

Spatial Planning Team
North Lincolnshire Council
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SENT BY EMAIL
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Dear Sir / Madam,

NORTH LINCOLNSHIRE LOCAL PLAN: ISSUES & OPTIONS (Regulation 18)

Thank you for consulting with the Home Builders Federation on the North Lincolnshire Local Plan Issues and Options consultation.

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.

The HBF have sought to answer the questions posed within the issues and options consultation for the North Lincolnshire Local Plan.

2. Is this an appropriate spatial vision for North Lincolnshire or is there something missing or a more suitable alternative?

The HBF generally supports the pro-growth stance of the vision, in particular, the parts of the vision that identify that housing growth will be required to support the growing economy, and the provision of a range and choice of housing the delivers the areas housing requirements and meets the needs as well as the aspirations of local people.

3. Do you agree with the spatial objectives? Can you suggest any alternatives; are there any missing?

The HBF are support the need to increase the supply of housing to meet future need and to support the growth of the economy.

5. Consider the implications of each option. Which do you support and why:

The HBF do not wish to comment upon the exact distribution of development. The HBF is keen to ensure that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels.

The HBF consider that it is important that the levels of development proposed for each settlement is informed by appropriate analysis of the deliverability and viability of the sites. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue. It is no use continually promoting growth locations if there is little or no prospect of them being brought forward.

7. Which one of the four housing options do you consider the most appropriate for North Lincolnshire up to 2036 and why?

The NPPF is clear that housing and economic strategies should be aligned, this is confirmed by the PPG. It therefore stands to reason that the Council seek to align its housing requirement with a positive growth strategy. Given the significant economic potential of the area, particularly with regards to the ports, renewable energy and logistics it would appear that an aspirational level of growth is appropriate and realistic. On this basis the HBF would recommend a housing requirement towards the upper end of the range.

A higher housing requirement would also support the delivery of affordable housing. It is noted that current affordable need is of the order of 156dpa as set out in the Affordable Housing Need document (February 2017). This represents 21% of the scenario 4 housing target or 35% of scenario 2. It is unlikely that economic viability would enable a 30% target, or greater, to be sustained in the area. Other mechanisms for delivery, in addition to private housing, may therefore have to be considered. The PPG states that an increase in the total housing included in a plan should be considered where it could help to deliver the required number of affordable homes (ID: 2a-029). It is therefore imperative that the Council consider how it can realistically address the affordable housing needs of the area. This adds further weight to the need to set the housing requirement towards the upper end of the range.

8. Do you think the Local Plan's annual housing figure should be higher or lower than identified within the four scenarios and why?

The NPPF is clear that plans should seek to meet the objectively assessed need for both market and affordable housing. Therefore, the HBF consider that the housing figure within the Plan should be at least the OAN, there does not appear to be any justification or evidence provided to highlight why a lower figure would be appropriate.

9. Which of the housing land allocation options do think is appropriate for the Local Plan? Or should the council consider an alternative approach?

The HBF does not wish to comment upon the acceptability or otherwise of individual allocations and sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period. The Council's assumptions on sites in

relation to delivery should be realistic based on evidence supported by the parties responsible for housing delivery; engagement with the relevant landowner, promoter or developer; and sense checked by the Council based on local knowledge and historical empirical data.

10. Which option do you think is the best approach for achieving a housing mix that suits the current and future population needs of North Lincolnshire? Or you can suggest an alternative.

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 or the need to provide significant amounts of additional evidence.

The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. The HBF would also highlight the need for creating a housing market that will attract investors, and to provide an element of aspiration to ensure working people and families are retained within the area.

11. Which housing density option do you support? Or you can suggest an alternative.

Whilst, the NPPF, paragraph 47, does indicate local authorities can set out their own approach to housing density this should be based upon local circumstances and not harm the overall objective of boosting significantly housing supply.

Consideration should be given to elements such as the character of the area; the need to retain features; amenity; local site characteristics; market aspirations; and viability.

The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, space standards and parking provision will all impact upon the density which can be delivered upon site.

The SHELAA does not appear to be available at the time of writing, therefore the HBF will need to reserve judgement upon which of the options proposed is the most appropriate.

14. Which of the affordable housing options do you support? Are there any other options that you feel should be considered?

The HBF would support Option B which could potentially help to boost both market and affordable housing provision.

15. Which of the options for providing housing for older people do you support? Are there any other options that need to be considered?

The HBF is generally supportive of providing housing for specialist needs. However, the HBF would take this opportunity to highlight the evidence required to introduce

policies which require a proportion of houses to be built to the new optional building regulations.

PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, 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 specific case for North Lincolnshire which justifies the inclusion of optional higher standards for accessible and adaptable homes. Whilst the SHMA may provide some of evidence, large elements such as the likely future need, impact on viability and adaptability of the existing stock need to be provided. Evidence of an ageing population does not in itself justify the requirements of this policy, without appropriate evidence the HBF would not support the introduction of this policy.

The HBF would generally be supportive of allowing developers to make their own decisions on house types and building standards, and the option to allocate specific sites for housing schemes for older people or those requiring extra care, providing this is done in consultation with landowners and appropriate developers.

17. Which of options for self-build and custom build do you support? Are there any other options that could be considered in the Local Plan?

In principle the HBF is supportive of self-build & custom build for its potential contribution to overall housing supply. The HBF would recommend appropriate evidence is collated to ensure that house building delivery from this source provides an additional contribution to boosting housing supply. This is likely to include engaging with landowners and working with custom build developers to maximise opportunities.

43. Which of the options do you support to address water efficiency and which standard should the policy address?

All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). PPG (ID: 56-010) states that where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

In order to introduce the policy, the local planning authority must establish a clear need based on: existing sources of evidence; consultations with the local water and sewerage company, the Environment Agency and catchment partnerships; and consideration of the impact on viability and housing supply of such a requirement.

The PPG goes on to suggest the types of evidence which might support a tighter water efficiency standard including the identification of areas of serious water stress, or a river basin management plan which highlights the pressure that the water environment faces. The HBF is unaware of any evidence to support the introduction of the optional standards, therefore at present there would not be support to implement option A.

44. Which of the options do you consider the most appropriate for delivering renewable and low-carbon energy within North Lincolnshire?

In relation to option B, whilst the HBF does not generally object to encouragement to the inclusion of renewable energy and low-carbon energy technologies it is important that this is not interpreted as a mandatory requirement. This would be contrary to the Government's intentions, as set out in Fixing the Foundations and the Housing Standards Review, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards.

The Deregulation Act 2015 was the legislative tool used to put in place the changes of the Housing Standards Review. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes. Transitional arrangements were set out in a Written Ministerial Statement in March 2015.

62. Which of the options (or a combination of both options) do you prefer to ensure that the infrastructure necessary to support growth across North Lincolnshire is delivered in a timely manner?

The HBF consider that the delivery of homes and appropriate infrastructure to support these developments is important, they think that either of the options could be used provided that appropriate consideration is given to the development and that key stakeholders are engaged at appropriate times.

68. Which option for applying development limits do you support, or are there other options that you feel should be considered?

Without the detail of the policies that may be used, it is a little difficult to comment on the potential policies in relation to development limits. However, the HBF considers that it is most appropriate to support the development and delivery of sustainable homes, to meet local needs.

Future Engagement

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.

The HBF would like to be kept informed of future stages of the production of the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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