



Planning Policy
South Kesteven District Council
Council Offices
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Grantham
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SENT BY E-MAIL AND POST

11th August 2017

Dear Sir / Madam

SOUTH KESTEVEN DRAFT LOCAL PLAN CONSULTATION

Introduction

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

Duty to Co-operate

The Duty to Co-operate (S110 of the Localism Act 2011 which introduced S33A into the 2004 Act) requires the Council to co-operate with other prescribed bodies to maximise the effectiveness of plan making by constructive, active and on-going engagement. The high level principles associated with the Duty are set out in the National Planning Policy Framework (NPPF) (paras 156, 178 – 181) and in twenty three separate paragraphs of the National Planning Practice Guidance (NPPG). In determining if the Duty has been satisfactorily discharged it is important to consider the outcomes arising from the process of co-operation and the influence of these outcomes on the Local Plan. One of the required outcomes is the delivery of full objectively assessed housing needs (OAHN) for market and affordable housing in the housing market area (HMA) as set out in the NPPF (para 47) including the unmet needs of neighbouring authorities where

it is reasonable to do so and consistent with sustainable development (NPPF para 182).

South Kesteven District Council is bordered by six neighbouring authorities of North Kesteven, South Holland, Rutland, Melton, Newark & Sherwood and the City of Peterborough. South Kesteven forms part of the Peterborough sub region HMA together with Peterborough, Rutland and South Holland Councils.

It is understood that the Peterborough sub region HMA authorities have signed a Memorandum of Understanding setting out an agreed position on OAHN as calculated in the Peterborough HMA & Boston BC SHMA Update Final Report dated March 2017 by J G Consulting. The Peterborough HMA OAHN is agreed as 2,209 dwellings per annum sub divided as 981 dwellings per annum in Peterborough, 159 dwellings per annum in Rutland, 445 dwellings per annum in South Holland and 624 dwellings per annum in South Kesteven which will be met by each individual authority respectively within its own administrative area.

The Council should also confirm that the neighbouring authorities of North Kesteven (part of Central Lincolnshire HMA & Joint Local Plan), Melton (part of Leicester & Leicestershire HMA) and Newark & Sherwood (part of Outer Nottinghamshire HMA) will meet their own OAHN in full without recourse to any assistance to meet unmet needs in South Kesteven. By the time of the South Kesteven Local Plan Examination a Statement of Common Ground explaining cross boundary working as proposed in the recently published Housing White Paper "*Fixing The Broken Housing Market*" may be required. If a Statement of Common Ground is prepared the HBF may wish to submit further comments on the Council's legal compliance with the Duty and any implications for the soundness of the Local Plan in response to the pre submission consultation, written Examination Hearing Statements and during oral discussion at the Examination Hearing Sessions.

Objectively Assessed Housing Needs (OAHN) & Housing Requirement

Under the NPPF the Council should be proactively supporting sustainable development to deliver the homes needed by identifying and then meeting housing needs (para 17). The Council should also be significantly boosting the supply of housing (para 47). The Council should use its evidence base to ensure that the Plan meets in full OAHN as far as consistent with the NPPF including identifying key sites critical to the delivery of the housing strategy over the plan period (para 47). The Council should ensure that the assessment of and strategies for housing, employment and other uses are integrated taking full account of market and economic signals (para 158).

The NPPG advises that OAHN should be unconstrained (ID 2a-004) and assessed in relation to the relevant functional area known as the HMA (ID 2a-008). The use of a standard methodology is strongly recommended (ID 2a-005). The NPPG methodology is a three stage process comprising :-

- Demographic (based on past population change and Household Formation Rates (HFR)) (ID 2a-015 – 017) ;

- Economic (in order to accommodate and not jeopardise future job growth) (ID 2a-018) ;
- Market signals (to counter-act worsening affordability caused by undersupply relative to demand) (ID 2a-019 & 020).

The Planning Advisory Service Technical Note dated July 2015 broadly endorses the NPPG methodology.

Whilst affordable housing need is separately assessed (ID 2a-022 – 028). The delivery of affordable housing can be a consideration for increasing planned housing provision (ID 2a-029).

The recently published Local Plans Expert Group (LPEG) Report recommended a simplified standard methodology for calculating OAHN. The LPEG methodology is a four stage process summarised as :-

- Official projections used to determine baseline demographic need ;
- Mandatory uplift of HFR in younger age groups ;
- Using absolute measures of affordability a prescribed market signal uplift (additional to HFR uplift) is applied ;
- Further 10% uplift applied if affordable housing need exceeds figures calculated in preceding stages.

Although there is no economic uplift it may still be incorporated as a policy on consideration to increase the housing requirement.

The Government's Housing White Paper is critical of Council's who are not undertaking an honest assessment of housing needs. The Government is proposing a standard methodology for the OAHN (subject to further consultation). It may or may not be the methodology recommended by LPEG.

The original OAHN for South Kesteven was set out in the Peterborough Sub-Regional SHMA 2015 Update Report by G L Hearn. The OAHN calculation was :-

- Demographic Need (based on 2012 Sub National Population Projections (SNPP) & Household Projections (SNHP) and a conversion rate for vacant / 2nd homes) of 583 dwellings per annum ;
- plus 43 dwellings per annum to support economic growth (68,700 jobs) and counter-act low projected workforce growth in the District ;
- plus 10 dwellings per annum to improve affordability ;
- resulting in a Baseline OAHN of 636 dwellings per annum ;
- Or an Aspirational Scenario (70,618 jobs / 20% uplift above Demographic Need) of 698 dwellings per annum.

At the time of the Sites & Settlements consultation ended on 5th August 2016 the HBF submitted the following criticisms of the OAHN calculation :-

- the relationship between the Peterborough sub regional HMA and its overlap with the adjoining Cambridgeshire HMA should have been considered ;
- the sensitivity testing of the 10 year (constant) and 10 years (variable) migration trend scenarios for South Kesteven are higher and therefore the higher longer term migration trends are more appropriate than the short term trend in the assessment of housing needs of the District ;
- the derivation of the 3.9% vacant / 2nd home conversion rate is unclear;
- the demographic projections and economic forecasting should be fully integrated so that jobs and housing are properly aligned ;
- the appropriateness of using an adjustment to suppressed HFR in 25 – 34 age group as the mechanism to uplift for worsening market signals which results in only a very modest uplift of 2% (10 dwellings per annum) in the District ;
- the proposed housing requirement of the Local Plan is less than the adopted Core Strategy figure of 680 dwellings per annum. The Local Plan 2011 – 2031 should account for any deficit in the adopted Core Strategy planned housing target for the plan period 2006 – 2011. The Council should not ignore any unmet needs from the preceding period by attempting to re-set the position in 2011.

Subsequent to this current Draft Local Plan consultation the original OAHN has been up dated in the Peterborough HMA & Boston BC SHMA Update Final Report dated March 2017 by J G Consulting. The updated Report identifies an OAHN of 15,625 dwellings (625 dwellings per annum) for South Kesteven for the plan period 2011 – 2036 which represents a decrease from the housing requirement figures set out in the Sites & Settlements consultation. This OAHN is also lower than the housing requirement of 680 dwellings per annum (13,600 dwellings between 2006 – 2026) set out in the adopted Core Strategy.

The latest OAHN calculation is summarised as :-

- 601 dwellings per annum resulting from 2014 Sub National Household Projections (SNHP) multiplied by a vacancy rate ;
- 569 dwellings per annum resulting from 10 year migration trend adjustment of -32 dwellings per annum ;
- 616 dwellings per annum resulting from jobs growth adjustment of +47 dwellings per annum (applied after the 10 year migration deduction) ;
- 624 dwellings per annum resulting from a market signal adjustment of +8 dwellings per annum to compensate for an increase in concealed households ;
- No adjustment to deliver affordable housing needs identified as 343 dwellings per annum.

The HBF's original criticisms remain concerning the limited uplift for market signals and worsening affordability.

There is also concern that the economic growth led adjustment is added after the negative adjustment for 10 year migration trends which now appear to

have declined in comparison to the original SHMA. This is of particular concern as it is noted that if anticipated economic forecasts are realised then the baseline demographic population is not sufficient to meet arising workforce demands and businesses could leave (see Appendix 1 of Draft Local Plan).

It is also noted that there is no consideration of increasing affordable housing delivery via a higher housing requirement despite significant identified affordable housing needs. Affordable housing need is calculated as 343 dwellings per annum representing 55% of the overall annual OAHN for the District.

The OAHN of 625 dwellings per annum is set out in **Policy SP1 – Spatial Strategy**. The minimum housing requirement figure should also be set out in policy in the Local Plan so that full housing needs are planned for in accordance with the NPPF.

For the reasons set out above it is evident that 625 dwellings per annum may under-estimate OAHN which is yet to be tested at Local Plan Examination. As stated by the Government in the Housing White Paper this may or may not be an honest assessment of housing needs. The Council should give consideration to the implications of the Government's proposal for a standardised methodology for OAHN. Indeed by the time of the Local Plan Examination it may have been necessary for the Council to prepare an assessment of housing needs based on this standard methodology. The DCLG Planning Update Newsletter dated 31st July 2017 confirms that the Government's consultation on the standard methodology is delayed until September 2017. The letter also states that if a Local Plan is submitted for examination on or before 31st March 2018 the Plan may progress using the existing methodology for OAHN as set out in current guidance. However if that Plan is withdrawn from examination or found unsound the new Local Plan would be prepared using the standardised methodology. If a re-assessment of housing needs using the standard methodology is undertaken the HBF may wish to submit further comments on OAHN and the Council's housing requirement during the pre-submission consultation, written Examination Hearing Statements and during oral discussion at the Examination Hearing Sessions.

Spatial Strategy & Settlement Hierarchy

Policy SP1 – Spatial Strategy and **Policy SP2 – Settlement Hierarchy** set out a spatial strategy focussed on a tiered structure comprising of Grantham, Stamford, Bourne, Deepings and fifteen large villages. In accordance with this strategy five housing sites are allocated in Grantham for circa 5,784 dwellings (**Policies GR4 H1 – H5**) together with a reserve site (**Policy GR5**). At Stamford two housing sites are allocated for circa 1,449 dwellings (**Policies STM1 H1 & H2**). At Bourne two housing sites are allocated for circa 235 dwellings (**Policies BRN H1 & H2**). In The Deepings three housing sites are allocated for circa 837 dwellings (**Policies DEP1 H1 – H3**). In 12 out of 15 of the larger villages thirteen sites for circa 870 dwellings are allocated (**Policies LVH1 – LVH13**).

The distribution of housing provision across this settlement hierarchy is proposed as follows :-

Settlement	Proposed distribution
Grantham	51%
Stamford	12%
Bourne	14%
Deeping	10%
Larger Villages	9%
Smaller Villages	4%

The apportionment of the housing requirement to the towns and villages and future directions of growth should give due consideration to meeting the housing needs of rural areas. The NPPF states *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”* (para 55) and *“take account of the different roles and character of different areas ... recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it”* (para 17). The NPPG also emphasises that all settlements can play a role in delivering sustainable development in rural areas so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. **Policy SP3 – Infill Development, Policy SP4 – Development on the edge of settlements and Policy SP5 – Development on open countryside** set out the Council’s approach to development within and on the edge of settlements and in the open countryside.

During the Local Plan pre-submission consultation the HBF may submit further representations on the spatial strategy and distribution of housing.

Housing Land Supply (HLS)

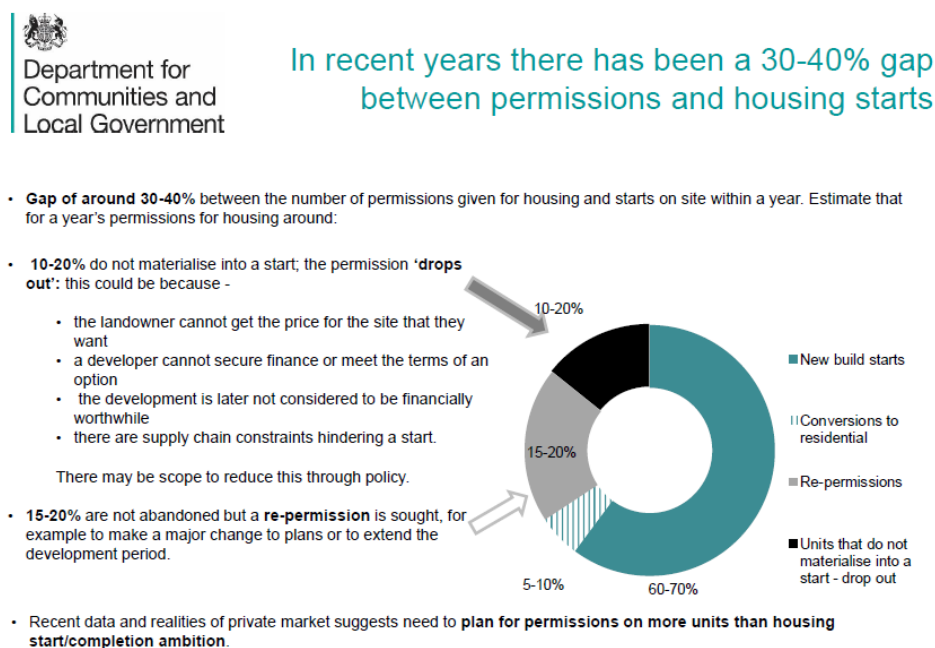
After the deduction of completions the Council’s residual HLS is a minimum of 3,400 dwellings however as the housing requirement is a minimum figure it should not be seen as a ceiling to prevent bringing forward sustainable development.

The HBF do not comment on the merits or otherwise of individual sites therefore our representations are submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the overall HLS, 5 YHLS and housing trajectories. The following comments address matters of principle only. First and foremost the Council’s assumptions on lead-in times, lapse rates and delivery rates for sites should be realistic with support from parties responsible for housing delivery but sense checked by the Council using historical empirical data and local knowledge.

It is noted that **Policy SD2 – The principles of sustainable development** proposes to encourage the use of previously developed land before the

development of new greenfield land. This should not be seen as a sequential test promoting brownfield first. The core planning principle set out in 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 green-field land (para 14). Whilst “*Local Planning Authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land*” there is no reference to prioritising the use of brownfield land (NPPF para 111). The Council’s proposal to prioritisation relates back to previous national policies which are now inconsistent with current national policy. Therefore future development proposals should be given equal considered based on sustainability credentials. It is recommended that **Policy SD2** is reworded.

Within its overall HLS the Council should have enough headroom to provide sufficient flexibility to respond to changing circumstances. The Council is referred to the DCLG presentation slide from HBF Planning Conference September 2015 (see below). This slide illustrates 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*”. It is acknowledged that this presentation slide shows generic percentages across England but it provides the Council with some guidance on the level of contingency needed to provide sufficient flexibility.



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

The HBF is supportive of the principle of allocating a reserve site in **Policy GR5** but make no comment on the site selected. The LPEG Report also recommends that “*the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for*

the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF” (para 11.4 of the LPEG Report).

During the Local Plan pre-submission consultation the HBF may submit further representations on the overall HLS.

5 YHLS

The 5 YHLS calculation is a snap shot in time which can change very quickly. The Council’s 5 YHLS assumes that all of the allocations in the Local Plan will be found sound. However the soundness of individual allocations will be discussed throughout the course of the Local Plan Examination. If any are found to be unsound these will need to be deleted from the deliverable supply accordingly. If further site allocations are needed to provide contingency to overall HLS and / or demonstration of 5 YHLS on adoption then 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. 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 Housing White Paper because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

It is noted that in the Council’s latest 5 YHLS calculation only 5% buffer is applied. The HBF’s preference is 20% buffer applied to both the annualised housing requirement and any shortfall. The 5 YHLS calculation deals with any accrued shortfalls to date using the Sedgefield approach as set out in the NPPG (ID 3-035). The HBF supports this approach. Using the adopted Core Strategy figure of 715 dwellings per annum there is 5.3 years supply.

However at the pre-submission stage of the Local Plan the Council should provide an alternative updated 5 YHLS calculation bearing in mind that without a 5 YHLS on adoption of the Local Plan would fail the NPPF soundness tests of positively prepared, effective and consistent with national policy (para 182). Unless there is a 5 YHLS under the NPPF (para 49) the policies for the supply of housing including policies restricting housing development would be instantly out of date on adoption of the Local Plan. At that time the HBF may submit further representations on the 5 YHLS.

Affordable Housing & Viability

Policy H1 proposes on sites of 11 or more dwellings 35% affordable housing provision subject to viability. In the supporting text an affordable housing tenure mix of 80% rent / 20% intermediate is proposed as a guideline.

It is noted that the Council’s viability testing evidence set out in Affordable Housing Viability Assessment Report dated December 2009 by Level is

somewhat out of date. If the Local Plan is to be compliant with the NPPF development should not be subject to such a scale of obligations and policy burdens that viability is threatened (paras 173 & 174). The residual land value model is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on viability. Therefore it is important that the Council understands and tests the influence of all inputs on the residual land value as this determines whether or not land is released for development. The Harman Report highlighted that *“what ultimately matters for housing delivery is whether the value received by land owners is sufficient to persuade him or her to sell their land for development”*. The Council should be mindful that the cumulative burden of policy requirements are not set so high that the majority of sites are only deliverable if these sites are routinely rather than occasionally negotiated because of viability. The proposed updated Affordable Housing Supplementary Planning Document (SPD) should not add any additional financial burdens onto development. It is recommended that the Council undertakes an up to date assessment of whole plan viability before the pre submission Local Plan consultation. At that time the HBF may submit further comments on affordable housing and whole plan viability.

Other Housing Policies

The Council's intentions under **Policy H1** Bullet Point (3) concerning the appropriate size and internal floor-space of affordable housing are not clear. It is unclear if the Council is or is not intending to adopt the nationally described space standards for affordable housing. The Written Ministerial Statement dated 25th March 2015 confirms that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”*. If the Council wishes to adopt the nationally described space standard for affordable housing then the Council should only do so by applying the criteria set out in the NPPG. The NPPG sets out that *“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas need, viability and timing”* (ID: 56-020) :-

- **Need** - It is incumbent on the Council to provide a local assessment evidencing the specific case for South Kesteven which justifies the inclusion of the nationally described space standard for affordable housing as a Local Plan policy. If it had been the Government's intention that generic statements justified adoption of the nationally described space standards then the logical solution would have been to incorporate the standards as mandatory via the Building Regulations which the Government has not done. The nationally described space standards should only be introduced on a “need to have” rather than a “nice to have” basis. The identification of a need for the nationally described space standard must be more than simply stating that in some cases the standard has not been met it should identify the harm caused or may be caused in the future.

- Viability - The impact on viability should be considered in particular an assessment of the cumulative impact of policy burdens. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The Council cannot simply expect developers to absorb extra costs. There is also an impact of larger dwellings on land supply. The requirement for the nationally described space standard would reduce site yields or the number of units on a site. Therefore the amount of land needed to achieve the same number of units must be increased. The efficient use of land is less because development densities have been decreased. At the same time the infrastructure and regulatory burden on fewer units per site intensifies the challenge of meeting residual land values which determines whether or not land is released for development by a willing landowner especially in lower value areas and on brownfield sites. It may also undermine delivery of affordable housing. The Council should undertake an assessment of these impacts.
- Timing - The Council should take into consideration any adverse effects on delivery rates of sites included in the housing trajectory. The Council should put forward proposals for transitional arrangements. The land deals underpinning the majority of identified sites will have been secured prior to any proposed introduction of nationally described space standards for affordable housing. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The nationally described space standards should not be applied to any outline or detailed approval prior to the specified date and any reserved matters applications should not be subject to the nationally described space standards.

There is also a lack of clarity in **Policy H1** Bullet Point (4) with reference to accessible homes standards for affordable housing. Again the Written Ministerial Statement dated 25th March 2015 is applicable. If the Council wishes to adopt the higher optional standards for accessible & adaptable 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 South Kesteven which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy.

Under **Policy H2** the Council proposes that on strategic sites of 400+ dwellings 2% should be self build & custom build. It is noted that the Council has not provided a definition of self build & custom build in the Glossary. In principle the HBF is supportive of self build & custom build for its potential contribution to overall housing supply in particular positive policy responses such as supporting development on windfall sites and allocation of more small sites by the Council which will increase the total amount of new housing developed. However the Council's approach is restrictive rather than permissive by requiring the inclusion of such housing on strategic sites of 400+ dwellings. This policy approach only changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply.

If the Council wishes to promote self & custom build it should do so on the basis of evidence of such need. It is not evident that the Council has assessed such housing needs in its SHMA work as set out in the NPPG (ID 2a-021) whereby the Council should collate from reliable local information the local demand for people wishing to build their own homes. The HBF do not know the number and requirements of people currently registered on the Council's Self Build Register and whether or not this evidence justifies the Council's proposed policy approach of requiring self & custom build plots on strategic housing sites.

Furthermore the Council has not undertaken any viability assessment of this policy proposal. The NPPG confirms that *"different types of residential development such as those wanting to build their own homes ... are funded and delivered in different ways. This should be reflected in viability assessments"* (ID 10-009). If these plots are not developed by self and / or custom builders the Council has proposed no mechanism by which these dwellings may be developed thereby effectively removing these dwellings from the HLS. The impact on viability if plots remain undeveloped in perpetuity should be assessed.

The Council should also give detailed consideration to the practicalities (for example health & safety implications, working hours, length of build programme, etc.) of implementing any such policy. The Council should refer to the East Devon Inspector's Final Report dated January 2016 which expresses reservations about the implementation difficulties associated with this sort of policy. In para 46 the Inspector states *"However, I don't see how the planning system can make developers sell land to potential rivals (and at a reasonable price)"*.

Other Policies

Under **Policy DE1 – Promoting Good Quality Design** all development must demonstrate compliance with Building for Life 12, Lifetime Homes, Manual for Streets. The reference to Lifetime Homes is out of date. As these requirements have been subsumed into Part M4 of the Building Regulations the reference to Lifetime Homes should be deleted from **Policy DE1** (also see comments on **Policy H1**).

The reference to Building for Life 12 in **Policy DE1** should be removed to the supporting text. The HBF is supportive of the use of Building for Life 12 as best practice guidance to assist the Council, local communities and developers assess new housing schemes but it should not be included as a Local Plan policy requirement which obliges developers to use this tool. The use of Building for Life 12 should remain voluntary. If the Council wishes to refer to Building for Life 12 it should be in supporting text only.

Policy SB1 – Sustainable Building proposes the optional higher water efficiency standard of 110 litres per person per day. The Written Ministerial Statement dated 25th March 2015 confirms that *"the optional new national technical standards should only be required through any new Local Plan*

policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG". If the Council wishes to adopt the higher optional standard for water efficiency the Council should only do so by applying the criteria set out in the NPPG. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The NPPG (ID 56-013 to 56-017) refers to *"helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand"*. The Water Cycle Study 2016 demonstrates a "water neutral position" therefore it is contended that South Kesteven is not an area of water stress and the higher optional water efficiency standard should be deleted as a requirement in **Policy SB1**.

Policy ID3 – Broadband Infrastructure

Policy ID3 should be deleted as it is inappropriate as a Local Plan policy. Developers should be able to determine which infrastructure provider to work with in the provision of fixed fibre superfast broadband which is controlled under Building Regulations.

Conclusion

For the South Kesteven Local Plan to be found sound under the four tests of soundness as defined by the NPPF (para 182), the Plan should be positively prepared, justified, effective and consistent with national policy. For the Council to avoid preparing a Plan which is unsound it is suggested that the Council re-consider the following aspects of the Draft Local Plan :-

- the OAHN calculation and its proposed housing requirement ;
- the spatial strategy and housing distribution ;
- the overall HLS (including contingencies) and 5 YHLS on adoption ;
- the lack of clarity and evidence justifying the introduction of space and accessible / adaptable standards for affordable housing, self & custom build on strategic sites, higher water efficiency standards and super-fast broadband infrastructure ;
- the updating of the whole plan viability evidence.

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

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



Susan E Green MRTPI
Planning Manager – Local Plans