

**Representations to the South Kesteven Local  
Plan – Regulation 18 Draft Local Plan  
Consultation Response.**

**Land at Brambling Walk, Rippingale.**

**On behalf of Seagate Homes.**

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## Document Management.

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# 1. Introduction

- 1.1. This consultation response is prepared by Pegasus Group in response to the Regulation 18 consultation for the new South Kesteven Local Plan. This has been prepared on behalf of Seagate Homes who have land interests within the District.
- 1.2. Seagate Homes have an interest in a site off Brambling Walk, Rippingale, which is currently vacant land. It is considered that the site will deliver upon the draft objectives of the South Kesteven Local Plan. This site presents an opportunity to provide residential development, offering some market housing and/or affordable dwellings for the District.
- 1.3. We submit representations to the pre-submission Local Plan in order to highlight the need to allocate additional housing sites in in South Kesteven.

# 2. Local Plan Policy SP1: Spatial Strategy

- 2.1. Local Plan Policy SP1: Spatial Strategy sets out the proposed spatial strategy for the District and states that the focus for the majority of growth is in and around the four market towns. The Policy states that in order to achieve new growth, the Local Plan includes allocations for both housing and employment land. The Policy continues to state that in recognition of recent and past housing delivery rates being below the 625 dwellings per annum requirement, the Local Plan incorporates policies sufficient to enable the delivery of approximately 13% in excess of the minimum Objectively Assessed Housing Need (625 dwellings per annum). Our client recognises the importance of, and supports the principles outlined by SP1 in terms of directing growth to the main towns and planning to provide more homes than the OAN requirement. However, it is considered that the Policy should be more flexible in order to provide more housing within the plan period over and above the 13%. Providing a significant boost in the delivery of housing is a key priority of the National Planning Policy Framework (NPPF). Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.
- 2.2. Whilst Seagate Homes is broadly supportive of the Council's approach to meeting housing needs principally through the allocation of strategic sites, it is recommended that the Council consider increasing their buffer between the need and supply such that the Plan is sufficiently flexible to respond to unexpected changes in the delivery of sites. In addition, where housing numbers are identified for strategic allocation, it is suggested that these be referenced as "up to" to reflect the uncertainty over the quantum of development capable of being delivered on sites which are subject to further technical work.
- 2.3. In light of the above, it is considered that the Council should, as a minimum, seek to test a higher housing need figure via the Sustainability Appraisal (SA) process and continue to work with neighbouring authorities to define levels of unmet housing need. The Council should keep an open-minded and flexible approach, so that the Local Plan is capable of responding to rising housing needs in the district as the plan-making process continues. This will assist with ensuring that objectively assessed needs are effectively met over the Plan period as required by Paragraph 35 of the National Planning Policy Framework (2023).

- 2.4. The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective is to *“support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations”* (paragraph 8).
- 2.5. Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 60 confirms the Government’s objective of *“significantly boosting the supply of homes”*.
- 2.6. The NPPF is clear that local authorities should deliver a mix of housing sizes, types and tenures for different groups, which include *“those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes”* (paragraph 63).
- 2.7. The Local Plan policies do not allocate any additional housing sites within small villages such as Rippingdale. The Local Plan should be flexible and allow developments in sustainable locations to ensure there is a balance of homes and jobs in the right place. It is important to ensure that a range of small sites are allocated in the Local Plan to ensure that these can be delivered in the short to medium term. The Local Plan should not overly-rely on large strategic allocations which are complex to deliver and rely on costly infrastructure to proceed. There should not be a sole provision of large strategic sites but a range of options and sizes to ensure that there is flexibility in the strategy and that housing (both market and affordable) can be delivered immediately. By allowing development to be dispersed across the District on the edge of urban areas and in villages, this would help to achieve this flexibility.
- 2.8. South Kesteven has previously relied on strategic sites for housing delivery. Challenges and subsequent delays that have arisen with such schemes have resulted in the shortfall in housing delivery particularly affordable housing provision. It is evident therefore that the allocation of smaller sites within the Local Plan, such as those within Small Villages will ensure a more robust delivery strategy for the district.
- 2.9. It is imperative that housing delivery is a priority for the Council in an attempt to ease the affordability pressures in the District. Development of this site will also widen the choice of different housing types in Rippingdale itself.

#### Remedy

- 2.10. To adjust the Policy to allow for more than 13% over the OAN requirement when additional housing sites have been identified in the District.

### **3. Local Plan Policy SP2: Settlement Hierarchy**

- 3.1. Local Plan Policy SP2: Settlement Hierarchy sets out the four tiers which the proposed Settlement Hierarchy comprises and the criteria which each settlement must meet for each tier. These include: *“Sub-regional centre”, “Market Towns”, “Larger Villages”, “Smaller Villages”*.

- 3.2. Seagate Homes endorses the settlement hierarchy identified and the need to focus development towards locations with best access to jobs, services and infrastructure through site allocations. This Policy is supported as it provides a clear structure for sustainable development to be located in the four market towns including Grantham, Stamford, Bourne and The Deepings.
- 3.3. It is considered that this Policy would be enhanced if additional opportunity was given to surrounding small villages given that their current opportunity is limited. The proposed site at Rippingale provides this opportunity to deliver affordable and market housing on a suitable scale, with development likely encouraging further amenity development within the village for existing residents. The council should be pro-active in ensuring that settlement boundaries do not act to arbitrarily restrict growth opportunities and limit the scope for addressing the requirements of the future in otherwise sustainable locations adjacent to urban areas.
- 3.4. Rippingale is identified within the South Kesteven District Council Local Plan 2011–2026 as a smaller village.. The policy supports development in accordance with Policy SP3 (infill land), SP4 (development on the edge of settlements) and all other relevant policies, where development will not compromise the village’s nature and character. This policy provides scope for development where it complies with other policies; the statement ‘*and all other relevant policies*’ should remain on this basis.

#### Remedy

- 3.5. To ensure that the Policy allows appropriate edge of settlement extensions.

## 4. Local Plan Policy SP4: New Residential Development on the Edge of Settlements

- 4.1. The principle of Policy SP4: New Residential Development on the Edge of Settlements, is supported given that the policy allows well designed, appropriate development, which integrates well into the existing settlement. Residential development on the edge of settlements should be supported and encouraged to allow for sustainable development.
- 4.2. We wish to raise a concern to part a of Policy SP4 however which reads the following:
- a. *Demonstrate clear evidence of substantial support from the local community\* through an appropriate, thorough, and proportionate pre-application community consultation exercise. Where this cannot be determined, support (or otherwise) should be sought from the Town or Parish Council or Neighbourhood Plan Group or Forum, based upon material planning considerations.*
- \*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 demonstrable 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.*

- 4.3. The need for community support needs to be weighted in the planning balance and cannot override the genuine planning benefits of the need for housing supply. It is very difficult to generate support for most development proposals, and a realistic and objective view must be taken of that part of the policy. Direct compliance with this policy criterion could lead to peculiar results in that development in the middle of nowhere that affects no one might better comply with policy, compared to development which is sustainably located on the edge of an existing settlement which has the potential to upset local existing residents. The Policy therefore has potential to prevent sustainable development if rigidly applied.
- 4.4. Moreover, local concerns must be reasonable and raise legitimate planning arguments, which the planning decision should assess regardless. Only genuine planning matters should be considered in the decision-making process. This approach also relies on Parish/Town Councils or Neighbourhood Plan Groups receiving sufficient training regarding Planning material considerations; they are likely to be influenced by public perception and opinion of the development which will further limit development opportunities.
- 4.5. The inspectors final report (2020) regarding the current Local Plan was generally supportive of this Policy and requirement of community support, however it clearly states in paragraph 66 of the inspectors report that the effectiveness of this Policy should be monitored, indicating that there is scope for alteration of this policy where necessary. This is consistent with paragraph 79 of the NPPF which emphasises that progression of the supply of houses must be monitored.

#### Remedy

- 4.6. Amendment of the Policy to remove need for community support as the planning process already accommodates public consultation

## **5. Local Plan Policy H1 – Housing Allocations**

- 5.1. Policy H1 provides a list of proposed housing allocations to be delivered in the District during the Plan period. We object to this policy on the grounds that it does not include any housing allocations in small villages.
- 5.2. If there are no housing site allocations in small villages such as the village of Rippingale in the Local Plan then there is the risk that the benefits of sustainable growth will not be enjoyed within the settlement. Projected development within the village of Rippingale will create strong, sustainable, cohesive and inclusive communities and enable a larger number of people to access services and facilities locally.
- 5.3. Rippingale does not benefit from any housing site allocations within the Neighbourhood Plan; it is largely restrictive of new development, albeit infill development. An update to the neighbourhood plan is not proposed, therefore the identification of suitable housing sites is unlikely to come forward. It is considered that a more suitable approach would be for the Local Plan to identify and deliver housing allocations which a new Neighbourhood Plan can then assist and support with the local level detail required at a later stage.

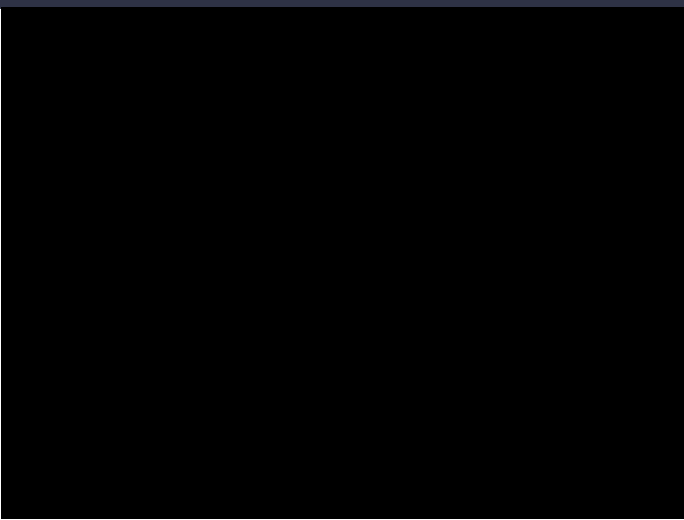
- 5.4. The promotion of housing within the small villages is consistent with paragraphs 82–83 of the NPPF, which promotes sustainable development within rural locations. Paragraph 83 states that “ [...] housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.”
- 5.5. The provision of suitable and affordable housing in existing villages such as Rippingdale will ensure that there is a choice of homes for either young people trying to move out of home yet stay within their community or elderly individuals wishing to downsize within the community. This will assist in providing a balanced community.
- 5.6. Developments in villages will give rise to economic and social benefits. New residents will use the existing local community services, facilities, clubs and societies within the village. This will support the ongoing provision, vitality and viability of these services. As part of any development proposals, financial contributions could be made, if required, towards these local facilities including education, health and public transport provision to enhance these facilities further; in line with paragraph 83 of the NPPF and the intention of supporting local services through development in rural areas.
- 5.7. This will positively influence individuals' health and lifestyle by having access to a good range of facilities, including public open space and an established community
- 5.8. Rippingdale is categorised as a Small Village reflecting the settlement's access to facilities,. It is considered that further limited development will help to maintain these remaining services and amenities as well as providing affordable housing to meet local needs.
- 5.9. There is therefore an opportunity as part of the new Local Plan to allocate modest residential development at Brambling Walk, Rippingdale which will provide much needed market and affordable homes in this location; in accordance with paragraph 60 of the NPPF and the objective of significantly boosting housing supply.

#### Remedy

- 5.10. To allow for housing allocations within small villages, such as Rippingdale in the list of allocations in Policy H1 and in particular the land off Brambling Walk, for market housing and/or affordable housing.



Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004



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