

Representation Form

Consultation on Schedule of Main Modifications Part 1, August 2024

Closing date for submitting representations: **11:59pm, Wednesday, 2nd October 2024**

Part A

Section 1: Contact information

	Respondent details	Agent details (where applicable)
Title:	Mr	Mr
First Name:	M	Andrew
Last Name:	Reeve	Hodgson
Organisation (where relevant):		Pegasus Group
Address:	c/o Agent	
Postcode:	c/o Agent	
Telephone:	c/o Agent	
Email:	c/o Agent	

Part B

Please fill in a separate form for each site and/ or policy

Section 2: Representations

Which Main Modification are you responding on?

Main Modification (MM) ref	Local Plan Paragraph ref	Local Plan Policy ref (if applicable)	Policy title (as applicable)
MM69			New Policy - Custom and Self-Build Housing

To which test of soundness does your representation relate?

The Local Plan 2021-2040 is currently under examination by Planning Inspectors, appointed by the Secretary of State). The Inspectors will assess the proposed Main Modifications against the soundness tests. Please indicate whether you consider the proposed Main Modification about which you are responding is:

	[Please tick appropriate box]	YES	NO
Legally compliant?			
Complies with the Duty to cooperate?			
Positively prepared (i.e. seeks to meet the area’s objectively assessed needs)?		x	
Justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)?			
Effective (i.e. deliverable over the plan period)?			
Consistent with national policy (National Planning Policy Framework: National Planning Policy Framework (publishing.service.gov.uk))?		x	

<p>Summary of Comments:</p> <p>Please give details of why you consider the proposed Main Modification that you are commenting on is sound (“Yes”) or unsound (“No”), with reference to the tests above. Please be as precise as possible.</p>
<p>MM69 relating to the insertion of a new policy which seeks to encourage Custom and Self-Build Housing is strongly supported in principle. The policy is clearly intended to address the need to seek opportunities for the delivery of small and self-build custom housing sites outlined in Paragraph 70 (b) of the NPPF (2023), and it is considered broadly consistent with national policy.</p> <p>Whilst the principle is supported, the policy wording currently includes reference to only allowing self-build and custom housing projects "where they respect local character". The need for this extract is not fully understood, especially given that various other policies, including LP16, LP18 and others which control the design, character and spatial aspects of schemes which are applicable to all sites and do not require the additional wording inserted by MM69. Moreover, the wording is ambiguous and open to unnecessarily subjective judgement from decision makers and applicants.</p> <p>It is considered that the unnecessary reference to "...where they respect local character" should be deleted from the policy for consistency and to ensure the policy is focussed upon encouraging self-build and custom housing.</p> <p>Notwithstanding the above, the policy wording as proposed would benefit from more explicit and positive support to encourage development of self-build and custom housing in order to</p>

demonstrate that the policy is aligned with the wording and intention of National Policy (including Paragraph 70 of the NPPF 2023). The unnecessary caveats introduced relating to character are not deemed to be within the spirit of the policy, and leave proposals open to subjective judgement on the part of decision makers and applicants. The policy should be streamlined, to provide explicit and clear policy support to self-build and custom housing only, and leave the remainder of the plan policies to deal with design and spatial matters.

It is noted that the Council's Self Build and Custom Housing Register currently stands at 327 individuals and so any strengthening of support which could significantly increase the pipeline of these crucial sites would be strongly supported. This is in line with the ambition of the Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) which seeks to significantly increase delivery and facilitate construction of self-build and custom housing across the country.

To conclude, whilst the principle of the changes proposed by MM69 are supported, further amendments should be made to ensure the policy is positively worded and removes the unnecessary and subjective reference to the character of settlements, which is already adequately covered by other policies in the plan. The amendments would ensure that the opportunities presented by self-build and custom housing sites are fully realised in line with the requirements of the SBCH Act 2015 and Paragraph 70 of the NPPF.

Please note you should cover succinctly all the information, evidence and supporting information necessary to support/justify your comments.

Section 4: Data Protection

The Main Modifications consultations form the final stage(s) of the plan-making process for the Local Plan 2021-2040. Do you wish to be notified further about the Local Plan, at either of the following stages?

Publication of Inspector's Report (anticipated January 2025)?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Adoption of Local Plan (anticipated February 2025)?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

In complying with the General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, King's Lynn and West Norfolk Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to this consultation on the Borough Council's website. However, it should be noted that all personal information (except for names and organisation name, where appropriate) will not be published.

When you give consent for us to process data, you have the right to withdraw that consent at any time. If you wish to withdraw your consent, you must notify us at lpr@west-norfolk.gov.uk or 01553 616200.

Section 5: Signature and Date of Representation

Please sign and date below:

Signature: (electronic signatures are acceptable)



Andrew Hodgson (Pegasus Group)

Date:

01/10/2024

Please note the following:

- To be considered, your representation will need to be received by **11:59pm on Wednesday, 2nd October 2024.**
- The Main Modifications are being consulted upon in two parts. The Part 1 consultation covers all aspects of the Local Plan except Gypsies, Travellers and Travelling Showpeople, which will be subject to a separate Main Modifications (Part 2) consultation during autumn 2024.