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Dear Sir / Madam

## **KETTERING DRAFT SITE SPECIFIC LOCAL PLAN PART 2 CONSULTATION**

### **Introduction**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. The HBF submit the following responses to the Kettering Draft Site Specific Local Plan Part 2 (SSLPP2) consultation document and specific questions therein.

### **Housing Requirement & Housing Land Supply (HLS)**

As set out in the National Planning Policy Framework (NPPF) the Council should be proactively supporting sustainable development to deliver a significant boost to the supply of housing to meet identified housing needs. The Council should ensure that its Local Plan meets Objectively Assessed Housing Needs (OAHN) in full as far as is consistent with the NPPF including identifying key sites critical to the delivery of the housing strategy over the plan period. The Housing White Paper (HWP) "*Fixing The Broken Housing Market*" also emphasised planning for the right homes in the right places by making enough land available to meet assessed housing requirements.

The North Northamptonshire Joint Core Strategy (NNJCS) adopted in July 2016 by Corby, East Northamptonshire, Kettering and Wellingborough Councils sets out :-

- the overall spatial strategy ;
- the level of growth and its distribution ;
- strategic site allocations (>500 dwellings) and ;
- strategic policies including place shaping requirements and development management policies.

It is proposed that the Kettering SSLPP2 will allocate non-strategic sites (<500 dwellings) and set out more detailed local policies.

As set out in the NNJCS the housing requirement for Kettering Borough is 10,400 dwellings (520 dwellings per annum) for the plan period 2011 – 2031. The NNJCS focuses the majority of development in Kettering as a Growth Town including the East Sustainable Urban Extension (SUE) for 5,500 dwellings. Burton Latimer, Desborough and Rothwell are defined as Market Towns. In the Villages local housing needs will be met.

After the deduction of completions and existing commitments the residual housing requirement is calculated as 1,186 dwellings (including a 10% buffer) distributed as follows :-

- Kettering - 344 dwellings ;
- Burton Latimer - 22 dwellings ;
- Desborough - 400 dwellings ;
- Rothwell - 284 dwellings ;
- Rural Area - 140 dwellings (after deduction of 140 dwellings windfall allowance) ;
- TOTAL - 1,190 dwellings.

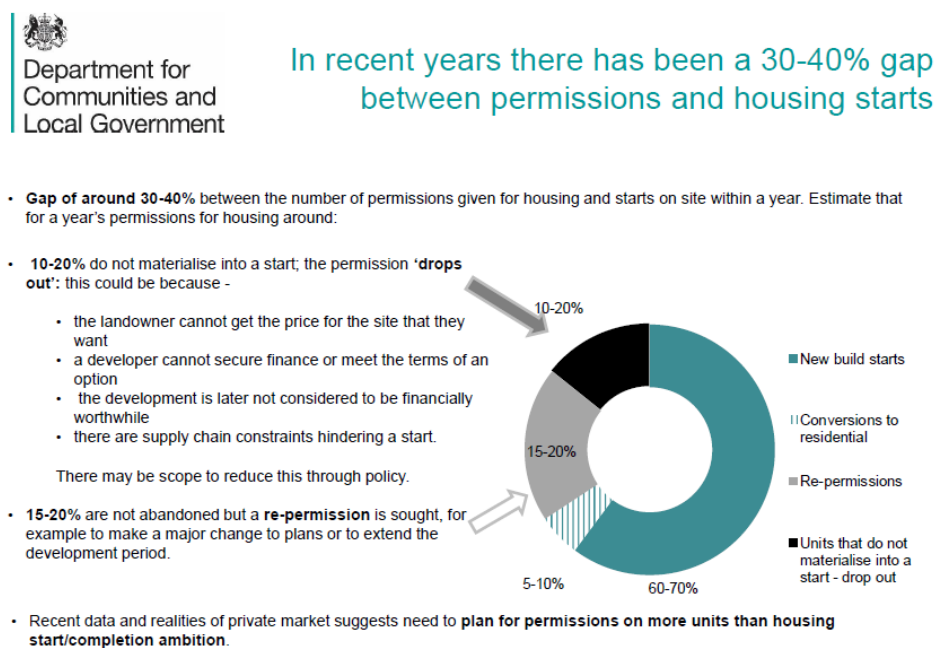
In the Draft SSLPP2 there are 31 proposed non-strategic site allocations comprising :-

- 11 proposed allocations in Kettering for circa 895 - 936 dwellings ;
- 4 proposed allocations in Burton Latimer for circa 105 dwellings ;
- 2 proposed allocations in Desborough for circa 439 dwellings ;
- 1 proposed allocations in Rothwell for circa 300 dwellings ;
- 13 proposed allocations in Rural Area (in various villages) for circa 166 - 181 dwellings ;
- TOTAL 1,905 – 1,961 dwellings.

The HBF submit no comments on the merits or otherwise of individual non-strategic sites so our representations are submitted without prejudice to any comments made by other parties. For the Council to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets whilst large strategic sites may have multiple outlets usually increasing the number of sales outlets available

inevitably means increasing the number of housing site allocations. In Kettering Borough strategic sites adopted in the NNJCS should be complimented by smaller scale non-strategic sites. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. This approach is also advocated in the HWP because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

The Council's proposed HLS includes a 10% buffer. It is agreed that a flexibility contingency should be applied to the overall HLS in order that the SSLPP2 is responsive to changing circumstances and the proposed housing requirement is treated as a minimum rather than a maximum ceiling. The DCLG presentation slide from the HBF Planning Conference September 2015 (see below) illustrates a 10 – 20% non-implementation gap together with 15 – 20% lapse rate. The slide also suggests “*the need to plan for permissions on more units than the housing start / completions ambition*”.



Extract from slide presentation “DCLG Planning Update” by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

The HBF always suggests as large a contingency as possible of at least 20%. If any of the Council's assumptions on lapse rates, windfall allowances and delivery rates were to be adjusted or any proposed housing site allocations were to be found unsound then the Council's proposed contingency of only 10% would be eroded. The smaller the Council's contingency becomes so any built in flexibility of the SSLPP2 reduces. It is acknowledged there can be no numerical formula to determine the appropriate quantum of such a flexibility contingency however where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. As identified in Sir Oliver Letwin's interim findings large housing

sites may be held back by numerous constraints including discharge of pre-commencement planning conditions, limited availability of skilled labour, limited supplies of building materials, limited availability of capital, constrained logistics of sites, slow speed of installation by utility companies, difficulties of land remediation, provision of local transport infrastructure, absorption sales rates of open market housing and limitations on open market housing receipts to cross subsidise affordable housing. The Council should provide a full justification for its proposed 10% buffer.

It is noted that all settlements have a defined boundary. Under **Policy LOD1** it is proposed that such settlement boundaries are used to interpret whether proposals are within or adjoining respective settlements for the purposes of **Policies 11 & 13** in the NNJCS and **Policies RS01 & RS02** of the SSLPP2. It is also proposed that Villages will be categorised into 3 designations Category A (**Policy RS01**), Category B (**Policy RS02**) and Category C (**Policy RS03**). **Policy RS01** proposes to restrict development to only within settlement boundaries, **Policy RS02** proposes to restrict development to infilling of 1 – 2 plots only within settlement boundaries and **Policy RS03** proposes to limit development to the reuse, conversion and / or redevelopment of existing rural buildings.

It is important that the Council recognises the difficulties facing rural communities in particular housing supply and affordability issues. The HBF suggests that the Council reconsiders its approach of preventing alternative sustainable developments adjacent to settlements from coming forward. By adopting a less restrictive approach as indicated in the NNJCS (**Policy 11**) and allowing sustainable development which is adjacent to as well as within settlement boundaries under **Policies RS01 & RS02** the Council could provide greater flexibility within its HLS if any unforeseen problems occur with existing consents and / or site allocations. Such an approach would also provide potential opportunities for self-build / custom build in these localities which are the indicated preference of entries on the Council's Self Build Register.

## Housing Policies

The HBF agree that the SSLPP2 does not need to re-address issues dealt with in the NNJCS nor replicate its adopted policies. It is agreed that no further details are required on housing mix, nationally described space standards, accessible / adaptable M4(2) homes or affordable housing provision which are set out in **Policy 30** of the NNJCS.

**Q1. Should the SSP2 include a policy identifying the proportion of new development that needs to comply with Category 3 of national accessibility standards?**

The SSLPP2 should not include a policy requirement for M4(3) homes. The Written Ministerial Statement dated 25<sup>th</sup> March 2015 stated that "*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG*". If the

Council wishes to adopt the higher optional standards for M4(3) homes the Council should only do so by applying the criteria set out in the NPPG. It is incumbent on the Council to provide a local assessment evidencing the specific case for Kettering which justifies the inclusion of optional higher standard. The Borough's ageing population is not unusual and is not a phenomenon specific to Kettering. With specific reference to M4(3) the NPPG confirms that the Council should only apply M4(3) standards to those dwellings where the Council is responsible for allocating or nominating a person to live in that dwelling (ID 56-008). The Council should also viability test such a requirement. In September 2014 during the Government's Housing Standards Review EC Harris estimated the cost impact of M4(3) per dwelling as £15,691 for apartments and £26,816 for houses. The additional work to be undertaken to justify any policy requirement would be disproportionate given that the SSLPP2 deals with a residual requirement of only 1,186 dwellings (circa 11.5% of the overall housing requirement for the Borough) and the Council can only apply such standards to those dwellings over which it controls nomination rights.

**Q2. Do you think that the SSP2 should include a policy which requires developments above a certain thresholds to make provision for older persons housing?**

A policy requiring developments above a certain thresholds to make provision for older persons housing is unnecessary given the existing provision of **Policy 30** in the adopted NNJCS and the proposal for **Policy HCU1** in the SSLPP2. The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as the elderly without seeking a specific housing mix on individual sites. Indeed the housing needs of older people is a diverse sector so the SSLPP2 should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.

Furthermore with regards to self / custom build **Policy 30** of the NNJCS provides support / encouragement for such schemes and requires a percentage on SUEs. The HBF is supportive of proposals to encourage self / custom build for its potential additional contribution to the overall housing supply. The HBF support the proposal for a policy to allow single plot exception sites in rural areas. It is noted that policies which encourage self / custom build have been endorsed in a number of recently published Inspector's Final Reports for East Devon Local Plan, Warwick Local Plan, Bath & North East Somerset Place-making Plan and Derbyshire Dales Local Plan.

However the HBF is not supportive of restrictive policy requirements for the inclusion of such housing on other residential development sites (threshold size yet to be determined) as under consideration by the Council. This approach only changes housing delivery from one form of house building company to another without any consequential additional contribution to

boosting housing supply. If these plots are not developed by self / custom builders then these undeveloped plots are effectively removed from the housing land supply unless the Council provides a mechanism by which these dwellings may be developed by the original non self / custom builder in a timely manner. Before introducing any such policy the Council should also give consideration to the practicalities of health & safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. The NPPG confirms that “*different types of residential development such as those wanting to build their own homes ... are funded and delivered in different ways. This should be reflected in viability assessments*” (ID 10-009). The Council should also consider the impact of loss of Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt.

Any policy requirement for self / custom build serviced plots on residential development sites should be fully justified and supported by evidence. If the Council wishes to promote self / custom build it should do so on the basis of evidence of need. The Council should assess such housing needs in its SHMA work as set out in the NPPG (ID 2a-021) collating from reliable local information (including the number of validated registrations on the Council’s Self / Custom Build Register) the demand from people wishing to build their own homes. The existing evidence from the Council’s Self Build Register (27 entries indicating preferences for individual serviced plots in the rural area) shows no justification for the policy approach for a percentage on other housing sites.

### **Other Policies**

The HBF is concerned that **Policy RS04** General Development Principles in Rural Area and individual village policies include design principles which go beyond national policy in setting out onerous requirements which were not viability tested during the preparation and examination of the NNJCS. If such design principles are pursued by the Council then further viability assessment should be undertaken.

**Q5. Do you think that the development principles above should remain in the SSLPP2 after the Broughton Neighbourhood Plan has been adopted?**

The Council should define the strategic policies of the SSLPP2 with which Neighbourhood Plans are expected to conform.

**Q6. Are there any infrastructure requirements which should be in the SSP2?**

Infrastructure requirements are set out in the NNJCS and therefore repetition is not needed. However if any site specific infrastructure is identified as necessary then such requirements could be separately set out within the site specific policies of each individual allocation.

## **Conclusion**

It is hoped that these representations are of assistance in informing the next stages of the Kettering SSLPP2. If any further information or assistance is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
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