

Planning Policy
South Kesteven District Council
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11 November 2019

Dear Sir / Madam

SOUTH KESTEVEN LOCAL PLAN MAIN MODIFICATIONS (MM) 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 representations to the proposed South Kesteven Local Plan MMs.

MM13 to Policy SP3 - Infill Development

MM13 to Policy SP3 refers to a Design Supplementary Planning Document (SPD) and sets out an expectation that development proposals will have regard to this Design SPD. The introduction of this reference into **Policy SP3** and the associated expectation should not be interpreted by the Council's Development Management Officers as conveying the weight of a DPD onto an SPD which has not been subject to Examination. This proposed modification should be removed from **Policy SP3** itself and inserted into supporting text.

MM14 to Policy SP4 - Development on the edge of Settlements

MM14 inserts a definition of "substantial support from the local community" into **Policy SP4** which states :-

* the term 'demonstration of clear local community support' means that at the point of submitting a planning application to the local planning authority, there



should be clear evidence of local community support for the scheme, with such support generated via a thorough, but proportionate, pre-application consultation exercise, where demonstratable evidence of local community support or objection cannot be determined, then there will be a requirement for support from the applicable Parish or Town Council or Neighbourhood Plan Group. If an application is in doubt as to what would constitute a 'thorough but proportionate', preapplication consultation exercise, then the applicant should contact the applicable local planning authority.

The HBF is concerned that this proposed requirement and its definition is likely to prejudice fair and balanced consideration of the merits of a scheme acting as a barrier to development. This is going further than encouraging developers to engage with the local community before submitting a planning application in accordance with the 2019 NPPF (para 40). **Criteria (a) of Policy SP4 and MM14** should be re-considered and modified.

MM18 to Policy H3 - Self and Custom Build Housing

MM18 to Policy H3 requires that on sites of 400 or more dwellings at least 2% of plots will be provided for self and custom build housing. The HBF's objection to this policy requirement remains as set out in previous representations and written Hearing Statements.

The Council's Self-Build and Custom Build Register indicates only 95 individuals registered between 30th October 2016 – Present. This may indicate an interest in this type of housing but this data cannot be reliably translated into actual demand should self & custom build plots be made available. It remains unclear how the development of single plots by individuals could operate alongside construction activity of large housing sites both practically and taking account of potential health and safety concerns. If demand for such plots is not realised, then these plots will lie vacant for a period of up to 12 months at which point the policy as proposed allows for the plots to be sold for market housing to be either built on by the original developer or sold on and developed at a later stage. This is likely to result in a consequential delay in development on those plots coming forward and may present practical difficulties in terms of co-ordinating their development with construction activity on the wider site.

The HBF agree that the Council should be supporting self & custom build housing however the imposition of a requirement for the provision of at least 2% self / custom build plots on housing sites of 400 or more dwellings is unjustified and impractical. **Policy H3** should be amended as follows :-

Policy H3 - Self and Custom Build Housing

Proposals for self and custom build housing will be supported in suitable locations. The Council will maintain a register of prospective self and custom house builders and have regard to the register in its decision making, plan making, housing and regeneration functions.

Conclusion

It is hoped that these representations are of assistance to both the Council and the Inspector in preparing the final stage 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