

Central Lincolnshire Local Plan Team,  
c/o North Kesteven District Council,  
District Council Offices,  
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Sleaford,  
NG34 7EF



SENT BY EMAIL  
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22/02/2023

Dear Planning Policy Team,

## **CENTRAL LINCOLNSHIRE LOCAL PLAN REVIEW: RECOMMENDED MAIN MODIFICATIONS**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Central Lincolnshire Local Plan Recommended Main Modifications consultation.
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.

### **MM1: Policy S2**

3. The HBF continues to consider that the housing requirement should reflect the higher housing figure of 1,325dpa which will help to provide balance between the homes provided and jobs created as stated in the Policy. There still appears to be limited benefit to the Councils reflecting the minimum LHN as their housing requirement when they know this will be insufficient to meet their actual need as identified by their own evidence. The HBF continues to recommend that the Council seeks to only include one housing figure within their Policy and that this reflects the 1,325dpa.

### **MM5: Policy S7**

4. The HBF continues to consider that this policy including the proposed modifications is not sound. The HBF wants to see improvements in energy efficiency, but this needs to be within a consistent national framework not through each area having its own approach to technical standards that places a burden not just on house builders but also on the local authorities themselves who are ill equipped to support developers and even monitor the policies they implement. Energy efficiency improvements delivered through national standards enables the effective delivery and monitoring of building standards for energy efficiency in a way the proposed approach by the Council cannot.
5. The HBF continues to consider that there is no justification for restricting the locations and land type for where viability should be taken into account. There may be



circumstances on any site in any location where the delivery of this policy is unviable. Without viability considerations being extended across Central Lincolnshire the policy lacks the necessary flexibility to be deliverable.

#### **MM20: Policy S22**

6. The HBF continues to be concerned by the price cap being applied to the First Homes and considers that ensuring that the homes are priced at least 30% below full market value would be sufficient. The HBF recommends that this policy is amended to remove the price cap.

#### **MM21: Policy NS24**

7. Whilst the HBF considers that the proposed modification which sees the reduction in the marketing time period and further clarity as to how that time period is to be measured is appropriate if this policy is maintained. The HBF continues to consider that the requirement for 5% of homes on sites of 100 or more dwellings is not sound because it is not positively prepared, effective, nor consistent with national policy, as set out in our previous responses to this policy.

#### **Future Engagement**

8. I trust that the Councils will find these comments useful as they continue to progress their Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
9. 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,



**Joanne Harding**  
**Planning Manager – Local Plan (North)**

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