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Dear Sir/ Madam

North East Lincolnshire Draft Local Plan: Preferred Housing and Employment Site Options (Regulation 18)

1. Thank you for consulting with the Home Builders Federation (HBF) on the North East Lincolnshire Draft Local Plan (Regulation 18).
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 multinational 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. The Council previously consulted on a Regulation 18 draft of its Local Plan between January and March 2024. However, in recognition of changes which have come about following the publication of the new National Planning Policy Framework (NPPF) in December 2024, the Council has taken the decision to undertake another Regulation 18 consultation to pick up the necessary changes that are required to the draft Local Plan, so as to ensure consistency with the current NPPF.
4. Amongst other changes, the current NPPF introduced a new (stock-based) Standard Method for calculating Local Housing Need (LHN). As a result of this, the HBF agrees that further consultation is necessary, albeit once completed, the Council should then seek to move swiftly to progress towards a submission draft of the Local Plan.
5. The HBF sets out its comments below. These should be read in conjunction with our previous representations. The HBF is keen to ensure that North East Lincolnshire produces a sound Local Plan which provides appropriate policies for the area.

Changes to National Planning Policy and Plan-Making System

6. It is worth highlighting that in December 2025 the Government published a consultation on a new National Planning Policy Framework (NPPF). This followed a Written Ministerial Statement made on 27 November 2025 which outlined the Government’s intention to move forward with a new plan-making system (reference: UIN HCWS1104). The move to a new plan-making system includes a series of transitional arrangements.
7. It is understood that currently from the most up to date Local Development Scheme (LDS, March 2025), the Council is intending to use these transitional arrangements and submit its Local Plan for examination under the current plan-making regime. On this basis, Paragraphs 4 and 8 in Annex A of the draft NPPF outline that the Local Plan will then be examined under the current NPPF (December 2024). However, it is also notable that in relation to decision making, Annex A also states that from the date the new NPPF is published, Local Plan policies that are “...*any way inconsistent with national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework*”.
8. Consequently, in preparing the next iteration of this Local Plan, the Council may need to have regard to national policies for decision making, given that any inconsistency may effectively render policies in the Local plan that are not consistent with the new NPPF redundant as soon as the Local Plan is adopted.

Part 1 – Preferred Option Policies

Section 2 – About Part 1

9. Paragraph 2.0.1 outlines that the Local Plan will have a plan period from 2025 – 2043. As the Local Plan is intended to be adopted by 2028, this means that upon adoption, it will have a plan period of 15 years.
10. Paragraph 22 of the NPPF outlines that Local Plans should have a minimum plan period of 15 years from adoption. This means that *prima facie* the Local Plan will fulfil this requirement of the NPPF. However, it is important to highlight that this leaves no contingency in the event that the preparation or examination of the Local Plan is delayed in any way and even if the timescales are achieved, the Council will only just meet this requirement (which is a minimum). If the Council wishes to avoid this risk and look to promote effective longer-term planning and investment, then the HBF recommends that the plan period should be extended.

Section 3 – Strategic Growth Requirements

11. Draft PO Strategic Policy 1 and its accompanying text correctly identify that the Council should identify its LHN through the new Standard Method and that this results in a minimum figure of 622 dwellings per annum (11,196 dwellings over the plan period).
12. As this figure represents a ‘floor’ rather than a ‘ceiling’, the HBF considers that the Council should fully examine whether there is a need for an uplift to the LHN because of requirements to provide a range and choice of sites, the need for flexibility, viability considerations, alignment of jobs and new homes, unmet need from neighbouring areas, and whether higher levels of open-market housing are required to secure an increase in the delivery of affordable housing. The HBF expects all these aspects to be explored thoroughly through the Council’s evidence base.
13. Part 2 of this draft policy commits the Council to monitor housing delivery in order to maintain a rolling five year housing land supply. It states further that where delivery falls below expectations, the Council will work with developers and stakeholders to address delivery barriers.
14. Whilst the HBF is supportive of the Council monitoring housing delivery in this way, it considers the remedy in this respect (ie. working with developers and stakeholders to address delivery barriers) to be vague and lacking in concrete measures. This part of the policy should cross refer to the Local Plan’s monitoring framework which should contain specific and clear measures which the Council should do in the event that it cannot demonstrate a five year supply of deliverable housing land.

Section 5 – Housing Allocations and Distributions

15. Whilst the HBF does not comment on specific site allocations, Draft PO Strategic Policy 3 contains an overall distribution of homes. This appears to concentrate homes in areas where there are existing infrastructure, services and facilities. The HBF can see the logic behind this strategy, however the Council will need to ensure that it can meet the needs (market and affordable housing) of the whole of North East Lincolnshire and all areas of the housing market. This should include an appropriate mix of both larger strategic allocations and smaller non-strategic allocations and consider both greenfield and brownfield sites. In particular, the plan should, through its evidence base, seek to identify and allocate 10% of its housing requirement on sites no larger than one hectare (in line with paragraph 73 of the NPPF).

Section 6 - Infrastructure

16. Within this section of the consultation document, the Council commits to undertaking an Infrastructure Delivery Plan (IDP). This will seek to identify the infrastructure required to support the development in the Local Plan and outline how and when this will be delivered.
17. The HBF would urge the Council to undertake work on the IDP as soon as possible, as ensuring that there is a strategy to accommodate the required infrastructure is vital if the Local Plan is to be found sound. This should be accompanied by a Viability Assessment which can ensure that the infrastructure that is required to be delivered will not undermine the viability of the development put forward in the plan.

Section 7 – About Part 2

18. Part 2 of the consultation document contains those policies which the Council does not consider need revising in light of the current NPPF. The Council has nevertheless summarised comments received from the previous Preferred Options consultation and provides a response to these.
19. We comment on the relevant areas of Part 2 below.

Section 8 – Vision and Objectives

20. Our previous representations highlighted support for Objective S04 (Housing) and consider that this objective is appropriate for boosting housing delivery in the Borough.
21. Whilst the Council has stated that the Vision and Objectives will be kept under review as the Local Plan evolves, we would seek that Objective S04 is retained as an important part of the Local Plan's function.

Section 9 – Spatial Strategy

22. Part 9.1 provides a summary of the responses previously provided in relation to the Settlement Hierarchy (Draft Strategic Policy 1). The Council has stated that it is examining the necessary infrastructure requirements to support planned growth. The HBF supports this approach, but we would reiterate that it is important that the Settlement Hierarchy is logical, based on evidence and that it provides an appropriate development pattern and supports sustainable development within all market areas.
23. This section also summarises comments received in relation to Development Boundaries (Draft Strategic Policy 2 and Part 9.2) where the Council has stated that it will continue to support its

current approach. The summary of comments has not picked up on our observation concerning the contradiction in the policy relating to supporting affordable homes beyond development boundaries and development identified within Neighbourhood Plans, whilst also recognising distinctive open character and landscape quality. The HBF continues to recommend that the Council differentiates between land adjacent to settlements and settlement boundaries which may be sustainable and appropriate for development, sustainable development in rural areas where it will enhance or maintain the vitality of rural communities and sites which are located in isolated areas.

24. In relation to Green Wedges (Draft Strategic Policy 3 and Part 9.3), whilst it is noted that the Council wishes to continue to develop its approach to this policy, the HBF considers that the designation should be carefully considered and balanced so that it does not unnecessarily exclude future opportunities for housing growth.
25. The Council has also committed in this section to keep its Viability Assessment under review as a key part of understanding the implications of delivering necessary infrastructure over the plan period (Draft Strategic Policy 4 and Part 9.4). The HBF notes that the current Viability Assessment was published in November 2024 (after the previous consultation). This means that there has been little opportunity for the housebuilding sector to comment on and scrutinise this document in any meaningful way. In line with the Planning Practice Guidance (PPG), the Council will need to ensure that it engages with developers to secure evidence to inform the viability work (Reference ID: 10-006-20190509). In this regard, the HBF can play a key role in facilitating these discussions.

Section 10 – Climate Change, Flooding and Energy

26. In relation to Water Management (Draft Strategic Policy 6 and Part 10.2), it is noted that following consultation comments, the Council is currently considering a reduction of the water efficiency standard for residential development, currently proposed to be 110 litres per person per day.
27. The Council will be aware that Part G of the building regulations sets the standard for water efficiency (125 litres per person per day). The PPG only permits local planning authorities to move to a more stringent 110 litres per person per day where there is a clear need (Reference ID: 56-014-20150327). This includes providing evidence of water scarcity, liaising with the relevant statutory bodies and examining viability implications.
28. Therefore, the HBF considers that if the Council is seeking to move to a more stringent water efficiency standard, it will need to justify this through its evidence base and that if this is to be done, it should not surpass the enhanced building regulation standard of 110 litres per person per day.

Section 11 – The Natural Environment

29. This section includes policies relating to Health and Wellbeing. Part 11.1 of the consultation document summarises that comments have been raised regarding the need for requiring Health Impact Assessments (HIAs) for developments over 150 dwellings (Draft Policy 1). This point was raised in the HBF’s previous representations.
30. The Council’s response indicates that it is reviewing its approach to ensure consistency with national planning policy and guidance. As outlined in our previous comments, local plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan, a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring a HIA. In addition, the HBF considers that any requirement for a HIA should be based on a proportionate level of detail in relation to the scale and type of development proposed. The requirement for HIAs for development proposals of 150 dwellings or more without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG (Reference ID: 53-005-20190722). Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.
31. The Council has committed to review its landscape evidence base following comments received during consultation (Draft Strategic Policy 10 and Part 11.3). Whilst the HBF notes this, the Council will also need to check regarding consistency with national planning policy. For instance, the proposed policy currently requires the installation of street trees for development (this is in line with paragraph 136 of the NPPF) but then does not make allowances for cases where this may not be possible or feasible (see footnote 52 of the NPPF).
32. Section 11 also contains a policy for biodiversity net gain (BNG) (Draft Policy 3 and Part 11.6) and whilst the Council is endeavouring to review the policy to ensure alignment with national guidance, the HBF would be keen for the Council to follow the PPG, especially where it is stated that there is not a need to include policies which duplicate the detailed provisions found in legislation (Reference ID: 74-006-20240214).

Section 12 – Design and Amenity

33. Part 12.1 confirms that the Council does not anticipate that changes are required to the design principles in the Local Plan (Draft Strategic Policy 13). The HBF would observe that several documents are referred to in the policy. This includes:

- Design Guidance for North East Lincolnshire.
- Lincolnshire Wolds Area of Outstanding Natural Beauty Management Plan 2018-2023.
- Landscape Character Assessment.
- Conservation Area Appraisals.

34. None of these are development plan documents, rather they are material considerations that can be taken into account (where applicable) when determining planning applications. As such, these documents should not be given development plan weight through policies of the Local Plan. The HBF therefore considers that it should be made clear that the Council will ‘have regard’ to these documents rather than requiring compliance with them.

Section 14 – Housing

35. The HBF is supportive of the Council considering both the affordable housing needs of the Borough, as well as seeking to ensure that this does not undermine viability (Draft Strategic Policy 18 and Part 14.2). This accords with paragraph 35 of the NPPF. The Council will need to keep both its Housing and Economic Development Needs Assessment (HEDNA) and its Viability Assessment up to date throughout the Local Plan process. To ensure this process is as robust as possible, housebuilders should be involved in shaping these documents and in this respect, the HBF can assist in coordinating this.
36. In this regard, it is noted that the current Viability Assessment was published in November 2024, which was after the previous Local Plan consultation. This means that the HBF and our members have not had the opportunity to scrutinise and analyse the inputs in any detail and feed this back to the Council.
37. From the HBF’s initial analysis, we have concerns regarding how elements such as the proposed enhance water efficiency standards and emerging Future Homes Standards (FHS) have been accounted for, as well as BNG. For BNG in particular, the costs are site sensitive and so to put a definitive cost on this is difficult. We would therefore be keen to see some sensitivity testing in relation to this. This applies to both greenfield and brownfield assumptions, especially as brownfield sites can be difficult to deliver if open mosaic habitats are found.
38. Whilst it is noted that the Council is confident that its affordable housing requirements in the Local Plan are viable, this is not necessarily what the Viability Assessment concludes. For instance, there is clear viability pressure in lower value areas and in medium value areas, some typologies are unviable with the affordable housing requirement contained in the Local Plan. Currently the expectation is that some viability testing may be required at the development man-

agement stage. The HBF has serious concerns with this approach, as it is unreasonable to negotiate sites on a one-by-one basis because the base-line aspiration of the affordable housing policy is set too high, as this will delay and frustrate future housing delivery.

39. In relation to Housing Mix (Draft Policy 8 and Part 14.4), the Council has acknowledged comments made regarding the fact that the policy, as drafted, is unwieldy given it includes matters relating to housing mix, housing density and older persons housing. The HBF would support the breaking up of this policy to make it more effective. It would also reiterate the need for the Council to take a pragmatic and flexible approach to housing mix and density that can effectively balance housing need and the requirement to develop sites efficiently with site specific conditions, market aspirations, deliverability, viability and accessibility.
40. The HBF recognises that the Council has acknowledged the issues previously raised in relation to its approach to Self-build and Custom build homes contained in Draft Policy 9 (Part 14.5) and recommends that the policy is revised accordingly. We look forward to reviewing this revised policy in due course.

Monitoring

41. The HBF would also like to take the opportunity to highlight again that the Council should 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 Local Plan is hoping to achieve and actions to be taken if the targets are not met.
42. The HBF therefore recommends that the Council provides 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

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

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