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SENT BY EMAIL
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Dear Planning Policy Team,

NORTH LINCOLNSHIRE LOCAL PLAN (2025 TO 2043): INITIAL ENGAGEMENT

1. Thank you for consulting with the Home Builders Federation (HBF) on the North Lincolnshire Local Plan (2025 to 2043): Initial Engagement and Call for Sites Addendum.
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.
3. We would like to submit the following comments upon the Initial Engagement document and its priorities. These responses are provided in order to assist the Council in the preparation of a sound plan, the HBF is keen to ensure that the Council produces a sound local plan which provides for the housing needs of the area.

Plan Period

4. The Plan Period is currently proposed to be 2025 to 2043. The HBF considers that the Council will need to ensure that their Plan covers an appropriate period and that this ensures at least a 15-year period post adoption, this may mean that the Council needs to review the 2043 end date. The NPPF¹ states strategic policies should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure, and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery.

Priority 1: Keeping people safe and well

5. The Council have set out the importance of creating healthy living environments and well designed buildings. They have also set out the importance of or promoting physical activity

¹ NPPF 2024 Paragraph 22

and maintaining green infrastructure networks. They have suggested that the Open Space Study will be updated, as will the primary health care accommodation requirements. The Council propose to include policy requirements in relation to health care provision and education and suggest that contributions from residential development will be required to support these.

6. The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. In preparing its Local Plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in the plan should ensure health benefits and limit any negative impacts and as such any development that is in accordance with that plan should be contributing positively to the overall healthy objectives of that area.
7. The HBF considers, in line with the NPPF², that the creation of high quality, well-designed and sustainable buildings and places is fundamental. However, the Council needs to be realistic about what can be delivered viably, and how design policies will sit with other policies in relation to climate change and energy efficiency.
8. The HBF supports the Council in looking to update their evidence in relation to open space, sport and recreation facilities and where appropriate green and blue infrastructure. The HBF considers that in line with the NPPF it is appropriate for the Council to include planning policies that create safe places which promote social interaction, are safe and accessible, and enable and support healthy lives. However, as above, the Council will need to ensure that all policies are deliverable and viable.
9. The NPPF³ is clear that Plans should set out the contributions expected from development, including those from education and health. It is, however, also clear that such policies should not undermine the deliverability of the Plan.

Priority 2: Enabling resilient and flourishing communities

10. The Council has set out that the annual housing requirement as calculated by the standard method has increased in North Lincolnshire from 396 dwellings per annum (dpa) to 640dpa. They have suggested that the current Housing and Economic Needs Assessment (HEDNA) will need to be updated.
11. The HBF considers that it will be necessary to gather appropriate evidence including a HEDNA and a Viability Assessment to determine what types of homes may be needed and can be delivered in North Lincolnshire. The HBF considers this is likely to include a wide range and variety of homes from homes for first time buyers, to family homes to homes to suit the older population. The HBF would encourage the Council to work with the home building industry working in the area to determine the types of homes that are currently being delivered, and where there is demand from home purchasers. The HBF considers that

² NPPF 2024 paragraph 131

³ NPPF 2024 paragraph 35

the Council will need to consider an appropriate balance of development, to ensure that all of their housing needs are met in terms of types and tenures; locations and markets, and to ensure that the Plan can deliver against its housing requirements. It will be important that the Council focus on the provision of homes as part of the delivery of the overall plan for the area.

12. The NPPF⁴ states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method set out in the PPG. The PPG sets out the method for calculating the minimum annual local housing need figure⁵, this includes setting the baseline; and making an adjustment to take account of affordability. The HBF would also expect the Council to investigate the circumstances where it might be appropriate to set a higher housing requirement figure as set out in the NPPF⁶, these circumstances include where the requirement includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment.
13. The HBF considers that it is appropriate for the Council to plan for the affordable needs of its community, and to ensure that it does this in line with the requirements in the NPPF⁷. This should ensure that any affordable housing requirements are clearly set out, are evidenced as viable through an assessment, and that flexibility is provided within the policy where viability may be an issue.
14. The Council has also set out how water resources need to be carefully managed to conserve their quality and value. The Council propose to encourage the use of Sustainable Drainage Systems (SuDS).
15. The HBF considers that a policy in relation to SuDs is not necessary as the NPPF⁸ already states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.
16. The Council have suggested that new developments can improve local air quality and adapt better to climate change by incorporating green walls and roofs and avoiding flood zones.
17. The HBF supports the Council in seeking to meet the challenge of mitigating and adapting to the effects of climate change. The NPPF⁹ states that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. The NPPF also highlights that sustainable development has three overarching objectives,

⁴ NPPF 2024 Paragraph 62

⁵ PPG ID:2a-004-20241212

⁶ NPPF 2024 paragraph 69

⁷ NPPF 2024 paragraphs 35, 64-66

⁸ NPPF 2024 paragraph 164, 181, 182

⁹ NPPF December 2024 paragraph 7

economic, social and environmental and that these are interdependent. The Council should not be seeking to put one of these objectives above the others in the name of sustainable development.

18. The PPG¹⁰ provides examples of mitigating climate change by reducing emissions: through reducing the need to travel and providing sustainable transport; providing opportunities for renewable and low carbon energy technologies; providing opportunities for decentralised energy and heating; and promoting low carbon design approaches to reduce energy consumption in buildings. The HBF recommends that the Council seek to ensure that they produce a sustainable Plan which supports a balance of homes and employment and is in line with the guidance provided by the NPPF and the PPG.
19. The HBF considers that it is important that the Council does not set its own standards for development which may differ from the approach being taken by national Government, and that any such policy in relation to cutting emission, low and reduced carbon, local heat and energy solutions are implemented on a flexible basis, and that the Council recognise the decarbonisation of the national grid. This would be in line with the Written Ministerial Statement of December 2023¹¹. The Council will also be aware that the Future Homes and Buildings Standards have been consulted upon¹².

Viability

20. The Council will also need to ensure that they have considered viability, the viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative costs of all relevant policies will not undermine deliverability of the Plan. The Council needs to ensure that policy requirements should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned development to be deliverable without need for further viability assessment at the decision-making stage.

Monitoring

21. The HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide more details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

Future Engagement

¹⁰ PPG ID: 6-003-20140612

¹¹ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>

¹² <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

22. 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.
23. 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,



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