



The Planning Policy Team  
South Kesteven District Council  
St Peters Hill  
Grantham  
NG31 6PZ

SENT BY E-MAIL AND POST

6<sup>th</sup> March 2015

Dear Sir / Madam

### **SOUTH KESTEVEN LOCAL PLAN - REGULATION 18 CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following comments and in due course attend the Examination Hearings Sessions for the Local Plan to discuss these matters in greater detail.

At this time the HBF does not have a definitive opinion on the full objectively assessed housing needs (OAHN) for the Peterborough Housing Market Area (HMA) defined as comprising the Local Planning Authorities (LPA) of Peterborough, Rutland, South Holland and South Kesteven nor the appropriate distribution of OAHN across this HMA. The HBF will undertake a detailed analysis of the most up to date version of the SHMAA report submitted as supporting evidence during later stages of the preparation of the Local Plan. However the Council's consultation paper refers to three scenarios for an OAHN for South Kesteven namely :-

- Scenario 1 – Baseline economic growth – 642 dwellings per annum ;
- Scenario 2 – Demographic projections – 659 dwellings per annum ;
- Scenario 3 – Increased economic growth – 706 dwellings per annum.

The National Planning Practice Guidance (NPPG) sets out that household projections produced by DCLG are just the starting point for OAHN (ID 2a-015-20140306). Other factors such as economic forecasts, worsening trends in market signals and affordable housing needs should also be considered which may necessitate an upward adjustment above demographic projections

(ID 2a-018-20140306, 2a-019-20140306 and 2a-020-20140306). Therefore Scenario 3 is most likely to comply with the guidance set out in the NPPG.

Whilst it is noted that the recently published 2012 based household projections identify lower household growth for South Kesteven these are projections of past trends rather than forecasts. Such projections reflect past influences both positive and negative on household formation. Housing shortages over the last two decades together with poor housing affordability have restricted the ability of many young people to form independent households. In addition household formation has been adversely hit by poor economic, housing and mortgage market conditions since 2008. Therefore the 2012 based household projections should be treated as under estimates of future requirements as these projections build into future housing provision the adverse impacts on household formation of past undersupply and very weak economic and market conditions between 2008 and 2012.

It is recommended that any policies referring to housing mix, the provision of affordable housing, the specific housing needs of an increasingly older population, design and climate change should be properly evidenced giving due regard to the House of Commons Written Statement on Support for Small Scale Developers, Custom and Self Builders dated 28<sup>th</sup> November 2014 and the outcomes of the Government's Housing Standards Review and other consultations on for example Allowable Solutions.

All such policies should also be subject to whole plan viability testing. When the Council undertakes its viability assessments the implications of the Community Infrastructure Levy (CIL) should be taken into full account. The relationship between CIL and S106 payments should be clearly set out so there is no actual or perceived "double dipping".

It is noted that the consultation Paper refers to "*prioritise the re-use of sustainably located brownfield land*". This proposed prioritising of previously developed land is contrary to the NPPF. The core planning principle set out in Paragraph 14 of the NPPF is to "*encourage the effective use of land by re-using land that has been previously developed (brownfield land)*" such encouragement is not setting out a principle of prioritising brownfield before greenfield land. Similarly Paragraph 111 of the NPPF states that "*Local Planning Authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land*" again there is no reference to prioritising the use of brownfield land. The Council's proposal to prioritisation relates back to previous national policies which is now inconsistent with current national policy. In Paragraph 17 of his determination of the Planning Appeal at Burgess Farm in Worsley Manchester (APP/U4230/A/11/215743) dated July 2012 (4 months after the introduction of the NPPF) the Secretary of State confirms that "*national planning policy in the Framework encourages the use of previously developed land but does not promote a sequential approach to land use. It stresses the importance of achieving sustainable development to meet identified needs*".

For the reasons set out above **Policy SAP H1 – Other Housing Development in the adopted Site Allocations & Policies DPD** and the following policies in the adopted Core Strategy should be reviewed :-

- **SP1 – Spatial Strategy ;**
- **SP4 – Developer Contributions ;**
- **EN4 – Sustainable Construction & Design ;**
- **H1 – Residential Development ;**
- **H2 – Urban Extension Sites (Grantham) ;**
- **H3 – Affordable Housing.**

It is hoped that these comments are of assistance to the Council in preparing the next stages of the South Kesteven Local Plan. In the meantime if the Council requires any further information or assistance please contact the undersigned.

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



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