

## Appendix 2e - Housing

Comment no.	KBC Response
<p><b>10. Question 1 – Category 3 Standard Homes</b>            If the national objective is to be able to care for people in their own homes during later life in order to take the pressure off hospitals then it will be necessary to have adequate housing to facilitate this. Lack of mobility will be a growing issue and so Cat 3 housing will be important and should not be overlooked.</p>	Noted
<p><b>11. Question 2 – Older Persons Housing</b>            A policy for housing for older people is important but locations should be carefully considered. Private transport will become more of an issue as people get older and, particularly in rural areas public transport is disappearing. Retirement villages would be self sustaining but mixed developments should be in locations within towns where public transport is more reliable.</p>	Noted
<p><b>52. Question 1 – Category 3 Standard Homes</b>            I support the need for more social housing for rent in Kettering District.</p>	Noted
<p><b>53. Question 2 – Older Persons Housing</b>            Yes</p>	Noted.
<p><b>60. Chapter 4 - Housing</b>            I am concerned that the document does not include the type of housing to be built. I would like to see what % of homes are suitable for people with a disability, are elderly or low income. How many of the homes will be for social housing and starter homes for young people who will be struggling to be able to buy a house. We need secure safe homes for our elderly population. We need bungalow type homes for people with a disability and elderly and small flat units. We also need the infrastructure to support these houses and green spaces easily accessible to all. Green spaces are vital for our health and well being and should be fully integrated into any new building project.</p>	<p>Within the Housing chapter, Question 1 and 2 ask the question as to whether policies should be included within the Plan for specialised housing both for the disabled and the elderly respectively. The responses to this consultation will inform a decision as to whether to include policies in relation to specialist housing, which would require the provision of this type of housing on sites of a certain size. More detail with regards to the type of housing for the elderly is likely to be included in a policy, if one is included in the next version of this Plan.</p> <p>The affordable housing requirement is set by Policy 30 of the JCS and all housing</p>

## Appendix 2e - Housing

	<p>developments, including allocations must accord with this. The housing allocations that have been proposed as part of this Plan have taken into account existing infrastructure of the settlements in which they are located. This growth therefore should not significantly impact on existing infrastructure. Further improvements to existing infrastructure or new infrastructure can be supported through S106 agreements. This is in accordance with Policy 10 of the North Northamptonshire Joint Core Strategy (JCS).</p> <p>Green spaces form an important part of any new housing development where it can be a key community facility. Policy 7 of the JCS therefore requires the provision of accessible greenspace in accordance with nationally recognised standards.</p>
<p><b>83. Chapter 4 - Housing</b></p> <p>One rarely sees housing for the elderly members of the community in a new development, who would like the choice to downsize, reduce their gardens to a manageable size, but continue to live amongst all the generations. At present their only option is to move to privately owned flats run by management companies. Could not the developments off Warkton Lane or Northampton Road include a small cul-de-sac of 6-12 bungalows. This is a thought for future development plans. Do the extra housing and employment opportunities mean that there will be an expansion in school etc. provision ?</p>	<p>Question 2 asks the question as to whether to include a policy requiring developments of a certain size to make provision for housing for the elderly. At this stage the question has been asked and therefore the likely mix and type of accommodation has not been determined but will likely be explored as part of further work prior to pre-submission consultation to support a policy in the pre-</p>

## Appendix 2e - Housing

	<p>submission plan, which is likely to include bungalows. Larger developments in the town will be required to contribute to the mitigation of additional housing and population growth, financially through Section 106, which can be used to improve existing facilities such as schools as well as assist in providing new facilities if possible.</p>
<p><b>111. Question 2 – Older Persons Housing</b>          We need far more housing for the elderly. Giving them smaller homes to move into would release the multiple bedroom houses for families.</p>	<p>Noted</p>
<p><b>114. Question 1 – Category 3 Standard Homes</b>          75% of Kettering's older people own their own home – this means 25% rent and therefore less likely to have equity to invest. A quarter of new homes for older people should therefore be affordable rents.</p> <p>By 2040 nearly 1 in 4 people will be over 65 therefore we would recommend as a policy position that 1 in 4 (25%) or all new homes are built to lifetime home standards. Purpose building downsizer homes (e.g. Extra Care apartments) for older people can then free up larger family homes in the borough for growing families, reducing the demand for new build family homes. Location is key for these lifetime homes and policies to facilitate appropriate locations of these schemes will mean they have the potential to deliver positive health and wellbeing outcomes. NASS/NCC are finalising details of a cross-county workshop at which we will share details of our evidence and the growing demand for suitable housing for older people and the forecast split across tenure types.</p> <p>Extra Care schemes do not need to be age exclusive. We have been involved in discussions with providers of care in these schemes and we would be happy to support development of schemes and place people in schemes for all age vulnerable adults, e.g. older people living</p>	<p>At present, the Joint Core Strategy sets the approach for both Category 2 and 3 housing (criterion c) and Question 1 asks for views for inclusion of the latter in the SSP2. Neither of these includes Lifetime homes standards. The lifetime homes standards are an alternative approach to the provision of accessible housing, the SSP2 and the JCS, will use Category 2 or 3 housing to deliver accessible housing. It is acknowledged that extra care schemes do not need to be age exclusive and therefore there is potential for SSP2 to further consider specialist housing for vulnerable adults of all ages. Your comments regarding Extra Care accommodation are useful in providing evidence in relation to the potential inclusion of a policy in relation to older</p>

## Appendix 2e - Housing

<p>alongside younger adults with moderate mental health, physical disabilities and learning disabilities. Younger adults with care and support needs are likely to be eligible for housing benefits, therefore affordable rents will continue to be key.</p> <p>There will be a small number of working age adults with needs which are too complex to make housing in a large extra care style scheme suitable. As such there is a need for smaller highly specialised housing for this small but complex customer base. NASS is happy to work with Kettering Council to ensure these housing needs are met and we will be producing a Housing Plan for Transforming Care later in the summer which will demonstrate the need.</p> <p>We would encourage Kettering Borough Council to work with Housing Associations to deliver affordable rents for Extra Care housing schemes. There is additionally a huge opportunity in the private market to develop Extra Care apartments for outright sale and shared ownership for the 75% of older people who do own their own homes. Understanding this at planning stage is key. If older people are able to buy attractive, purpose built, safe, retirement homes, investing their equity, downsizing so reducing the burden of a large house, they are far less likely to become isolated, be admitted to hospital, or need to move into very costly residential care and nursing care schemes. We would encourage a planning policy that acknowledges these benefits to older people and to the public purse, which also frees up family homes, which can allow for a swifter planning process for these schemes, and NASS would like to be engaged in these developments at pre-planning stage. NASS can share information to inform policy regarding tenure type for new builds for older people.</p> <p>NASS would strongly support any approach which can help tackle poor and hazardous conditions from private landlords, and would have a preference to work with housing associations for Adult social care customers. NASS would also encourage Kettering council to sign up to the principles in the recent Health &amp; Housing Memorandum of Understanding.</p>	<p>persons housing and will certainly be taken into account in composing the content.</p>
<p><b>115. Policy HOU1 Retirement Housing and Care Homes</b> Retirement schemes with local amenities and good transport links will be key, this should also include the relevant health infrastructure to meet the needs of a population with higher health needs than the general population. Housing for working age adults with care needs should also</p>	<p>At present, the Joint Core Strategy sets the approach for both Category 2 and 3 housing (criterion c) and Question 1 asks for views for inclusion of the latter in the</p>

## Appendix 2e - Housing

be well situated with health, transport and public amenities within easy reach.

Not all older people and younger adults with care needs will want to live in urban areas, therefore rural developments should also include housing policies for lifetime homes and planning processes should support these applications.

There will be a small number of working age adults with needs which are too complex to make housing in a large extra care style scheme suitable. As such there is a need for smaller highly specialised housing for this small but complex customer base. NASS is happy to work with Kettering Council to ensure these housing needs are met and we will be producing a Housing Plan for Transforming Care later in the summer which will demonstrate the need.

We would encourage Kettering Council to work with Housing Associations to deliver affordable rents for Extra Care housing schemes. There is additionally a huge opportunity in the private market to develop Extra Care apartments for outright sale and shared ownership for the 75% of older people who do own their own homes. Understanding this at planning stage is key. If older people are able to buy attractive, purpose built, safe, retirement homes, investing their equity, downsizing so reducing the burden of a large house, they are far less likely to become isolated, be admitted to hospital, or need to move into very costly residential care and nursing care schemes. We would encourage a planning policy that acknowledges these benefits to older people and to the public purse, which also frees up family homes, which can allow for a swifter planning process for these schemes, and NASS would like to be engaged in these developments at pre-planning stage.

NASS would strongly support any approach which can help tackle poor and hazardous conditions from private landlords, and would have a preference to work with housing associations for Adult social care customers. NASS would also encourage Kettering council to sign up to the principles in the recent Health & Housing Memorandum of Understanding.

A greater ambition for housing to help/ support adult social care housing needs is required– the plan would benefit from greater reference to extra care or supported living and a strong, clear

SSP2. Neither of these includes Lifetime homes standards. The lifetime homes standards are an alternative approach to the provision of accessible housing and at present, although this has not been considered as part of the SSP2 or the JCS and therefore will look to be delivered through Category 2 or 3 housing.

It is acknowledged that extra care schemes do not need to be age exclusive and therefore there is potential for SSP2 to further consider specialist housing for vulnerable adults of all ages.

Your comments regarding Extra Care accommodation are useful in providing evidence in relation to the potential inclusion of a policy in relation to older persons housing and will certainly be taken into account in composing the content.

## Appendix 2e - Housing

ambition in terms of development and pace for general lifetime homes.	
<b>130. Chapter 4 - Housing</b>	Duplicates in Kettering section – comments are responded to under the Kettering chapter.
<b>150. Question 1 – Category 3 Standard Homes</b> Yes	Noted
<b>151. Question 2 – Older Persons Housing</b> Yes you should have a policy which requires developments above a certain threshold to make provision for older persons housing otherwise it is never going to be delivered. Developers do not want to build this type of accommodation as it adds to the footfall and eats into the amount of housing their can build and sell. We are already behind in terms of housing delivery for older people. By 2040 nearly 1 in 4 people will be over 65 – Kettering could ask that for every 4 homes built, 1 is built to lifetime homes standard or this national accessibility standard to ensure people can stay in their homes until they cannot manage.	Noted
<b>152. Policy HOU1 Retirement Housing and Care Homes</b> Yes it should otherwise it will never be delivered, we are already behind in terms of delivering OP accommodation across the county, we need to start building now in order to meet demand. Developers are going to try and get out of building this type of accommodation as it is messy as they have to do additional work to find someone to take it on and manage it. It should be treated in exactly the same way schools are treated in the S106. If the estate is over a certain amount of units then they should provide extra care. You also don't have any reference to schemes for younger people with a learning disability or autism. This is a growing area especially in the urban areas. We need at least 40 units building across the county each year. If you asked for 5-10 self-contained flats off a developer which is building over 50 dwellings then they will be filled, we can work with our providers to find someone to take them on.	Noted. The approach and mechanisms by which the Plan can assist in the provision for housing for the elderly needs to be determined. The content of any policies relating to this will be sufficiently justified by robust evidence.  The proposal to include schemes for younger people with learning disabilities in Policy HOU1 can certainly be looked at and will be taken into account in this policy in the next version of the Plan. Although this is subject to further work being undertaken to determine any need for this type of scheme within Kettering Borough.

## Appendix 2e - Housing

### 190. Question 1 – Category 3 Standard Homes

Government guidance states that local planning authorities will need to assemble evidence to demonstrate that higher accessibility standards are justified where these are imposed. This exercise has already been carried out in the process of formulating the JCS as far as Building Regulation M4(2) is concerned, but the draft SSP2 seeks stakeholder views as to whether a proportion of new development should be required to comply with Building Regulation M4(3). M4(3) relates to wheelchair user dwellings and Government guidance makes clear that policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or identifying a person to live in that dwelling. Effectively, this means that only a certain proportion of affordable homes may be required to be built to the standards set out in M4(3).

In considering whether to introduce enhanced accessibility standards, Government guidance is clear that local planning authorities need to take account of evidence on the likely future need for housing for older and disabled people; the size, location, type, and quality of dwellings to meet specifically evidenced needs; the accessibility and adaptability of existing housing stock; how needs vary across different housing tenures; and the overall impact on viability. The JCS reflects these requirements, stating that Part 2 Local Plans and Neighbourhood Plans **may** identify the proportion of new development required to comply with M4(3) subject to taking account of these factors.

The supporting text of the draft SSP2 notes that there is currently no evidence to support the introduction of a policy that would require the delivery of a certain proportion of homes to Category 3 standards. As this is the case, it is unclear why the introduction of such a policy requirement is even being consulted on as an option at this stage. The adoption of such enhanced requirements should be evidence-driven, that is to say it should be on a “need to have” and not on a “nice to have” basis. Enhanced standards should not be used as a starting point. Application of enhanced standards have significant implications in terms of housing range, build cost, affordability, cumulative policy burdens, viability, and ultimately housing delivery. This is reflected in the Ministerial Statement dated 25<sup>th</sup> March 2015 which **states** “**The optional new technical standards should only be required through any new Local Plan**

If it is considered that a policy in relation to Category 3 standards should be included within the SSP2, evidence will be obtained to justify the inclusion of such policy. Viability of implementing these standards in practice will be taken into account and the policy requirement of a certain percentage on sites of a certain size will be driven by need. This will justify such provision, where viability will be taken into account but it is not intended to preclude development on sites where this type of housing will be located. The SSP2, through the inclusion of a policy which requires a proportion of new developments that must comply with Category 3 of the national accessibility standards, has the potential to provide specialised housing such as Category 3 homes not only on site allocations but for windfall developments. This is therefore likely to assist in making a contribution to the supply for this type of housing if there is an evidenced need.

## Appendix 2e - Housing

**policies if they address a clearly evidenced need, and where there impact on viability has been considered, in accordance with the NPPF and the PPG.”** Local planning authorities should assess the likely cumulative impacts of existing and proposed local standards on development in the area. In order to be justified, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk and should facilitate development throughout the economic cycle.

Category 3 dwellings incur significantly higher build costs and a policy requirement for such dwellings will likely see a reduction in the level of affordable homes that can be viably incorporated in future schemes. In 2014 during the Government’s Housing Standards Review EC Harris estimated the cost impact of Category 3 dwellings as £15,691 for apartments and £26,816 for houses. The additional work that would need to be undertaken to formulate a policy requirement in this regard would be disproportionate for a site allocations plan particularly given the size of the residual requirement.

A policy requirement for Category 3 dwellings will likely exacerbate existing viability challenges. The Housing Background Paper associated with the JCS dated January 2015 observed at paragraph 7.6 that “The viability assessment of the JCS highlights that viability is challenging across much of the area, particularly on larger developments with significant infrastructure costs. However, it indicates that, **with flexible adaptation of policy targets and S106 requirements**, it is possible to secure affordable housing as part of market housing developments.” [Emphasis Added] This conclusion clearly indicates that maintaining flexibility in terms of policy provisions and S106 costs is of vital importance to delivering affordable housing in North Northamptonshire. The introduction of a rigid policy requirement for a certain number of affordable homes to be delivered as Category 3 dwellings would be antithetical to that approach and will reduce the Borough Council’s ability to meet its needs for affordable homes.

As an alternative, rather than introducing a rigid policy requirement for the introduction of a certain number of Category 3 dwellings, the Council should favour a more flexible approach and simply encourage the provision of such dwellings where it is viable to do but on a case by



## Appendix 2e - Housing

<p>case basis. It stands to reason that requirements for specialist accommodation will not remain static over the plan period and accordingly the relative need for such accommodation could change over time. A rigid policy requirement for a certain percentage of Category 3 dwellings would not be compatible with this evolving nature of housing need and a more flexible approach would allow for decisions on planning applications to take account of the most recent evidence.</p> <p>For the above reasons, the SSP2 should <b>not</b> include a policy identifying the proportion of new developments that need to comply with Category 3 of the national accessibility standards. Persimmon Homes Midlands would <b>object</b> strongly to the introduction of any such policy in the plan.</p>	
<p><b>191. Question 2 – Older Persons Housing</b></p> <p>In common with Question 1 above, Question 2 highlights the need for further work to be undertaken in order to assess at what threshold developments should be required to make provision for older persons housing. The introduction of such a requirement on a Borough-wide basis would undermine flexibility and threaten the viability of schemes. It would not be justified and hence a policy requirement in this regard would fail the test of soundness. Retaining flexibility has been identified in the viability evidence accompanying the JCS as a key to ensuring the delivery of new homes, including affordable homes. A rigid policy requirement for the inclusion of a certain percentage of older persons housing would not comply with this approach and reduce the ability of schemes to contribute towards affordable homes and infrastructure.</p> <p>The provision of older person housing should be market-led. Whilst the Council could take measures to stimulate the delivery of such housing through the SSP2, the policy should be positively-prepared and it is considered that a rigid policy requirement for older person's accommodation would inhibit the plan's ability to meet the Borough's need for affordable homes by adding disproportionate burdens on development schemes.</p> <p>The supporting text refers to a study commissioned by Northamptonshire County Council entitled the "Study of Housing and Support Needs of Older People Across Northamptonshire"</p>	<p>If a policy is included requiring a proportion of development above a certain threshold to make provision for older persons housing this will be supported by robust evidence and subject to viability testing. This will be prepared prior to the Pre-submission consultation.</p>

## Appendix 2e - Housing

<p>(dated March 2017). Paragraph 4.19 of the supporting text states that the report makes a number of recommendations in respect of how local plans can facilitate the delivery of older person housing comprising: support for windfall sites which come forward, allocation of employment and retail sites for retirement housing or care homes, and preparing Brownfield Registers so that they incorporate criteria that assess the suitability of identified sites to make provision for retirement housing. Persimmon considers that any of these measures would be a proportionate way of addressing the need for older person housing in a way that would not compromise viability or the delivery of affordable homes in general housing schemes. But these recommendations have not been carried through to the premise of Question 2 which is that developments above a certain threshold could need to make provision for older persons housing.</p> <p>If the evidence suggests the pressing need for such housing in the Borough, then in order for the plan to be positively prepared and justified it should identify and allocate suitable sites for older person accommodation. It should not introduce a blanket policy requiring such development to be incorporated into schemes where such housing may not be viable or appropriate. As such, the SSP2 should not include a policy which requires developments above a certain threshold to make provision for older person housing. Persimmon Homes Midlands would <b>object</b> to the introduction of any such policy in the plan.</p>	
<p><b>193. Policy HOU1 Retirement Housing and Care Homes</b>  As with older person housing and the accessibility standards, paragraph 4.28 states that the Council will need to do further work to determine an appropriate threshold for and the percentage of self-build plots to be bought forward through development schemes. Again, it is unclear why this option is being consulted upon if there is no comprehensive assessment of what the need for self-build housing plots in the Borough. The Council states that it is its intention to <b>encourage</b> the delivery of serviced plots for self and custom build housing. However, the setting out of rigid policy requirements in respect of thresholds and required percentages for self-building housing plots is an extremely prescriptive approach and again does not incorporate sufficient flexibility.</p>	<p>Noted. Further work will be undertaken prior to concluding whether a policy should be included on self-build and custom build housing.</p>
<p><b>237. Question 1 – Category 3 Standard Homes</b>  Yes, there should be a requirement for an appropriate quantum of Category 3 Accessible</p>	<p>Noted</p>

## Appendix 2e - Housing

Houses to be built as part of every new housing allocation.	
<p><b>239. Question 2 – Older Persons Housing</b>          Yes, all new housing allocations over an appropriate threshold should include housing suitable for the needs of older people. Such housing should preferably be Category 3 Accessible housing, following "Homes for Life" principles.</p>	Noted
<p><b>251. Question 1 – Category 3 Standard Homes</b>          Yes, the demographic work done for the JCS clearly demonstrates a need for disabled access housing.</p>	Noted
<p><b>252. Question 2 – Older Persons Housing</b>          Yes, again the demographics show an aging population. Along with the problems that NCC are having it would be appropriate to assist elderly people stay in their own homes and community where they feel safe and secure rather than having to move them into expensive residential care. By staying in their own homes their physical and mental well being is maintained and avoids unnecessary hospital and residential care.</p>	Noted
<p><b>275. Question 1 – Category 3 Standard Homes</b>          Yes, I do think that the SSP2 must include a policy identifying the proportion of new development that needs to comply with Category 3 of the national accessibility standards.</p>	Noted
<p><b>278. Question 2 – Older Persons Housing</b>          The SSP2 should indeed include a policy that requires developments above a certain threshold to make provision for older persons housing. The Kettering demographic makes this an imperative. It will also give older people, who are willing and able to downsize, a choice to move into a smaller property, releasing larger homes for families.</p>	Noted
<p><b>285. Table 4.1 Housing Requirements (Base date 1<sup>st</sup> April 2017)</b>          Table 4.1: Housing Requirements shows the housing requirement for each of the four towns in Kettering Borough and the rural area and shows how much of the requirement has been completed, committed and allocated. Table 4.1 highlights a particular concern for Burton Latimer.</p> <p>It is clear that a very limited amount of residential development is anticipated in Burton Latimer during the remainder of the plan period for Draft SSKLP to 2031. A significant proportion of the housing requirement for Burton Latimer has already been delivered through completed</p>	The JCS sets out the spatial strategy for development in Kettering Borough. It is recognised that Burton Latimer has delivered the majority of its housing requirement within the early part of the plan period; however the JCS clearly sets out Burton Latimer's role as a market town. Market Towns provide a strong service role for their local community and

## Appendix 2e - Housing

developments, and the three larger outstanding commitments in Burton Latimer (two sites on land to the north of Higham Road and the site at Bosworth Nurseries on Finedon Road) have been granted planning permission and are or will shortly be under construction. Therefore, it is very likely that most if not all of the housing requirement for Burton Latimer will have been delivered within the first half of the plan period i.e. by 2021. This outcome is not surprising because historically housing delivery in Burton Latimer has been strong; Burton Latimer was the only settlement that delivered its housing target from the Core Spatial Strategy 2008, and sites with planning permission proceed quickly to delivery. Therefore, no large scale residential development is anticipated in Burton Latimer after 2021 and for the remainder of the plan period, which means that any housing and affordable housing needs arising between 2021 and 2031 will not be met, and there will be no support for the delivery of additional infrastructure from new development. It is requested that an additional residential allocation is made in Burton Latimer at land south of Higham Road, to meet housing and affordable housing needs in the future, which would also support the expansion of Burton Latimer Medical Centre and provide significant levels of green infrastructure on the south eastern edge of the town.

The housing requirement contained in Table 4.1 and the distribution of that requirement to the different settlements in Kettering Borough are derived from Policy 28 and Policy 29 of the adopted JCS. The supporting text to Policies 28 and 29 do identify additional actions to support housing delivery that are not reflected in Table 4.1 or the supporting text. Paragraph 9.10 of the adopted JCS does allow higher levels of housing to be provided, and states in part that: “...*These plans [the Part 2 Local Plans] may assess higher levels of housing provision at individual settlements where this meets identified local needs and aspirations or, in the case of Growth Towns and Market Towns, would meet a shortfall in deliverable sites at another settlement within the same Part 2 Local Plan area...*”. Paragraph 9.17 identifies actions to be taken if housing delivery at the SUEs is delayed, which is particularly relevant since the three SUEs in Kettering (at Kettering East, Desborough North and Rothwell North) are delayed and not delivering as quickly as predicted.

The Kettering East SUE is under construction, but the start of development on the land parcels has been slower than predicted. A predicted annual housing delivery rate of 280 dwellings per

surrounding rural area with growth in homes and jobs to support regeneration and local services at a scale appropriate to the character and infrastructure of the town. Table 1 of the JCS provides further detail on the spatial role of Burton Latimer which should provide a more localised convenience and service role, with growth pressures directed to the adjoining Growth Town. The SSP2 has already identified 10% more dwellings than the requirement set out in the JCS. There is no identified shortfall in available sites at the other market towns or growth town and therefore this is not a justification for further development at Burton Latimer. The pre-submission plan will be accompanied by a background paper setting out additional information on the Council’s housing trajectory and five year land supply position. The SSP2 will identify adequate land for development in the plan period in accordance with the spatial strategy set out in the JCS and any further development at Burton Latimer should be considered through a review of the JCS.

## Appendix 2e - Housing

annum at Kettering East SUE is unrealistic and is inconsistent with national evidence and similar examples elsewhere including urban extensions to Milton Keynes, Northampton and Corby. It is considered that an annual housing delivery rate of 200 dwellings per annum should be applied to the housing trajectory for Kettering East SUE.

The delivery of the Desborough North SUE has been significantly delayed, and the predicted start date for the development is regularly moved to later years in housing monitoring data. Outline planning permission was granted on 25th April 2014 but development has still not commenced. A number of actions still need to be completed before the construction of residential development at Desborough North SUE, including the following: appoint housebuilders for the development parcels, submit outstanding reserved matters, discharge relevant conditions, and deliver primary infrastructure.

The delivery of the Rothwell North SUE has also been significantly delayed. An outline planning application was submitted in 2007 and the Council resolved to grant planning permission in early 2017, but the S106 Agreement has not yet been signed and as such the decision notice has not yet been issued. The housing trajectory for Rothwell North SUE is clearly unrealistic because there are a number of outstanding actions that need to be completed first, including the following: complete S106 Agreement, confirm previous resolution to grant planning permission, issue decision notice, submit outstanding reserved matters, discharge relevant conditions, and deliver primary infrastructure.

Paragraph 9.17 states in part that “...*If the SUEs and other sites are not developed quickly enough to maintain a deliverable 5 year supply of housing land against the requirements set out in Policy 28, the local planning authorities will identify additional sources of housing, with the priority being the Growth Towns and Market Towns. Additional sites should be capable of quick delivery, make appropriate contributions to infrastructure*”.

It is considered that Paragraphs 9.10 and 9.17 does allow an increase to the housing requirements identified in Table 4.1 to be made through SSKLP, in order to meet identified needs in a particular settlement and to address the potential and likely housing shortfall

## Appendix 2e - Housing

associated with an overreliance on the SUEs. Burton Latimer, which has historically delivered a consistent supply of housing with no concerns about deliverability or viability, and is a suitable settlement to accommodate a higher housing requirement. Additional allocations in Burton Latimer would help to maintain a five year housing land supply for the remainder of the plan period, and would compensate for the likely continued delays to delivery at Desborough North and Rothwell North and the other strategic allocations in these towns.

Recent engagement with some of the members of the Burton Latimer Town Council has indicated potential support for additional growth within the Town, specifically growth that is able to deliver much needed infrastructure enhancements. Such infrastructure enhancements include improvements to the local road network, expansion opportunities for the medical centre and enhancements to the provision of open space and green connections through the town. Land south of Higham Road is able to help positively address these infrastructure enhancements and therefore help meet local needs and aspirations.

It is noted that NPPF2 2018 introduced a standard methodology for calculating local housing needs. The 'Housing and Economic Development Needs Assessment' section of the Planning Practice Guidance will be updated once new household projections data is published in September 2018. The draft revisions to the Planning Practice Guidance in respect of local housing needs assessment subject to consultation in March 2018 indicated that housing targets contained in strategic plans, such as the adopted JCS, should be used when preparing local plans and supports no change to the housing requirements contained in Table 4.1 of Draft SSKLP. However, the draft revisions to the Planning Practice Guidance also indicated that if there are significant difference between adopted housing requirements and those derived from the standard methodology then an early review of strategic plans should be undertaken. It is acknowledged that Draft SSKLP could not have taken into account NPPF2 2018, but the next version of SSKLP will need to reflect new national policy and guidance, including the implementation of the standard methodology, particularly as SSKLP is not due to be submitted until after the transition date of 24th January 2019 set out in Paragraph 214 of NPPF2 2018.

### **286. Table 4.2**

Table 4.2 Housing Allocations identifies the total quantum of development to be allocated in

The JCS sets out the spatial strategy for development in Kettering Borough. It is

## Appendix 2e - Housing

each of the settlements and in the rural area. Table 4.2 highlights the concerns raised in representations to Table 4.1 i.e. that a very limited amount of residential development is anticipated in Burton Latimer during the remainder of the plan period for Draft SSKLP to 2031. This outcome is inconsistent with a development strategy that seeks to direct development to the growth towns and market towns.

As set out in our representations to Table 4.1, Paragraphs 9.10 and 9.17 of the adopted JCS does allow additional allocations to be made through Draft SSKLP to meet local needs and aspirations and address housing delivery. Burton Latimer has historically delivered a consistent supply of housing, where there are no concerns about deliverability or viability. It is a sustainable location for additional development with no significant constraints. Furthermore, additional allocations in Burton Latimer would help to maintain a five year housing land supply for the remainder of the plan period. It is requested that an additional residential allocation is made in Burton Latimer at land south of Higham Road, to meet housing and affordable housing needs in the future, which would also support the expansion of Burton Latimer Medical Centre, help delivery identified highway enhancements and provide significant levels of green infrastructure on the south eastern edge of the town.

recognised that Burton Latimer has delivered the majority of its housing requirement within the early part of the plan period; however the JCS clearly sets out Burton Latimer's role as a market town. Market Towns provide a strong service role for their local community and surrounding rural area with growth in homes and jobs to support regeneration and local services at a scale appropriate to the character and infrastructure of the town. Table 1 of the JCS provides further detail on the spatial role of Burton Latimer which should provide a more localised convenience and service role, with growth pressures directed to the adjoining Growth Town. The SSP2 has already identified 10% more dwellings than the requirement set out in the JCS. There is no identified shortfall in available sites at the other market towns or growth town and therefore this is not a justification for further development at Burton Latimer. The pre-submission plan will be accompanied by a background paper setting out additional information on the Council's housing trajectory and five year land supply position. The SSP2 will identify adequate land for development in the plan period in accordance with the spatial strategy set

## Appendix 2e - Housing

	<p>out in the JCS and any further development at Burton Latimer should be considered through a review of the JCS.</p>
<p><b>287. Table 4.3 Required tenure as percentage of new housing 2011-31</b>  Policy 30 of the adopted JCS seeks to ensure that new residential development provides a mix of housing sizes and tenures. Table 4.3: Housing Tenures sets out the housing tenure requirements for Draft SSKLP. It is considered that affordable housing needs and the identified tenure mix will not be achieved because the SUEs (Kettering East, Desborough North and Rothwell North) are only required to provide 20% affordable housing, it is not clear how much affordable housing will be delivered at the other strategic allocations in Desborough and Rothwell, and all allocations of 10 dwellings or less are not required to provide affordable housing. The lower levels of affordable housing delivered from the SUEs and some of the strategic allocations, and the fact that no affordable housing will be provided from smaller sites, will not be compensated for by the delivery of additional affordable housing in other allocations. In these circumstances, it is requested that additional strategic allocations are made in order to meet affordable housing needs and deliver the expected mix of housing tenures. Burton Latimer does provide policy compliant levels of affordable housing, as demonstrated by recent developments to the north of Higham Road. As such, it is requested that land south of Higham Road in Burton Latimer is allocated for approximately 160 dwelling and retirement living accommodation (including 30% affordable housing) in Draft SSKLP to increase the supply of affordable housing.</p>	<p>The affordable housing requirements have been tested through the examination of the JCS. The housing requirements in the JCS have been identified to meet housing need. There is no evidence to suggest there is a need to allocate additional land at Burton Latimer to meet affordable housing requirements.</p>
<p><b>289. Policy HOU1 Retirement Housing and Care Homes</b>  Paragraphs 4.16 to 4.18 of Draft SSKLP identify a need for housing for older people. Policy HOU1: Retirement Housing and Care Homes provides support for such housing in locations which have good access to public transport links and to local facilities. The North Northamptonshire SHMA Update 2015 and the Study of Housing and Support Needs of Older People Across Northamptonshire (March 2017) identified a significant need for housing for older people of a variety of types of accommodation e.g. retirement apartments, care homes, specialist care accommodation and dementia care housing. For example, Paragraph 4.17 states that <i>“The study estimated that the need for retirement provision in Kettering Borough could be as high as 92 dwellings per year”</i> and Paragraph 4.18 states that <i>“The study</i></p>	<p>Noted.</p>



## Appendix 2e - Housing

<p><i>recommends that each district should seek to encourage provision of 1 dementia care housing scheme within the next 3-5 years. In Kettering Borough it estimates the need for 228 care home places in the plan period”.</i></p> <p>It is anticipated in Policy 30 of the adopted Joint Core Strategy 2016 that the SUE’s and other strategic developments would provide housing for older people including care accommodation. It is noted that the proposed developments at Desborough North and Rothwell North do not specifically include housing for older people or care accommodation, and therefore it is uncertain whether this type of accommodation will be delivered at these strategic developments. The proposed development at land south of Higham Road in Burton Latimer could include a parcel of land for retirement living, which could include accommodation for a nursing home, supported living and/or retirement apartments.</p>	
<p><b>446. Table 4.1 Housing Requirements (Base date 1<sup>st</sup> April 2017)</b></p> <p>Table 4.1 shows the housing requirement for each of the four towns in Kettering Borough and the rural areas. It includes details of historic dwelling completion rates, residential commitments and proposed allocations. In the rural areas, a need of 280 dwellings remains once commitments and allocations have been accounted for. It is expected 140 of these will be delivered through windfall sites (10 dwellings per annum).</p> <p>The strategy, which ultimately underpins the housing allocations, is inappropriate given that paragraph 70 of the National Planning Policy Framework states <i>“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”.</i></p> <p>Whilst it is acknowledged that there has been historic delivery from windfall sites, we are not aware of there being any robust evidence which confirms a) how this figure has been derived; and b) why the Council believe that this rate of delivery will continue.</p> <p>Windfall sites are a finite resource, and possibilities for infilling have and will continue to</p>	<p>The windfall allowance used was used in the preparation of the JCS in the identification of the rural housing requirement. A paper will be prepared to accompany the consultation on the pre-submission plan which will provide the evidence used in identifying the level of windfall development in the rural area. Settlement boundaries are used to make a distinction between the open countryside and the urban form of settlements and provide certainty over where development is likely to be acceptable. The principles that have been used to define the settlement boundaries have been formulated through previous work and have been updated a number of times to ensure they provide an up-to-date and robust evidence base to</p>

## Appendix 2e - Housing

<p>diminish, resulting in a significantly slower delivery. To assume that windfall sites in the rural areas will continue to be developed at the same historic rate would be inappropriate given that the 'easy win' sites have already been developed. It is likely that future windfall sites will be more constrained and come forward at a significantly slower rate. This will be compounded by the tightly defined settlement boundaries. It is also relevant to note that the historic rates appear to have been skewed by development of large windfall sites such as the Redrow Homes site in Broughton (delivered under a five-year land supply case). Adjustments are required to be made to historic delivery rates to reflect that these large one off sites are unlikely to come available again in the future. No evidence has been provided to confirm that this has been done.</p> <p>In conclusion, reliance in the SSP2 on windfall sites to meet half of the rural area requirement is not consistent with the approach set out in the National Planning Policy Framework. For the reasons given above, the Council must review its policy and take an active role in allocating more sites in the rural areas. Land South of Home Farm would make a significant contribution to addressing this deficiency.</p>	<p>accurately define the settlement boundary for settlements in Kettering Borough. The Council believes that these principles allow for the defining of settlement boundaries which clearly define the built framework and open countryside. This allows for the simultaneous protection of the open countryside whilst allowing for growth in areas of these settlements in suitable locations within the existing built environment.</p> <p>The promoted site 'Land south of Home Farm, Pytchley' has not been considered for allocation at any stage during work on the SSP2. Sites in Pytchley are considered under the Pytchley chapter</p>
<p><b>452. Table 4.1 Housing Requirements (Base date 1<sup>st</sup> April 2017)</b></p> <p>Table 4.1 shows the housing requirement for each of the four towns in Kettering Borough and the rural areas. It includes details of the historical dwelling completion rates, residential commitments and proposed allocations. In the rural areas, a need of 280 dwellings remains once commitments and allocations have been accounted for. It is expected 140 of these will be delivered through windfall sites (10 dwellings per annum).</p> <p>This strategy, which also underpins housing allocations, is clearly inappropriate given that paragraph 70 of the National Planning Policy Framework states "Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends".</p> <p>Whilst it is acknowledged that there has been historic delivery through windfall sites, we are not</p>	<p>The windfall allowance used was used in the preparation of the JCS in the identification of the rural housing requirement. A paper will be prepared to accompany the consultation on the pre-submission plan which will provide the evidence used in identifying the level of windfall development in the rural area. Settlement boundaries are used to make a distinction between the open countryside and the urban form of settlements and provide certainty over where development is likely to be acceptable. The principles that have been used to define the settlement boundaries</p>

## Appendix 2e - Housing

<p>aware of there being any robust evidence having been produced which confirms a) how this figure has been derived; and b) why the Council believes that this rate of delivery will continue.</p> <p>Indeed, table 12.1 of the document refers to historical completion rates (146 completed dwellings and 54 existing commitments) in the rural areas. These figures appear to include larger scale windfall sites such as the Redrow Homes site (60 dwellings) which was brought forward under a five-year land supply case. As you are aware, adjustments should be made to any trend calculations to offset these large 'one-off' developments to avoid distorting the results. No evidence has been provided to confirm that this has been done. Therefore, we can only assume that the historical completion rates, which appear to underpin the windfall quota are unreliable and misleading.</p> <p>It is also important to note that windfall sites are a finite resource, and possibilities for infilling have and will continue to diminish, resulting in a significantly slower delivery. To assume that windfall sites in the rural areas will continue to be developed at the same historic rate would be inappropriate given that the 'easy win' sites have already been developed. It is likely that future windfall sites will be more constrained and come forward at a significantly slower rate. This will be compounded by the tightly defined settlement boundaries.</p> <p>In conclusion, reliance in the SSP2 on windfall sites to meet half of the rural need is not consistent with the approach set out in the National Planning Policy Framework. For the reasons given above, the Council must review its policy and take an active role in allocating more sites in the rural areas. The allocation of Land to the Rear of 18-20 Glebe Road, Broughton would contribute to addressing this deficiency.</p>	<p>have been formulated through previous work and been updated a number of times to ensure they provide an up-to-date and robust evidence base to accurately define the settlement boundary for settlements in Kettering Borough. The Council believes that these principles allow for the defining of settlement boundaries which clearly define the built framework and open countryside. This allows for the simultaneous protection of the open countryside whilst allowing for growth in areas of these settlements in suitable locations within the existing built environment.</p> <p>Broughton has a 'made' Neighbourhood Plan which provides policies and proposals for the Broughton Parish. Kettering Borough Council is not proposing any further allocations in Broughton beyond that identified in the Neighbourhood Plan.</p>
<p><b>458. Table 4.1 Housing Requirements (Base date 1<sup>st</sup> April 2017)</b></p> <p>Table 4.1 shows the housing requirement for each of the four towns in Kettering Borough and the rural areas. It includes details of historical dwelling completion rates, residential commitments and proposed allocations. In the rural areas, a need of 280 dwellings remains once commitments and allocations have been accounted for. It is expected 140 of these will be delivered through windfall sites (10 dwellings per annum).</p>	<p>The windfall allowance used was used in the preparation of the JCS in the identification of the rural housing requirement. A paper will be prepared to accompany the consultation on the Pre-submission plan which will provide the evidence used in identifying the level of</p>

## Appendix 2e - Housing

The strategy, which ultimately underpins the housing allocations, is inappropriate given that paragraph 70 of the National Planning Policy Framework states “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”.

Whilst it is acknowledged that there has been historic delivery from windfall sites, we are not aware of there being any robust evidence having been produced which confirms a) how this figure has been derived; and b) why the Council believe that this rate of delivery will continue.

Although it is unclear whether the Redrow Homes site in Broughton has been used in the calculation of historic windfall delivery, Table 12.1 appears to suggest that it has. As you are aware, adjustments should have been made to any trend calculations to offset these large ‘one-off’ past windfall developments to avoid distorting the results. No evidence has been provided to confirm that this has been done. Therefore, we can only assume that the historical completion rates, which appear to underpin the windfall quota are unreliable and misleading. It is also important to note that windfall sites are a finite resource and possibilities for infilling have and will continue to diminish, resulting in a significantly slower delivery. To assume that windfall sites in the rural areas will continue to be developed at the same historic rate would be inappropriate given that the ‘easy win’ sites have already been developed. In reality, it is likely that future windfall sites will be more constrained and come forward at a significantly slower rate. This will be compounded by the tightly defined settlement boundaries.

In conclusion, reliance in the SSP2 on windfall sites to meet half of the rural need is not consistent with the approach set out in the National Planning Policy Framework. For the reasons given above, the Council must review its policy and take an active role in allocating more sites in the rural areas. This would include the allocation of the Site in Mawsley which is clearly a sustainable location for growth.

windfall development in the rural area. Settlement boundaries are used to make a distinction between the open countryside and the urban form of settlements and provide certainty over where development is likely to be acceptable. The principles that have been used to define the settlement boundaries have been formulated through previous work from 2005 and been updated a number of times to ensure they provide an up-to-date and robust evidence base to accurately define the settlement boundary for settlements in Kettering Borough. The Council believes that these principles allow for the defining of settlement boundaries which clearly define the built framework and open countryside. This allows for the simultaneous protection of the open countryside whilst allowing for growth in areas of these settlements in suitable locations within the existing built environment. As mentioned above a paper will be prepared to justify the windfall allowance as well as how the previous levels of delivery of windfall sites in the rural area will be maintained through the plan period. The promoted site ‘Land west of Mawsley’ has been considered previously

## Appendix 2e - Housing

	and discounted. Sites in Mawsley are considered under the Mawsley chapter.
<p><b>469. Chapter 4 - Housing</b></p> <p>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.</p> <p>The North Northamptonshire Joint Core Strategy (NNJCS) adopted in July 2016 by Corby, East Northamptonshire, Kettering and Wellingborough Councils sets out :-</p> <ul style="list-style-type: none"><li>• the overall spatial strategy ;</li><li>• the level of growth and its distribution ;</li><li>• strategic site allocations (&gt;500 dwellings) and ;</li><li>• strategic policies including place shaping requirements and development management policies.</li></ul> <p>It is proposed that the Kettering SSLPP2 will allocate non-strategic sites (&lt;500 dwellings) and set out more detailed local policies.</p> <p>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.</p>	Noted. A background paper will accompany the pre-Submission plan which will set out the justification for the 10% buffer.

## Appendix 2e - Housing

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

## Appendix 2e - Housing

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.

**475. Chapter 4 - Housing**

Noted

## Appendix 2e - Housing

<p>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 <b>Policy 30</b> of the NNJCS.</p>	
<p><b>476. Question 1 – Category 3 Standard Homes</b> The SSLPP2 should not include a policy requirement for M4 (3) homes. The Written Ministerial Statement dated 25th March 2015 stated that “<i>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</i>”. 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.</p>	<p>Noted. If a policy is included in the plan this will be evidenced and viability tested.</p>
<p><b>477. Question 2 – Older Persons Housing</b> A policy requiring developments above a certain thresholds to make provision for older persons housing is unnecessary given the existing provision of <b>Policy 30</b> in the adopted NNJCS and the proposal for <b>Policy HCU1</b> 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</p>	<p>Noted</p>



## Appendix 2e - Housing

<p>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.</p>	
<p><b>478. Chapter 4 - Housing</b>  Taylor Wimpey UK Ltd has previously promoted four sites for allocation within the Site Specific Part 2 Local Plan and have been given the following references:</p> <ul style="list-style-type: none"> <li>• RO/205 – Land to the west of Shotwell Mill Lane, Rothwell</li> <li>• RO/206 – Land to the north of Rushton Road, Rothwell</li> <li>• RA/094 – Land south east of Northampton Road, Broughton</li> <li>• RA/096 – Land West of Cransley Hill and Darlow Close, Broughton</li> </ul> <p>These sites have all been assessed by Kettering Borough Council as detailed within the ‘Housing Allocations Background Paper’ May 2018. Page 11 of that report summarises that all sites have been discounted as draft housing allocations for various reasons. Objection is raised against the Council’s identified sites for allocation at Rothwell and Broughton. We maintain that that the above sites represent reasonable alternative sites for allocation within the Site Specific Part 2 Local Plan.</p>	<p>The Housing Allocations Background Paper sets out the process behind the allocation of housing sites. All sites were assessed via the same assessment criteria. The site allocated in Rothwell was suitable given its scale and scoring in its assessment and therefore it was considered that no further sites needed to be allocated given that the allocation sufficiently met the housing requirement. With regards to Broughton, Kettering Borough Council is not proposing any further allocations in Broughton beyond that identified in the Neighbourhood Plan.</p>
<p><b>479. Chapter 4 - Housing</b>  Furthermore with regards to self / custom build <b>Policy 30</b> 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 &amp; North East Somerset Place-making Plan and Derbyshire Dales Local Plan.</p> <p>However the HBF is not supportive of restrictive policy requirements for the inclusion of such</p>	<p>Noted. The inclusion of a policy that enables self and custom build housebuilding depends on the responses to this consultation as well as the availability of sufficiently robust evidence with regards to the likely demand for this type of housing during the plan period. Consideration will also be given to the practicalities of placing a policy requirement for self and custom build housing on sites of a certain size. At</p>

## Appendix 2e - Housing

<p>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 &amp; safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. The NPPG confirms that <i>“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”</i> (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.</p> <p>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.</p>	<p>present, the self and custom build register is the only measure of demand in the area, however it is likely that further work/evidence is required to determine the real extent/scale of future demand. A policy if included will be based on the most up-to-date and robust evidence available.</p>
<p><b>485. Chapter 4 - Housing</b>  Paragraph 4.2, page 27 states that the Council is proposing to plan for the housing requirement established within the JCS (Policy 29, Table 5) with an additional 10% buffer as summarised at Table 4.2 of the SSP2.</p> <p>Comment: We welcome the application of a 10% buffer to the supply of housing in the interests of significantly boosting the supply of homes across the Borough, but careful consideration</p>	<p>Noted. A housing trajectory (site schedule) is produced on an annual basis and will include site allocations. A housing trajectory will accompany the consultation on the pre-submission plan.</p>

## Appendix 2e - Housing

<p>needs to be given to whether this buffer is sufficient.</p> <p>It is acknowledged at paragraph 2.3 of the SSP that the majority of development will be focused at Kettering whilst smaller scale development will also take place at Burton Latimer, Desborough and Rothwell. There is limited provision for development in the rural area.</p> <p>The NPPF 2018 places a greater focus on the delivery of residential sites which will become increasingly relevant with the introduction of the 'Housing Delivery Test' as of November 2018 (footnote 9 of the NPPF 2018).</p> <p>The NPPF 2018 defines 'Deliverable' as follows: <i>"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years"</i> (page 66). The final sentence of this definition is of particular relevance to the large scale allocation sites within Kettering Borough.</p> <p><b>Recommendation:</b> The Council should produce a housing trajectory identifying all the draft allocation sites and their anticipated timescales for delivery. Once this exercise has been completed it may become apparent that there is a need to allocate additional sites to assist in the delivery of housing across the Borough.</p>	
<p><b>487. Question 1 – Category 3 Standard Homes</b></p> <p>The NPPF (2018) identifies at paragraph 61 that <i>"...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who</i></p>	Noted.

## Appendix 2e - Housing

<p><i>rent their homes and people wishing to commission or build their own homes)</i>". If there is a specified need for Category 3 (wheelchair user dwellings) and/ or older persons housing across the Borough this should be fully justified prior to the creation of any such policies to identify a specific proportion of new development needing to comply with Category 3 of the national accessibility standard and/or to be older persons housing.</p>	
<p><b>501. Chapter 4 – Housing</b></p> <p>Harris Lamb Planning Consultancy has been instructed by * to prepare these representations to the draft plan consultation. * owns a site to the south west of Burton Latimer, which is known as 'Land off Gardener Road, Burton Latimer'. The deliverability of the site has been confirmed through a recent outline application and we consider that the site should be included in the plan as either an allocation or a reserved site to assist with short term delivery in a sustainable location if the '25% buffer' monitoring figure is triggered.</p> <p><b>North Northamptonshire Joint Core Strategy (NNJCS) adopted July 2016</b></p> <p>The backdrop to the Kettering Part 2 Plan is the NNJCS. In terms of housing we acknowledge that this sets minimum housing requirements for the individual towns and the rural area, but these are not caps to development and Policy 11 allows for additional housing numbers to be identified through the Part 2 plans. It is our view that additional sites need to be considered at this time based on the draft document and supporting evidence.</p> <p><b>National Planning Policy Framework (NPPF) July 2018</b></p> <p>As you will be aware the new NPPF was published during the consultation period. It replaces the 2012 NPPF and, with the Part 2 plan predicted to be submitted in March 2019, the draft version of the plan will need to be reconsidered in accordance with the new NPPF.</p> <p><b>New definition for 'deliverable' site</b></p>	<p>Sites in Burton Latimer are considered in the Burton Latimer chapter. However, the JCS sets out the spatial strategy for development in Kettering Borough. The JCS clearly sets out Burton Latimer's role as a market town. Market Towns provide a strong service role for their local community and surrounding rural area with growth in homes and jobs to support regeneration and local services at a scale appropriate to the character and infrastructure of the town. Table 1 of the JCS provides further detail on the spatial role of Burton Latimer which should provide a more localised convenience and service role, with growth pressures directed to the adjoining Growth Town. The SSP2 already identified 10% more dwellings than the requirement set out in the JCS. There is no identified shortfall in available sites at the other market towns or growth town and therefore this is not a justification for further development at Burton Latimer. The Pre-submission plan</p>

## Appendix 2e - Housing

In Annex 2, the new NPPF sets out an updated definition of 'deliverable' from that in the previous version of the NPPF. The new definition is as follows:

*"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years"*

The main change relates to the inclusion of the requirement for local authorities to provide clear evidence in relation to completions for sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register.

This is relevant to the Part 2 plan because the new Framework, at Paragraph 67, continues to set out a requirement for local authorities to identify and maintain a supply of specifically deliverable sites sufficient to provide a minimum of five years' worth of housing. It will need to be demonstrated through the Part 2 plan that a supply of specific deliverable sites exists, which is currently set out in the 16/17 AMR. We have reviewed the latest AMR and note there are a number of sites included without full planning permissions, without "*clear evidence*" to show delivery will occur in the 5 year period. For example:

Desborough North is shown to deliver 425 dwellings in the 5 year period, with delivery starting 2018/19 (this year). However, the site has only got outline consent. No reserved matters applications have been submitted. An agreement has not been reached with a housebuilder and there are significant infrastructure requirements. We understand this is undermining interest in the site and, even if a developer does come on board, the delivery of the necessary

will be accompanied by a background paper setting out additional information on the Council's housing trajectory and five year land supply position. The SSP2 will identify adequate land for development in the plan period in accordance with the spatial strategy set out in the JCS and any further increase in development at Burton Latimer should be considered through a review of the JCS.

## Appendix 2e - Housing

infrastructure requirement will have significant time implication.

Rothwell North – another site contributing 425 dwellings in the 5 year period, with delivery starting 2018/19. This site was subject to an outline application, but it does not appear the consent has been issued.

Kettering East – We have not been able to identify Reserved Matters approvals for the number of dwellings predicted to come forward in the 5 year period. Furthermore we can find no evidence to suggest that delivery will reach the aspiration target of 280 dwellings per annum in 2020/21, 2021/22 and 2022/23. Sites of this size are particularly complicated and there has been a continual pattern of this site, and the other SUEs in the NNJCS, not delivering as expected. We do not dispute that dwellings will be delivered in the next 5 years, but we do not consider clear evidence exists to support the figures currently stated.

We await further details to be provided by the Council in relation to all the relevant sites in the supply and look forward to the opportunity to review this evidence when it becomes available.

With a 5 year shortfall, additional sites will need to be identified now in order to secure the necessary delivery levels in the short term.

### **Kettering East**

We do not consider that delivering 280 dwellings year in year on Kettering East for the last 11 years of the plan, with an overall average of 257 dwellings per annum, is a realistic position. Delivery may have commenced, but it is far too simplistic to suggest that all issues are now resolved and a smooth delivery process will follow. The history of SUEs in North Northamptonshire, in terms of the delays that we have been experienced for a variety of reasons, clearly demonstrate the complexity of sites of this size. The complex nature of the SUE sites will inevitably continue to have an influence on the average delivery rate that will be achieved. For example, prolonged negotiations between the landowner and housebuilders for the remaining phases and parcels; numerous reserved matters applications need to be

## Appendix 2e - Housing

submitted and approved; other permissions/approvals will be needed (e.g. s.104, s.278, s.38, building regulations, etc.); it is highly unlikely that the housing market will continue to grow over the remainder of the plan period; certain infrastructure items will need to be delivered at the right point in time; trigger points for contributions will need to be carefully managed; unknown issues becoming apparent (e.g. issue with the title, additional contamination/archaeology, etc). All of these matters have the potential to take longer as expected or be delayed for a variety of reasons. The result being a delay in delivery and reduction in the delivery rates.

### Monitoring targets

We acknowledge that the 280 dpa figure is included in the NNJCS; however, the Planning Inspector's report also acknowledges the understandable concerns raised by the development industry about the delivery rates on the SUEs. This resulted in monitoring triggers and measures being added to the plan to address these matters. In this context, we note that the trigger in relation to delivery rates on SUEs is predicted to be triggered by the end of the 2018/19 monitoring year. Again this is further evidence of the uncertainty surrounding the delivery rates being predicted.

With regard to the second trigger, this requires the local authority to identify additional sites when a local authority falls below a 25% buffer in a 5 year supply calculation. In light of the uncertainty that surrounds the delivery on a number of sites in the site both in the short terms and over the plan period, as a minimum, we consider that reserve sites should be identified now in the growth and market towns that could come forward should the aforementioned monitoring target be triggered. We consider it would be prudent to identify these deliverable sites now in order to ensure this is done in a planned manner, rather than in an adhoc manner by appeal.

Our concern with this monitoring target being triggered is support by a recent appeal decisions in Desborough - APP/L2820/W/16/3149835. The Inspectors consideration included the most up

## Appendix 2e - Housing

<p>to date monitoring data for the 16/17 year and the Inspector concluded that a 5.7 year supply existed against a 5% buffer. When a 25% buffer is applied, this would leave the Council without a 5 year supply thereby trigger the requirement for the Council to identify additional sites.</p>	
<p><b>504. Chapter 4 - Housing</b> We consider that the information available does not robustly demonstrate a 5 year housing land supply exists and that uncertainty remains in relation to both the timing and delivery rates on a number of the sites in the supply. Additional sites should be identified now to aid delivery in the next 5 years. Reserve sites should also be identified to provide a pool of sites that can be drawn upon should the monitoring target against a 25% buffer be triggered. This will ensure a planned approach to delivery, rather than planning by appeal.</p>	<p>At present the council is able to demonstrate a 5 year supply of housing. The allocations look to fulfil the remaining residual housing requirement when existing and commitments are taken into account. A housing background paper will be updated to provide information on the Council's five year housing land supply.</p>
<p><b>506. Chapter 4 - Housing</b> These representations have been prepared by Marrons Planning on behalf of The Boughton Estate (the Estate) in respect of their following land interests in the Rural Area of the Borough:</p> <ul style="list-style-type: none"><li>• Land at Broughton Allotments (site reference RA/099a)</li><li>• Geddington Sawmill, Grafton Road (site reference RA/107)</li><li>• Geddington South East (site reference RA/109)</li><li>• South of Dovecote Farm, Newton (site reference RA/130)</li></ul> <p>The Estate submitted representations in support of the above sites during previous Local Plan Part 2 (LPP2) consultation events, most recently through a call for sites exercise in July 2016. Following this exercise, the Estate engaged regularly with planning policy officers on these sites, providing them with various information and technical work to help inform the Draft Plan.</p> <p>All references to the National Planning Policy Framework relate to the version published in July 2018, unless otherwise stated.</p>	<p>The windfall allowance used was used in the preparation of the JCS in the identification of the rural housing requirement. A paper will be prepared to accompany the consultation on the pre-submission plan which will provide the evidence used in identifying the level of windfall development in the rural area.</p> <p>Settlement boundaries are used to make a distinction between the open countryside and the urban form of settlements and provide certainty over where development is likely to be acceptable. The principles that have been used to define the settlement boundaries have been formulated through previous work and been updated a number of</p>



## Appendix 2e - Housing

### Section 4: Housing Requirement

The Council's housing requirement of 10,400 homes between 2011 and 2031 and its broad distribution across the Borough is set out in the North Northamptonshire Joint Core Strategy (JCS). Of relevance to these representations is the plan period requirement for 480 dwellings in the Rural Area.

The Council should be aware that a review of the JCS should be completed by July 2021 (i.e. five years from its adoption date, as referenced in paragraph 33 of the NPPF). This is a legal requirement stipulated in Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012. In order to comply with the requirement, work on the JCS Review should commence in the near future. The JCS Review will have implications for the LPP2 which is likely to be rendered out-of-date as a result of the JCS review. At the appropriate time, it is imperative the LPP2 is reviewed in line with the objectively assessed needs set out in the JCS Review in order for it to be regarded as up-to-date and sound.

Whilst this consultation is not the forum to comment on the Rural Area housing requirement stipulated by the JCS, the Estate does wish to comment on the appropriateness of the Rural Area figures contained in Table 4.1 Housing Requirements of the LPP2 Draft Plan (page 27).

The requirement for the Rural Area over the plan period is 480 dwellings. Table 4.1 states that as at 1 April 2017 there are 200 dwellings which have either been completed, are under construction or have planning permission/resolutions to grant planning permission (the commitments figure is later confirmed as 54 dwellings at Table 12.1 of the Plan). Firstly, the Council should be mindful of the fact that in its requirement to identify a supply of deliverable sites for the first 5 years of the Plan, sites with outline permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years (as referenced in the Glossary of the NPPF).

Secondly, the Estate objects to the Council's proposed use of windfall sites to contribute

times to ensure they provide an up-to-date and robust evidence base to accurately define the settlement boundary for settlements in Kettering Borough. The Council believes that these principles allow for the defining of settlement boundaries which clearly define the built framework and open countryside. This allows for the simultaneous protection of the open countryside whilst allowing for growth in areas of these settlements in suitable locations within the existing built environment. As mentioned above a paper will be prepared to justify the windfall allowance as well as how the previous levels of delivery of windfall sites in the rural area will be maintained through the plan period.

The JCS sets out the spatial strategy for the borough. This strategy focuses development in the growth towns and to a lesser extent the market towns. Within these areas the Council has added a 10% buffer to the housing requirement. However the strategy for the rural area is to limit development to that required to meet locally arising need, which cannot be met more sustainably at a nearby larger settlement. The 10% buffer provided at the growth town and market

## Appendix 2e - Housing

towards its supply. Table 4.1 states that after accounting for completions and commitments, there is a residual housing requirement of 280 dwellings. However, the Council goes on to deduct a windfall allowance of 140 dwellings (10 dwellings per annum) from the residual requirement, before concluding that it only needs to find sites in the Rural Area to accommodate the remaining 140 dwellings.

Whilst windfall allowances can legitimately form part of a Council's anticipated supply (NPPF paragraph 70 refers) the Estate has the following concerns about the approach adopted in this instance:

- A windfall allowance should only be deemed appropriate where there is **compelling evidence that such sites will provide a reliable source of supply** (NPPF paragraph 70 refers). There is no obvious evidence on the windfall allowance provided in the Draft Plan or accompanying background papers. Also, the use of any windfall allowance within the Council's trajectory should not be applied in the next two to three years. Windfall sites to be constructed in the next few years will already have planning permission and will have been accounted for elsewhere in the Council's trajectory. On this basis, the Council's proposal to apply a windfall allowance for the remaining 14 years of the plan period, is not justified and is unsound.
- Plans should also consider the case for setting out policies to resist inappropriate development in residential gardens (NPPF paragraph 70 refers). The proposed approach to the settlement boundaries (Box 1 of the LPP2 Draft Plan) is to exclude large gardens where they are visually open and relate to the countryside or whose inclusion or possible development would harm the structure, form and character of the settlement. A number of the general rural settlement policies contained in Section 12 of the LPP2 Draft Plan also propose to exclude new dwellings in rear gardens or resist the loss of, subdivision of or infill of gardens.
- Given the Council's proposals with regards to garden development set out above, the fact that the settlement boundaries are drawn relatively tightly around the rural settlements, and that there is a finite supply from such sites, there is no clear evidence that the proposed 140 windfall dwellings could be accommodated within the rural

towns provides a reasonable oversupply to reduce the risk of identifying inadequate land to meet the growth needs of the borough. It is not considered necessary for this purpose to add the same buffer to the rural area given the different role of rural settlements in the development hierarchy.

The Council will supply evidence that it is meeting the requirements of the NPPF in relation to the provision for 10% of its housing requirement to be provided on smaller sites.

The approach taken with regards to the windfall allowance within the Council's trajectory will be considered as part of a housing background paper which will be updated to provide information on the Council's five year housing land supply.

## Appendix 2e - Housing

<p>settlements.</p> <ul style="list-style-type: none"><li>• A 10% contingency has been added on to the housing requirements for Kettering, Burton Latimer, Desborough and Rothwell. This approach has not been adopted for the Rural Areas, where 140 dwellings have been deducted from the Rural Area requirement (as windfall). In combination with the tight settlement boundaries, this approach risks constraining sustainable growth in the Rural Area over the plan period. Since the same housing requirement considerations apply to the Rural Area as the other parts of the Borough, the same approach should be adopted as the rest of the Borough.</li></ul> <p>In light of the above concerns, it is the Estate's position that the LPP2 should be planning to accommodate the residual 280 dwellings within the Rural Area in the form of allocations and that a 10% buffer of 48 dwellings should be applied. This would mean that after completions and commitments, there would be a requirement <b>to find sites for 328 dwellings in the Rural Area</b>. The LPP2 Draft Plan currently proposes allocations for 171-179 dwellings within the Rural Area. In order to meet the soundness test of being positively prepared (NPPF paragraph 35 refers) and to ensure it conforms with the JCS, the LPP2 should be providing for approximately 155 additional dwellings in the Rural Area. Any windfalls which do come forward should be regarded as a contingency providing flexibility and boosting the supply of housing.</p> <p>Finally, as a result of the NPPF, the Council should provide evidence that 10% of its total housing requirement (i.e. 1,040 dwellings) can be provided on sites no larger than one hectare (NPPF paragraph 68a refers); such small sites are more easily identified in rural areas and will make a positive contribution to meeting the housing needs of the Rural Areas.</p>	
<p><b>507. Question 1 – Category 3 Standard Homes</b></p> <p>If the Council want to include a policy identifying the proportion of new developments that need to comply with category 3 of the national accessibility standards, then the Council needs to prepare the relevant evidence to demonstrate the local need. The Written Ministerial Statement dated 25th 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”. The Council will therefore need to clearly consider these requirements in accordance with</p>	<p>The inclusion of a policy with regards to Category 3 Homes will be justified by suitable and robust evidence.</p>

## Appendix 2e - Housing

paragraph 007 (Reference ID: 56-007-20150327) of the Housing: Optional Technical Standards Guidance.

In addition, paragraph 003 (Reference ID: 56-003-20150327) of the Housing: Optional Technical Standards Guidance sets out that 'Local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment.' In this respect, a viability assessment should also be prepared to understand the impacts on the viability and deliverability of development schemes due to the introduction of this requirement, and inform the site threshold and proportion of homes to be M4(3) compliant. The revised National Planning Policy Framework emphasises the need of front-loading viability assessments. Paragraph 002 (Reference ID: 10-002-20180724) of the 'Viability and plan making' section of the Planning Practice Guidance clearly states that "[t]he role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan." (our emphasis).

Accordingly, there is neither support or objection to the inclusion of a policy relating to category 3 of the national accessibility standards at this moment in time as there is not sufficient evidence to demonstrate whether there is a requirement for such a provision. However, if there is a local need then the policy will need to be carefully framed to comply with paragraph 008 (Reference ID: 56-008-20160519) and should outline what proportion of new dwellings for each relevant development will be required. The size of development that may need to contribute to the provision will depend on the following factors:

- Existing and future local need for wheelchair users;
- The accessibility and adaptability of existing housing stock; and
- The outcomes on viability.

In addition, and as outlined in paragraph 008, any proposed policy should also make reference and take account of site specific factors that may make the provision for the M4(3) requirement

## Appendix 2e - Housing

unfeasible.	
<p><b>508. Question 2 – Older Persons Housing</b>          The Framework encourages Councils to address the needs of groups with specific housing requirements. Policy 30 of the North Northamptonshire Joint Core Strategy sets out a requirement for new dwellings to meet Category 2 of the National Accessibility Standard as a minimum. Although this is not exclusive to housing for older people, category 2 does provide specifications equivalent to Lifetime Homes which make dwellings usable for older people and so this should be taken in to account if provision is made for older persons housing. In this respect, further evidence is required to understand the local need of each area and requirement for any provision.</p>	<p>The inclusion of a policy with regards to Category 3 Homes will be justified by suitable and robust evidence.</p>
<p><b>518. Chapter 4 - Housing</b>          We understand that the SSP2 will allocate land for housing, employment, recreation and other uses. The JCS sets out a total housing allocation for the Borough of 10,400 dwellings. Taking in to consideration completions and commitments, Town Centre Area Action Plan allocations, JCS allocations and the application of a 10% buffer there remains a residual requirement of 1,186 dwellings to be allocated across the Borough within the SSP2. Of this allocation 344 dwellings are allocated to Kettering and Barton Seagrave, 18 to Burton Latimer, 400 to Desborough, 284 to Rothwell and 140 across Rural Areas.</p>	<p>Noted</p>
<p><b>521. Chapter 4 - Housing</b>          Given the level of growth proposed to come forward as a whole in the Borough of Kettering and the proximity of many of the sites to the SRN, it is considered that the cumulative impact of growth should be assessed through the development management process. For larger sites it is expected that Transport Assessments are undertaken to establish the impacts and potential mitigation required.</p>	<p>Transport Assessments will be required as part of larger applications as requested. This is an existing requirement of the development management process that exists at present.</p>
<p><b>554. Question 2 – Older Persons Housing</b>          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.</p> <p>Gladman are not supportive of restrictive policy requirements for the inclusion of such housing</p>	<p>Noted. Any policy that requires the provision of housing for older people will be justified by suitable and robust evidence.</p>

## Appendix 2e - Housing

<p>on other residential development sites (threshold size yet to be determined) as under consideration by the Council.</p>	
<p><b>556. Chapter 4 - Housing</b> Gladman note that the Council's proposed Housing Land Supply factors in a 10% buffer and whilst we support the flexibility that this allows, we consider it essential that development plans ensure that there is sufficient headroom within their housing allocations in order to avoid the likelihood of circumstances where a five-year housing land supply cannot be demonstrated. In line with this, we suggest that the proposed 10% uplift is increased to 20%, ensuring that a robust supply is more likely to be maintained and increasing the delivery of the identified affordable housing need. At this point Gladman wish to draw the Council's attention to the residential allocations set out in the Kettering Town Centre Area Action Plan 2011-2021 and wish to highlight the significantly slower than predicted delivery of the 1,000 dwellings allocated in the plan. It has been demonstrated that between 2011 and 2016 only 5% of the 1,000 dwellings had been delivered and as such 95% of the requirement, or some 950 dwellings, are required between 2016 and 2021.</p> <p>Whilst we appreciate, that delivery elsewhere in the Borough has been in line with the Council's trajectory, particularly when considering greenfield development on the edge of market towns, the above does highlight the need for a large contingency and indeed the identification of sites that can assist the Council in establishing a 5-year housing land supply, should delivery rates or lapse rates on sites already identified for allocation slip..</p>	<p>The pre-submission plan will be accompanied by a background paper setting out the justification for the 10% buffer and a housing trajectory. The proposed allocations will sufficiently meet and in some cases exceed the housing requirement as set out by the JCS in addition to the existing commitments and completions that already been accounted for in calculating the residual requirement.</p>