Gravesham Local Plan Core Strategy

Examination – September 2013

Gravesham Borough Council

Response to Issues:

ISSUE 6: HOUSING POLICIES – Policy CS14, CS15, CS16, CS17

Issue 6 Question (i)

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Date: 23 August 2013
Housing Policies – Policy CS14
Issue 6 Question (i) – Gravesham Borough Council

Issue 6: Housing Policies – Policy CS14

(i) **Is Policy CS14 on the mix of size and type of housing reasonable and realistic, including regarding the needs of older people, and does it provide sufficient flexibility, if viability is an issue for a particular scheme?**

**Relevant Background Documents**

- **SCS-01** Proposed Submission Gravesham Local Plan Core Strategy December 2012
- **SCS-02** Proposed Submission Gravesham Local Plan Core Strategy – Appendices December 2012
- **SCS-05** Proposed Submission Gravesham Local Plan Core Strategy – Representations Report May 2013
- **SCS-08** Conformity of the Submission Gravesham Local Plan Core Strategy with the National Planning Policy Framework and the Planning Policy for Traveller Sites May 2013
- **SCS-14a** Proposed Submission Gravesham Local Plan Core Strategy Schedule of Proposed Minor Changes May 2013
- **SCS-14b** Proposed Submission Gravesham Local Plan Core Strategy Document May 2013 (tracked changes version)
- **SCS-15** Correspondence with Respondents March 2013 to May 2013
- **DEM-01** Demographic and Labour Supply Assessment of Gravesham Borough Council’s Core Strategy Dwelling Proposal April 2012
- **HOU-01** Strategic Housing Market Assessment 2012 Interim update (corrected May 2013)
- **HOU-02** North Kent Strategic Housing Market Assessment 2009
- **HOU-03** Gravesham Borough Council Affordable Housing Viability Study February 2010
- **GRAV-06** Gravesham Housing Strategy 2009 to 2013
- **NAT-01** National Planning Policy Framework 2012

**Is Policy CS14 Reasonable and Realistic?**

1. The Council is of the view that Policy CS14 is reasonable and realistic with regard to the mix of size and type of housing, including regarding the needs of older people. This is because it conforms closely with the requirements of paragraph 50 of the NPPF for local planning authorities to plan for a mix of houses based upon the needs of different groups in the community and identifies the size, type, tenure and range of housing required. Furthermore it has been based upon robust and comprehensive evidence, including current and future demographic and market trends set out in the Gravesham Strategic Housing Market Assessment Interim update 2012. (HOU – 01).

2. Paragraph 10.1 of the Interim Update (Document HOU-01) states that the North Kent SHMA set out the Borough’s housing need by tenure and type. This was achieved by inserting household projections, completions data, right to buy sales and other information into the ORS North Kent SHMA model, which then apportioned future need based upon the most relevant data available, the 2001 Census.
3. This model has been re-run, using 2012 based population and household projections for 2011 to 2028 in the Interim Update. This indicates in Table 14, that there is a need for a mix of house sizes for both market and affordable housing. For market housing, it shows a significant need for 3 bedroom (47%) and 2 bedroom (31%) properties. For affordable housing, which comprises social and intermediate housing, it shows that the greatest need is for 1 bedroom properties (37%) but it also shows significant needs for 2 bedrooms (32%) and 3 bedroom (28%) properties. This is reflected in paragraph 5.10.3 of the Core Strategy.

4. Whilst new housing can provide different sizes of units, the existing housing stock also has a significant role to play in ensuring that a mix of housing is provided. Paragraph 8.63 of the North Kent Strategic Housing Market Assessment 2009 recommends that the conversion of family homes (taken to be homes with 2 or more bedrooms) into smaller units should be restricted so that new families have more choice within the market and, by doing so, will improve the flow of smaller homes onto the market that they vacate. This is reflected in paragraph 5.10.4 of the Core Strategy.

5. With regard to meeting the housing needs of older people, it is the Council’s view that Policy CS14 is reasonable and realistic. Paragraph 11.2 of the Interim Update (HOU – 01) states that Gravesham’s older population is going to significantly increase over the plan period with the oldest age group (85+), and hence the most likely to need support, growing faster than the rest of the population. It goes on to say that the Demographic and Labour Supply assessment for 2011 to 2028 shows an increase of 5,500 aged 65+ including a doubling of persons aged 85+. This assessment is shown in Table 3 of the Interim Update and reproduced below. This ageing population will be associated with an increase in the numbers of those who have difficulties completing household tasks and self-care activities and an increase in those with a limiting long term illness. Paragraph 11.9 of the interim update advises that increasing proportions of the older population in future years are likely to own their home and whilst some may want to downsize others may want a similar sized home for the lifestyles that they want to lead as they age.

6. Consequently, Policy CS14 makes provision for the building of market housing in accessible locations close to services, particularly suited to the needs of older households. This includes meeting lifetime homes design standards and requiring some housing to be built to wheelchair standard. It also includes encouraging the provision of specialist and extra care housing.

7. McCarthy and Stone in their representation to the Proposed Submission Gravesham Local Plan Core Strategy state that they “commend the Council for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population”.

4
Table 3: Change in Population 2011-28 by Age (Demographic and Labour Supply Forecasts for Gravesham, April 2012)

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<th>Age group</th>
<th>2011</th>
<th>2016</th>
<th>2021</th>
<th>2026</th>
<th>2028</th>
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Source: Research & Evaluation, Kent County Council
All figures have been individually rounded to the nearest hundred
Percentages have been calculated using unrounded numbers

Does Policy CS14 Provide Sufficient Flexibility?

8. Whilst the explanatory text sets out the types, sizes and tenures required to meet local needs, these are not included in the policy which remains sufficiently flexible to allow for negotiation on the precise mix of dwellings.

9. A further proposed minor change is proposed to remove paragraph 5.10.10. The Council considers that as this does not have percentages included, its ambiguity is unhelpful, unnecessary and it is not adding anything beyond that already in CS19. Policy CS19 is clear that “the design and construction of new development will…be adaptable to reflect changing lifestyles”; “New development will be designed in an inclusive way to be accessible to all members of the community”; “new development will be…adaptable to allow changes to be made to meet the needs of users”.

Conclusion

10. Policy CS14 is realistic and reasonable in that it meets the requirements of paragraph 50 of the NPPF relating to the mix, type, size, tenure and range of housing that is required, is based upon reliable demographic projections and other data in Documents HOU – 01 to HOU – 03 and GRAV - 06, and is sufficiently flexible in its requirements to enable negotiation to take place, if necessary, on viability issues.
Response to key issues raised on Policy CS14 during the Proposed Submission Gravesham Local Plan Core Strategy December 2012 consultation

11. CPRE Kent in their representations state that while CPRE Protect Kent supports Policy CS14, they consider that further guidance is needed on potential locations for housing to meet the needs of older people and some additional wording is suggested that the Council needs to be more explicit that the Opportunity Areas is the preferred location for this type of accommodation. The Council does not accept that this is necessary as the need for sheltered / special care housing may arise in the rural area as well as the urban areas and it is appropriate to leave all options open. Policy CS02 sets out the strategy for the distribution of development namely that development will be focused in the urban area but development will be allowed within rural settlements inset from the Green Belt and this does not need to be replicated in this policy. It is considered that the policies, taken as a whole, provide for the adequate control of inappropriate development in the rural area.

12. Urban Gravesham in their representations state that it is evident that recent schemes for urban sites contain housing that is inadequate to meet the day-to-day need of its residents, to meet possible future demands, and to meet a variety of lifestyles. They state that the Policy fails to address this issue, and fails to put in place up-to-date minimum standards to address the issue. The Council does not accept that recent schemes have been inadequate and whilst the Council’s Residential Layout Guidelines were adopted in 1996, they continue to be relevant and stand up well at appeal.

Further Proposed Minor Changes

13. As explained above, the Council is suggesting that paragraph 5.10.10 be deleted and this is shown in blue below:

5.10.10 The Council will seek the provision of an increased proportion of housing designed to the lifetime homes standard with some housing to be built to wheelchair standard to meet the needs of older people and people with disabilities.