the draft policy if it is retained.

Q12: What does “appropriately marketed” mean in practice and how will prevailing market value be assessed? Why has a 6 months marketed period been chosen and is this justified?

1.1.16 Marketing in this context should take place in the same manner as any other home sold on the open market and any measure required in excess of this would not be justified. If such a requirement is applied, then six months is a reasonable period in which to test demand for such plots following which they can be build-out in the usual manner. We are supportive of this aspect of the policy should it be retained but still consider that it should be removed for general soundness reasons.