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18 July 2019

Dear Sir / Madam

## **CENTRAL LINCOLNSHIRE LOCAL PLAN REVIEW - ISSUES & OPTIONS CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned 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. We would like to submit the following responses to specific questions set out in the Councils consultation document.

### **Policies not intended to be changed**

**Q3. Do you agree with the list of proposed policies that are not intended to be changed significantly in the new plan? If not please provide details.**

As the new Local Plan progresses it may become necessary to review policies not intended to be changed in response to outcomes from the Government's forthcoming Planning Green Paper and the Building Better, Building Beautiful Commission. The Councils should remain open-minded about the need to significantly change policies such as Policy LP10 : Meeting Accommodation Needs and Policy LP26 : Design and Amenity Policy.

### **Plan Period**

**Q4. Do you agree with the proposed plan period of 2018-2040?**

The proposed plan period of 2018 – 2040 is reasonable. The proposal accords with the 2019 National Planning Policy Framework (NPPF) for a timescale of fifteen years after plan adoption. As set out in the 2019 NPPF strategic policies should look ahead over a minimum fifteen years period from adoption to anticipate and respond to long term requirements (para 22).



### **Tiers of the Hierarchy**

**Q5a. Do you think the 8 tiers of the Settlement Hierarchy should be retained in the new Local Plan?**

The new Local Plan should set out a spatial strategy which accommodates the level of housing growth needed in Central Lincolnshire and where that growth should be located. A settlement hierarchy should be retained in the new Local Plan. The Inspector's Final Report on the Central Lincolnshire Joint Local Plan dated 10<sup>th</sup> April 2017 noted that the policy approach proposed in the now adopted Plan was untried and complex with risks of potentially foreseeable complications and unintended consequences. The Councils were charged to monitor this policy approach to ensure that appropriate levels of growth in the right locations were delivered and an effective framework for decision-making was provided (Inspector's Final Report paras 123 & 124). The new Local Plan is the opportunity for the Central Lincolnshire authorities to do as directed by the Inspector.

### **Housing Need and Requirement - Inclusion of a Range**

**Q6a. Do you agree with the use of a range for identifying the housing need and requirement for Central Lincolnshire?**

See HBF answers to Q6b and Q6c below.

### **Housing Need and Requirement – Bottom end of the Range**

**Q6b. Do you agree with using the Local Housing Need (LHN) figure as the bottom end of the range?**

If a range for identifying the housing need and requirement is used then the LHN figure for Central Lincolnshire should be identified as the bottom end of the range. The LHN of 1,083 dwellings per annum based on 2014 SNHP and 2018 affordability ratio is only the minimum starting point. This LHN figure should be kept under review until the date of submission for examination of the new Local Plan. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to LHN. The Government's objective of significantly boosting the supply of homes remains (2019 NPPF para 59). It is important that housing need is not under-estimated.

### **Housing Need and Requirement – Top end of the Range**

**Q6c. Do you agree with using 1,300 dwellings as the top end of the range and as the number which the new Local Plan will help facilitate to be delivered? If no, please provide a clear explanation of what alternative you think should be used and justification for this alternative.**

The Central Lincolnshire authorities are encouraged to have an ambitious plan for housing growth. The top end of the range figure should be fully justified and supported by robust evidence.

### **Lincoln Strategy Area**

**Q7a. Do you agree that the Lincoln Strategy Area should remain as the focus for growth in Central Lincolnshire?**

Lincoln should remain as a focus for growth in Central Lincolnshire.

### **Gainsborough and Sleaford**

**Q7b. Do you agree that Gainsborough and Sleaford should remain as a focus for growth?**

Gainsborough and Sleaford should remain as a focus for growth in Central Lincolnshire.

### **Breaking down the “Elsewhere” category**

**Q7c. Do you agree that the “Elsewhere” category should be broken down further to address deliverability?**

If the “Elsewhere” category is broken down then for consistency of approach in the new Local Plan policies such as Policy LP11 – Affordable Housing should also be changed to reflect the breakdown of the “Elsewhere” category.

### **Consideration of the Market and Deliverability**

**Q7d. Do you agree that market capacity and deliverability should be considered before choosing what growth to distribute to which area?**

Market capacity and deliverability should be considered when determining the distribution of growth. When distributing housing growth the widest possible range of sites by both size and market locations should be chosen to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice and competition in the land market.

The new Local Plan should provide a sufficient supply of deliverable and developable land to deliver the housing requirement of Central Lincolnshire, to maintain a 5 Years Housing Land Supply (HLS) and to achieve measurements against the Housing Delivery Test. This HLS should include a short and long-

term supply of sites by the identification of strategic and non-strategic allocations for residential development.

### **Sustainable Urban Extensions**

**Q8. Do you agree that the Sustainable Urban Extensions (SUEs) in the 2017 Local Plan should be carried forward into the new Local Plan with policies updated to account for the latest situation on each SUE?**

SUEs in the adopted Local Plan which remain deliverable and / or developable as defined in the 2019 NPPF should be carried forward into the new Local Plan subject to individually updated policies.

### **Housing Allocation Threshold**

**Q9a. Do you agree with the proposed revised lower threshold of 10 dwellings or more, in terms of minimum site size for allocations?**

The proposed lower threshold of 10 dwellings or more as a minimum site size for housing site allocations is reasonable. As set out in the 2019 NPPF (para 68a) at least 10% of the housing requirement should be accommodated on sites no larger than one hectare.

### **Location of Housing Allocations**

**Q9b. Do you think more settlements should receive site allocations and if so what do you think should be taken into account in deciding which settlements should receive allocations?**

The Central Lincolnshire authorities should be mindful of 2019 NPPF (paras 68a, 77 & 78) in deciding which settlements should receive allocations.

### **Retaining Housing Allocations from the 2017 Local Plan**

**Q10a. Do you agree with the principle of carrying forward site allocations from the 2017 Local Plan where they are still considered suitable for development?**

Housing site allocations in the adopted Local Plan still considered suitable for development should be carried forward into the new Local Plan.

### **Deallocating Housing Allocations from the 2017 Local Plan**

**Q10b. Do you agree that where there is evidence that a housing allocation from the 2017 Local Plan is no longer suitable or available, or where there has been a lack of sufficient progress on the site that it should be deallocated in the new Local Plan?**

Housing site allocations in the adopted Local Plan that fail to meet the 2019 NPPF definition of deliverable and / or developable should be considered for de-allocation.

### **Preferred Approach for Growth in Villages**

**Q12. Do you think the preferred approach to reviewing the growth level for villages in the new Local Plan is appropriate? If not, please provide details of what alternative approach you would suggest.**

The level of housing growth in villages should be reviewed.

### **Affordable Housing Requirements**

**Q13a. Do you agree that any new need for affordable housing arising from evidence being produced should be addressed in the new Local Plan?**

The Councils affordable housing evidence should be updated. As set out in the 2019 NPPF all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31).

### **Affordable Housing Delivery**

**Q13b. Do you think there is more that the new Local Plan should do to deliver additional affordable housing?**

The Central Lincolnshire authorities should consider the allocation of 100% affordable housing sites, rural exception sites and entry-level exception sites in order to deliver additional affordable housing.

### **Entry-Level Exception Sites**

**Q14. How do you think the new Local Plan should address the need for entry-level housing?**

The new Local Plan should address the need for entry-level housing.

### **Energy Performance Standards in Residential Development**

**Q20a. Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Central Lincolnshire authorities from stipulating energy performance standards that exceed the Building Regulations but consider that the Councils should comply

with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations and to maintain this for the time being at the level of Part L 2013 (as set out in *Fixing the Foundations*, HM Treasury, July 2015).

Under the 2019 NPPF new development should be planned to help reduce greenhouse gas emissions by its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards (para 150b). The Government has sought to set standards for energy efficiency through the Building Regulations. The starting point for the reduction of energy consumption should be an energy hierarchy of energy reduction, energy efficiency, renewable energy and then finally low carbon energy. From the start, emphasis should be on a "fabric first" approach which by improving fabric specification increases thermal efficiency and so reduces heating and electricity usage consequentially newly built homes are far more energy efficient than the existing housing stock.

The HBF support the movement towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements which is universally understood and technically implementable. It is the HBF's opinion that the Councils should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of every authority in the country specifying its own approach to energy efficiency which would mitigate against economies of scale for both product manufacturers, suppliers and developers.

### **Viability Implications of Higher Energy Performance Standards**

**Q20c. If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?**

It is important that the Central Lincolnshire authorities understand and test the influence of all inputs on viability as this determines if land is released for development therefore an updated whole plan viability assessment should be undertaken. The new Local Plan should set out the contributions expected from development including the level and types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. As set out in the 2019 NPPF such policy requirements should not undermine the deliverability of the new Local Plan (para 34). Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on the viability or otherwise of development. The cumulative burden of infrastructure and other contributions together with policy requirements should be set so that most sites are deliverable without further viability assessment negotiations (para 57).

## **Parking Standards**

### **Q25. Do you agree that minimum parking standards are needed in Central Lincolnshire?**

Any car parking standards introduced in the new Local Plan should accord with the 2019 NPPF (paras 105 & 106).

### **Conclusion**

It is hoped that these responses will assist the Central Lincolnshire authorities in informing the next stages of their Local Plan Review. If any further information or assistance is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



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