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SOUTH
KESTEVEN
DISTRICT
COUNCIL

**South Kesteven District Council Local Plan Review
Regulation 18 Issues and Options Consultation Response Form
Monday 12th October to 11.59pm Monday 23rd November 2020**

This form has three parts

Part A is for your personal details

Part B is your response to the Issue and Options Consultation Questions

Part C is your response to the Sustainability Appraisal Scoping Report

How to respond:

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

Respond by returning forms by:

Email: planningpolicy@southkesteven.gov.uk

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

The deadline for responses is 11.59pm on Monday 23rd November 2020.

All representation will be made publicly available and must be received by 11.59pm on Monday 23rd November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at planningpolicy@southkesteven.gov.uk or call 01476 406080.

Part A: Personal Details

	1. Personal Details	2. Agents Details (if Applicable)
Title		Ms
First Name		Sue
Last Name		Green
Organisation		Home Builders Federation (HBF)
Address		c/o 80 Needlers End Lane Balsall Common Warwickshire
Postcode		CV7 7AB
Telephone		07817 865534
Email Address		sue.green@hbf.co.uk

Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
If you do not wish to be added or would like your details to be removed, then please select the following box	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

4. Please Sign and date this form

Signature (please type for an electronic response)	Date
S.E.Green	23/11/20

Part B: Issue and Options Consultation Questions

5. Proposal 1 – 2036 Vision for South Kesteven					
Q1a – The Vision					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	X	No		Unsure	
If not please provide details.					
Q1b – The Vision					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	X	No		Unsure	
If not please provide details.					

6. Proposal 2 – Objectives					
Q2 – Objectives					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	X	No		Unsure	
If not please provide details.					

7. Proposal 3 – Policies not proposed to be changed significantly					
Q3 – Policies not proposed to be changed significantly					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No	X	Unsure	
If not please provide details.					
<p>The Council cannot be definitive that the listed adopted Policies will not significantly change. Future revisions to national policy may impact upon Policies SD1, H2, H4, EN2 and DE1. The final determination of the housing requirement quantum and its spatial distribution may influence Policies SP3, SP4, SP5 and H1. Updated viability evidence may affect Policies H2, H3 and H4.</p>					

8. Proposal 4 – Plan Period					
Q4 – Plan Period					
Do you agree with the proposed plan period up to 2041?					
Yes	X	No		Unsure	
If not please provide details					

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9. Proposal 5 – Settlement Hierarchy					
Q5a – Settlement Hierarchy					
Do you think the Settlement Hierarchy should be retained in the new Local Plan?					
Yes		No	X	Unsure	
If not, please provide details of what changes you think should be made.					
The retention of the Settlement Hierarchy will be influenced by the housing requirement figure and proposed spatial distribution strategy. See HBF answers to Q6 and Q7 below.					
Q5b – Settlement Hierarchy Methodology					
Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?					
Yes		No		Unsure	
If not, please provide details of what changes you think should be made.					
No comment.					
Q5c – New Settlement					
Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?					
Yes		No		Unsure	
If so, please outline any suitable and deliverable proposals.					
See HBF answer to Q5a above.					

10. Proposal 6 – Housing Need and Requirement					
Q6 – Housing Need and Requirement					
Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?					
Yes		No	X	Unsure	
If not, what evidence do you have to justify an alternative need and requirement?					
As set out in the NPPG, the Local Housing Need (LHN) is calculated at the start of the plan-making process however this number should be kept under review until the Local Plan Review (LPR) is submitted for examination and when appropriate revised (ID 2a-008-20190220). The minimum LHN may change as inputs are variable and this should be taken into consideration by the Council.					

The latest LHN calculation using the 2014-based SNHP and the 2019 affordability ratio is 732 dwellings per annum.

The Government's standard methodology identifies the minimum annual LHN as a starting point. It does not produce a housing requirement figure (NPPG ID : 2a-002-20190220). The Government's objective of significantly boosting the supply of homes as set out in the 2019 NPPF remains (para 59). Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere may necessitate a housing requirement figure above the minimum LHN.

The Government has also confirmed its intention to review the standard methodology. Using the Government's revised standard methodology as set out in the consultation ended on 1 October 2020, the minimum LHN for South Kesteven increases to 839 dwellings per annum.

The LHN and housing requirement should be kept under review. The final figures are likely to be higher than 754 dwellings per annum.

11. Proposal 7 – Distribution of Growth

Q7a – Focus of Housing Growth on Grantham

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No	X	Unsure	
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If not, please provide details and any alternative proposals.

The focus for growth in the adopted Local Plan is 53% in Grantham, 18% in Stamford, 7% in Bourne, 8% in The Deepings, 10% in Larger Villages and 4% in Smaller Villages. The Council propose to retain this focus of growth in the LPR. The starting point for the spatial distribution in the LPR is 50 – 55% in Grantham, 15 - 18% in Stamford, 8 - 10% in Bourne, 8 - 10% in The Deepings and 8 - 10% in Larger Villages. Local communities living in the smaller towns and larger villages will be supported by the proposed pattern of development. However, local communities living in the smaller villages may be disadvantaged. The Council should confirm that the proposed spatial distribution meets the locational housing needs of the resident population. The LPR should meet the housing needs of both urban and rural communities. A more dispersed the pattern of development will also diversify housing land supply (HLS) and optimise housing delivery.

Q7b – Stamford, Bourne and The Deepings

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No	X	Unsure	
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If not, please provide details and any alternative proposals.

See HBF answer to Q7a above.

Q7c – Larger Villages

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No	X	Unsure	
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If not, please provide details and any alternative proposals.

See HBF answer to Q7a above.

Q7d – Other Settlements

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	X	Unsure	
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If not, please provide details and any alternative proposals.

See HBF answer to Q7a above.

Q7e – Consideration of the Market and Deliverability*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	X	No		Unsure	
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Please provide details

Market capacity and deliverability (absorption rates) are a consideration in determining an appropriate spatial distribution.

** (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
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If yes, please provide details.

No comment.

13. Proposal 9 – Revisions to the Employment Policy

Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

No comment.

Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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If not, please provide details.

No comment.

14. Proposal 10 – Climate Change

Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No	X	Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

Existing adopted Climate Change Policies should be reviewed. The Council should not be getting ahead of Government proposals for national policy concerning climate change. The Future Homes Standard consultation (ended on 7th February 2020) set out the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. This consultation addressed options to uplift standards for Part L (Conservation of Fuel & Power) and changes to Part F (Ventilation) Building Regulations. In a separate consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019), the Government also set out a preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010. These proposed changes to Building Regulations may render the Council's adopted policies as unnecessary.

15. Proposal 11 – Energy Performance Standards

Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No	X	Unsure	
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Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No	X	Unsure	
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Please give details.

See HBF answer to Q10 above.

Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

At the plan-making stage, viability is inseparable from the deliverability of development. The viability of individual developments and plan policies should be tested at the plan making stage. As set out in the 2019 National Planning Policy Framework (NPPF), viability testing should assess the cumulative impact of affordable housing provision, policy compliant requirements, infrastructure and other contributions so that there is sufficient incentive for a landowner to bring forward their land for development. Development should not be subject to such a scale of obligations that the deliverability of the South Kesteven’s LPR is threatened (para 34).

The Government’s Future Homes Standard estimated costs of £2,557 per dwelling for Option 1 or £4,847 per dwelling for Option 2. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per space plus any costs for upgrading local electricity networks. These costs should be included in the Council’s viability assessment.

Developer contributions should not be artificially reduced to cover the cost of other developer contributions. The Savills / HBF CIL Getting It Right publication dated January 2014 illustrated that viability becomes increasingly challenging where residential sales values are lowest. Viability assessment is an iterative process, where residential values are lowest “trade-offs” between affordable housing provision, CIL / S106 contributions and any other policy compliant requirements may be necessary.

16. Proposal 12 – Need for Caravan Accommodation

Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
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Please give details

No comment.

17. Proposal 13 – Parking Standards

Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes

No

Unsure

Please give details

Any Parking Standards Policy introduced by the LPR should be consistent with 2019 NPPF (paras 105 & 106) and supported by robust evidence justifying its necessity for managing the local road network.

18. Any other Comments

Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

No comment.

Part C: Sustainability Appraisal Scoping Report

19. Comments about the Sustainability Appraisal Scoping Report

No comment.

Thank you for responding to this consultation.