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03/11/2022

Dear Planning Policy Team,

NORTH EAST LINCOLNSHIRE LOCAL PLAN: SCOPING AND ISSUES PAPER

1. Thank you for consulting with the Home Builders Federation (HBF) on North East Lincolnshire Local Plan Review Scoping and Issues Paper.
2. 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.

Responding to housing needs

Question 1: Housing Need and Requirement

3. The HBF does not consider that the principle of using a range to identify the housing need and requirement for North East Lincolnshire is appropriate.
4. The HBF considers that this use of a range has the potential to cause confusion and to make the policy difficult for people to understand or use effectively. The HBF does not consider that the policy is clearly written and unambiguous as required by the NPPF¹. The HBF considers that a range is not appropriate, it suggests that the top figure would be a maximum and could limit development of homes. The HBF does not consider that this is in line with national policy which looks to support the Government's objective of significantly boosting the supply of homes or in line with paragraph 61 of the NPPF which states that *'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals'*.

Question 2: Housing Requirement

¹ Paragraph 16



5. The HBF has considered the local housing need (LHN) using the Standard Methodology set out in PPG and has calculated the LHN as 208dpa. It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The Standard Method provides a minimum starting point, and there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates. PPG (ID: 2a-010) goes on to state that these circumstances can include growth strategies for the area; strategic infrastructure improvements; previous levels of delivery; or where previous assessments of need are significantly greater than the outcome from the Standard Method.
6. The HBF would expect the Council to consider each of the circumstances as set out in the PPG as part of their work to determine if a higher figure is likely to be appropriate. Additionally, the HBF considers that the Council will also need to consider the balance between employment and housing to ensure that housing is not a barrier to investment, and the requirement for affordable housing to ensure that sufficient homes are provided to meet the needs of the local community.

Question 3: Spatial Distribution of new housing

7. The HBF considers that the most appropriate spatial strategy for new housing development is one that sees the spatial distribution of sites follows a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.

Question 4: Housing Mix

8. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements, requiring a mix that does not consider the scale of the site or the need to provide significant amounts of additional evidence. The HBF considers that flexibility will be important in any policy in relation to housing mix, this allows developers to consider not only the identified need but also market aspirations, local and site characteristics and viability.

Question 5: Affordable Housing

9. The Council state that planning policy will only meet a proportion of affordable housing need and are looking at ways to increase the delivery of affordable housing. The HBF notes that a simple solution to increasing the delivery of affordable homes in line with the PPG² would be to increase the total housing figures included in the plan.
10. The HBF considers that any affordable housing split will need to take into consideration the need to provide affordable home ownership products including First Homes in line

² ID: 2a-024-20190220

with national policy. The NPPF³ states that where major development involving the provision of housing is proposed, planning policies and decision should expect at least 10% of the total homes to be available for affordable home ownership. The PPG⁴ states that First Homes are the Government's preferred discount market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. The HBF also considers that it is important that the Council considers the viability implications in relation to affordable housing provision and ensures that the policy includes flexibility to allow the proportion of affordable housing or the tenure of affordable housing to be amended if needed due to viability issues or due to changes in demand in affordable housing provision.

11. The Council may also want to undertake further work with affordable homes providers to look at alternate methods of delivery as an additional way to increase the delivery of affordable homes.

Question 6: First Homes

12. The HBF considers that the Council will need to ensure that any additional requirements in relation to First Homes over and above the standards set out in the PPG do not have impacts on the viability of development, and do not result in a reduction in the provision of affordable homes.

Question 7: Self and Custom Housebuilding

13. The HBF considers that a policy which encourages self and custom-build development and sets out where it will be supported in principle would be appropriate. The HBF also considers that allocating sites specifically for self and custom-build home builders could also be appropriate, however, this would need to be done through discussion and negotiation with landowners. The HBF does not consider that requiring a proportion of large housing sites to be available for self-builders is appropriate. The HBF would be interested to know whether any of the people on the self-build register have identified a preference to living on a large housing site, and whether the Council considers that there would be evidence of a demand for such sites. The HBF would also highlight the practical issues in terms of developing a large site where there are self-build plots on site, with potentially different builders and construction programmes. The Council will also need to consider the viability implications of this provision on larger housing sites.

Question 8: Housing Standards – Accessibility

14. The HBF considers if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. The PPG⁵ identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the

³ Paragraph 65 of NPPF 2021

⁴ PPG ID: 70-001-20210524

⁵ ID: 56-007-20150327

specific case for North East Lincolnshire which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.

15. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, and the ability to provide step-free access.
16. The Council should also note that the Government response to the Raising accessibility standards for new homes⁶ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.
17. The HBF notes that the nationally described space standards (NDSS) as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. PPG⁷ identifies the type of evidence required to introduce such a policy. It states 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.
18. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

Question 12: Responding to the climate emergency

19. The HBF considers that climate change is not an issue that can just be addressed by one or two policies and is in fact a consideration that needs to be incorporated and considered throughout the Plan. This can include reducing the need to travel, creating a sustainable spatial strategy, providing active and sustainable travel options, providing opportunities for renewable and low carbon technology, providing multi-functional open spaces, along with considering the design and layout of developments.
20. The Council should also not seek to undermine the Government's intention to set energy efficiency standards through the Building Regulations via the 2021 Part L Interim Uplift (effective from June 2022) and the 2025 Future Homes Standard. The HBF considers that tackling climate change by promoting greater energy efficiency via a nationally

⁶ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

⁷ PPG ID: 56-020-20150327

consistent set of standards and timetable, which is universally understood and technically implementable, is the most appropriate way forward.

Future Engagement

21. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

22. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Harding', written in a cursive style.

Joanne Harding
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