

Appendix 3 Preferred Options Local Plan (Regulation 18)

Copy of Letter

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Your Ref:

**North
Lincolnshire
Council**

«Address1»

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www.northlincs.gov.uk

Helen Manderson

Director of Business Development

Dear «Title» «Family_Name»,

NORTH LINCOLNSHIRE LOCAL PLAN (2017 TO 2036) – PREFERRED OPTIONS CONSULTATION

North Lincolnshire Council is preparing a new single Local Plan for its area. It will set out the vision and objectives for the area, allocate sites for housing, employment, retail, and other forms of development and will set out development management policies up to 2036. As well as setting out where new development will go, the Plan will also set out policies which seek to protect and preserve open space, green infrastructure, the historic environment and environmental assets. Once adopted, it will update and replace the existing planning policy framework for the area.

Preferred Options Consultation

A Preferred Options document has been prepared setting out the council's preferred approach as to how the new Local Plan could address the important issues that face North Lincolnshire, now and in the coming years. It can be viewed on the council's website: www.localplan.northlincs.gov.uk/localplan.

Previously an Issues & Options consultation exercise was undertaken between late January and mid-March 2018 in order to get the views of local communities and others about the issues that should be covered in the plan and how these issues might be addressed. This, together with available evidence and national planning policy, has helped to inform this Preferred Options stage.

The easiest and most efficient way to view and provide comments on the Preferred Options Local Plan is via the council's website: www.localplan.northlincs.gov.uk/localplan. Through this approach you can provide comments on the policies, sites and designations online.

The consultation runs from 14th February to 27th March 2020. All comments should be submitted online, but they can be emailed or sent to the Place Planning & Housing team, by 5pm on 27th March 2020.

A number of roadshows are to be held across North Lincolnshire to allow local people and others to come along to give us their views about the future growth and development of the area as well as the issues the plan should cover. Dates and times can be found on our website: www.localplan.northlincs.gov.uk/localplan

The Preferred Options document can be viewed electronically at [Local Link offices](#) & [Libraries](#) across North Lincolnshire using the public access computer network. A paper version will be available for inspection at [Scunthorpe Central](#), [Scunthorpe](#).

Call for Sites

As part of this consultation, the council is also seeking to identify land that may be suitable for development or protection within the new Local Plan. More information about the Call for Sites process can be found on our website: www.localplan.northlincs.gov.uk/localplan

More Information

If you wish to know more about the North Lincolnshire Local Plan (2017 to 2036) or get involved in the process, please contact the Place Planning & Housing team for more information.

E-mail: localplan@northlincs.gov.uk

Tel: 01724 297573

Post: Place Planning & Housing, Economy & Growth, Business Development, North Lincolnshire Council, Church Square House, 30-40 High Street, Scunthorpe, North Lincolnshire, DN15 6NL.

Yours faithfully



Chris Barwell

Place Planning & Housing Specialist

Copy of Email

North Lincolnshire Local Plan (2017 to 2036) - General Email

To:

Cc:

Bcc:

Subject: North Lincolnshire Local Plan (2017 to 2036) – Preferred Options

Dear Sir or Madam;

North Lincolnshire Council is preparing a new single Local Plan for its area. It will establish the vision and objectives for the area, allocate sites for housing, employment, retail, leisure and other forms of development and includes development management policies up to 2036. As well as setting out where new development will go, the Plan will also include policies which seek to protect and preserve open space, green infrastructure, historic environment and environmental assets. Once adopted, it will update and replace the existing planning policy framework for the area.

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E-mail: localplan@northlincs.gov.uk

Tel: 01724 297573

Post: Place Planning & Housing, Economy & Growth, Business Development, North Lincolnshire Council, Church Square House, 30-40 High Street, Scunthorpe, North Lincolnshire, DN15 6NL.

Kind Regards,

Chris Barwell

Place Planning & Housing Specialist

Copy of Website

Stage 3: Preferred Options Consultation (Regulation 18)

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HAVE YOUR SAY. BE PART OF THE PLAN

The progression of the North Lincolnshire Local Plan has now reached its third stage in plan preparation. This stage is known as the “Preferred Options” stage, and it is the third opportunity to have your say on how North Lincolnshire grows from now to 2036.

We have prepared a Preferred Options document that builds on earlier consultation undertaken at **Stage 1 (2017)** and **Stage 2 (2018)**. It sets out planning issues that face North Lincolnshire and preferred options for the way they could be addressed.

The Preferred Options document is supported by two important assessments that must be published alongside it – **Preferred Options – Sustainability Appraisal** and **Preferred Options – Habitat Regulations Assessment**.

The consultation on the Preferred Options North Lincolnshire Local Plan has now closed. All the comments and Call for Sites submissions received as part of the consultation are currently being assessed. A Summary of Written Representations report will be available shortly.

WHAT HAPPENS NEXT?

Your views will help to inform the next stage of the Local Plan—‘The Draft Plan’, which is the final version of the Local Plan, prior to its submission to the Government’s Planning Inspectorate.

Press Release

LOCAL PLAN PUBLIC CONSULTATION OPENS

A public consultation exercise has opened on the next stage of the new North Lincolnshire Local Plan. The Local Plan is a strategic planning document setting out North Lincolnshire Council’s ambition to grow the economy and build new homes to ensure we are the best place for our residents. The consultation runs for six weeks and will close at 5pm on Friday 27th March 2020.

The North Lincolnshire Local Plan Preferred Options document sets out the Council’s preferred policy approach for guiding development in North Lincolnshire up to 2036. The document identifies potential sites for the future development of homes and new employment opportunities whilst safeguarding sites of ecological, recreational, historic and amenity importance.

It aids facilitating the right type of development the Council wishes to deliver to achieve its ambitions and grow the economy, keep our residents safe and well and to enable our communities to flourish.

This document builds on two previous versions of the Local Plan where the Council invited comments and additional sites for allocation or designation. All the comments received have been assessed and utilised to draft this preferred options plan.

The public are now being consulted on the proposed Local Plan and exhibition roadshows have been organised so that people across North Lincolnshire can give their views.

The times and places are as follows:

Venue	Date	Time
Ulceby. Village Hall	18 th February 2020	3pm to 7pm
Baysgarth School, Barton upon Humber	19 th February 2020	3pm to 7pm
The Angel Suite (Ballroom), Brigg	20 th February 2020	3pm to 7pm
Imperial Hall, Epworth	24 th February 2020	3pm to 7pm
Old School Hall Community Centre, Winterton	26 th February 2020	3pm to 7pm
The Pavillion, Bottesford	27 th February 2020	3pm to 7pm
Central Library, Scunthorpe	4 th March 2020	3pm to 7pm
Memorial Hall, Haxey	9 th March 2020	3pm to 7pm
Town Hall, Kirton in Lindsey	12 th March 2020	3pm to 7pm
Crowle Local Link- The Library 52-54 High Street	16 th March 2020	3pm to 7pm

Alternatively people can view the Local Plan and leave comments online at <http://www.localplan.northlincs.gov.uk> on the Council's Consultation Portal or by emailing localplan@northlincs.gov.uk prior to 5pm on Friday 27th March 2020.

NORTH LINCOLNSHIRE LOCAL PLAN (2017 TO 2036)

PREFERRED OPTIONS CONSULTATION

SUMMARY OF RESPONSES

1 INTRODUCTION

- 1.1 North Lincolnshire Council is preparing a new single local plan for North Lincolnshire. Once agreed (formally adopted) it will replace the current North Lincolnshire Local Plan, the Core Strategy and the Housing and Employment Land Allocations Development Plan Documents (DPDs), and the Lincolnshire Lakes Area Action Plan.
- 1.2 It will bring together relevant policies and proposals included in the existing plans and include new policies and proposals required by the National Planning Policy Framework (NPPF) plus new and revised local studies and evidence.
- 1.3 As the Local Plan develops there will be a number of opportunities for local people, businesses, voluntary groups, public bodies and landowners to get involved in helping to shape the future growth and development of North Lincolnshire. This Preferred Options consultation was the third stage in process of preparing the plan. This followed an initial (Regulation 18) consultation stage that took place in early 2017 and issues and options (regulation 18) that took place in early 2018.
- 1.4 This document has been prepared to provide a summary of the responses received from the community and others during the preferred options consultation period. Under regulations 19 & 22 of the Town & Country Planning (Local Planning) (England) Regulations 2012, local planning authorities are obliged to prepare two statements setting out how they conducted public consultation/community involvement prior to the Local Plan being published and submitted to Government for an independent examination. This document will assist in preparing these statements. It will also form part the evidence base for the Local Plan.

Consultation Overview

- 1.5 The consultation period ran from 14th February to 27th March 2020 (a six-week period). A Preferred Options Consultation document was prepared and published on the bespoke North Lincolnshire Local Plan (2017 to 2036) website - <http://localplan.northlincs.gov.uk/localplan/>. A paper version of the document was available for public inspection at the Central Library in Scunthorpe, whilst it could be viewed on-line at Local Link offices and branch libraries across North Lincolnshire via the council's public access computer network.
- 1.6 A Sustainability Appraisal Report and Habitats Regulations Assessment were published alongside the Preferred Options document to meet the legislative requirements. Respondents were also able to comment on them.
- 1.7 The Preferred Options Consultation document was accompanied by a questionnaire. It related to the questions being posed in the document and could be completed on-line via the Local Plan website. A paper version was available upon request.
- 1.8 During the consultation period, a number of consultation events took place at various venues across North Lincolnshire (see below). The events predominately ran from 3pm to 7pm. These allowed local people to come along and find out about the Local Plan and put forward their views about the preferred

options for future growth and development of North Lincolnshire. The events were visited by over 100 local people, who sought to put forward their views.

Venue	Date	Time
Village Hall, Ulceby	Tuesday 18 February 2020	3pm to 7pm
Baysgarth School, Barton upon Humber	Wednesday 19 February 2020	3pm to 7pm
The Angel Suite (Ballroom), Brigg	Thursday 20 February 2020	3pm to 7pm
Imperial Hall, Epworth	Monday 24 February 2020	3pm to 7pm
Old School Hall Community Centre, Winterton	Wednesday 26 February 2020	3pm to 7pm
The Pavillion, Bottesford	Thursday 27 February 2020	3pm to 7pm
Scunthorpe Central, Scunthorpe	Wednesday 4 March 2020	3pm to 7pm
Haxey Memorial Hall, Haxey	Monday 9 March 2020	3pm to 7pm
Town Hall, Kirton in Lindsey	Thursday 12 March 2020	3pm to 7pm
Library, Crowle	Monday 16 March 2020	3pm to 7pm

- 1.9 An event scheduled to take place at Burton upon Stather and one for Goxhill residents were cancelled due to the Covid 19 lockdown.
- 1.10 During the consultation events, those attending were invited to provide their thoughts on the preferred policies and land allocations/designations via the bespoke local plan website or via the questionnaire.
- 1.11 The consultation, including details of the various events, was advertised throughout the period as a news story on the front page of the council's website, www.northlincs.gov.uk as well as the council's social media channels including Facebook and Twitter.
- 1.12 Town and parish councils were contacted with a view to them advertising the Preferred Options consultation and the consultation events via their newsletters, websites and social media. Where possible, this took place.
- 1.13 Press releases were issued to local media outlets. An article about the Preferred Options consultation appeared on the Scunthorpe Telegraph's website on.

Call for Sites Exercise

- 1.14 Alongside the Preferred Options consultation, a third Call for Sites exercise was undertaken. This allowed landowners, developers and/or agents to put forward land to be considered for potential site allocations within the emerging Local Plan. They were able to submit sites for a variety of uses including:
 - Housing (including market housing, affordable housing & self-build housing)
 - Employment (including office, light industrial, general industrial & warehousing)
 - Development limit changes
 - Retail/Town Centre Uses
 - Sports/Leisure/
 - Travellers Sites
 - Local Green Space/Important Open Space
 - Waste Management; and
 - Minerals Extraction
- 1.15 An initial Call for Sites exercise took place as part of the Initial (Regulation 18) Consultation between February and April 2017, which resulted in around 500 sites submitted for consideration. Work is ongoing to assess these sites. The third Call for Sites exercise was aimed at identifying sites that were not submitted as part of the earlier consultation stages.

- 1.16 Respondents could submit their sites via an on-line Call for Sites Form, which was available via the council's bespoke Local Plan website. A paper and MS-Word version of the form and associated guidance note was available on request. The form set out a series of questions about the site including ownership details, location, current use, existing trees or landscape features, access arrangements, existing ecological features, planning history, proposed use(s), market interest, availability of utilities infrastructure, and constraints to, and timescale for, availability. As those submitting sites were required to provide a map of the site boundary. Those who used the on-line form were able to use the council's on-line mapping system to draw the site boundaries.
- 1.17 138 sites were put forward for consideration as part of this third Call for Sites exercise, using the on-line form and via e-mail. These will be assessed by employees of the council.

Overview of Responses

- 1.18 The Preferred Options document set out **94** questions covering a number of topics to get views about the future of the area. These set out the council's draft preferred policy for example for the overall spatial strategy, housing, the economy, environment, communities, minerals and waste. These were also set out in the accompanying questionnaire. **165 respondents** provided **1,883 individual responses** to these questions using the on-line questionnaire, via e-mail or in writing during the consultation period. It should be noted that not all respondents provided detail answers.
- 1.19 It should be noted that not all those who responded answered every question. The total number of responses received for each question is set out in each chapter under the policy heading. The responses received and the issues raised by them are summarised in detail in the subsequent sections of this document.
- 1.20 The Sustainability Appraisal Report attracted **2** comments from **1** respondent, whilst the Habitat Regulations Assessment received **1** comment from **1** respondents. These will be forwarded to JBA Consulting Ltd, who are undertaking the Sustainability Appraisal and Habitat Regulations Assessment on behalf of the council, for consideration. These comments will be fed into subsequent Local Plan stages.

Next Steps

- 1.21 All comments received and the issues raised will be given careful consideration, and where appropriate, inform the preparation of subsequent versions of the North Lincolnshire Local Plan (2017 to 2036).
- 1.22 The next stage in developing the new Local Plan is to prepare a Publication version of the Local (the final plan). This will be based on the emerging evidence base and consultation carried out to date. This version of the Local Plan will set out the council's "final" spatial strategy for North Lincolnshire up to 2036 including identifying "final" site allocations and areas for new housing, jobs, retail, minerals, waste and infrastructure as well as areas for protection. It will also include new policies to help determine planning applications.
- 1.23 The Publication Local Plan, together with an accompanying Sustainability Appraisal Report and Habitat Regulations Assessment will be published to allow local people and others to have their say on its contents. The responses received on the Publication Local Plan together with the developing evidence base will be published for a formal six week consultation on its soundness and legal compliance prior to its submission to the Government for independent examination. The timetable for the Local Plan can be found in the [Local Development Scheme](#), which is available to view on-line.

Comments on Preferred Options Introduction

- 1.24 The Preferred Options document did not contain a question in chapter 1 - Introduction, but two comments were received regarding this chapter. 1 respondent provided views on the 'Duty to Cooperate' and the Local Plan, whilst the other put in comments supporting the work undertaken so far but did not support the contents of the Local Plan.

Table 1.1: Responses to Chapter 1: Introduction		
Response	Number of Respondents	Percentage of Respondents
Yes	1	50%
No	1	50%
No option selected	0	0%
Total	2	100

- 1.25 The detailed comments or views on this chapter were split 50:50
- 1.26 A respondent stated that their client (a local house builder) appreciates the time and effort put in by both staff and members of North Lincolnshire Council to review the Local Plan and appears extremely reluctant to appear to be critical or negative in responding to the consultation process. However, they consider there to be fundamental issues relating to the overall strategy which has a bearing on the subsequent development of many critical policies.
- 1.27 It was noted in paragraphs 1.22/24 that the draft Plan has been prepared in line with the 2018 revision of the NPPF. Since then, the NPPF has been slightly revised again in 2019, and there have been significant High Court rulings that have had a bearing on the interpretation of various policies; it is therefore necessary to have regard to these matters.
- 1.28 The second response was made by an adjoining local planning authority stating that both councils have worked together regarding the duty to cooperate for both their Local Plan and the North Lincolnshire Local Plan, and to date, no outstanding strategic matters or issues have been raised. They look forward to working with North Lincolnshire regarding the duty to cooperate in the future, including signing a draft of the Statement of Common Ground.

UNDERSTANDING THE SUMMARIES

- This document sets out the summaries of the responses received based on the each section of the Preferred Options consultation document. Each section contains a number of questions relating to the topic.
- The number of responses received for each question, and where appropriate each option, are set out in tables.
- Where respondents have provided additional comments to support the choices, these are summarised after the tables.
- However, it should be noted that not all respondents have provided further comments, where they have selected an option.

2. NORTH LINCOLNSHIRE: FACTS & FIGURES

Introduction

- 2.1 Our ambition is that North Lincolnshire is the best place for our residents and businesses. To achieve and sustain this ambition and outcomes we need to make sure we plan not only for the needs of existing communities but that we also ensure it remains a destination of choice, as well as an area that is cleaner, greener and safer.

- 2.2 The North Lincolnshire Local Plan (2017 to 2036) and the strategy for meeting our ambitions must be based on a good understanding of where North Lincolnshire is today and its characteristics. It should also consider the issues and challenges it faces as well as the opportunities it offers.
- 2.3 The information set out below is based on some of the early evidence gathered to support the Local Plan as well as statistical information provided by the council's Data Observatory. This online resource provides the local authority, partner agencies and communities across North Lincolnshire easy access to data on population, the economy, community safety, health and education.

Consultation

- 2.4 The Preferred Options document did not contain a question in chapter 2 but comments were received regarding this chapter. However only 1 respondent had views that support this chapter. 4 did not respond either yes or no. 13 disagreed with the content of this chapter.

Responses – Overall to Chapter 2 North Lincolnshire: Facts & Figures

Table 2: Responses to North Lincolnshire: Facts & Figures		
Response	Number of Respondents	Percentage of Respondents
Yes	1	6%
No	13	72%
No option selected	4	22%
Total	18	100%

Summary of Responses – Chapter 2 North Lincolnshire: Facts and Figures

- 2.5 Those who provided detailed comments or views on this generally did not agree with this chapter with the majority of the comments regarding not enough emphasises on biodiversity.

General Comments

- 2.6 A respondent stated that paragraph 2.51 does not go far enough to suggest development should be directed away from flood risk locations and the use of sequential approach. There also needs recognition that mitigation schemes actively reduce the risk of flooding. The different types of flooding which can occur were also suggested to be included in the paragraph.
- 2.7 Many responses (mainly from two respondents) commented on the natural environment being an asset and a large factor in the visitor economy which should be addressed further in this paragraph including figures of nature tourism in North Lincolnshire.
- 2.8 The importance of open space for people's health and wellbeing was addressed by several responses and that it should be included in the 'key challenge of health and wellbeing'. Also there should be reference to the natural environment or quality green spaces alongside services and facilities in paragraph 2.42. This would contribute towards the requirement of the NPPF laid out in paragraph 91c.
- 2.9 A need for clarity in paragraphs 2.14 and 2.16 was addressed by a respondent. The use of the terms dwellings and household may lead to people not understanding the housing need.
- 2.10 In the 'natural environment key challenge' respondents also felt it needs to include biodiversity and the importance that habitats play in underpinning quality places to live and work, health and wellbeing, green tourism and provision of ecosystem services. They also commented on positive wording should be used regarding biodiversity not using the word "stifled" but instead 'It is essential that these assets are

protected and enhanced whilst ensuring that necessary economic and housing growth are also allowed to take place'. Biodiversity as a whole needs to be addressed further. This involves protecting and enhancing not just our protected sites, which form the core reservoirs of our remaining biodiversity, but also the wider countryside. National character areas should also be included in paragraph 2.48.

- 2.11 Transformation so far paragraph states the Able Marine Energy Park has either been completed or under way, this is incorrect and is a key challenge to bring forward in this plan period.
- 2.12 Paragraph 2.21 needs Clugston Group to be removed as no longer operational, another point raised on paragraph 2.21 was that Associated British Ports (ABP) are not on the list.
- 2.13 The South Humber Gateway consists of facilities that are located both within and beyond the North Lincolnshire boundary and paragraph 2.24 should including the collaborative work between local authorities.
- 2.14 Within paragraph 2.54 a comment suggested including waterborne freight as transport within North Lincolnshire, with the presence of the River Trent and the Stainforth & Keadby canal, that are both capable of handling waterborne freight. Both waterways provide a direct route to the Humber Ports (and marine sourced aggregate) and provide an alternative route for bulky freight materials without the need for HGV traffic. This helps reduce congestion and emissions on the local road networks.
- 2.15 A respondent agrees with the key challenge relating to international connections but does not agree that it is simply ensuring access is improved and maintained but it also encourages and supports the development of the ports and airport.
- 2.16 The reduction on the reliance of fossil fuels should be included in the minerals section as it is an unsustainable source of energy and this helps meet carbon reduction targets.

3. A SPATIAL VISION & OBJECTIVES FOR NORTH LINCOLNSHIRE

Introduction

- 3.1 At the heart of the North Lincolnshire Local Plan (2017 to 2036) are the Spatial Vision and Spatial Objectives. Their role is to provide the direction for the North Lincolnshire Local Plan and a framework for its policies and land allocations and designations. The Spatial Vision is a clear statement of what North Lincolnshire will be like at the end of Local Plan period in 2036. Both the Spatial Vision and Spatial Objectives should be distinct to North Lincolnshire and reflect the area's circumstances alongside the key issues and challenges facing the area. They should also have the support of the community. They can be aspirational, but must also be realistic and deliverable.
- 3.2 The emerging Spatial Vision and Spatial Objectives were identified by assessing a range of strategies produced by North Lincolnshire Council and other bodies alongside the views of the community during the initial consultation (February to April 2017), and issues & options consultation (February to March 2018) of the Local Plan.
- 3.3 The draft Spatial Vision sought to build on the council's broader ambitions, emerging evidence and national planning policy. It has sought to bring through those elements of the existing Spatial Vision that attracted support and consider them against the council's ambition and outcomes that North Lincolnshire is: safe; well; prosperous; and connected. The Spatial Vision will be further developed as work on the Local Plan moves forward to the publication and submission stages and more certainty is gained about what, where, how and when new development will be delivered. Consultation on the Local Plan will also have an important role as will the emerging evidence base.
- 3.4 The draft Spatial Objectives (SOs) derive from the Spatial Vision and focus on the key issues that the Local Plan needs to address. They will provide the broad direction for the Spatial Strategy for North Lincolnshire

and the detailed policies that will be included in the Local Plan. In a similar vein to the Spatial Vision, these Spatial Objectives develop as work on the Local Plan progresses.

Consultation

- 3.5 The Preferred Options Local Plan contained two “Yes/No” questions one about the draft Preferred Spatial Vision and the other about the draft Preferred Spatial Objectives.

Question SV1p: Do you think the Preferred Policy SV1p: Preferred Spatial Vision for North Lincolnshire is the right approach?

Question SV1p: Do you think the Preferred Policy SV2p: Preferred Spatial Objectives for North Lincolnshire is the right approach?

Responses – Question SV1p: Preferred Spatial Vision for North Lincolnshire

- 3.6 **42** respondents provided an answer to this question. **28** of these considered that the preferred spatial vision was appropriate, whilst **13** did not. **1** did not select an option but still provided comments. Of those who responded **23** provided additional or further comments to support their choice.

Table 3.1: Responses to Question SV1p: Preferred Spatial Vision for North Lincolnshire		
Response	Number of Respondents	Percentage of Respondents
Yes	28	67%
No	13	31%
No Option Selected	1	2%
Total	42	100%

Summary of Responses – Question SV1p: Preferred Spatial Vision for North Lincolnshire

- 3.7 As mentioned above, the largest proportion of respondents considered the draft preferred spatial vision to be appropriate and were broadly supportive of its content. A number of the supports outlined additional elements that they required to be included or greater consideration given.
- 3.8 Overall the vision was felt to be pro-growth, spreading development across the majority of settlements which will not put too much pressure on existing smaller communities, and positive in its intent, as well as covering all relevant issues that affect North Lincolnshire’s communities. It was highlighted that the spatial vision should be carried through into the plan’s policies and proposals. References to a strong alignment between growing the economy and the location of sustainable housing growth were particularly welcomed.
- 3.9 A number of respondents provided detailed comments on the various different elements of the spatial vision to support the inclusion of the sites they are promoting for allocation or suggesting additional issues that they felt should be included in the spatial vision.
- 3.10 A number of the comments received, whilst broadly supporting the spatial vision, sought to identify further issues that the spatial vision, and the plan, should address. This included the need to have new housing in areas that can sustain it and has the infrastructure, concentrating services in a few nodes thus reducing journeys to services and more detail on affordable housing provision especially in rural areas (including the 'Market Towns'). In order to support rural communities, there needs to be better public transport (even if this has to be subsidised by NLC) to connect them to larger conurbations or enable more shops and other facilities in those small rural communities.

- 3.11 A number of responses welcomed the objective of creating a network of attractive, thriving and vibrant sustainable communities and ensuring the sustainability of the Principal Towns, Large Service Centres and rural communities. Stating the objective should recognise that the sustainability of the Market Towns and smaller villages can be enhanced by housing and economic growth to ensure that the subsequent Spatial Strategy achieves the correct balance of allocations through the area.
- 3.12 Scunthorpe's role of as a Major Sub-Regional Centre for housing, employment and services was supported by one respondent.
- 3.13 In terms of impact on the strategic highway network the wider aspiration within the Local Plan that the 8,380 new homes proposed will be delivered in sustainable locations was supported by Highways England. Such an approach should minimise the number of single-occupancy private vehicle trips generated and assist in supporting and creating a network of attractive, thriving and vibrant sustainable communities.
- 3.14 Several respondents supported the elements of the spatial vision that seek to support and deliver economic growth. The intention is to create 11,500 new and highly skilled jobs in sustainable, innovative and key sectors was supported, particularly that the focus will be on sustainable economic growth and diversifying the area's key economic sectors as well as being welcoming to and supportive of new enterprises. Support for the ambition that North Lincolnshire will be a location of choice for business and should make the most of its strategic location adjacent to the Humber and excellent transport networks and international connections was also received.
- 3.15 The economic growth elements of the spatial vision were also supported in terms of: including the aim to deliver increased prosperity for the area and how this will be achieved through directing growth across the area; seeking to deliver a competitive, diverse and high value economy with increased levels of prosperity and higher employment levels; and to make North Lincolnshire a location of choice for business, maximising the location of the area and the comprehensive transport networks therein.
- 3.16 The aim to protect North Lincolnshire's natural environment, and the recognition given to it as an asset for the visitor economy was welcomed, alongside the spatial vision's commitment to protect and enhance biodiversity, and recognition of risks to wildlife and the commitment to avoid risks when considering renewable and low carbon energy.
- 3.17 Two respondents supported the recognition of an energy corridor across North Lincolnshire which will form a major part of the local economy. The specific recognition to energy production within the corridor, and the recognition that North Lincolnshire will continue to play its part in producing the steady and adequate supply of minerals to meet national and local needs was also welcomed.
- 3.18 Anglian Water support for the principles within the spatial vision that encourage that development is designed in accordance with water resource best practice, in particular the management of surface water, through the use of SuDS and the drainage hierarchy to ensure resilience of any new development to the impacts of flooding and climate change.
- 3.19 There was particular support that North Lincolnshire will be, "a location of choice for business, making the most of being part of the Humber Enterprise Zone, the largest in England, as well as capitalising on its strategic location adjacent to the Humber, excellent transport networks and international connections provided by the South Humber Gateway ports" The view was provided that this aspect of the spatial vision correctly recognises that the gateway port facilities of the South Humber Gateway are all important facilities for the North Lincolnshire area.
- 3.20 Three comments generally support the Spatial Vision in terms of the recognition that the plan will support a growing population and the need for sustainable growth to be at the heart of policies, although it should be clear that the housing requirement is a minimum (NPPF paragraph 60), and it should be expressed as 'at least' 8,380 new homes.

- 3.21 A number of respondents did not support the draft spatial vision and provided detailed comments to support their reasoning. Many of the comments felt the vision should be clearer, address additional issues or include more detail. Those issues where greater clarity or detail was sought within the spatial vision were as follows.
- 3.22 One respondent considers that the Spatial Vision is generally appropriate but is seriously flawed or lacking in its approach to the spatial distribution of new housing development and its development strategy. With a new Local Plan to 2036, there is the exciting opportunity to promote a new 'vision' which addresses the failings of the existing 'vision' of the adopted LDF Core Strategy, which makes Scunthorpe the focus for development, growth and regeneration, but has singularly failed to achieve this. New housing development should be where the need is and where the infrastructure is being delivered to support strategic employment sites, investment and jobs at the South Humber Gateway. This is to ensure that the jobs and growth in renewable energy, ports, logistics and other sectors are supported by new, quality, aspirational homes for people, who, for sustainability and quality of life reasons wish to live closer to their jobs and in the attractive rural parts of North Lincolnshire, which can benefit from new investment, infrastructure, community facilities and improved services.
- 3.23 In terms of the specific mention of the natural environment one comment states it only refers to recognised areas of nature conservation importance and requires reference to maintaining and expanding a Nature Recovery Network, which is based around the designated and priority habitats as core sites. Biodiversity net gain, delivered through the planning system will contribute to the Nature Recovery Network through on site and off-site strategic provision of habitats. This network will deliver habitat connectivity for biodiversity to respond to climate change in addition to provision of ecosystem services and climate change mitigation.
- 3.24 Several responses (mainly from two respondents) required the inclusion of 'biodiversity net gain' in the spatial vision. Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing, as well as creating attractive and sustainable places to live and work in as set out in NPPF (para 170).
- 3.25 The value of North Lincolnshire's natural environment to public health and wellbeing was deemed to be an omission. The value that better quality green infrastructure will make for towns and villages as attractive places to live and work, and bring about key long-term improvements in people's health needs acknowledging.
- 3.26 Several responses welcomed the objective of creating a network of attractive, thriving and vibrant sustainable communities and ensuring the sustainability of the Principal Towns, Large Service Centre and rural communities. However the objective should recognise that the sustainability of the Market Towns and smaller villages can be enhanced by housing and economic growth to ensure that the subsequent Spatial Strategy achieves the correct balance of allocations throughout the area.
- 3.27 A view was provided that the spatial vision is clearly employment led, delivering economic growth to capitalise on the strategic location of the area, and delivering sufficient housing, in appropriate locations, to support the growth aspirations. The spatial vision must be supported by allocating sufficient sites for employment use, in line with paragraph 23 of NPPF. These allocations should comprise a variety of sites which range in size and location to ensure that they meet the needs of the market, delivering a range of employment opportunities and supporting communities across the area.
- 3.28 One response was supportive of the spatial vision, especially the notion of protecting and enhancing the high-quality natural environment and that the countryside will be protected from 'inappropriate development.' The spatial vision focusses heavily on the need to deliver prosperity for the area. However they were disappointed that the reference to the protection of the natural environment 'for its own sake' is so far towards the bottom of the spatial vision. It is recognised that the countryside is an asset and will be enjoyed by tourists and residents alike and that accessing it in turn helps to improve the quality of lives and the health and well-being of residents. However, it is felt that in light of the climate emergency declared by central Government and many local authorities across the country, the countryside really

should be given greater importance in the spatial vision as an aid to help reduce the impact on climate change and achieve a net gain in biodiversity in line with the emerging Environment Bill.

- 3.29 Those issues where greater clarity or detail was sought within the spatial vision included:
- It does not appear to consider the long term uncertainty of the Scunthorpe steel works or the refinery. With a move to electric cars in 2030 the petroleum industry is a dying industry, if the refinery site is retained longer term then it will look very different.
 - This spatial vision is fine for places such as Scunthorpe and smaller towns but not rural areas. There are many areas for the building of new homes in places that have become rundown and neglected. Rural areas should be kept as natural as possible for wildlife and growing food products.
 - No mention on how the growing traffic issues are destroying villages in and around the corridor to the Immingham port and Humber Bridge.
 - More ambition for Barton Upon Humber to grow, as opposed to just being grouped with other Principal Towns, Large Service Centres and rural communities. Growth, supported by appropriate infrastructure, will help sustain and improve the town's shops and public services for the benefit of existing as well as new residents.

Responses – Question SV2p: Preferred Spatial Objectives for North Lincolnshire

- 3.30 **37** respondents provided an answer to this question. **24** agreed with the preferred spatial objectives, whilst **12** did not. **1** did not select an option, but still provided comments.

Table 3.2: Responses to Question SV2p: Preferred Spatial Objectives for North Lincolnshire		
Response	Number of Respondents	Percentage of Respondents
Yes	24	65%
No	12	32%
No option selected	1	3%
Total	37	100%

Summary of Responses – Question SV2p: Preferred Spatial Objectives for North Lincolnshire

- 3.31 As highlighted above, a number of respondents provided detailed comments that set out their reasons why they agreed or disagreed with the draft spatial objectives, or felt that alternative objectives should be included in the local plan.
- 3.32 The comments received in support of the spatial objectives took two forms. A number of respondents broadly agreed with the proposed spatial objectives, considering them reasonable as well as aspirational, covering all issues and topic areas expected of a Local Plan (12 in total). Whilst the remainder supported the draft spatial objectives but with amendments or new spatial objectives in certain instances.
- 3.33 Outlined below are the specific spatial objectives that received support, but through the consultation were deemed to require amendments. Spatial objectives not mentioned received overall support with no suggested amendments.
- 3.34 **Spatial Objective 1: Growing Our Economy** – A number of respondents supported this objective. One comments stated that economic growth should continue to be located at sustainable locations, and existing key employment areas should be encouraged to grow and adapt in line with Paragraph 80 of NPPF. A particular site at Gefco site off Belton Road in Sandtoft was outlined as providing an excellent opportunity for North Lincolnshire to deliver against the objective to grow the economy. Another supporting response stated this objective seeks to leverage the strategic location adjacent to the Humber

Estuary, infrastructure and international connections to identify sufficient levels of employment land to meet the needs of existing and future businesses. Another comment welcomes and supports the aspect of this objective which makes it clear that, 'The area will make the most of its strategic location adjacent to the Humber Estuary, infrastructure and international connections to be a key location for businesses....'.

- 3.35 **Spatial Objective 3: Meeting our Housing Need (Best Place to Live)** – Three comments support the recognition within this spatial objective that North Lincolnshire Council needs to increase the supply of quality housing to meet future needs and support the growth of the economy, including the provision of affordable housing.
- 3.36 **Spatial Objective 4: Delivering Infrastructure for Growth (A Connected North Lincolnshire)** – There was support for this spatial objective, particularly the mention of green infrastructure relating to connectivity. For the sake of continuity within the Plan the respondent thought there is an opportunity to include green infrastructure within the Connected section of the Outcomes for North Lincolnshire. Highways England stated it will need to be ensured that the Strategic Road Network can safely and efficiently support the objectives of the Plan.
- 3.37 **Spatial Objective 6: Protecting and Enhancing Our Natural, Built and Historic Environment** – Historic England only supported this spatial objective and welcomed the inclusion of 'setting' in relation to the historic environment.
- 3.38 **Spatial Objective 9: Improved Enabling Quality of Life** – There was overall support for this objective and a view was provided that it recognises that cultural facilities can contribute to quality of life and well-being.
- 3.39 **Spatial Objective 11: Planning for Climate Change** - A response welcomes the recognition of sustainable flood management, carbon reduction measures and decarbonization through conservation land management. However, the wording specifically mentions 'protecting habitats', which is not sufficient alone, there also needs to be reference to creating new habitats too, including natural solutions to climate change, i.e. habitat creation and management, which can also help to deliver Nature Recovery Networks and the opportunities to deliver these through mandatory biodiversity net gain.
- 3.40 **Spatial Objective 12: Efficient Use of Our Resources** – Anglian Water provided a view that the use of good design can reduce the consumptions, and need to manage water/sewerage, this approach represents a more sustainable way of reducing our impact on the water cycle and increase the sustainability of our system.
- 3.41 **Spatial Objective 13: Ensuring Minerals Supply** - Two respondents welcomed this spatial objective and its intention to ensure a steady and adequate supply of minerals, including energy minerals.
- 3.42 One respondent supported a number of the spatial objectives in terms of hydrocarbons. These were Spatial Objective 11: Planning for Climate Change; Spatial Objective 12: Efficient Use of Our Resources; and Spatial Objective 13: Ensuring Minerals Supply. The proposed growth set out in other spatial objectives can only be achieved utilising natural resources within and beyond the boundaries of North Lincolnshire. Hydrocarbons will continue to have a role within and beyond the plan period as part of the transition towards a low carbon economy. They will continue to be an efficient use of resources and it will be important provision is made to ensure a steady and adequate supply to meet national, regional and local needs. The potential to utilise natural indigenous resources would be more sustainable than a continued reliance on imports.
- 3.43 The reasons provided by respondents for disagreeing with the spatial objectives varied. Some sought greater clarity in order to aid interpretation, some objected to a number or as a whole, whilst others focused on specific spatial objectives and the Plan's strategic aims, priorities and overall spatial approach.

- 3.44 One respondent stated that the fourteen objectives set out do not appear to cover a broad range of issues relevant to North Lincolnshire. They suggest that 'Spatial Objective 3: Meeting Our Housing Need (Best Place to Live)' should be identified ahead of 'Spatial Objective 2: Enabling Sustainable Communities to Flourish'. This is because there has been significant under-delivery of housing over a prolonged period of time, which will need to be addressed through the emerging Local Plan. The fact that there has been under-delivery should be reflected in the wording of the objective, so that it is clear that the Council is seeking to address under-delivery through this Local Plan to help meet the housing need. In addition, housing need is a mechanism to supporting sustainable communities (Objective 2) as new development can support the vitality, viability and economic performance of existing settlements, by providing a critical mass that is required to ensure local services can remain open and operational.
- 3.45 **Spatial Objective 6: Protecting and Enhancing Our Natural, Built and Historic Environment** – A view was provided that the text relating to the natural environment needs to be strengthened, to reflect the need to contribute to nature's recovery throughout North Lincolnshire, which the Government has stated will be achieved through mandatory biodiversity net gain. One respondent felt that reference to the importance of the non - designated 'ordinary' countryside would be beneficial as these areas so often get overlooked but are crucial to residential amenity and well-being. Opportunities to access these areas should be protected and enhanced alongside those sites and landscapes which are nationally and internationally recognised. Another response felt that the wording "conserve and enhance" does not go far enough and a principle of biodiversity net gain and a commitment to enhancing ecological networks should be included as required by NPPF.
- 3.46 **Spatial Objective 9: Improved Enabling Quality of Life** – One comment disagreed with this objective on the grounds that Local Plan policies must recognise the value of Greater Lincolnshire's natural environment to public health and wellbeing, NPPF (paragraph 170b). This would include the value of the natural environment for and the role of green infrastructure in promoting positive health and wellbeing outcomes. This would feed into the Government's commitment, in the 25 Year Plan for the Environment to connect "...people with the environment to improve health and wellbeing." Another comment felt this objective does not go far enough, only seeking to protect core designated sites.
- 3.47 **Spatial Objective 10: Developing Our Visitor Economy** - A view was provided that Local Plan policies must recognise the value of Greater Lincolnshire's natural environment to the visitor economy and as such the recognition of nature as an asset to visitor economy was welcome, however all visitors have a physical impact and there is a risk that this will have a negative effect on the biodiversity. There is a responsibility to ensure the appropriate use and management of the natural environment. The NPPF calls for a sustainable approach which includes "making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution..." (Paragraph 8c). In line with this Spatial Objective 10 should include a commitment to mitigating against the impacts of the visitor economy on the natural environment that it uses.
- 3.48 **Spatial Objective 11: Planning for Climate Change** – A view was provided that this objective could be clearer in terms of reducing the causes and impacts of climate change in North Lincolnshire, contributing to achieving safer environments and communities; reducing flood risk to (existing and new) communities by identifying and supporting implementation of necessary flood risk infrastructure, locating new development, where possible, away from areas at risk of flooding, and ensuring that new development is safe from flooding/securing sustainable flood management in new development; and increasing the use of low and zero carbon technologies and decarbonisation by encouraging appropriate building design, supporting businesses to adapt and decarbonise and promoting sustainable land management, including habitat protection and creation.
- 3.49 One response felt that this Spatial Objective 11 should be strengthened by reference to the need to achieve a net gain for biodiversity as set out in the NPPF and the emerging Environment Bill. Appropriate encouragement for re-wilding and tree-planting should be included alongside the measures already provided for.

- 3.50 One respondents did not state whether they agreed or disagreed with the spatial objectives, nor did they seek to suggest any alternative objective. Their comment related to paragraph 2 stating that Local Plans should contain robust policies for the protection and enhancement of green infrastructure and therefore support its inclusion in this paragraph. However they also felt that the wider benefits of the natural environment should be recognised and as such more detail of the multiple benefits should be included within the policy wording. This detail would serve to evidence the need for green infrastructure and support its inclusion within the policy meeting the NPPF (Paragraph 31) requirement for policy to be “...underpinned by relevant and up-to-date evidence.”

General Comments

- 3.51 A number of general comments were made to the contents of Chapter 2 and these are summarised as follows:
- 3.52 A comment noted the series of ‘Prosperity Plans’ that feed into the proposed Spatial Vision and Spatial Objectives, including a ‘Housing Growth Plan 2018-2023’. A summary of the Housing Growth Plan is set out but the full text of the Housing Growth Plan does not appear to be available, and the only detail of the Prosperity Plans is a summary document. If the full suite of Prosperity Plans are to be relied upon as evidence they must be published in full to allow reasonable consideration.
- 3.53 One response supported the recognition of the following key challenges: Population Changes: To meet the housing requirements of our growing, and increasingly older population; and Housing Provision: Providing a sufficient supply of housing land and quality houses supported by infrastructure provision, in the right locations in North Lincolnshire to support economic growth, including meeting the needs for all our communities.

4. SPATIAL STRATEGY

Introduction

- 4.1 Creating and delivering sustainable development lies at the heart of the planning system. The Local Plan is essential in ensuring the proper planning of North Lincolnshire over the next 19 years. It will set out a clear and co-ordinated approach to the provision of new homes, jobs and supporting infrastructure alongside the need to protect the interests of our communities and the environment.
- 4.2 This means that, when deciding how much growth will take place and where it should be located, the Local Plan must take the issue of sustainability into account, i.e. by looking at and assessing the economic, environmental and social impacts of growth and development on the area. The Local Plan will identify those locations that are most appropriate to accommodate future growth and development and set this out in a clear spatial strategy. The plan also needs to set out what “sustainable development” means locally and how its principles are applied.
- 4.3 This will take account of the need to minimise impacts on the environment and make the best use of existing or planned infrastructure. It will also look to identify areas/locations that could be serviced by new infrastructure or services. This is what is meant by sustainable development that will benefit both existing and future communities in North Lincolnshire.

Consultation

- 4.4 The Preferred Options document contained 10 questions relating to the spatial strategy and the plans strategic policies.

Question SS1p - Do you think SS1p: Presumption in Favour of Sustainable Development is the right approach?

Question SS2p – Do you think SS2p: Spatial Strategy for North Lincolnshire is the right approach?

Question SS3p – Do you think SS3p: Development Principles is the right approach?

Question SS4p – Do you think SS4p: Neighbourhood Planning in North Lincolnshire is the right approach?

Question SS5p – Do you think SS5p: Overall Housing Provision is the right approach?

Question SS6p – Do you think SS6p: Housing Distribution for North Lincolnshire is the right approach?

Question SS7p – Do you think SS7p: Strategic Site Allocation – Lincolnshire Lakes is the right approach?

Question SS8p – Do you think SS8p: Employment Land Requirement (including Strategic Employment Sites) is the right approach?

Question SS9p – Do you think SS9p: South Humber Bank is the right approach?

Question SS10p – Do you think SS10p: Development Limits is the right approach?

Responses – Question SS1p: Presumption in Favour of Sustainable Development

- 4.5 **30** respondents had views on the approach that should be adopted in the Local Plan in terms of the ‘Presumption in Favour of Sustainable Development’ policy and/or what it should contain. **23** respondents agreed with contents of the policy (with some amendments), whilst **7** did not.

Table 4.1: Responses to Question SS1p: Presumption in Favour of Sustainable Development		
Response	Number of Respondents	Percentage of Respondents
Yes	23	77%
No	7	23%
Other	0	0%
Total	30	100%

Summary of Responses – Question SS1p: Presumption in Favour of Sustainable Development

- 4.6 Overall the majority of comments received supported the inclusion of Policy SS1p.
- 4.7 Two responses support the policy but state that Policy SS1 and paragraph 4.4 should be amended to include the official definition of sustainable development rather than a summary. In contrast one response questioned the policies inclusion as it does not add anything which is not appropriately covered in NPPF (paragraph 16f).
- 4.8 Two comments focused on the ‘Monitoring’ section outlining its limited current indicator list given the breadth of the term sustainable development. There are no environmental indicators and social is limited to population growth (no wellbeing, access, quality of life).
- 4.9 A response did not specifically comment on the policy itself but outlined comments on the Spatial Strategy. West Halton was specifically mentioned and that it is categorised as a Smaller Rural Settlement, which will accommodate small-scale development of a limited nature, within settlement development limits. They consider this to be a missed opportunity to allow sites to come forward adjacent to

development limits, where it can be demonstrated that there would be no significant harm in terms of the character and appearance of development.

- 4.10 One view stated their opinion of the policy was dependent on the definition of sustainability. If housing growth, business growth development etc are kept to within the urban\industrial areas then the policy is acceptable.
- 4.11 A comment of support took the view that the policy is the right approach so long as the relevant Neighbourhood Plans, flood risk, highways issues and local choice are taken note of. While another supported stating and following this there should be no change to the present position of the development limit of a specific settlement.
- 4.12 Five comments felt Policy SS1 is considered to align with the presumption in favour of sustainable development outlined within NPPF and requires no change.

Responses Policy SS2P: Spatial Strategy for North Lincolnshire

- 4.13 **52** respondents had views on the approach that should be adopted in the Local Plan in terms of the 'Spatial Strategy' policy and/or what it should contain. **31** respondents agreed with contents of the policy (with some amendments), whilst **21** did not.

Table 4.2 Responses to Question SS2P Do you think the Preferred Policy SS2p: Spatial Strategy for North Lincolnshire is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	31	60%
No	21	40%
Total	52	100%

Summary of Responses – Do you think the Preferred Policy SS2p: Spatial Strategy for North Lincolnshire is the right approach?

- 4.14 As set above, the majority of respondents agree with the proposed approach to the Spatial Strategy for North Lincolnshire set out in Policy SS2p. Many suggested amendments to improve the policies soundness in NPPF terms. Those who did not agree with the policy approach provided substantial submissions outlining their objections and issues that need addressing.
- 4.15 The NPPF and its guidance was regularly quoted by respondents in objections and comments. A view was provided that the Spatial Strategy seeks to deliver growth in a 'balanced manner'. They however have concerns as the policy identifies only one site for allocation within Goxhill, and this site already benefits from outline planning permission. In relying solely on this site, the Council are potentially stifling growth in this Large Service Centre. It is considered that the approach to growth in Goxhill does not meet the requirements of the NPPF, which encourages LPAs to plan positively in their approach to plan making. The NPPF seeks to ensure that Local Plans should positively seek and support opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. In contrast, the approach taken for Goxhill is not flexible, nor is it considered to be positive in respect of seeking opportunities to meet the needs of the community. In line with this, no evidence of housing need for the settlement of Goxhill has been made available therefore it is difficult to establish if the current growth strategy meets the current need.
- 4.16 It was considered that the plan has instead taken the path of least resistance, and have failed in their NPPF requirement to be aspirational in terms of growth, particularly important in Large Service Centre.

LPAs should allocate a range of sites in terms of both size and location, to ensure that any development which comes forward is sufficiently varied to meet market requirements. Quoting paragraph 68 of NPPF, the respondent recognises that small and medium sites can often be developed and delivered relatively quickly. In recognition of this important contribution Large Service Centres are considered to be particularly appropriate for accommodating levels of growth which remain in keeping with the size of the relevant settlement and its services.

- 4.17 Referring to the Council's Settlement Study (2019) one comment noted that Kirton in Lindsey was ranked fifth out of the 76 settlements and is clearly a demonstrably sustainable location to accommodate future growth. Given the categorisation in the Settlement Study it is not considered justified for Barton Upon Humber and Brigg to be placed in a higher tier of settlement than Kirton in Lindsey. It is also notable that of the seven settlements scoring more than 50 in the Settlement Study, Kirton in Lindsey is the only one with fewer than 2,000 existing dwellings. In fact, it is some 25% smaller than any other settlement with a similar score. This suggest that the services and facilities in the town offer ample scope for housing growth. In their view Kirton in Lindsey should be in the same tier of settlement as Barton Upon Humber and Brigg and should be a focus for growth. Under this option there is no reason why growth should be prevented in lower order settlements which appears to be the justification for the approach adopted having regard to the table that appears on Page 49 of the Preferred Options document.
- 4.18 Several responses support the policy focus on the Scunthorpe & Bottesford Urban Area through large scale residential site allocations, including sustainable urban extensions, and the appropriate use of previously developed land. There was recognition that Scunthorpe & Bottesford Urban Area, Principal Towns and the Large Service Centres are most suited to any large scale development, mainly because they have the facilities and capacity to deliver sustainable development.
- 4.19 One comment points out that opportunities for new development at the Local Service Centres and Rural Villages are proposed, commensurate to the size of these settlements. Though they are largely supportive of the overall thrust of the preferred spatial strategy, the response raises concern that Policy SS2p is only seeking to meet the minimum amount of new housing required over the plan period as defined through the Standard Methodology.
- 4.20 In relation to the published evidence, one lengthy comment considered there is no explanation why the Council is not seeking to significantly boost housing to a level consistent with the adopted Core Strategy 2011. Policy SS2p seeks to deliver at least 7,961 new homes (419 per year) to meet the needs of the existing and future population in sustainable and balanced communities. However there is no explanation within the Preferred Options about why the figure of 7,961 new homes is less than the 8,380 noted in the Vision, although it appears to be one year less supply based on the stated annual requirement of 419 homes. It is noted that the figure is based upon the government's standardised objectively assessed housing need methodology and is significantly below that adopted in the 2011 Core Strategy.
- 4.21 It was suggested in arriving at the above figure, the Council fails to give due consideration of a number of other documents which are said to inform the Local Plan. Most notably, these include: The North Lincolnshire Economic Growth Plan, The Greater Lincolnshire LEP Strategic Economic Plan 2014-2030, The Greater Lincolnshire Growth Deals (2014, 2015 & 2017). Consistent with the above strategies and NPPF, the plan must consider further options for increased housing growth over the plan period. Such growth will also support the economic objectives of the plan and ensure there is a wide range of house types and tenures provided for the diverse and aging population. The settlement hierarchy is broadly supported, but clear cross-reference should be made to the principle of affordable exception sites being acceptable beyond settlement limits where there is an identified need.
- 4.22 The Local Housing Need of 392.78 dwellings was scrutinised in detail by a comment as follows. The cap is set at 40% above the higher of the most recent average annual housing requirement figure (754) or average annual household growth over 10 years (399 or 374). $\text{Cap} = 754 + (40\% \times 754) = 754 + 301.6 =$

1055.6. The capped figure is greater than the minimum annual housing need figure and therefore, the cap does not apply and the respondent does not consider that this should lead to any reduction in the housing requirement. Indeed, the Council will be aware that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The Standard Method provides a minimum starting point, and there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates.

- 4.23 PPG (ID: 2a-010) sets out circumstances when there might be a higher housing need than the standard method indicates this includes where there are growth strategies for the area, strategic infrastructure improvements, taking on an unmet need from neighbouring authorities, where previous levels of housing delivery or previous assessments of need are significantly greater than the standard method. They believe the Council will need to consider growth strategies for the area including: The North Lincolnshire Economic Growth Plan; The Greater Lincolnshire LEP Strategic Economic Plan 2014-2030; and The Greater Lincolnshire Growth Deals (2014, 2015 & 2017). It is suggested that the Council needs to consider strategic infrastructure improvements such as those set out in the Local Transport Plan, the Growth Deals and the Strategic Infrastructure Delivery Plan, considering that the evidence respondent submitted for the Issues and Options consultation sets out an assessment of need that is significantly greater than that set out in the standards method. Therefore, it is suggested that the medium economic growth projection had a housing requirement of 452dpa and that the longer term economic growth had a housing requirement of 583dpa. The response states the housing need is higher than the standard method indicates due to the circumstances set out above and in line with the PPG and considers that a higher housing requirement should be included within the Plan.
- 4.24 A number of comments outline that in their view there has been a significant decrease from the 2011 Core Strategy housing requirement of 12,063 new dwellings between 2010 and 2026 (754 new dwellings per year) and that it is not apparent what has changed in terms of the local communities' aspirations. They highlight the Governments 'Planning for the Future' paper, specifically that the housing requirement needs reviewing in light of the new formula included in the paper to determine if it is still the appropriate strategy for the Council.
- 4.25 Of the comments received a number generally support the using the standard method as the starting point to assess the housing need for the area. A number of comments highlight that assessing housing need is only the first step in determining how many homes need to be planned for and it should be undertaken separately from assessing land availability and establishing a housing requirement. It should also be noted that, as set out in the PPG, the standard method identifies a minimum annual housing need figure, it does not produce a housing requirement. They state that the Council have used the annual average household growth over the 10-year period from 2017 to 2027, and that this gives an average annual growth of 399 dwellings. The PPG states that the current year should be used as the starting point. If the most up to date figures were used, the average annual household growth over a 10-year period is from 74,611 in 2020 to 78,354 in 2030, giving an average annual household growth of 374.3 dwellings. The Council have used the median workplace-based affordability ratios for 2017 which provides a figure of 4.82. Local Housing Need is 392.78 dwellings. Whilst the calculation of the LHN based on the most up to date figures would give a lower figure than that calculated, they do not consider that this should lead to any reduction in the housing requirement. Indeed, the Council will be aware that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The Standard Method provides a minimum starting point, and there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates. PPG sets out circumstances when there might be a higher housing need than the standard method indicates this includes where there are growth strategies for the area, strategic infrastructure improvements, taking on an unmet need from neighbouring authorities, where previous levels of housing delivery or previous assessments of need are significantly greater than the standard method. They consider that the Council need to consider strategic infrastructure improvements such as those set out in the Local Transport Plan, the Growth Deals and the Strategic Infrastructure Delivery Plan. It is

considered that the (OAN Paper, 2017) sets out an assessment of need that is significantly greater than that set out in the standards method, and it suggested that the medium economic growth projection had a housing requirement of 452dpa and that the longer term economic growth had a housing requirement of 583dpa. They go on to say that they consider that the housing need is higher than the standard method indicates due to the circumstances set out above and in line with the PPG and considers that a higher housing requirement should be included within the Plan.

- 4.26 A significant number of responses comment on the Spatial Strategy in terms of its requirements and relationship to specific settlements and how this should, in their view, be rectified.
- 4.27 There was support that the Council has identified a logical approach is to deliver a 'Settlement Hierarchy' which identifies the most sustainable and suitable locations to accommodate growth within North Lincolnshire. It is a sensible and logical approach to direct the majority of new development to the major regional centre of the Scunthorpe and Bottesford urban area and sensible and logical to establish the settlement hierarchy based on the size of settlements and the level of services contained within the various settlements. In this context, the identification of 'Messingham' as a 'Large Service Centre' through emerging policy is supported. It is an important settlement with a range of services and facilities and it is essential that the vitality of the settlement is maintained, which will be achieved through sustainable growth.
- 4.28 A comment points out a number of settlements which have fewer facilities and services and are therefore considered by the Council to be less sustainable, and ultimately are ranked lower than Winteringham, but are proposed to see more housing growth than higher ranked settlements. The response considers that, in line with national policy, development should be focussed in locations which are sustainable through limiting the need to travel. There is no rationale for not allocating any site's in Winteringham and no evidence to support the Council's approach in this regard. They highlight a site they promote, which is currently the subject of a planning application, that (in their view) has no technical objection, why it should not be allocated as the suite of reports accompanying the current planning application set out that the proposal is acceptable. In light of this, they feel their client's site in Winteringham should be allocated for housing. They go on to say, this is a 15 year plan and North Lincolnshire needs to deliver new homes, and these should be located in sustainable locations like Winteringham. As set out above, the current planning application has no objections from technical consultees. Other proposed housing sites across the district, including sites in other Larger Rural Settlements, may have not gone through this process and material considerations (for example impact on highways) may mean that they are unlikely to be developed. This situation is further exacerbated as the Council has been unable to demonstrate a five year supply of housing land for a number of years, particularly in light of the new definition of deliverable set out in the NPPF. In light of this and the Housing Delivery Test results, they considers that the Council should allocate more sites for housing.
- 4.29 One view agrees with the proposals set out for Spatial Strategy in North Lincolnshire but suggests that growth in settlements (such as Winteringham), must be proportionate to the size of the settlement and no growth should considered outside of the defined development limit.
- 4.30 One response objects to the Ealand growth for the following reasons:
- They feel the development boundary fails to include land at Outgate Lane as shown on the Plan below. This is a deliverable residential development opportunity, and feel it is a large rural settlement where residential development can be sustainably located.
 - They feel the strategy in the Plan fails to distribute a reasonable proportion of the residential development required to the large rural settlements.
 - Ealand is a sustainable location with a railway station and provision for new Employment.
 - They feel additional development should be allocated to this sustainable settlement in line with a revised strategy to distribute new housing and maximise the prospects of supporting the rural economy.

- 4.31 A comments used this question as an opportunity to support the development limit for Wootton. More broadly for residents in 'Villages in Smaller Rural Settlements' they outline concerns that developers can submit sites again despite there being two previous similar exercises and asks procedural questions. On the same theme the document refers specifically to 'Villages in Smaller Rural Settlements' and states that 'All development should reflect the character and nature of these villages and give due consideration to the availability and capacity of infrastructure to support its growth. All proposals will be considered on their merits'. This latter paragraph should have added to it after 'merits' the words 'and on their adherence/conformation to these principles'. They state between now and the final approval of the Plan (which is far from imminent) the Council should be reassuring residents in such areas that any Planning Applications received will be dealt with having regard to the principles in the draft plan, to avoid a scenario where developers will seek to obtain Planning permission outside the development line in advance of the Plan being finally Adopted. Another respondent echoes this sentiment and suggests there needs to be a strict adherence to the scale of developments in these smaller rural settlements. They claim these fundamental policies should not be allowed to be undermined by planning appeals.
- 4.32 Multiple responses support the local plan's aspects on Wootton and raise concern over the available infrastructure capacity and service availability in the area. These responses put forward these concerns but also state their approval for the local plan for Wootton whilst wanting it keep its status as a low density village. One respondent goes on to say that they feel any large scale development outside these lines, particularly on Grade I agricultural land would have an adverse impact on the character and nature of the village environment. Another respondent goes on to say, the village lanes cannot take any more traffic and that the sewers cannot cope and water pressure would be even worse. There is support the local plan whereby Wootton remains a low density village with only limited sustainable infill inside the defined settlement limit that you have highlighted on the plan. Another response elaborates further supporting the policy whereby Wootton remains a low density build village within the existing defined settlement limits defined on the policies map. They state any large scale developments outside these limits would be on Grade 1 arable land as defined by the government body Natural England. They feel a large development outside these lines would have an adverse effect on the nature of the village and on the environment, and emphasise the protection of agricultural land for food growing in light of the current pandemic.
- 4.33 Comments were received in objection to South Ferriby's new classification as a Larger Rural Settlement. The population of South Ferriby is similar to Bonby and Worlaby, both of which remain as Smaller Rural Settlements and it is felt feel that the most appropriate classification for South Ferriby is Smaller Rural Settlement.
- 4.34 In relation to Rural Hamlets and Villages a comment questions the number of dwellings that will come forward under Policy SS2 and suggests considerably less than the neighbouring West Lindsey Plan (WLP). They feel North Lincolnshire villages seem to be constrained by settlement boundaries leaving very little but infill development available. They state expansion in some of the villages is greater than the 10% and it can also be increased via the Neighbourhood Plan option. The West Lindsey Plan (WLP) which is essentially the Central Lincolnshire Local Plan (CLLP) manages to classify many more Small Villages than the North Lincs Plan (NLP) and give them a minimum of 10% expansion of the dwellings in the village at the time of the Plan (2017), they count something like 98 such small villages and the 10% growth allows for some 2000 dwellings. There is a confusion over the differing approaches in North Lincolnshire Planning to that of West Lindsey, and the individual expresses difficulties in expressing this to small developers. The respondent goes on to propose a unified approach is taken across the whole of the top half of Central Lincolnshire.
- 4.35 Multiple responses broadly support the Settlement Hierarchy but suggest it underplays the role of the market towns in supporting the rural communities around them. The market towns and villages are more desirable places to live than the inner urban area, others echo this point emphasise the desirability of the

smaller rural villages too compared to urban areas. They state this is alluded to within the main sub-regional centre and an appropriate scale of development is needed to achieve the stated objectives for economic growth. Delivering high quality jobs means providing high quality homes in places where people want to live. Similarly, the network of rural villages can sustain a more appropriate level of growth that would enhance their sustainability, vitality and viability. Restricting growth in the villages to minor/small scale infill will stagnate those settlements particularly given the demographic trend of an ageing population. Whilst the hierarchy is broadly supported, it is interpreted in the subsequent policies as severely restricting growth opportunities in the market towns and smaller villages. In short – the Council's Preferred Options make all the 'right noises' about the preferred approach having an area-wide focus and spreading development across the area's towns and villages beyond Scunthorpe, the Principal Towns and Larger Service Centres. In reality, it shies away from this objective, particularly in its approach to the identification of housing allocations.

- 4.36 Another response states that a balanced approach to growth across all settlements is welcomed within the spatial strategy. Draft policy SS2p supports growth in Smaller Rural Settlements such as Appleby and small sites will have a role to play. All development should reflect the character and nature of these villages and give due consideration to the availability and capacity of infrastructure to support its growth. All proposals will be considered on their merits.
- 4.37 Another response outlines that Option A (Scunthorpe and Market Towns) set out in the 'Issues and Options' Local Plan consultation is the most appropriate spatial strategy to focus future growth. The range of services that Scunthorpe can offer and the population that it supports means that it is the main town in North Lincolnshire. The size of the other towns and villages are much lower in the hierarchy. Scunthorpe is already an established Sub Regional town and therefore should continue to be seen for expansion of its role for housing, employment and other services of the scale previously envisaged in the adopt Plan. They consider that the most sustainable option taking into account economic growth and environmental considerations, is to continue to concentrate significant growth in Scunthorpe and Bottesford combined with development to a lesser extent in the market towns and rural settlements within defined development limits. Allocating more housing to less sustainable rural locations would also risk eroding the character of these settlements. Therefore, the Council's preferred option will create a dispersed pattern of growth within the rural areas and this would not achieve the desired level of sustainability that would be forthcoming from a more focused approach on the higher order towns within the settlement hierarchy. They recommend that the proportion of housing growth to Scunthorpe should increase from 52% to at least a figure of 70% which is still considerably less than the proportion set out within the adopted Core Strategy.
- 4.38 One response objects to Policy SS2p in respect of both the number of homes the policy is proposing to deliver, and the strategy for development as discussed below. In summary, the housing delivery target identified in Policy SS2p (point 1) should identify the number of homes which will be delivered over the plan period, not the housing need identified by the Standard Method. The housing requirement should be adjusted to include a minimum 10% buffer of additional homes in the event sites do not deliver on time or at all. It should also allow for any additional growth that could occur as a result of the North Lincolnshire Growth Deal or and/or any other circumstances which could facilitate growth as outlined in the PPG.
- 4.39 One comment objects to the identification of the village of Eastoft as a 'Smaller Rural Settlement.' It is unclear how the proposed settlement hierarchy has been defined. The naming of the groups in the hierarchy (i.e. larger rural settlements and smaller rural settlements) and the placing of the settlements within this hierarchy, suggests that they have been grouped by size. However, paragraph 4.12 of the Plan notes that the settlement hierarchy reflects the role and function of the settlements in North Lincolnshire and is based on factual information. The Settlement Hierarchy Paper (2019) would suggest settlements were grouped by services. However, in some cases villages which scored poorly (i.e. Ealand and Wrawby) have been identified as larger rural settlements - and therefore suitable of accommodating additional

growth - whereas settlements with a higher score (i.e. Eastoft and Wootton) have been identified as smaller rural settlements - and can therefore accommodate limited growth. They suggest Eastoft should be recognised because they feel the existing services, suggest it is a sustainable location capable of accommodating appropriate new development and this should be recognised in the Council's Spatial Strategy and Settlement Hierarchy; this is developed on as they point the amenities Eastoft has. It is not considered that the approach to allocation in SS2P will secure the vitality of smaller rural communities. In failing to allocate small scale suitable sites, there is no guarantee that development will come forward to support smaller villages and services, whilst it also provides less certainty to communities, landowners and developers alike as to where and how development could come forward. The respondent states as a predominantly rural district, it is important the North Lincolnshire Local Plan recognises its rural villages and the important role new development plays in supporting their local services and rural communities.

- 4.40 In relation to Smaller Rural Settlements (specifically West Halton) it is noted that these settlements will accommodate small-scale development of a limited nature, within their defined settlement development limits, that supports their vitality and viability. As currently worded, the policy would not permit new housing (other than exception sites) on sites that are adjacent to the development limits. This is a missed opportunity to allow sites to come forward adjacent to development limits, where it can be demonstrated that there would be no significant harm in terms of the character and appearance of development.
- 4.41 In support of the suggestion above, the following two key points were highlighted. The first is the Settlement Survey 2018 (2019 Revision) which includes a revised settlement hierarchy with West Halton categorised as a Smaller Rural Settlement. These villages are unsuitable for accommodating a large allocation but capable of taking residential infill and development of an appropriate scale to the settlement either within or adjoining the settlement. This acknowledges that smaller rural villages are able to accommodate development at an appropriate scale on sites adjoining the settlement. The second point is to note that there have been several recent appeal decisions, where planning inspectors have permitted small scale housing schemes on sites adjoining the development limits in 'smaller rural settlements'. It would be very difficult for the LPA to fully review and accurately consider every development limits. Therefore, the restriction on only allowing sites within the development limits is likely to significantly restrict sites coming forward. By simply amending the wording to allow consideration of sites adjoining the development limits of smaller rural settlements, it will afford the certainty provided of development limits, alongside a degree of flexibility to allow suitable sites to come forward.
- 4.42 Draft Policy SS2p outlines that employment growth will be supported through the delivery of at least 7,961 new homes to meet the needs of the existing and future population in sustainable and balanced communities. Particular support is given at national and local levels for the expansion of existing business areas, providing a range of employment sites and support given the economic growth of rural areas through the expansion of all types of businesses and enterprise; this should be mirrored by supporting economic growth in rural areas currently home to businesses and enterprise within Spatial Objective 1. They strongly support the employment strategy outlined in the policy, and state this Spatial Strategy should be backed up thorough sufficient and appropriate allocations for employment land, and a flexible policy framework which allows for additional development of employment sites to come forward in appropriate locations across North Lincolnshire. They also note that the council's target of delivering 91.5 ha of employment land is 22ha greater than the target outlined within the Core Strategy (2011). In order to achieve this ambitious target, they feel the council must ensure that a pragmatic approach is taken when considering applications for employment development, this may be reflected through a flexible policy approach to ensure that measures can be taken to support development on sites outside of employment allocations and to allow measures which seek to ensure the viability of proposed employment sites. This may also take the form of an over allocation of employment sites to ensure that development can be market driven.

- 4.43 One response sets out the reference made at point 3 of the Spatial Strategy policy to 'Develop at least 91.5ha of employment land in key locations that supports the delivery of housing growth (...)'. The response supports this approach of focusing employment land in key locations. However, it is not clear from the policy the full extent of locations which are considered 'key'. Furthermore, they note that 'key' locations are not annotated on the associated key diagram, which would be helpful to ensure clarity and consistency. They also state that Humberside Airport has not been referred to as a key location in the policy, although 'strategic locations on Transport Corridors' could also apply to the airport as noted at paragraph 6.3 of the draft Plan and paragraph 6.14 references the airport as a priority site for supporting the draft Plan's Spatial Strategy. Clarity is sought on the list of key employment locations, the definition of strategic locations on Transport Corridors and the distinction between the two. As an international gateway, it is considered that the airport should be considered a key employment location. It is noted that the 91.5 ha figure is a minimum land requirement (paragraph 4.57) subject to review as more evidence becomes available. Ultimately, they support this flexible approach which will allow the district's response to changing employment needs to adapt over the course of the Plan period. They conclude that the application of an additional buffer of 50% which results in the minimum land requirement of 91.5ha should ensure flexibility and choice for future occupiers and is also supported.
- 4.44 A number of respondents expressed support for use of infill and brownfield sites for development and numerous responses call for development in larger settlements with existing facilities and amenities. For example, one states the Council have opted for the balanced option of spreading development across Scunthorpe and the larger Principal Towns, large service centres, larger rural settlements and smaller rural settlements through the provision of appropriately sized allocations or through infill opportunities within a defined settlement development limit; they therefore support this approach and feel it is essential that settlements keep their character and that sustainable growth occurs. Another asks for development to be concentrated on Scunthorpe and the larger towns and only use infill and neglected brownfield sites. They suggest this will help reduce transport issues and problems with the lack of amenities in village locations, as well as assisting in maintain footfall in major economic areas to avoid businesses closing. One response goes further and states the SS2P policy will prevent inappropriate development in smaller rural settlements. Finally, another respondent simply states developments should be on brownfield rather than Greenfield sites.
- 4.45 Another respondent supports the Spatial Strategy for SS2P, noting the prospective scale of growth envisaged within the Plan period particularly the number of new homes required, the creation of jobs, the development of a substantial area of employment land and new and the improved infrastructure to service such. They express whilst the drive towards renewable energy and low carbon energy will continue within and beyond the Plan period, realistically hydrocarbons will continue to be needed throughout this transition. Concluding, the importance that proposals for the development of hydrocarbon resources within and beyond the Plan boundary be carefully considered against the strategic policies for growth.
- 4.46 One respondent objects to the policy towards to Barton Upon Humber, where they feel it lacks ambition and require similar wording to that considered for Scunthorpe, that supports development on-allocated sites within the defined development limit and appropriate use made of previously developed land and greenfield sites. They suggest this wording is more positive whilst not giving an automatic assumption of approval through noting that use of sites must be appropriate, they also call for reference to be made to Barton as a centre for cultural and leisure activities, to build upon its existing offer.
- 4.47 Highways England support the approach set out within Policy SS2p as it is similar to the 'Scunthorpe and Market Towns' option they supported at Issues and Options consultation. In addition it is felt, decisions on investment in services and facilities are to be guided by the settlement hierarchy, resulting in support for the aspirations of the policy.

- 4.48 In terms of the protection of agricultural land several comments agree that it should not be considered for development, with one suggesting it should be protected with rare exception.
- 4.49 One response supports the policy but calls for protection of the heritage of the historic market town of Kirton-in-Lindsey taking full cognisance of its Neighbourhood Plan.
- 4.50 Another response supports the established settlement hierarchy and the identification of Wrawby as a larger rural settlement within the amended proposed development limits shown on the provided maps. They also support the commitments set out to support development within the defined settlement limits.
- 4.51 One response agrees with the sentiments of the policy but suggests there is a lack of detail and questions for instance, the quote: 'due consideration to the availability and capacity of infrastructure to support its growth' they then raise concerns about the availability of infrastructure such as transport networks, schools, shops and the future of electric vehicles and the necessity for infrastructure to support this including electrical charging facilities in light of an increased population.
- 4.52 One comment outlined the five Spatial Strategy options set out in the Issues & Options Local Plan but feels it is unclear in the Preferred Options if Option E has been pursued or whether an alternative strategy altogether is being put forward. It is their view that Option D 'a new settlement' should be pursued this most suitable reflects the ambitions of the Spatial Vision for North Lincolnshire. The Spatial Strategy as proposed appears to be aligned with Option A, B or C because 52% of the housing target is to be provided in Scunthorpe and Bottesford and therefore not a balanced approach. The Spatial Strategy needs to reflect a new Option for Growth linking housing to the employment growth at South Humber (particularly the economic growth ambitions of Able UK in their Able Logistics Park and Able Marine Energy Park schemes). The need to deliver jobs and attract investment to the area is crucial to the future of North Lincolnshire and this must include optimising the opportunities provided by the Humber Ports. The growth of villages in close proximity to the South Humber ports would be the most appropriate Balanced Option for future growth in North Lincolnshire. This can be achieved by changing the current spatial strategy to accommodate growth via strategic allocations close to major proposed sources of employment, including the significant expansion of an existing settlement, such as East Halton.
- 4.53 Several responses support the focus on large scale residential development through the provision of allocations including sustainable urban extensions and the appropriate use of previously developed land within the Scunthorpe Urban Area.
- 4.54 The desire to keep rural areas rural was outlined. Many villages do not have roads, drainage or anywhere for wildlife. Use the countryside for growing food.
- 4.55 In terms of Kirton in Lindsey supportive comments were received but with the amount of empty commercial units and the lack of sustainable transport, Kirton in Lindsey should be modified to a 'Principal Towns' settlement to allow more trains throughout the week and on a weekend and to develop a more regular bus service. They claim the way in which the towns' character can be protected is to allow it to grow via allocated sites (residential and commercial) through the Neighbourhood Plan, whilst it is currently being developed alongside the modified Local Plan. If this is not possible, they feel it should stay a 'Large Service Centres'; pointing to this method being used by a neighbouring authority.
- 4.56 In terms of flood risk the Environment Agency supports the policy approach however believes two settlements listed as a focus for growth (Barton Upon Humber, Brigg) and some of the large service centres (e.g. Crowle, Epworth, Goxhill) are wholly or partly within FZ3. Whilst the issue of flood risk is acknowledged as a constraint for Barton and Brigg in the Policy, a commitment to minimising development in areas in Flood Zone 2/3a, should be included.

- 4.57 The requirement that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity was highlighted and there was support for the commitment to protecting and enhancing the natural environment. A slight revision bullet point 7 to expand and recognise the need for the planning system to help deliver nature's recovery was recommended.

Responses – Question SS3p: Development Principles

- 4.58 39 respondents had views on the approach that should be adopted in the Local Plan in terms of the 'Development Principles' policy and/or what it should contain. **25** respondents agreed with contents of the policy (with some amendments), whilst **13** did not. 1 other comment was provided that did not select an option.

Table 4.3: Responses to Question SS3p: Development Principles		
Response	Number of Respondents	Percentage of Respondents
Yes	25	64%
No	13	33%
Other	1	3%
Total	39	100%

Summary of Responses – Question SS3p: Development Principles

- 4.59 A response did not specifically comment on the policy itself but outlined comments on a particular site in Kirton in Lindsey and the development on Grayingham Road before this development was granted permission. A similar response was provided for Wootton outlining concerns with regards to the highways network, and the drainage system which is old as is the water supply system.
- 4.60 One particular response welcomed the development principles and suggested additional text.
- In point 3 we suggest additional text: Promote and encourage the effective use of previously developed (brownfield) land (providing it is remediated where necessary and not of high environmental value), whilst demonstrating the efficient use of land and resources by ensuring development is built at appropriate densities.
 - Water resource efficiency is built into this policy: 4. Minimise the use of non-renewable and unsustainable resources, including energy, water and materials, during both construction and use. It is unclear what is meant by the term 'unsustainable resources' and we would suggest the term 'finite resources' may be more appropriate). As such we would expect to see a policy in the Plan requiring the tighter water efficiency standards of 110l/person/day for dwellings.
 - The policy would be strengthened by encouraging developments to add/enhance natural capital as well as biodiversity and requiring developments to avoid, remedy or mitigate adverse impacts to natural capital.
 - Paragraph 4.18: this could be broader, for example 'retention and provision of green spaces, trees, planting and habitats...'
 - Paragraph 4.24: Suggest adding reference to creating safe and attractive walking and cycling routes alongside protected and enhanced green corridors between communities, towns etc.
- 4.61 On a similar theme two comments were provided to include biodiversity net gain within these development principles, in accordance with NPPF paragraphs 170d and 174b.
- 4.62 Three objections were submitted to the requirement for all development to comply with the thirteen development principles. This would be overly burdensome for infrastructure and mineral applications such as those for hydrocarbon exploration and production. Minerals can only be worked where they are found, which is often in rural areas. Hydrocarbon applications often comprise functional, utilitarian plant and equipment such as drilling rigs and storage tanks which are standard in terms of height, scale and colour. There is little or no scope to make a positive contribution to the locality. They require the policy

to recognise that for many forms of development, the principles should be taken into account but that in practical terms, many may not be relevant. There should be no requirement to provide justification as to why each and every principle has been considered and discounted.

- 4.63 In terms of this policy seeking to promote and encourage the effective use of previously developed (brownfield) land (providing it's not of high environmental value), whilst demonstrating the efficient use of land and resources by ensuring development is built at appropriate densities whilst they consider that the re-use of previously developed land is generally a positive way to contribute to sustainability, it should not limit the development of other sustainable sites or compromise the delivery of housing to meet local needs.
- 4.64 A particular comment welcomes point 3 of draft Policy SS3P: Development Principles, setting out all proposals for development in North Lincolnshire should (inter alia) '3. Promote and encourage the effective use of previously developed land (brownfield) land (providing it's not of high environmental value), whilst demonstrating the efficient use of land and resources by ensuring development is built at appropriate densities.' However, there is no reference to this in the supporting textual justification. It is considered that developing brownfield land as a priority is in conformity with the NPPF and should be actively encouraged, therefore, such reference will strengthen the policy.
- 4.65 The policies aims to achieve the higher standards of sustainable construction and design through the incorporation of the principles of low carbon development was commented on by three separate responses. These were not objections to moves towards sustainable construction or the introduction of new technologies, however, the Council will be aware that the Government has consulted on The Future Homes Standard. The UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. The Government is proposing to remove the ability of LPAs to set higher energy efficiency standards than those in Building Regulations which has led to disparate standards across the country and inefficiencies in supply chains. This response considers that the Council does not need to include a policy in relation to the need to set standards of sustainable construction and design, as this will be provided by national standards.
- 4.66 A comment welcomed the reference made to making sustainable use of water as part of new development proposals. However the sustainable construction standards refer to low carbon development rather than water consumption and needs amending.
- 4.67 The principles outlined within this policy are supported in principle by one respondent, however, it's considered that they should be applied on a case by case basis, and any perceived harm should be weighed against any potential benefits in the wider planning balance.
- 4.68 One comment was supportive of the general principles to encourage brownfield sites, does not oppose this approach but would highlight that when looking to develop brownfield sites, the need to ensure that contamination is not allowed to migrate into the water system. The use of current best practice when developing sites, ensuring that development looks to separate surface water and foul drainage, even where an existing combined system may have been used on site, and that flows are reduced in accordance with the principles of the Non Statutory Technical Standards for Sustainable Drainage.
- 4.69 A response suggested the policy could be made more effective if the additional explanatory paragraphs specifically addressed the need for development to positively address existing walking and cycling routes and green infrastructure. As these are not part of the vehicular highway network, there is a common risk that decision makers will trust these as 'secondary' frontages. This could result in situations where tall fences, blank frontages and services such as bin stores could be created next to routes used for leisure and active travel. This could diminish the ability for existing assets to be used to their full potential.
- 4.70 One respondent felt sustainable pubic transport as well as cycling and community buses etc. should be encouraged with investment and subsidies. Putting cycleway signs is not enough.

- 4.71 A view was provided that bullet point 1: 'Be of a high standard of design' should be modified to 'Be of the highest standard of design' and a Design Standards Document should be developed.

Responses – Question SS4p: Neighbourhood Planning in North Lincolnshire

- 4.72 19 respondents had views on the approach that should be adopted in the Local Plan in terms of the 'Neighbourhood Planning' policy and/or what it should contain. 17 respondents agreed with contents of the policy (with some amendments), whilst 2 did not.

Table 4.4: Responses to Question SS4p: Neighbourhood Planning in North Lincolnshire		
Response	Number of Respondents	Percentage of Respondents
Yes	17	89%
No	2	11%
Other	0	0%
Total	19	100%

Summary of Responses – Question SS4p: Neighbourhood Planning in North Lincolnshire

- 4.73 Two responses note that the Kirton-in-Lindsey Neighbourhood Plan is in the developmental stage and the local community has shown real interest. They are pleased to have had the opportunity to develop our own plan and look forward to it being influential.
- 4.74 Another respondent feels the approach of encouraging the participation of Local Communities in planning matters and in shaping a spatial strategy is supported, in line with Paragraph 29 of the NPPF and relevant PPG. They feel any Neighbourhood Plan should be prepared in the context of the principles outlined within the NPPF and should seek to support and not restrict growth. They are aware of the emerging Neighbourhood Plan for Goxhill, which is at an early stage of production. On behalf of the respondent's client, they look forward to the opportunity to liaise closely with the Neighbourhood Plan Steering Group to become active participants in its development moving forward.
- 4.75 In regards to Winteringham, a respondent supports this strategy as the Parish has been designated a Neighbourhood Area and is in the early stages of developing a Neighbourhood Plan it will give our community a greater say in any future growth in the Parish.
- 4.76 One response says the people who live in the village parish should have a say in any developments they will have to live with long after the developer has gone.
- 4.77 A response supports the approach but states, not for private developers. They feel there is no such thing as affordable housing, having younger families in mind. They believe housing associations should only be given permission to build if the properties are to be let NOT sold. They were originally not for profit as such but any profit should go to building rented accommodation. There is a serious lack of "council housing".
- 4.78 One person comments, it would give local communities more control over any proposed developments within their areas.
- 4.79 A response agrees in principle, calling neighbourhood planning a laudable idea, but say it appears very cumbersome and so far doesn't reflect the diverse nature of the North Lincolnshire population. They ask, where are New Holland, Ulceby and North and South Killingholme? They feel process will be driven by the middle classes and not officers of the elected council.

- 4.80 Another individual thinks North Lincolnshire Council should support Towns who are developing a NP to be the prevailing policy driver when it comes to allocated commercial and residential sites in a Principal Town or Large Service Centres subject to a suitable level of research and underpinning being carried out (housing needs survey, etc.).
- 4.81 Another response calls for new developments to address how they meet sustainability criteria and proposals for development of more new homes in Wootton are unsustainable and go against Neighbourhood Planning Policies in their entirety.

Responses – Policy SS5p: Overall Housing Provision

- 4.82 **32** respondents had views on the approach that should be adopted in the Local Plan in terms of the 'Overall Housing Provision and/or what it should contain. **12** respondents agreed with contents of the policy (9 did not make further comments and 3 agreed), whilst **20** respondents did not agree with the policy approach.

Table 4.5: Responses to Question Policy SS5p: Overall Housing Provision		
Response	Number of Respondents	Percentage of Respondents
Yes	12	37.5%
No	20	62.5%
Other	0	0%
Total	32	100%

Summary of Responses – Question Policy SS5p: Overall Housing Provision

- 4.83 Those who provided detailed comments or views on this question generally disagreed with its principles. Most comments centred on the particular contents of the policy and did not agree with the housing growth figure suggested. Majority of respondents wanted to see a higher housing figure based on Economic Growth.
- 4.84 Comments which supported the policy firstly stated that as this is national policy they don't see how this approach cannot be supported. However they stated that they did not want to see any more development in Kirton-in-Lindsey under this plan after what has already been agreed prior to March 2020.
- 4.85 Another comment of support stated that a large proportion of the 2,153 dwellings already consented will be located at Lincolnshire Lakes, which Highways England has had a longstanding involvement in. It is recommended that the overall housing provision is brought forward in sustainable locations, in accordance with the relevant policies in the Plan, to minimise the number of single-occupancy private vehicle trips generated. It will also need to be ensured that the Strategic Road Network can safely and efficiently support the delivery of the Plan (including this overall housing provision).
- 4.86 One of the reasons respondents did not agree with the proposed policy as they felt a higher housing figure should have been proposed based on the economic projections. One responded stated that North Lincolnshire should be aiming for an aspirational economic growth approach to housing provision for the plan period (at least 745 homes per annum). This higher figure was reflective of the significant contribution to economic growth that Able UK will make to the North Lincolnshire economy and to take into account the paucity of supply in the last five years or so since the Core Strategy was adopted. Due to the latter, this figure should have been set at 1,182 homes per annum. It is disappointing therefore to see that NLC are opting for a much lower housing target and therefore annual requirement of housing (7,961 new homes at 419 per annum).

- 4.87 North Lincolnshire should be considering housing scenarios based on employment growth, particularly given the progress of the ALP and AMEP schemes. This progress can be given even greater weight for the reasons set out earlier, particularly now both schemes have been granted permission and consent respectively and are being built out. There is a strong case for the housing figures to be increased to support the proposed employment and economic growth at the South Humber Gateway through the ALP, AMEP and other developments. These offer the potential of about 9,000 jobs to 2030/when fully developed.
- 4.88 Economic changes are a key driver affecting housing demand and household formation rates and it is necessary to consider how the level of economic growth in North Lincolnshire relates to the possible level of housing provision. Income levels are directly related to employment opportunities and have an important relationship with the ability of households to exercise choice in the housing market. For example, it is more likely that a new household can enter the housing market when the state of the economy is good and employment levels and confidence are buoyant, and vice versa. The relationship between the housing requirement and economic growth and local jobs is also important in ensuring that there are sufficient workers to fill planned jobs and vice versa and to also achieve regeneration and other objectives. In order to support economic growth, a comparable level of homes will need to be provided to support the growth of economically active residents. It was stated that accurately assessing population change and housing need even in the short term is difficult. It is important, therefore, that figures derived from looking ahead over a twenty-year time frame are treated with some caution and the necessary caveats are applied to both these population figures and their translation into indicative figures for additional houses and jobs. However, in other studies (e.g. Cambridgeshire Housing Market Area) there is estimated to be between a 0.4 and 1.6 ratio of new jobs to housing, averaging at about 0.9. Therefore, for 9,000 jobs this would equate to a need for some 8,100 additional new homes to support jobs growth. This needs to be taken into account in the emerging Local Plan.
- 4.89 Further comments were received specifically on housing supply stating the housing supply position is in a critical condition. The NPPF requires local planning authorities to significantly boost the supply of housing. To help to do this local planning authorities should identify and annually update a supply of specific deliverable sites to provide five years' worth of housing against their housing requirements, with an additional buffer to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. They state on review of recent appeal decisions the NLC cannot demonstrate a 5YHLS. This confirms that the Council, based on current identified supply, is unable to meet its short- term housing needs. As a consequence, there is a clear expectation that unless material considerations imply otherwise sites that offer the opportunity to deliver additional housing should be considered in the context of the presumption in favour of sustainable development within NPPF (Paragraph 11). This puts the Council in a very vulnerable position and demands drastic action and whilst we welcome the ongoing "Call for Sites" submissions to address this, we do not agree with the assessment of the sites we have put forward through this process, as set out before.
- 4.90 This vulnerable position is compounded by the severe problem of housing delivery in the district that has pervaded for over a decade and threatens housing, economic and other objectives included in the Council's spatial vision. The Lincolnshire Lakes development in Scunthorpe, which has been relied upon to deliver much of the housing requirement for North Lincolnshire, has been held back by massive flood risk, infrastructure and other factors and has failed to deliver any housing as yet. Extensive infrastructure works to overcome these significant constraints are underway but there is still some way to go before any homes will be constructed and occupied. A new outline planning application was submitted in May 2015 for 2,500 homes of the Lincolnshire Lakes scheme and is yet to be determined. This reliance and subsequent failure of delivery at Lincolnshire Lakes has meant that there has been a severe under-delivery of housing in the district. In the absence of an updated 5YHLS statement, the graph below shows the rate of completions against the Core Strategy annual target (note the annual target from the May 2018 Housing Land Supply Statement was 1,182 dwelling per annum). These figures point clearly to an urgent need for a fundamental re-think and review of the Council's housing strategy and supports the representations set out herein.

- 4.91 To ensure choice and competition in the housing market and market for land (as required by Paragraph 67 of NPPF) the annual housing figure must be increased to get the housing trajectory on track and meet spatial planning, economic, employment and other objectives in the Council's Local Plan and the Greater Lincolnshire LEP Strategic Economic Plan (SEP) 2014-2030 (Refresh 2016).
- 4.92 Policy SS5p details the housing requirement of 7,961 new homes for North Lincolnshire over the plan period 2016-2037, an average of 419 dwellings per annum. To provide flexibility in the delivery of housing the Council propose to allocate an additional 419 dwellings over the plan period. Overall, this means that there is a 5% surplus in supply over and above the proposed housing requirement.
- 4.93 Another respondent stated that they consider that the level of surplus land provided through the Local Plan is insufficient. To enhance the deliverability of the Local Plan they recommend that the surplus in supply should be increased to at least 20% of the proposed housing requirement (an additional 1,119 dwellings to that planned for through the Local Plan as drafted. The proposed housing requirement of 419 dwellings per year represents the very minimum level of housing needed to comply with national planning policy. As highlighted, the PPG confirms the existence of several circumstances in which the adoption of a higher housing requirement is justified. There is little evidence that the Council has considered these circumstances when arriving at the proposed housing requirement. As such, based on existing evidence and in the context of current national planning policy, the respondent cannot support the Council's proposals for the housing requirement as drafted. They state it is noted that the Council prepared a Local Housing Needs Assessment in September 2019 which set out four alternative scenarios for housing growth in North Lincolnshire. The current proposed housing requirement is significantly lower than all of the housing requirements considered through the scenarios which were based on the level of economic growth in the local area, as indicated by the Council's own evidence base. As a result they suggest that an exercise is undertaken by the Council ahead of the Regulation 19 stage to examine whether the housing requirement should be uplifted in response to any of the above factors. This exercise should be undertaken in parallel to work considering what effects accommodating a higher level of growth in the Borough would have on sustainability factors, including identifying further potential supply options. The work should inform the final version of the Local Plan to be submitted for examination.
- 4.94 Other comments stated that the NPPF (2019) paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing including affordable housing. The Local Housing Needs Assessment (LHNA) identifies that the Standard Method calculation would require a minimum of 419 dpa (as per NPPF (2019) paragraph 60). For the plan period 2019/20 and 2035/36 this suggests a minimum requirement of 7,123 (419 x 17) dwellings. The LHNA considers the suitability of this minimum requirement against the average build rate of 358 dpa over the previous 10 years (table 6, 11). It is important to note that these levels of completions were significantly below the policy requirement for these years and that this was in part due to the under delivery of the Lincolnshire Lakes. They state that the failure of this strategic location to deliver housing has had implications, not only with regard to undermining the locational strategy of the previous plans but also to the poor rate of delivery of affordable housing within the district. National Planning Practice Guidance (NPPG) Paragraph 2a-010 states that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area and that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.
- 4.95 Affordable housing was also raised as part of these comments and it was stated that meeting all of the identified need for affordable homes in North Lincolnshire (156 dwellings per annum) will be challenging, particularly with regard to the recent numbers of affordable housing completions recorded, detailed in Table 8.29. Since 2014/15 the number of affordable houses constructed in North Lincolnshire has fallen. Fewer than half the identified annual affordable housing need figure of 156 have been delivered during each of the past three years. The average number of affordable homes built in North Lincolnshire over this five year period is 91 dwellings per year." Table 8.29 of the LHNA shows that the delivery of affordable dwellings has fallen from 128 in 2013/14 to 69 in 2017/18. While the LHNA quotes the superseded NPPF the need to provide for affordable housing is encapsulated in paragraph 20 of the NPPF (2019) as highlighted above. The LHNA identifies a need for 156 affordable houses a year. The Local Plan Preferred Options Policy uses the same approach as the Core Strategy Affordable Housing Policy which sets a target

of 20% within the Scunthorpe and the Market Towns and 10% within the Rural Settlements on all major housing development. They state that the suitability of adopting an approach that only delivered 69 affordable dwellings in the last year appears to be unsound. They state the over reliance on the stalled Lincolnshire Lakes project which is identified to deliver almost half of the requirement (some 3,000 dwellings) is a considerable risk to the delivery of the plan overall and to the delivery of affordable housing. The outline application for 2,500 dwellings at Lincolnshire Lakes will only deliver 5% affordable housing due to issues of affordability associated with this high-risk venture. Even this level of provision is only possible with a considerable level of grant funding for the development. This means that within the plan period the 3,000 dwellings identified to contribute to the supply are only likely to deliver some 150 affordable dwellings. This is less than a year's need. In this situation, even if all the remaining allocations 3,515 (6515 – 3000) delivered at 20% affordable housing this would only provide for 702 affordable dwellings which is less than 4.5 years of affordable housing need. It is clear that the plan as currently drafted is unsound as it does not make sufficient provision for affordable housing. The solution to make the plan sound would be to increase the overall level of housing requirement so that additional sites can be allocated in viable locations which can deliver a greater percentage of affordable dwellings.

- 4.96 It was also stated that in view of the aim of the draft Plan to grow the economy it is unfortunate that the housing growth figure is restricted by prescriptive Government guidance. The overall need of 7,961 new houses is increased to 8,380 by the addition of a further 419 to be provided in the first 5 years of the Plan. This increases the annual requirement from 419pa to 503pa for this period yet this is not set out as clearly as it might be, nor is it referred to as a monitoring indicator.
- 4.97 Another objection stated that the overall housing requirement is said to be 419 X 19 years. The 419 units is derived from the government standard methodology and taking into account the under delivery over the past years. This requirement is said to include the Planning permissions already granted of some 2,153 dwellings. It is unclear from the document how if at all the economic aspirations of the LPA have been taken into account and if there is any additional dwellings requirement as a result, of the economic strategy and proposed growth. It is said that in the first five years of the Plan an additional 419 dwellings are to be allocated, giving a requirement of 8,380. These are the 20%buffer dwellings in the five year land requirement and it is not clear how these are allocations. Furthermore it is unclear if the existing commitment of 2,153 is indeed the correct figure. The latest five year land supply document of January 2020 indicates the sites with permission are 1,968. If this is a more accurate figure then there will have to be more allocations to meet the overall requirement. It is the case that the completions in the area have not met the Plan requirements over the last few years and have not even met the proposed 419 dwellings per annum that are now proposed. This is due to the skewing of the strategy to large sites in the urban area that have failed to be delivered. The new Plan should not make the same mistake. In simple terms there needs to be more and varied sites in the "Planning Hopper" so that the required amount will be delivered. Allocations in bare numbers and housing delivery are not a perfect match and this Plan should allocate additional sites to ensure flexibility. There is no evidence of flexibility in the allocations and such an allowance of at least 20% should be included. The overall requirement should therefore be 1.Clear as to what is included [economic uplift] 2. Include a flexibly allowance and 3 be accurate as to what the level of commitments are.
- 4.98 Another comment received stated that the housing requirement should be a higher figure. Support was given to the Council in seeking to maintain a rolling five-year supply of deliverable sites, and generally considers that providing additional allocations to provide flexibility in supply is appropriate. However, an additional 419 homes is only a very small level of flexibility and they consider that the Council should seek to provide further flexibility in the supply.
- 4.99 Further comments stated that the Policy seeks to introduce flexibility and choice by allocating an additional 419 dwellings for the early part of the Plan Period. However, the Council's trajectory for the delivery of housing through the Lincolnshire Lakes project is unrealistic. Problems over delivery in the short-term are compounded by the over reliance on a major strategic urban extension which relies on the resolution and delivery of major infrastructure. These problems are compounded by the historical rates of delivery as borne out by the Housing Delivery Test; and by the over reliance on a small number of allocations delivering the bulk of the housing growth. To illustrate, Policy H1p: Site Allocations identifies just 37 new housing allocations for the Plan Period. Of these, there are 12 sites in excess of 100

dwellings (per Allocation) delivering a total of 5259 dwellings out a proposed 6515 – or put another way 11 sites are supposed to deliver over 80% of the requirement through new allocations.

- 4.100 They state that there is an insufficient number of new allocations of smaller sites under 100 dwellings identified, particularly in the short term. These smaller sites are the sites that can have the greatest economic impact (local sub-regional builders) and which can realistically boost housing supply in the short term. Indeed, the Government is currently stressing the importance of Local Authorities assisting small builders– recognising the importance they need to play in diversifying the housing market players. Therefore the Policy needs to provide for an even greater increase in housing numbers in the short term in order to provide more flexibility and choice in the face of such a significant proportion of growth dependent on the delivery of a strategic new settlement and such a small number of larger sites. This can be achieved through the identification of a range of smaller sites under 100 dwellings – which can play a vital role in boosting supply – and which proportionately can have a greater economic impact in the short term. This is because smaller sites can be delivered by local and sub-regional builders.
- 4.101 Other comments state that Paragraph 59 of NPPF aimed to boost significantly the supply of housing. Paragraph 60 recommends that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard methodology in national planning guidance unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends signals. Given this context, Strategic Housing Market Assessments (SHMAs) primarily inform the production of the Local Plan and their key objective is to provide the robust and strategic evidence base required to establish the full Objectively Assessed Need (OAN) for housing and provide information on the appropriate mix of housing and range of tenures needed. The NPPG clearly states that they do not set a ‘housing target’ for the planning authority. Paragraph 11 of the NPPF sets a presumption in favour of sustainable development whereby local plans should meet objectively assessed development needs, with sufficient flexibility to respond to rapid change. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. It identifies a minimum annual housing need figure but guidance in the NPPG clearly states the figure does not produce a housing requirement figure.
- 4.102 Indeed, the use of the standard method for strategic policy making is not mandatory. If it is felt that circumstances warrant an alternative approach the NPPG guidance allows for this to take place. The NPPG specifically asks when it might be appropriate to plan for a higher housing need figure than the standard method indicates. It reconfirms that the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there is a clear acceptance that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Circumstances where this may be appropriate include but are not limited to situations where increases in housing need are likely to exceed past trends because of growth strategies for the area that are likely to be deliverable.
- 4.103 Given the Council’s ambitious employment growth plans for the area, the respondent considers North Lincolnshire’s housing need is far greater than is proposed within the Preferred Options Local Plan. Government advises authorities that it will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests. They also note that within the recently released Government document entitled ‘Planning for the Future’ dated March 2020 as part of the Budget announcement, it confirms they will be introducing a new approach to the standard method which encourages greater building within and near to urban areas to make sure the country is planning for the delivery of 300,000 new homes a year. They refer to the SHMA 2019 which focuses on housing completions in North Lincolnshire over the past 10 years with the annual average number of dwellings completed over this being 358. It confirms that the district has struggled to deliver new housing at the levels required by the Core Strategy 754 dwellings per annum. The SHMA compares the average completion figure over the past 10 years with the minimal annual local housing need figure for the district calculated using the standard method which equates to 419 dwellings. The study simply compares the two figures and confirms that ‘the delivery of 419 new homes per year is an accurate, realistic and

achievable minimum target on which to base future housing allocation policies.’ We consider this is a too simplistic approach to adopt and no weight is given to the area’s significant potential and continued aspiration for economic growth as promoted within the draft Local Plan.

- 4.104 To ensure that the plan is based upon a sound footing it is therefore essential that the Council seek to align its housing requirement with a positive growth strategy. Given the economic potential within the area, the housing growth strategy proposed by the Council is not considered to adequately fulfil these criteria. Within the SHMA reference is made to comments from Midlands Engine to a pressing need to boost the supply of new homes to attract and retain the skills and flexible workforce needed to fill jobs and continue to drive productivity and growth.
- 4.105 Having regard to the employment land requirement, it is clear that the Council take a somewhat conservative approach through the identification of only 91.5 hectares of land between 2017 to 2036 which includes an additional buffer of 50% of the total requirement on the basis of ensuring appropriate flexibility and choice to deliver approximately 11,500 jobs over the plan period. It should be recognised that this employment requirement is a minimum amount and not a target. Clearly the draft plan has significant ambitions for economic growth beyond the minimum requirement as it identifies 190 hectares of employment land allocations in connection with Policy EC1P and a further 1063 hectares of strategic employment allocations relating to South Humber Bank, North Killingholme and Lincolnshire Lakes.
- 4.106 In stark contrast, it is clear that the only proposed increase by the Council above the standard housing need figure of 419 dwellings pa is an additional 419 dwellings within the first 5 years and so the overall requirement for the plan period equates to 8,380 dwellings. The Council have taken a very caution view by not significantly deviating from the standard method for calculating the objectively assess housing need. However, it is clear from the advice within the NPPF that it should be considered as a baseline minimum figure which local plans should seek to exceed. It is also clear that areas which seek to exceed the baseline objectively assessed housing need will be supported in doing so by the Government. It is considered that a sound plan for North Lincolnshire which is positively prepared and aspirational that matches the economic growth ambitions will need to go significantly beyond any standard calculation. By failing to provide a necessary number of new housing for envisaged new employees, the economic strategy would not be realised unless there are significant increased rates of commuting into the area which is neither sustainable nor desirable.
- 4.107 It was also stated that the area has a high degree of affordable housing need. The baseline evidence found within the Strategic Housing Market Assessment 2019 indicates an annual affordable housing need of 156 dpa but the completion rate reveal only on average 91 dpa being achieved. Whilst it is recognised that market housing schemes are not the only mechanism for delivering affordable housing it is unlikely that the proposed housing requirement will be able to meet this need. This lends greater weight to the identification of a higher housing requirement which is consistent with the NPPG.
- 4.108 Further comments relate to Table 1 in the draft Local Plan entitled Housing Delivery which indicates that there is potential to deliver 9,329 homes over the plan period which includes housing completions, extant planning permissions and housing allocations. However, paragraph 5.6 of the draft local plan also confirms that the SHLEAA identifies over the plan period there is sufficient ‘developable’ land to provide approximately 11,000 new dwellings on a range of sites but from studying this document it is unclear as to how this figure has been derived and which potential housing sites have been included in the calculation as they can only be identified and brought forward through the draft local plan. Given the lack of transparency in this figure, they have assumed an overall proposed housing supply of 9,329 dwellings over the plan period. The difference between this and the proposed housing requirement of 7,791 homes (not including the additional 419 dwellings proposed by the Council for ‘flexibility’) amount to a percentage buffer or headroom of 17%. In terms of housing supply and in the context of the employment strategy we do not consider there is enough headroom in the supply to ensure that the plan remains robust in the event that there is slippage in the delivery of housing from the proposed allocations or committed sites. Increasing this supply headroom, particular through the allocation of a variety of sites in sustainable locations that accord with the settlement growth distribution, would ensure that: an

adequate five year supply of housing land would be maintained; the plan is robust; and it would deliver sufficient housing to help address the pressing issues of affordability and affordable housing needs.

- 4.109 Interestingly, the proposed employment strategy adopts the principles of a headroom approach to introduce the desired level of flexibility to response to rapid changes in commercial demand and respond by offering a range and choice of site. The employment headroom amounts to over 100% of the identified employment provision and this doesn't include the three allocated strategic sites which would take the headroom figure to well over 1,000% of the proposed requirement even though they featured as firm allocations in the adopted local plan. There need to be some recognition in the plan that a similar approach should apply to the housing growth strategy to reflect the growth ambitions of the District and introduce sound contingency measures. They considered it would not be unreasonable to have a housing supply headroom that was around 50% of the proposed low minimum housing requirement figure. This approach is in accordance with the NPPF which says that plans should have sufficient flexibility to adapt to rapid change. Based on the current limited headroom available between the housing requirement and the committed and proposed allocations as well as the continued reliance on the delivery of Lincolnshire Lakes we are not convinced that the policies demonstrate a flexible integrated and forward looking approach towards meeting present and future needs in the district.
- 4.110 Comments relating to the Housing Trajectory stated that the plan needs to be robust and capable of meeting unexpected contingencies such as delivery failure or slippage on one or more sites. It needs to be borne in mind the housing requirement is a minimum figure not a target. A robust strategy is particularly relevant for North Lincolnshire where longer term housing delivery is largely by means of a single large strategic housing site at Lincolnshire Lakes. An increase in the supply provides greater flexibility over timing and ensures that if a degree of slippage does occur, the plan is not vulnerable.
- 4.111 The plan needs to be effective over its life span and have regard to potential changes in circumstances. To that end it needs to contain a balance of short- and long-term sites. The permitted and commenced sites together with smaller allocations will need to deliver and address the immediate five-year supply issues. Large scale strategic sites notoriously have long leading times and development periods.
- 4.112 Evidence that the Lincolnshire Lake site has not come forward as quickly as anticipated can be seen from reviewing the delivery assumptions within previous draft versions of the Core Strategy and the Housing and Employment Sites DPD through to their adoption. In addition, for the evidence found in the Litchfield Start to Finish: What Factors Affect the Build-Out Rates of Large Scale Housing Sites? Report dated February 2020, it confirms that large schemes of over 2,000 dwellings can take up to 8.4 years from the date at which an outline application is validated for the first home to be delivered. With this evidence in mind, it is important that the Council aim to future proof the plan and review the housing trajectory rates.
- 4.113 Reference is also made to Appendix 1: Housing Trajectory which seeks to identify the projected net additional dwellings over the lifetime of the plan. First, they state it is difficult to understand this table as there are no key assumptions as to how these rates will be achieved. And second, the two bar charts which show the total actual net additional dwellings are based on a yearly time scale whereas the projected net additional dwellings bar charts are based on periods of four years which gives the wrong impression that the number of dwellings are significantly increasing however it is simply an accumulative of total dwellings over that period of time. In conclusion they consider that the significantly lower housing requirement put forward by the Council compared to the adopted development plan would not have regard to the reality of North Lincolnshire's characteristics or its aspirations, would pose a risk to local economic prospects and plans and would not adequately address housing affordability or the availability of affordable housing and would potentially increase the rate of commuting. Rather than progress on the basis as 'business as usual' scenario influenced by past low growth trends, recognition should be given to the desired level of growth and aspirational stepped change in the economy. They therefore recommend the following approaches:
- Provide a substantial housing land supply headroom or buffer above the proposed housing requirement to create sufficient flexibility to respond to the changes as well as offer a choice and range of sites;

- That the Council should consider a similar approach adopted by North East Lincolnshire District Council for their housing growth strategy. They have planned for a successful economic growth strategy by identifying an ambitious housing target to reflect economic growth aspiration above past trends but the annual housing requirement is stepped up across the plan period so that there is a strong alignment between delivering the two strategies. These principles should be adopted as part of the plan to ensure that communities make land sufficiently available to deliver homes in the right places and be consistent with Government guidance regarding a positive approach to planning making. As things stand the level of housing requirement proposed would stifle the growth ambition and this would be a backward step particularly in the context of the previous growth targets set out in the adopt local plan.
- 4.114 Further comments stated that it was unclear why the Council has chosen a 1 April 2017 base date for the Plan; presumably it is to reflect the fact that a number of sites in the area which were allocated in the Core Strategy/HELA have not produced the number of dwellings they were expected to. However, by the time the Plan is submitted, Examined and adopted it is unlikely to have 15 years left to run contrary to Paragraph 22 of the Framework and is therefore unsound: "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".
- 4.115 Additionally, the policy needs to be amended to reflect the fact that the housing requirement is a minimum requirement. As drafted the omission of the word minimum means that the policy is not consistent with national planning policy (Paragraph 11 b of the Framework) and is therefore unsound.
- 4.116 It was also stated that the Council's Local Housing Needs Assessment Table 8.29 contains data relating to affordable housing completions for the period 2013 – 2018 and this is reproduced below together with the text that precedes it. The above clearly demonstrates that the delivery of affordable housing is problematic in this area. That is particularly going to be the case going forward as the Local Housing Needs Assessment notes that net affordable housing need is 156 dwellings per annum. That need is clearly not going to be met given the percentage requirements in Policy H3p on sites of 10 or more dwellings. There is clearly a case here for looking at increasing the housing requirement to take account of unmet affordable housing need. In that respect exceptional circumstances do not need to be demonstrated to justify an uplift from the standard method figure as the PPG simply refers to "circumstances". The term exceptional circumstances only applies where a LPA wishes to use a different approach to the standard method. In terms of economic growth it is clear the Council has positive plans to stimulate and support economic growth in the area. Chapter 6 of the Preferred Options document talks at length about these plans noting, for example, that: "The Council places a key emphasis on driving economic vitality" (paragraph 6.2) and "places great emphasis on economic growth and the benefits that a prosperous economy will bring." (paragraph 6.5).
- 4.117 The alternative options section of policy SS5p includes three potential housing targets based on varying economic growth scenarios, taken from the Strategic Housing Market Assessment (SHMA) which is no longer available on the Council's website. These alternatives are dismissed solely because they are not the standard methodology. While the standard method sets the absolute minimum requirement for the number of homes to be delivered, the Council are at liberty to increase that target in a variety of circumstances, including those identified at Paragraph: 010 Reference ID: 2a-010-20190220 of the PPG. Whilst that list is an open one ("circumstances where this may be appropriate include, but are not limited to"), the first bullet point refers to "growth strategies for the area that are likely to be deliverable." The Council can - and should - consider increasing the housing target above the standard method in order to support their economic growth plans. Should that not happen, the economic policies set out in the Preferred Options cannot be considered sound as there will be an insufficient supply of new homes to support them.
- 4.118 Another comment received stated that no more new housing was needed as there was enough empty homes to deal with the housing need.

Responses Policy SS6p: Spatial Distribution of Housing Sites

- 4.119 45 respondents had views on the approach that should be adopted in the Local Plan in terms of the 'Spatial Distribution of Housing Sites' policy and/or what it should contain. 21 respondents agreed with contents of the policy (with some amendments), whilst 22 did not. 2 other comments were provided that did not select an option.

Question SSP6: Do you think the Preferred Policy SS6p: Spatial Distribution of Housing Sites is the right approach?

Table 4.6. Policy SS6p: Spatial Distribution of Housing Sites		
Response	Number of Respondents	Percentage of Respondents
Yes	21	46%
No	22	49%
Other	2	5%
Total	45	100

Summary of Responses – Question SS6P Do you think the Preferred Policy SS6p: Spatial Distribution of Housing Sites is the right approach?

- 4.120 There were a number of similar comments that there is too much focus and reliance delivering housing in the Scunthorpe and Bottesford Area, which has a track record of failing to deliver the housing requirement that the area really needs. This has been primarily due to reliance on a strategic site which has significant constraints and has not delivered any housing to meet the districts historic housing targets. New housing should be focussed where the need is and where the infrastructure is being delivered to support strategic employment sites, specifically at the South Humber Gateway. Given the rates of delivery, the fragile 5YHLS position, and the increasing stimulus for economic growth and job creation at the South Humber Gateway through the ALP and the AMEP schemes, NLC should give greater consideration of distributing housing sites away from Scunthorpe and Bottesford and towards where the demand is. This will provide a more balanced scale of housing supply and will help NLC deliver much needed housing to support their vision for the emerging Local Plan.
- 4.121 Several comments agreed with the overarching strategy to deliver the majority of housing within the Scunthorpe & Bottesford urban area, however they object to the inclusion of the Lincolnshire Lakes strategic allocation due to its questionable deliverability.
- 4.122 More than one response (often from the same planning consultants, but for different clients) point to Lichfield's "Start to finish" second edition which suggests that on average there is 3 years between the granting of outline planning permission and the completion of the first dwelling on the site, as outline planning permission has not yet been granted on Lincolnshire Lakes then at best completions cannot be expected to start before 2023/24, giving some 13 years of build. The Lichfield report also includes an average build out rate of 160 dwellings per annum (dpa). A number of responses are clear in their view that Lincolnshire Lakes is not an average strategic allocation. There are exceptional circumstances surrounding the proposal not least the costly infrastructure and the fact that the site remains in flood zone 3 and these factors impact on the overall viability of the scheme. This is demonstrated that despite the promoters seeking the support of national housebuilders for over a decade now there are still no actual housebuilders committed to delivering the scheme. This contrasts with other locations which have lower development costs and are in more attractive market areas. The respondent claims, the failure of this single site to deliver in the next decade (as it failed in the last decade) would have a significant impact on the distribution of growth around the district with the majority of growth being delivered outside of Scunthorpe in the Market Towns and Rural Areas; the over reliance on a single site with a proven history of non-delivery places the overall strategy and proposed distribution at considerable risk and is not justified on the available evidence base.

- 4.123 Several comments (related to the above respondent) question whether the Lincolnshire Lakes meets the definition of being developable and as such should be deleted from the policy. They go on to say, Lincolnshire Lakes is highly unlikely to deliver the requisite amount of units to meet the Council's overall housing need, allowing flexibility to deliver alternative and more viable sites such as, Holme Lane or land to the north of Asda, Scotter Road (their clients land).
- 4.124 In terms of affordable housing provision on the Lincolnshire Lakes a number of comments were concerned that of the 3,000 dwellings only 5% affordable housing will be delivered which is less than a years' worth of affordable housing.
- 4.125 Multiple responses refer to the site in the Lincolnshire Lakes that currently has an outline planning application which has been under consideration since 2015 for 2,500 dwellings but that this is yet to be approved. Due to the length of time to resolve these matters and the sites natural constraints, they argued that the site is not capable of delivering the forecast 3,000 dwellings.
- 4.126 According to a respondent, the failure of the Lincolnshire Lakes to deliver in the next decade (as it failed in the last decade) would have a significant impact on the distribution of growth around the district with the majority of growth being delivered outside of Scunthorpe in the Market Towns and Rural Areas. The over reliance on a single site with a proven history of non-delivery places the overall strategy and proposed distribution at considerable risk and is not justified on the available evidence base. At present there remain serious questions over whether this location meets the definition of being developable and as such reference to it in this policy should be deleted.
- 4.127 A particular comment is supportive of the spatial distribution of housing sites set out in draft Policy SS6p which reflects the settlement hierarchy identified in draft Policy SS2p. They do have concerns that the Lincolnshire Lakes has not delivered the housing numbers as expected since its allocation and the adoption of the Lincolnshire Lakes AAP. Whilst they did not support the allocation of these sites given they are in a known flood zone the principle is now well established. They welcome the recognition of the floodplain and required measures set out in draft Policy SS7p to help avoid flooding and the consequential impact of Climate Change. The final sentence of the paragraph relating to flooding also refers to the implementation of Sustainable Drainage Systems (SUDS) and sets out that these should be incorporated to reduce surface water run-off 'unless it can be demonstrated that it is not technically feasible'. The respondents believe that this gives developers enough wriggle room not to implement such schemes and should not be encouraged. Given that this is a known flood zone and land saturation is an issue in heavy precipitation events, any such proposal that does not include appropriate SUDs should be refused. If an applicant wishes to develop the site, SUDS and adequate flood risk measures should be pre-requisites of any masterplan.
- 4.128 Various propositions were put forward to address the Lincolnshire Lakes issues identified. According to one party, the removal of the Lincolnshire Lakes allocation from the spatial distribution of housing sites must then be addressed. Alternative sites should therefore be identified to make up the shortfall of development land. Such allocations for housing would build in flexibility and certainty of delivery in accordance with NPPF objectives of preparing a positively prepared plan. They go on to say, Policy SS6 and the spatial distribution will need to be amended accordingly to provide a wider variety of the sites and allocation should be made to meet at least the level of housing identified for each settlement. The Lincolnshire Lakes provision should be redistributed and increase the number of properties anticipated in Scawby for 38 dwellings. Additional land, such as that off Vicarage Lane at Scawby should be identified for residential development as part of this process.
- 4.129 Another view claims, Lincolnshire Lakes is highly unlikely to deliver the requisite amount of units to meet the Council's overall housing need and that it should be excluded from the policy wording to allow flexibility to deliver alternative and more viable sites such as Holme Lane.
- 4.130 One individual goes on to say regarding Lincolnshire Lakes, with a start in 2023, they suggest there would be 2,030 dwellings if Lincolnshire Lakes was an average site of 2000 plus dwellings.

- 4.131 According to an individual's feedback, Scunthorpe and Bottesford should continue to be the main focus for the majority of new development and growth but at a higher level than identified within policy SS6p. They consider the most sustainable option is taking into account economic growth and environmental considerations, continuing to concentrate growth in Scunthorpe and Bottesford on similar proportions to those identified in the previously adopted Local Plan combined with development to a lesser extent in the market towns and rural settlements within development limits. Policy SS2p significantly reduces the percentage directed to Scunthorpe and Bottesford Urban Area from the figure in the Core Strategy as it now proposes 52% of the overall proposed housing requirement. With the proposal to reduce the overall housing requirement generally within the district, this leads to a substantial reduction in the total number of dwellings proposed for this settlement compared to the Core Strategy from a housing provision of 9,892 dwellings between 2011 to 2026 to 4,358 dwellings between 2017 to 2036. In other words, a change in growth strategy from 659 dwelling per annum in the adopted plan compared to 229 dwellings per annum. This new approach is a dramatic and stepped change reduction in growth of over 65% for the Scunthorpe and Bottesford Urban Area which fundamentally contradicts and undermines the previous policy objectives and principles that had been accepted and judged to be sound. The Council's preferred option will create a dispersed pattern of growth within the rural areas and would not achieve the desired level of sustainability that would be forthcoming from a more focused approach on the higher order towns within the settlement hierarchy. Furthermore, 4358 dwellings proposed for Scunthorpe and Bottesford urban area 3000 would relate to the Lincolnshire lakes development, equating to nearly 70% of the housing provision proposed to be directed to this settlement and this places a significant over reliance on the delivery of a single strategic opportunity particularly in terms of the early stages of the local plan period where there is already a five year housing land supply deficit. A better approach would be to also introduce a wider range of smaller sites to offer a choice of opportunities for house builders.
- 4.132 Moving away from the specific Scunthorpe Urban Area and Lincolnshire Lakes comments a response views the arrangement of settlements which is derived from the evidence of the revised 2019 Settlement Survey is logical. However, the distribution of new housing completely fails to relate to the distribution of employment land uses. Whilst the level of focus on Scunthorpe is understood, there is no acknowledgement of the strategic aim to grow employment at the South Humber Bank and to a lesser extent, North Killingholme. Policy SS8p calls for 900 ha of land to be allocated at the South Humber Bank and yet this is almost totally unsupported by similar housing numbers to provide essential homes for workers. Not only does this undermine the economic growth potential of the South Humber Bank, but in the absence of houses nearby, it will inevitably lead to an unsustainable travel to work pattern. In this sense the housing and employment distribution policies are unrelated and thus contrary to the strategic objectives of the Plan as a whole. Notwithstanding the issue of principle, the intention to direct growth to Barton, Barrow and Goxhill is supported. Barton is an increasingly thriving market town whilst both Barrow and Goxhill have the physical structure to support substantial growth. In addition, they have services and facilities which are capable of expansion to serve both the immediate and surrounding communities as advocated in NPPF. Furthermore, this group of settlements are well related to the South Humber Bank and benefit from the availability of a rail service. A major concern about the policy is that it is too prescriptive and thus lacks flexibility. It is not necessary to get down to the level of detail in a Local Plan that tells us that a minute percentage or specific number of houses is directed to individual settlements, some of which are very small.
- 4.133 One comment considers the importance of the spatial distribution of sites and that it must follow a logical hierarchy, providing an appropriate development pattern, supporting sustainable development within all market areas. This comment highlighted the particular importance that significant development continues to be focused in Brigg as a principal town, capable of accommodating additional growth.
- 4.134 One item of feedback rejects SS6P stating there simply is no justification for significantly higher levels of development being direct to Barton on Humber and Brigg compared to Kirton in Lindsey. 377 dwellings are planned to be brought forward in Kiron in Lindsey under Policy SS2p and Policy H1p has commitments of 454 dwellings for Kirton in Lindsey. However, 3 of the sites are housing allocations in the HELADPD. Moreover, it should be noted that these housing allocations were intended to meet housing needs up to 2026 (not 2036 as is now being suggested in the Local Plan Preferred Options):
- KIRH-1 Land west of Station Road benefits from detailed planning permission. It should be noted that whilst allocated for 100 dwellings in the existing plan the scheme with permission is 91 dwellings (-9).

- KIRH-2 Land at and adjoining Beechcroft, Station Road has full planning permission was for 41 dwellings (-19 from previous plan allocation of 60 dwellings). The scheme is being delivered by Cyden Homes with many homes now complete.
- KIRH-3 Land at former RAF Kirton in Lindsey (300 dwellings in the HELA) has outline planning permission for up to 302 dwellings (+2). As no reserved matters applications have been submitted it is not established whether this site will in fact deliver 302 dwellings and this will only become clearer once a reserved matters application is lodged. Furthermore, the agents have marketed the site on 23 March 2020 further to a November 2019 exercise that had previously been successful but a deal fell through earlier this year. Clearly this site is many years away from delivering any dwellings and the outline planning permission is just 18 months from lapsing. It is notable also that the site is available having been marketed and a deal falling through. In most circumstances there would be a second placed bidder who would take on the proposal following the preferred bid falling away. That doesn't appear to be the case here with the site still being available. They claim it is evident that the housing allocations in Kirton in Lindsey will not deliver the number of dwellings envisaged in the HELA on a site by site basis. At best the allocations are 28 dwellings short of what was expected although this could be much more if the former RAF base does not deliver 302 dwellings or any dwellings at all. In any event, the former RAF base will not deliver anywhere near 302 dwellings by 2026 given the absence of any reserved matters applications. Whether it will deliver any dwellings by 2036 is also debatable. They recommend further allocations in Kirton in Lindsey and emphasise their client's site as a prime candidate.

- 4.135 A comment objects to the policy and sets out the following reasons: With 77% of housing required focused in Scunthorpe, Brigg and Barton; 23% for all large service centres and larger villages, 5% for the Larger villages is not in line with the overall objectives of the Plan to ensure prosperity of rural areas. Distribution is too focused on the main urban areas e.g. Scunthorpe and the Lincolnshire Lakes taking up a huge part of the requirement. Larger rural villages need to be given a greater proportion of the requirement, with sites available in these settlements for a variety of deliverable sites. Larger villages should have at least 15% of the overall requirement, and furthermore the table in SS6 should show the allocations rather than the four combination of the commitments and allocations. It is difficult to understand what new sites are proposed if they are conflated in this way and there is no explanation of how the housing allocation for larger villages has been arrived at relative to the size of settlement and facilities available there.
- 4.136 The provision of 1,000 additional houses in Barton upon Humber was noted. With a population increase of about 2500, there is concern that nothing is mentioned in Policy SS6 about increased healthcare provision including GP, Dentists and Pharmacy provision, and states all these would struggle to cope with this sort of increase in demand and increases in population of surrounding villages will also drive further demand for these Barton Services.
- 4.137 One response raises an objection to the policy, and claims the overall level of housing provision, and therefore the annual rate, as set out in this policy appears to be the absolute minimum in line with the standard method. North Lincolnshire Council should be adopting a pro-active approach to the delivery of housing for its area, particularly in light of the significant under-delivery of housing over many years, as demonstrated in the Housing Delivery Test: 2019 Measurement published in February 2020, which shows that over the last three years, delivery has only been 75% of the total number of homes required. It's clear that the current approach adopted by the Council has consistently failed to deliver an adequate supply of housing and a different approach must now be adopted. To continue with a minimal figure approach, as is set out in this policy, will only exacerbate an existing problem. The Council must adopt an aspirational approach to the overall housing provision in order to meet the aim set out in the NPPF; and to provide the much-needed homes for the area.
- 4.138 The proposed distribution of growth fails to reflect the spatial objectives set out in the draft Plan according to two comments (by the same planning consultant). Specifically, the level of growth for the Sub-Regional Centre is too large at 52% of the housing requirement and this level of growth unbalances the ability to achieve a meaningful spread of development across the area's towns and villages beyond Scunthorpe, the Principal Towns and Larger Service Centres. This completely undermines the ability to achieve a meaningful level of growth within the 2nd and 3rd tier of settlements. The level of growth

anticipated in the Sub-Regional Centre is also unrealistic given it is largely predicated on the delivery of new village settlements through the Lincolnshire Lakes project. The level of growth directed to the Large Service Centres is far too low. In total, just 17% of the housing requirement is being distributed to the Large Service Centres which by definition are highly sustainable settlements. This level of distribution will have the opposite effect to the stated objective by hindering the growth of those settlements, dampening their viability and reducing their sustainability over the Plan Period.

- 4.139 The above point is used as justification for additional growth in Epworth and Wootton respectively. The Council's draft Spatial Strategy (as described above) allocates just 1% (92 dwellings) to Epworth for the whole Plan Period – just 15 dwellings per year. At the same time, the evidence behind this Spatial Strategy shows that Epworth is regarded by the Council as the 4th most sustainable settlement (Settlement Survey 2019). The extract below summarises the sustainability credentials of Epworth. Kirton in Lindsey – which is scored below Epworth in the Settlement Survey is allocated 4.5% of the housing requirement (377 dwellings). The level of growth proposed in Epworth is more comparable with some of the larger rural Settlements which score significantly below Epworth. The level of growth proposed for Epworth does not reflect the proposed Spatial Strategy which seeks to enhance its role as a large service centre. Epworth can assimilate a much greater level of growth around its northern and eastern boundaries; and a level of growth that would achieve the stated objectives in the draft plan.
- 4.140 In terms of Wootton the village scores 38th in the settlement survey and no allocations are proposed. The village has a primary school and a pub and those key services will come under increasing pressure re a viable future as the local population ages and insufficient new housing is provided for local people to access the market and stay in the village. The lack of any allocation also fails to recognise the proximity of the village to key employment opportunities within 20-minute travel time and therefore fails to deliver the stated objective of providing high quality homes close to key employment opportunities.
- 4.141 One comment objects to the proposed distribution of housing sites for the primary reason that no sites have been allocated in smaller rural settlements (as identified in Policy SS2p). They do not object to the principle of the majority of growth being located in the main towns and service centres. However, it is important the Council recognise the role housing can play in supporting smaller rural communities, as advocated by paragraph 78 of the NPPF (2019). This is especially true for the village of Eastoft in which no sites have been allocated. The settlement is identified as a 'Smaller rural settlement' in Policy SS2p despite its strategic location on the A161 between the M62 and M181, and its range of local services and facilities which include, amongst others, a primary school, village hall and daily bus services. It is considered appropriate small scale housing sites should be identified in the village to support its local services and community. Two such sites include 'Land north of the Old Moorings' and 'Land west of Yorkshireside'.
- 4.142 A comment states, the approach in SS2p which recognises the need to support growth in Small Rural Settlements is not considered to be supported by Policies SS6p and SS10p, which take a more restrictive approach. Whilst SS6p supports development within development limits, in the case of Appleby, these have been drawn very tightly around the existing built form of the village. In addition, no housing allocations are proposed within the Local Plan nor the Neighbourhood Plan. Therefore, opportunities for any growth are very restricted in Appleby. This approach is considered to be contrary to the principles of sustainable development as set out within the NPPF and NPPG, in particular, with paragraph 78 of the NPPF. The development limit appears to contradict the spatial strategy of SS6p, seeking to constrain growth in a tier of the hierarchy where some should be supported.
- 4.143 A respondent suggests both village centres (Haxey & Westwoodside) have severe traffic flow / parking issues, an additional 70 or 80 housing units will undoubtedly add to the grid lock in the villages. They recommend building a car park in each village centre in addition to any planned housing units, both villages have land in the village centres that could accommodate this.
- 4.144 One response supports the policy and stresses the important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas.

- 4.145 Another response once again accepts the policy, and states that the distribution of housing set out in the Policy is consistent with earlier policies within the Plan, with 75% of the proposed dwellings to come forward in Scunthorpe, Bottesford, Barton upon Humber and Brigg. Therefore, they support the policy aspirations regarding the distribution of housing sites. However, it will need to be ensured that the Strategic Road Network can safely and efficiently support the delivery of the Plan (including this spatial distribution of housing sites).
- 4.146 Several comments were submitted objecting to further residential development in Wootton. A number of comments view the village infrastructure cannot support further builds in respect to drainage which could cause flooding and the water supply which is already lower pressure. The road system is only a single track road, with the exception of High Street and any builds will cause more pollution within the environment. There is also an issue with safety for those walking the country roads with no footpaths alongside the single track roads, and the speed limit is 60mph. The school is full and apart from the local public house, there claim there are no other facilities in the village. Their main concern is the wildlife that is resident in the area, some of which are rare.
- 4.147 Two comments express their support of the local plan whereby Wootton remains a low density village with only limited sustainable infill inside the defined settlement limit. They feel any large scale development outside these lines, particularly on Grade I agricultural land would have an adverse impact on the character and nature of the village environment and there is no available capacity, services and infrastructure in place to support this.
- 4.148 An individual rejects the proposals for Wootton, stating it does not have the same facilities as most villages with no shops, just a church, pond and a pub. The recent proposed development on grade 1 agricultural land to build 81 houses has concerned the individual considerably. They state, if applied for and granted, a further application will surely follow to develop the remaining piece of land resulting in a possible 160 plus new houses. They then state further reasons for the rejection:
- Wootton only has 226 houses, so this is effectively doubling the size of the village!
 - No industry in Wootton and very much in the middle of the farming community.
 - Water pressure is very low at the best of times – twice as many houses would make it impossible.
 - During heavy rain, this field is water logged, and the gardens on the south side of the High Street all flood. Once this field is built on and block paved, the houses on the High Street will flood as well.
 - The drains cannot cope at the moment, it is not so long ago that the High Street and Vicarage Lane both had flooded houses.
 - The proposed access to this site is Swallow Lane has issues because the lane is far too narrow to accommodate an additional possible 200 car movements. It is difficult now to pass another vehicle.
 - Issues with pollution from additional cars.
 - The village school is at capacity now, so I believe is Kirmington, so again, more car movements on the 'school run' to whichever and wherever that is likely to be.
 - All villagers here feel very safe and secure at this moment, this proposal is not wanted and not needed. It will offer no benefit to the village whatsoever, and is outside of your 5 year building plan. We just do not have the infrastructure here to warrant the proposal, and local feeling is 100% against it.
- 4.149 A number of comments accepts that it is national policy that people to have somewhere to live. However it considers that plans already passed prior to March 2020 provide for sufficient development in Kirton-in-Lindsey and do not support or see any justification for any more during the lifetime of this Local Plan.
- 4.150 In respect of Brigg it has now been defined as a 'Principal Town' and is proposed that of the overall housing requirement it would delivery 12% of the housing growth (i.e. 1006 dwellings). This compares to the adopted Core Strategy whereby the settlement was defined as a 'Market Town' delivering 7% of the District's housing requirement (844 dwellings). The town is well placed as a result of its existing and proposed employment opportunities, services and facilities and with good access to the strategic highway network and this comment welcomes and supports the increased focus for housing growth.

- 4.151 One comment claims development should take place where amenities are readily available and another comment asks to restrict developments to areas which can sustain them. Whereas another writes, growth centres should include a consideration of future possible flooding issues exacerbated by climate change e.g. not on flood plains but on higher locations such as Winterton.
- 4.152 Agreement with the majority of SS6P and the distribution of where housing should go was made by a comment, but this is a short term win and the consideration a new sustainable, environmentally sound, carbon neutral new settlement should be made. This is a fabulous opportunity to start creating a town that would not only be highly desirable, but a showcase, tourist attraction and a chance to show the country (and further afield) that the Council are in a class of their own. The council should be really hands on in creating something unique. They suggest the ability to do this has already arrived but no council as far as they are aware, has had the courage to demand new builds are carbon neutral in both construction and their ongoing living/running costs to the environment.
- 4.153 In respect of the housing growth set for Barton Upon Humber an objection was received, stating it should be slightly higher to help grow the town's shops and services for existing as well as new residents, going on to say, it would also build on Barton's proximity to Hull and surrounding areas of the East Riding of Yorkshire, and help to encourage more Wren Kitchens employees to live in the town, reducing commuting. They question the planned growth of Barton Upon Humber compared to Brigg. Although they appreciate population and housing growth are not the same, they point to the 2011 census, as the last accurate measure they can find, and state Barton had a population of 11066 and Brigg 5626 - i.e. Brigg had 51% of Barton's population. Although they feel this may be slightly unfair due to the tightly defined town boundary in Brigg, but even allowing for that, Barton is a substantially bigger settlement than Brigg. They ask, therefore 'why is Brigg being allocated 12% housing growth but Barton only 1% more at 13%?' In their view, it would be more appropriate for Barton to have at least 25-30% higher growth than Brigg.
- 4.154 A comment received by the Environment Agency in relation to New Holland outlined that the settlement is wholly within FZ3 and effectively has a hazard rating of 'danger for all' should a breach in the defences occur, with potential flood depths up to and beyond 2m; this is the case for present day sea levels, as well as climate change scenarios and therefore the intention to site 12 new dwellings needs reconsidering. Keadby is wholly in FZ3; locations close to the River Trent are at greater risk and development should be directed away from these. We do not object in principle to the target of 14 proposed dwellings, subject to location (sequential test) and suitable mitigation. We note there are no allocations in Keadby at present. The Environment Agency has carried out breach modelling for the area, with the results available on request: however, for sites not located close to one of the breach points used in the modelling, further assessment would be required to inform flood risk mitigation. Barton and Brigg have been given significant targets and both settlements include areas of Flood Zone 1 as well and Zones 2 and 3 so should be able to accommodate the necessary housing, which should be directed to the low probability areas as far as possible. In relation to this paragraph, they stress that advice should be taken from Anglian Water (AW) and Severn Trent Water on existing, expected or planned water recycling capacity. The data we have from AW, following our analysis, indicates lack of capacity for the growth in this Plan in Barton, Brigg, Wrawby, Hibaldstow and Scawby.

Responses Policy SS7: Strategic Site Allocation - Lincolnshire Lakes Sustainable Villages

- 4.155 **31** respondents had views on the approach of the 'Strategic Site Allocation – Lincolnshire Lakes Sustainable Villages' policy and/or what it should contain. **15** responses agreed with the policy approach, whilst **16** did not.

Table 4.7 Responses to Question SS7P: Strategic Site Allocation – Lincolnshire Lakes		
Response	Number of Respondents	Percentage of Respondents
Yes	15	48%
No	16	52%

Total	31	100%
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Summary of Responses – Question SS7P: Strategic Site Allocation – Lincolnshire Lakes is the right approach?

- 4.156 The overall view of this policy is balanced, with 52% raising particular concerns with its content, and 42% are in support, often requiring some amendments. It should be noted that many of the responses in objection were submitted separately by the same respondent under different clients.
- 4.157 A multitude of comments raise concerns over the strategic allocations ability to deliver 2,500 - 3,000 dwellings and state this as a reason for objection; with some pointing to the level of infrastructure that will be needed for delivery, and some objecting in regards to the pending consideration on the legal agreement required to issue the decision notice to proceed.
- 4.158 Numerous comments (primarily by a few respondents) state that they feel the allocation of alternative sites within the Scunthorpe Urban Area which are not at undue risk of flooding are a good alternative, and have the potential to make a significant contribution to the supply of housing. They state examples such as, land at Holme Lane which they support as a viable alternative.
- 4.159 It was highlighted that there should be more detailed evidence for the site in order to justify a credible number of dwellings delivered. One particular comment claims that it is likely to be necessary to reduce the number of dwellings to be delivered over the plan period with the site being developed past the plan period; they go on to claim that more land will need to be allocated for housing and emphasise their candidate site.
- 4.160 Multiple responses (generally from a single planning consultants with more than one client) point out Litchfield's "Start to finish" second edition which suggests there are 3 years between the granting of outline planning permission and the completion of the first dwelling on the site, and because outline planning permission has not yet been granted they believe at best completions cannot be expected before 2023/24 giving some 13 years of build. They also point to the guidance that suggests the average build out rate is 160 dpa, and with a start in 2023 there would be 2,030 dwellings if Lincolnshire Lakes was an average site of 2000 plus dwellings.
- 4.161 These comments highlight that Lincolnshire Lakes is not an average strategic allocation. There are exceptional circumstances surrounding the proposal, not least the costly infrastructure and the fact that the site remains in Flood Zone 3; and these factors impact on the overall viability of the scheme. This is demonstrated that despite the promoters seeking the support of national house builders for over a decade now, and there are no actual house builders committed to delivering the scheme. Other locations with lower development costs and in more attractive market areas should be allocated instead.
- 4.162 A number of responses discuss there is no viability assessment available to demonstrate that this site is now viable and can be developed. As submitted, this major allocation in the plan is not considered to be developable in the context of the definition set out in NPPF. They point to the NPPG paragraph 10-02 (Plan Making) stating "the role for viability assessment is primarily at the plan making stage". It goes onto state that "while the viability assessment should not compromise sustainable development, it should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan."
- 4.163 A comment requires development in other locations such larger villages when deliverable sites exist without major infrastructure required and that these will help keep the service base of these settlements viable. They also claim the plan has failed to deliver in the past because of the over optimistic delivery targets from very large sites.
- 4.164 One comment reiterates earlier concerns raised on the Spatial Strategy and the level of growth in the Lincolnshire Lakes, and goes on to suggest the scale of the problem is shown by allocating 3,000 new homes in what they deem to be an unsustainable location, representing about 40% of the total new

houses provided. They go on to point to concerns over climate change and a large strategic allocation which requires huge up-front infrastructure and involves limited numbers of developers. They claim it would need at least 5 to 6 separate developers to be building out at the accepted annual rates, in order to achieve 3,000 dwellings within the timescale, and suggest experience shows that such a range of developers are unlikely to be continuously operating in the area.

- 4.165 One comment has concerns that the new Plan will replace the Lincolnshire Lakes Area Action Plan (AAP). The Lakes proposal went through examination as a whole project with a full range of policies, as set out in the AAP with some relating to villages 4, 5 and 6, and lake 5 (all west of the motorway) and it is essential to establish how the important requirements within the AAP will not be lost. In addition, the policies included for the first 3 villages do not cover all requirements of the equivalent AAP policies, particularly with regards to biodiversity. Concerns are raised over subdividing the development areas which could run the risk of losing outcomes and not delivering on the overall vision, raising concerns for biodiversity, particularly for wetland areas 3 and 4. The suggestion is put forward to look at the first 3 villages separately to see if they are sustainable, should the new motorway not come forward. The feedback explains concerns over piecemeal development and similarly to other respondents, points to concerns over flood risks; they state the importance of the Lincolnshire Lakes Flood Risk Assessment and Drainage Strategy and Collaboration Strategy are maintained within the new local plan policies in order to manage flood risk in the agreed way for up to 2036.
- 4.166 It is highlighted there is not a policy for Lake 5 included in the Strategic Site Allocation. Lake 5 is an important element of the overall vision and policy which was there to ensure it was 'planned for and delivered as an important gateway feature' for the AAP. Lake 5 is not directly adjacent to any of the villages and is by the highway network, it is sensible to be considered in its own right as a Strategic Site Allocation. The respondent then wishes to amend the content of the Trent Banks Lincolnshire Lakes Flood Defence Scheme in: 4.49: the (Trent Banks) Lincolnshire Lakes Flood Defence Scheme, pointing to its completion but states (although some minor associated work to prevent increased risk to third parties in future is ongoing).
- 4.167 A number of respondents raise concern over the deliverability of the project in the plan period.
- 4.168 Anglian Water point to policies DQE7P and DQE8P of the draft plan that states development proposals should meet high water efficiency standard and water re-use measures should be maximised, however there is no information about how these design principles will be adopted.
- 4.169 A comment points to two issues from their perspective, one the general allocation in North Lincolnshire, particularly Scunthorpe and two the contrast with the suggested strategy compared to the adjoining LPA of West Lindsey and then further with Lincoln and North Kesteven. The feedback also raises concerns about the correlations between Flood Zones 2 and 3 and the proposed development. They go on to say society has changed over the last 5 years and that the development that once appealed has changed as a result of chronic flooding over a whole range of locations across the UK over recent years. The respondent also feels the flood plain on maps of the proposals show FZs 2 and 3 are tidal and not the same as river flooding BUT the vast number of the public do not quite follow this; and suggests others question the council's decision to build on a flood plain; and raises concerns over whether the public will buy the houses on the site as a result. There are concerns over the boundary of the area benefitting from defences ending/coinciding with the start of the development, and the respondent asks if this will change with further works; they also show concern over the term 'benefitting' from the defences and raise concerns over the strength and reliability of the defences in the past.
- 4.170 In relation to timescales there 'significant concern' that the project will be, at least for the next couple of decades, restricted to the eastern side of the M181, inconsistent with the image-changing intention of the project devised originally to provide a new and iconic view of Scunthorpe to visitors travelling east along the M180. As a result, the development is now just a housing development. Housing development right up to the M180 and M181 motorway is poor planning and that this needs to be rectified, in addition, there is concern over the removal of the green space protection along part of Scotter Road, and how it is not keeping with the 'industrial garden town' image for Scunthorpe.

- 4.171 Natural England comment that the Lincolnshire Lakes development should be delivered with the aim of maximising opportunities for biodiversity gain. They point to the current AAP provides some basic specifications for the lakes, “surrounded by public accessible spaces that are designed for safe access and facilitates recreational walking, cycling and running along the lake side.” They suggest this specification should include a requirement to provide biodiversity gain. They comment that para 3.10 of the adopted Lincolnshire Lakes Area Action Plan (AAP) states that “In particular, an area of significant interest and importance for wintering birds has been identified to the north of the A18 through on-site surveys during winter 2011/2012. Biodiversity should be protected and enhanced through the AAP proposals.” In addition, the AAP includes the requirement for the delivery of 235ha (hectares) of natural and semi natural greenspace in policy GI1 which includes some areas with limited public access that are critical to the mitigation of impacts on this area of significant interest, and of importance for Humber Estuary SPA/Ramsar wintering birds. Natural England does not consider that this has been properly addressed in the draft policy SS7p or the Habitats Regulations Assessment, although, we note the early stage of this assessment. More generally, the AAP provides a wealth of detailed policy and proposals regarding the protection and enhancement of the natural environment which is not included in policy SS7p. Considering the scale of the aspiration for Lincolnshire Lakes, we consider that there is merit in opportunity to provide more detail provided by the AAP in contrast to policy SS7p.
- 4.172 In a similar vein one response outlines that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity. While in support of the inclusions regarding green infrastructure and protecting and enhancing natural habitats, the NPPF requires planning policies and decisions to achieve this by “...providing net gains for biodiversity...” (170d) and requires plans to “...pursue opportunities for securing measurable net gains for biodiversity” (174b). To meet these requirements this policy should include a principle of biodiversity net gain.
- 4.173 There is a suggested amendment to policy wording around ecological protection and enhancement is not strong enough given the implications of the Environment Bill and mandatory biodiversity net gain. A suggested a figure of 20% Biodiversity Net Gain is proposed as this demonstrates an exemplar approach over and above the mandated 10% requirement which provides the de minimis. An extra section should be added to the preferred options that this development is an exemplar project, with targets over and above the de minimis statutory requirements for mandatory biodiversity net gain and contribute to Nature Recovery Networks through implementation of the Biodiversity Opportunity Mapping which has been carried out.
- 4.174 Highways England outlines that the Council will support de-trunking the M181 and creating an M181 Southern and Northern junctions providing connectivity to Scunthorpe and the M180; also, there is a new Strategic Route east –west to Scotter Road (along the route of Burringham Road) and a new Primary Route linking the villages to each other and to the strategic network / Scotter Road is required. The respondent says the scale of the development irrespective of the ongoing works and specific aspirations of Lincolnshire Lakes, it needs to be ensured that the Strategic Road Network can safely and efficiently support the delivery of the Plan. Evidence directly relating to this will be essential.
- 4.175 A comment suggests that the council recognises this as an obvious area to develop which can offer a range of amenities, but they stress the need to use water effectively and encourage the development to be a community or ‘village’ in its own right. The Lincolnshire Lakes Development Proposals include the statement to “reduce surface water run-off rates to include the implementation of Sustainable Drainage Systems (SuDS)”. This is supported, but the Drainage Hierarchy is equally important to the sustainable management of surface water and this should be acknowledged.
- 4.176 A response is fully in favour of the Lincolnshire Lakes, and adding 3 new villages is a positive step forward. They hope the development will be as carbon neutral as possible in construction and its ongoing lifespan. Furthermore, they hope the lakes will be carefully considered as in their experience, no stretch of water is cheap or easy to maintain and often comes with many hazards-dangers.

- 4.177 Several comments raise concern over the sites location in the flood risk zones 2 and 3; as well as also pointing to the challenges of deliverability. The outline application for 2500 dwellings has been pending since 2015 and point to issues with the legal agreement which are yet to be resolved; as a result they question the deliverability of the anticipated figure in the local plan period.
- 4.178 One supportive comment believes the Lincolnshire Lakes project will relieve the pressure on developments in smaller communities that don't have capacity to incorporate major housing developments. Additionally a comment states the Lincolnshire Lakes concept is a very good idea and should be kept.
- 4.179 In relation to climate change, these options will have been modelled against the present climate change model, but the knowledge of the effects and speed of climate change is changing all the time. For example, we know that a warmer atmosphere carries more moisture and the increased rainfall results with more regular and unpredictable flooding; additionally sea level rise is happening and very unpredictable with the potential for vast chunks of Antarctica breaking.

Responses – Policy SS8p: Employment Land Requirement (including Strategic Employment Sites)

- 4.180 **17** respondents had views on the approach that should be adopted in the Local Plan in terms of the 'Employment Land Requirements' policy and/or what it should contain. **13** respondents agreed with contents of the policy (with some amendments), whilst **4** did not.

Table 4.8: Responses to Question SS8p: Employment Land Requirements (including Employment Sites)		
Response	Number of Respondents	Percentage of Respondents
Yes	13	76%
No	4	24%
Other	0	0%
Total	17	100%

Summary of Responses – Question SS8p: Employment Land Requirements (including Employment Sites)

- 4.181 Those who provided detailed comments or views on this question generally agreed with its principles. 12 comments supported the policy as it stands (no changes), whilst the remaining comments suggested amendments. Most comments centred on the particular contents of the policy and suggested additional wording or new site allocations.
- 4.182 One respondent noted that the developments included in the policy have been allocated previously, however, it is not clear from the information provided, if there are any changes to the extent of the allocations since the previous local plan. Confirmation should be provided to demonstrate that the boundaries remain the same and that it is clearly stated where amendments have been made from previous allocations.
- 4.183 One view acknowledged the approach taken to get the minimum land requirement of 91.5ha. The Government also recommends that a range of procedures are used to compare projected employment land demand, including the use of past employment land monitoring returns to predict future demand. Historic take up of employment land over the last 10 years has shown an average of approx. 5 ha per year over the traditional B1, B2 and B8 employment uses. The Employment Land Review confirms that if past trends were used to forecast future employment land requirements, North Lincolnshire would require an allocation of approximately 95ha of land up to 2036. There is little to show between the Experian forecast figures and the current rate of employment land take up. It is therefore questioned whether the

requirement of 91.5ha would enable North Lincolnshire a sufficient level of flexibility to maximise its economic offer whilst at the same time seeking to bolstering and broadening its economic base. The figure should at least include all the allocations that are included as an allocated Employment Site which amounts to 190.07ha.

- 4.184 Support for continuing to over-allocate employment land in North Lincolnshire was provided. Doing so would help to deliver the plan's economic growth aspirations, highlighted in the draft spatial vision, as well as allowing some flexibility for new employment developments and opportunities to come forward. Furthermore, it would help to maximise prospects of attracting new investment to the area alongside meeting the demands of new and developing industries. Having a wide range and choice of sites is therefore a necessary requirement.
- 4.185 A response noted that Policy SS8 includes strategic employment allocations as part of considering the employment land requirement. Their view was that Sandtoft Airfield Strategic Employment Sites exclusion was an oversight given the scale its scale, importance and status as an opportunity to take advantage of its strategically accessible location both to the nearby ports and airports through strong connections along the M180 corridor. They specifically request its inclusion as a strategic allocation in Policy SS8P to recognise its essential value in terms of the significant contribution it would make to the Council's economic growth strategy. Given that the South Humber Bank (SHB) allocation and North Killingholme are included, and evidence confirms that development other than port related development and energy generation uses will be discouraged and refused the airfield site has an important role to play supporting the port-related activities at the SHB acting as a special site for the employment purposes. In accordance with the adopted Core Strategy's spatial strategy Sandtoft Airfield was identified as a strategic employment site within the HELADPD to support the growing logistics and distribution sector in North Lincolnshire. It is clear from the strategic allocations table found within policy SS8P that Sandtoft Airfield has not been recognised as a strategic employment site. This is an oversight of the draft Plan that should be rectified.
- 4.186 Two comment supported the allocation of the South Humber Bank as a strategic allocation for employment. This will assist with the progress made by Able UK at Able Logistics Park and Able Marine Energy Park to create jobs and economic growth in the area.
- 4.187 The inclusion of Humberside Airport, identified as site allocation EC1-3p, was welcomed by a respondent. The site is a priority employment site which conforms to and supports the Plan's Spatial Strategy of focusing employment provision at key transport interchanges and also at the area's major settlements. They also support the employment land requirement of 91.5ha which will make a positive contribution to the area wide employment need.
- 4.188 In terms of the impact on the strategic road network (SRN) by Policy SS8p one comment considers that the strategic locations identified – South Humber Bank, North Killingholme and Lincolnshire Lakes – are appropriate for employment development. These sites should be brought forward sustainably in order to minimise the number of single-occupancy private vehicle trips generated and the SRN can safely and efficiently support the delivery of the Plan. Evidence directly relating to this will be essential.
- 4.189 One comment had concerns that Draft Policy SS8p outlines that the 91.5h hectares of employment land to be delivered over the plan period, delivered on sites allocated and this equates to at least 4.75 of employment land per annum between 2017 and 2036. A 50% buffer within the identified employment needs should be added which seeks to provide flexibility to accommodate changes which occur to the proposed requirements as more evidence becomes available. This approach will ensure that the choice of location for any future employment uses will be determined by the market, in locations which are considered to be most appropriate.
- 4.190 The Preferred Options Document also outlines that 4,900 of the 11,500 jobs generated over the plan period are expected to be created in B1 (c), B2 and B8 use classes. As such, a large proportion of the total employment land requirement is to be allocated for these uses (54, 38 ha of B1c/B2 and 30 ha of B8 uses).

This approach is supported and will ensure that North Lincolnshire make the most of their geographical location and main transport routes, and will support the continued growth of the South Humber Ports.

- 4.191 It was noted that Draft Policy SS8p outlines the requirement for employment land to be provided in line with the broader overall Development Strategy, delivered on Employment Sites allocated through Draft Policy EC1p. In addition to the allocations for employment uses listed within Policy EC1p, three strategic allocations for employment uses have been identified. Whilst they support the growth and supply of large employment sites across North Lincolnshire, they consider that strategic sites of this nature are unlikely to deliver the quantity of employment space specified within the strategic allocation (totalling 1,063.15 ha across the three strategic allocations). Indeed it is possible that given the significant infrastructure costs required for the delivery of these sites, there may be obstacles to the delivery of these sites which will result in delivery after the plan period. The inclusion of these sites within the Local Plan document as allocated employment sites must be in addition to the allocation of sufficient sites across the district to meet the identified need for North Lincolnshire.
- 4.192 One comment welcomed the recognition given to North Lincolnshire being a major energy capital for energy generation (page 65) and the importance of energy production and consumption (pages 101-102). However in their view Brigg Power Station should benefit from a site-specific policy in the Local Plan as this would be consistent with NPPF paragraph 16, which encourages local planning authorities to plan positively through, amongst other matters, effective engagement with infrastructure providers. Alternatively, a more general policy for safeguarding strategic and nationally significant infrastructure could be included. This should provide support for safeguarding existing operations and future infrastructure and identify Brigg Power Station on the proposals map.
- 4.193 Finally, all three strategic employment allocations are in Flood Zone 3 and therefore subject to the sequential test. However, most employment uses are classified as 'less vulnerable' or in some cases 'essential infrastructure' (including for reasons of proximity to ports). PPG advises that 'highly vulnerable' development is not appropriate in Flood Zone 3.

Responses – Question SS9p: Strategic Site Allocation - South Humber Bank

- 4.194 **21** respondents had views on the approach of the 'Strategic Site Allocation - South Humber Bank' policy and/or what it should contain. **13** respondents agreed with the policy approach, whilst **6** did not. **2** did not form an opinion and provided comments instead.

Table 4.9: Responses to Question SS9p: Strategic Site Allocation - South Humber Bank		
Response	Number of Respondents	Percentage of Respondents
Yes	13	62%
No	6	29%
No Option Selected	2	9%
Total	21	100%

Summary of Responses – Question SS9p: Strategic Site Allocation - South Humber Bank

- 4.195 Those who provided detailed comments or views on this question generally agreed with its principles. 8 comments supported the policy as it stands (no changes), whilst the remaining comments suggested amendments. Most comments in objection (and some in support) centred on the particular contents of the policy and associated paragraphs and suggested additional wording or new evidence / information.
- 4.196 There was support for this draft policy specific to the South Humber Bank. These representations have explained the long-term and ongoing commitment from Able UK at their two sites within the South

Humber Bank. Once completed there will be a substantial employment offering (c 9,000 jobs) and has the growing potential to support residential development in close proximity to these employment areas.

- 4.197 It was highlighted that further clarification on whether North Lincolnshire Council will be designating additional land to the allocation, as previously the whole of the South Humber Gateway (SHG), including the area in North East Lincolnshire has been quoted as approximately 1000ha. It was pointed out that Able UK's new quay length will be 1,279m, not 1,320m as listed here.
- 4.198 It was noted that the original mitigation area for Able Marine Energy Park (AMEP); which is within the red line boundary of the development limits of the Development Consent Order (DCO)) has been removed and only Halton Marshes has been regarded as a SHG mitigation area. In addition, Paragraph 4.69 discusses these changes. Although it has been agreed in principle to this change, it is recommended that the original mitigation site remains included within the plan, until there is confirmation that the DCO has been amended to include this detail by the Planning Inspectorate.
- 4.199 In Paragraph 4.70 it is stated that "other proposals which may come forward on the remainder of the SHB employment allocation (other than the proposed AMEP and ALP projects) will have to pass the tests of the Habitats Regulations". However, it is not clear whether the mitigation measures provided for the loss of land functionally linked to the Humber Estuary Special Protection Area and Ramsar site as part of the AMEP/ALP projects will provide adequate mitigation for other developments within the South Humber Gateway strategic allocation. The respondent requests that further information on the mechanism for the provision of mitigation is outlined to demonstrate how this will remain a strategic approach.
- 4.200 A comment advises that bullet point 3 of the policy is incorrect and it is the Birds and Habitats, that bullet point 4 of the policy is not clear and should be re-worded and it should be clearly stated where the SHB Mitigation Strategy can be found.
- 4.201 In bullet point 9 of the policy, there is reference to include buffering to limit visual impact to nearby communities, but this can also be crucial for limiting the visual impact on SPA/Ramsar bird species that might use neighbouring fields as supporting habitat to the European sites. Any landscaping provided should be appropriate to the location and sensitivities of nearby habitats and species.
- 4.202 A response highlighted the LPA's legal and policy duties to protect and enhance biodiversity, and requirements of NPPF. All development is an opportunity for securing biodiversity net gain. To meet these requirements this policy should include a principle of biodiversity net gain.
- 4.203 In relation to flood defences a comment welcomes the requirement that new development within the site along the deep-water frontage of the Humber Estuary between the Port of Immingham and the Humber Sea Terminal needs to maximise the potential for high value jobs and high job densities and that this part of the site will be safeguarded against piecemeal development proposals that do not meet these employment maxims. This should address concerns over the proliferation of car storage facilities and the need for development of sufficient economic scale to fund the required drainage / water infrastructure, and develop the site in a more sustainable manner. The requirement to include pollution and waste control measure 'wherever practical' is not sufficient in this environmentally sensitive location.
- 4.204 A number of responses highlighted the LPA's legal and policy duties to protect and enhance biodiversity, and requirements of NPPF. The policy wording currently only recognizes the need to take into account the various levels of designated sites (including Birds and Habitats Directives) and water birds as part of the mitigation strategy, however this is not sufficient. There should be a requirement added for all development to deliver measurable biodiversity net gains (whether on site, off site or through strategic offsetting). As the South Humber Bank should be seen as an exemplar site, we would recommend that targets are set to exceed the statutory minimum of 10%, which the Lichfield Biodiversity & Development SPD 20% biodiversity net gain policy has demonstrated can be approved by the Planning Inspectorate. A suggestion is to bring all existing documents together in a Supplementary Planning Document ('South Humber Bank Strategic Mitigation & Landscape SPD').

- 4.205 Strong concerns around specifying a distance of 15m for buffering of Local Wildlife Sites were highlighted. These sites are selected on the basis of different habitats and species which will all have different requirements and sensitivities. Applying a 'one size fits all' approach is not appropriate and this should be dealt with on a case by case basis. The detail of any buffering required should be dealt with by an ecologist as part of the ecological assessment rather than a landscape architect. Wording was suggested to overcome this.
- 4.206 A comment welcomed the reference made to a surface water and sewage management solution being required to accommodate development to the satisfaction of Anglian Water. For clarity it would be helpful if Policy SS9p referred to a 'foul sewage' management solution. There is also no reference made to water efficiency/re-use measures being required as part of the design of employment developments forming part of this allocation site.
- 4.207 One respondent referenced the Uniper Killingholme Power Station (KPS), a 600MW Open Cycle Gas Turbine Power Station. It is noted that the emerging planning policy supports the principle of development being explored by Uniper with one notable exception. The extent of the employment land allocation (Policy SS9p) does not extend over the entire site. The extent of the policy reflects the adopted plan, which excluded part of the site as it is an operational power station. Hence, it was not necessary for the adopted plan to allocate a policy across the entire site. As the power station forms part of a wider masterplan for the site, this material changes justifies the inclusion of the whole site within the strategic policy. A request is made to extend Policy SS9p across the Killingholme Power Station site.
- 4.208 It was considered that as the scale of the proposed land allocations and anticipated growth is substantial this will facilitate the development and growth of new and existing industry (including hydrocarbon storage, processing and distribution), energy plants and renewable energy. To realise this growth, there will be a need for a continued and increased supply of minerals, and particularly energy minerals. There are currently large oil and gas companies operating in the South Humber Bank employment area where growth is envisaged. Some of the companies provide for the bulk storage of oil and gas imported offshore or imported from elsewhere. It is important that indigenous energy resources are provided for in the growth proposals for the Plan.
- 4.209 In relation to the Strategic Highway Network it is considered that the development quantum at this location should be brought forward sustainably in order to minimise the number of single-occupancy private vehicle trips generated. Paragraph 4.71 is supported, but such assessments should also be subject to consultation with Highways England. Irrespective, given this is a strategic allocation, it will also need to be ensured that the SRN can safely and efficiently support the delivery of the Plan (including this strategic site).
- 4.210 A comment viewed that the Council is fundamentally seeking to retain the current policy set out within policy SHBE-1 of the adopted HELADPD and supports this. However they outline the following specific points. (i) It is not clear from the emerging plan and the accompanying policies map what actually is the geographical extent of the South Humber Bank allocation. In particular, does the allocation now include the North Killingholme Airfield. (ii) To ensure that the policy achieves its purpose it will be necessary for the Council to continue to apply it to development proposals within the allocated area in the way that it has to date. In particular, relation to piecemeal development within that part of the allocation adjacent to the Humber Estuary (i.e., the AMEP site element of the allocation) and proposals that do not maximise the transformational economic potential of the site are refused planning permission (particularly car storage). (iii) The fourth bullet point of the policy indicates that the preferred location for waterbird mitigation is now solely at Halton Marshes – rather than reference in the adopted policy that the preferred sites for mitigation are at Halton Marshes and at Killingholme Marshes. Paragraph 4.69 of the emerging plan indicates that this changed approach is now endorsed by the plan and 'has been agreed by the conservation groups.' The emerging plan and its accompanying evidence base, however, provides no evidence to support the position which is now being taken by the Council. This needs clarifying with conservation groups and amending if necessary.

Responses – Policy SS10p: Development Limits

- 4.211 **85** respondents had views on the approach of the ‘Development Limits’ policy and/or what it should contain. **19** respondents agreed with the policy approach, whilst **66** did not. The vast majority who did not agree with the policy support the policy approach but required a settlement development limit amending to include or exclude an area or areas of land. Several responses did not agree that it was appropriate to apply development limits at all.

Table 4.10: Responses to Question SS10p: Development Limits		
Response	Number of Respondents	Percentage of Respondents
Yes	19	23%
No	66	77%
Other	0	0%
Total	85	100%

Summary of Responses – Question SS10p: Development Limits

- 4.212 During the Preferred Options consultation, 85 representations were received in respect of the policy approach and requesting amendments to settlement development limits. 15 comment supported the policy as it stands (no changes). The responses varied with specific comments focusing on the contents of the policy whilst many proposed additions to the development limits or general comments regarding the overall growth in some settlements, as well as a number in support of the approach being taken. These comments are summarised as follows.
- 4.213 A view was provided that the approach of defined development limits is not unsound and accepts that this provides a high degree of certainty in the decision making process. However, the application of such a blanket approach to development beyond the lines on the policy map reduces the plan’s flexibility and ability to respond to change. Areas at the edges of settlements have a very different context to those areas that are remote countryside locations. It is suggested that as the policy is refined, consideration is given to these issues to ensure opportunities for sustainable proposals outside of the development limits are not unduly constrained – particularly around those settlements higher in the hierarchy such as Messingham.
- 4.214 Two responses were concerned that restricting development outside of development limits is not in compliance with NPPF. Paragraph 77 suggests that in rural areas planning policies should be responsive to local circumstances and support housing developments that reflect local needs. Paragraph 78 goes on to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. In their view the NPPF only sets restrictions on development in the countryside where it would create isolated homes.
- 4.215 A comment was made about the detail in SS10p which sets criteria for the designation of development limits. In their view these criteria are helpful in setting a context but there is no requirement for them to allow for the small scale, incremental growth necessary for villages to remain sustainable, vibrant places. The approach does not allow for the wider benefits that development in villages can have to the wider network of settlements, as set out in paragraph 78 of NPPF. The impact is further exacerbated by the lack of proposed allocations in small rural settlements. In circumstances where small scale development at lower tiers of the settlement hierarchy is not proactively included via housing allocations, it is important that planning policies are flexible enough to support windfall growth at a suitable scale. Without this, the combination of tightly drawn settlement boundaries and lack of small site housing allocations will undermine the stated intention of SS2p.
- 4.216 Several responses suggested to encourage flexibility for housing growth amongst the different settlements that no settlement development limits should be applied and instead use criteria-based policies to determine whether a development proposal is sustainable. This will seek to avoid the new

Local Plan from being too narrow and not considering potentially more sustainable development options than might appear to initially be the case. Many reasons were quoted in justification for this change including compliance with NPPF and case law. This is essential to be consistent with the NPPF and national planning policy. Maintaining the current strategy will only mean that many smaller rural settlements will become even less sustainable. It is also contrary to the Government's desire to create mixed communities in all areas, both urban and rural.

- 4.217 A view was provided about the restrictive approach taken by the Local Plan towards proposed development beyond the identified development limits. It is considered that a more flexible approach is necessary given the limited surplus in supply planned against the proposed housing requirement and the reliance on the strategic site allocation at Lincolnshire Lakes to deliver a significant proportion of the total housing requirement. A positive policy framework for windfall development to come forward at suitable and sustainable locations adjoined to its named settlements should be included. To guide this a criterion-based approach towards windfall proposals enabling an uplift in housing land supply should be applied.
- 4.218 A comment was made that the development limits are drawn too tight and don't allow enough growth opportunities in the Larger Rural Settlements. The boundaries are drawn too tightly to allow sufficient flexibility to allow development in those sustainable locations.
- 4.219 One response focused specifically on minerals as the policy does not explicitly include minerals which can only be worked where they are found. Often these are in the countryside, but unlike agriculture or forestry, for example, hydrocarbon mineral exploration and production is not essential to the functioning of the countryside. Therefore, for purposes of clarity and to avoid ambiguity, mineral working should be referred to in the policy so that mineral development is not restricted.
- 4.220 Many of the responses in objection focussed on specific areas of land. Some wanted areas of land including in, or removing from, a development limit (these are registered as objections), and some were happy with the development limit and provided a support (these are registered as support or support with comments). Outlined below is a summary of the specific comments received on the development limits. The sites submitted through the 'Call for Sites' have also been included. It should be noted that not all settlements with/without development limits attracted consultation responses. Only those settlements where comments were received have been included in the table below and subsequent summaries.

Site Name/Location	Object	Support	Support with Conditions	Observations	Other	Total
Appleby	1	0	0	0	0	1
Barnetby-le-Wold	4	0	0	0	0	4
Barton upon Humber	3	0	0	0	0	3
Belton	1	0	0	0	0	1
Brigg	1	0	0	0	0	1
Eastoft	2	0	0	0	0	2
Elsham	0	1	0	0	0	1
Epworth	3	0	0	0	0	3
Goxhill	3	0	0	0	0	3
Haxey	3	0	0	0	0	3
Hibaldstow	2	0	0	0	0	2
Kirmington	1	0	0	0	0	1
Kirton in Lindsey	3	2	0	0	0	5
Messingham	1	1	0	0	0	2
Roxby cum Risby	1	0	0	0	0	1
Scawby	4	0	0	0	0	4
South Killingholme	1	0	0	0	0	1

Scunthorpe	8	1	0	0	0	9
Ulceby	1	0	0	0	0	1
West Halton	3	0	0	0	0	3
Westwoodside	1	0	0	0	0	1
Winteringham	1	0	0	0	0	1
Winterton	2	0	0	0	0	2
Wootton	3	0	0	0	0	3
Wrawby	2	0	0	0	0	2
Wroot	2	0	0	0	0	2
Cadney	1	1	0	0	0	2
Croxton	1	0	0	0	0	1
Graizelound	0	1	0	0	0	1
Melton Ross	1	0	0	0	0	1
Sandtoft Airfield	1	0	0	0	0	1
Thealby	1	0	0	0	0	1
Wressle	1	0	0	0	0	1
Total	63	7				70

SUMMARY OF ISSUES RAISED

Appleby

- In terms of the preferred draft settlement development limit for Appleby there was one suggested amendment proposed at this stage.
- It was suggested that the development limit should be amended to include the operational Ermine Farm on the north side of Risby Road, in the development limit. This also includes a parcel of open land to the south of Risby Road.

Barnetby-le-Wold

- Four areas of land were suggested as amendments to the Barnetby-le-Wold settlement development limit.
- The settlement development limit was suggested to be amended to include two separate areas of land to the west of Kings Road. The first site abuts the existing settlement to the north-west and is an open greenfield site in nature. The second site consists of two large agricultural open fields to the rear of the existing dwellings fronting Kings Road that do not contain any structures or built form of development.
- Land east of Low Cottages was also suggested for inclusion within the settlement development limits. Again this site consists of a large agricultural open field that does not contain any structures or built form of development and would result in the development limit spreading into the open countryside.
- The final piece of land suggested is land to the rear of 81 St Barnabas Road. This land adjoins the main body of the settlement, is directly to the rear of the existing properties, and is currently used as an agricultural horse paddock.

Barton upon Humber

- There were three amendments proposed to the development limits set for Barton Upon Humber during this consultation period.

- Firstly, the development limit should include the large area to the east of the Humber Bridge Industrial Estate, to the north of Wren Kitchens and the south of the Barton to Cleethorpes railway. Removing it from the development limit would prevent future employment use due to the following paragraph in the policy "Development outside these defined boundaries will be restricted to that which is essential to the functioning of the countryside."
- The second relates to the development limit in the south of the settlement which does not reach to the proposed Barton relief road. The response took the view that Barton relief road would form a natural development limit to the town during the lifetime of this new local plan. East of Eastfield Road this would be the most appropriate limit to use.
- Finally the proposed new employment site to the west of Barton, located by Ferriby Road and Gravel Pit Lane is not within the defined development limits. The site should be included within the development limits, which should also be extended northwards to Westfield Road.

Belton

- One particular area of land was suggested for inclusion within the Belton settlement development limit. The site is a large area of open land north of number 60 on Westgate Road. The site is greenfield in nature currently in agricultural use. It is surrounded to the north, west and south by residential development.

Brigg

- There was one amendment proposed to the development limits set for Brigg during this consultation period.
- It was considered that the northern boundary of the site allocation H1P-11p identified on the Proposals Map is inconsistent compared to proposed allocation H1p-10p immediately to the west of Grammar School Road. For allocation H1P-10p the development limits has been drawn so that the line immediately abuts and runs in parallel with the M180 Motorway. In contrast to the east of Grammar School Road the development limits does not follow a definitive physical feature on the ground. This inconsistency in approach should be addressed with both the development limits adopting the same principles as allocation H1P-10p so that its north boundary closely follows the line of the physical boundary formed by the M180 motorway between Grammar School Road and Brick Yard Lane further to the east.

Eastoft

- It is suggested that the development limit for Eastoft should be amended to include two small areas of land which are well related to the village.
- The first suggestion was that the settlement development limit is reviewed to include 'Land north of the Old Moorings'.
- The second suggestion was that the settlement development limit is amended to include 'Land west of Yorkshireside'.

Elsham

- One comment was received for Elsham which supports the proposed development limit as proposed, as it allows for some infilling and limited organic growth.

Epworth

- Three comments were received which require amendments to the Epworth settlement development limit.

- Firstly, it was suggested that the development limit for Epworth should be amended to include the area of land behind the Fire Station on Tottermire Lane. This includes an existing dwelling and a large agricultural field (including buildings) that extends to the north.
- Secondly, it was proposed that land west of Mill View Close should be included within the settlements development limit. This is an area of land that currently has buildings occupying the site and it extends into the countryside.
- Thirdly, it was suggested that the large garden to the south of the Mill on Belton Road should be included within the settlement development limit.

Goxhill

- There were three amendments proposed to the development limits set for Goxhill during this consultation period.
- Two individual areas of land to the south of School Lane were suggested for inclusion within the development limit as they are enclosed by existing built form on three boundaries therefore making this area of the site largely urban in nature.
- Land to the south of School Lane and the adjacent site to the rear of Abbeygarth Villas, should also be included within the settlement development limits.

Haxey

- It is suggested that the development limit for Haxey should be amended to include three areas of land.
- Firstly it was suggested that two parcels of land south of Northside and the Courtyard should be included in the development limit. One response considered two parcels of land including a larger area of open land and a smaller site that could be used for access. The second only requires the inclusion of the larger area of open land within the development limits.
- Secondly land east of Mowbray House on Upperthorpe Road was also suggested for inclusion within the development limits. This site is predominantly undeveloped land in agricultural use, but includes a number of structures to the south. It is on the westerly extent of the settlement.

Hibaldstow

- There were two suggested settlement development limit changes submitted for Hibaldstow.
- The first response suggested that the development limit of the settlement should be amended to include a triangular piece of agricultural land to the south of Manton Lane.
- The second proposed that land behind number 31 off Hunts Lane should also be included inside the Hibaldstow settlement development limit. This land is currently part of a large rear garden situated to the north of the dwelling.

Kirmington

- The only area of land that was proposed for inclusion within Kirmington's settlement development limit is land currently occupied by Manor Farm, as it was viewed that this area of land meets the criteria for designation established by Policy SS10p. This land is occupied by an operational farm scattered with buildings and vacant open land.

Kirton in Lindsey

- There were two supports for the proposed development limit of Kirton in Lindsey. These focussed on the need for the settlement to adjust to the major growth that is taking place currently and over next few years, before considering any further development.
- Three suggestions were put forward to amend the proposed development limit for Kirton in Lindsey.
- The first suggestion is to extend the development limit to include land at Ings Road. It is felt that the inclusion of this site would be ideally suited for residential development as the site is more deliverable than certain other land allocations proposed in this plan and existing plans.
- The second suggestion relates to the area of land now identified as a Committed Site H1C-51p. This committed site benefits from planning permission (PA/2017/511) for 16 two and three bedroom affordable houses. It is contended that this site, like the adjacent site, should be included within the development limits of the settlement.
- The third suggestion is to amend the development at Gainsborough Road so it's the same as the previous plan as the development at Gainsborough Road is an exception site for the building of affordable homes. Changing the Kirton in Lindsey development limit due to this is inappropriate as it places the neighbouring locations at risk from development which would be disastrous.

Messingham

- One respondents supported the proposed development limit for Messingham, whilst one proposed amendments.
- The proposed change was to extend the development limit on the northern edge of the village to include the land to the north of Holme Lane. The land is currently in agricultural use and in single ownership. Access is from Holme Lane and is available for development in 5 – 10 years.
- One respondent stated the development limits for Messingham should be cast in stone with no further expansion beyond which is already planned. This is based on the fact that the infrastructure of the village cannot cope at present (sewerage, broadband and public transport).

Roxby cum Risby

- A single response was received requesting that the development limit for Roxby cum Risby is amended. The change requested is an amended to include land south of Linhay.

Scawby

- There were four amendments proposed to the development limits of Scawby.
- An objection was received to the development limit around Scawby to include the site south of St Martins Road. The land has a current planning application which is live and the respondent believes there are no technical objections. The Plan sets out that the boundaries are drawn to reflect a variety of issues including the capacity of the settlement to absorb new development and its service base. This is set out in the Settlement Survey [2019] which they believe is inaccurate as it doesnt identify a Coop supermarket.
- The development limits should be redrawn with the inclusion of land at the rear of The Cottage on Vicarage Lane at Scawby. The site has in part previously benefitted from planning permission for a single dwelling although this has now lapsed. However, there is scope for additional development to make a small, but sustainable contribution to the delivery of housing in a sustainable location.
- The final comment recommended that two parcels of land at Wold View/Follye Hill on Station Road should also be included in the development limits. This first site consists of the existing properties and their large

rear gardens. The second site includes the first site with the addition of White House Farm and an agricultural paddock to the north.

Scunthorpe

- There were eight objections and one support for the development limits for Scunthorpe.
- There was support for the inclusion of the site at Burringham Road, Scunthorpe within the settlement development limit. This site was considered a logical extension of the development limit in this location which has good access to a range of services and facilities, including public transport.
- The first proposed amendment (which was covered by two responses) requires the development limits to be redrawn to include land at Holme Lane. The development limits as shown currently include the area of land earmarked for Lincolnshire Lakes, however, the ability of Lincolnshire Lakes to deliver 3,000 dwellings over the plan period was seriously questioned.
- The second suggested amendment is the inclusion of land at Scotter Road South. The site is currently subject to a planning application under reference PA/2018/1608, and the site comprises of a Builders Merchants and a former Brickworks, which qualifies as previously developed land.
- The third is land to the north of Burringham Road. Pre-application advice was undertaken for proposed residential development for up to 144 dwellings and woodland walkway for Lindsey Lodge Hospice.
- The fourth proposed amendment to the Scunthorpe development limit is for land adjoining Beck Farm, located south of the Gravel Pit Lane, Yaddlethorpe. The land at Beck Farm located between Gravel Pit Lane and Bottesford Beck totalling around 10 acres was put forward previously. It can be accessed without needing to use the already congested Yaddlethorpe High Street and would also benefit the local community by extending the Beckside footpath past the new cafe and linking it to the Playing fields on Gravel Pit Lane. The land is predominantly an open agricultural field with operational farm building in situ in the eastern section.
- The fifth and the sixth sites respectively suggested the inclusion within the Scunthorpe development limit of two separate pieces of land at Brumby Common West, to the west of Scotter Road. One site runs parallel to the existing rail line heading west to Doncaster while the other larger site is currently designated a local nature reserve.
- The seventh suggested an amendment to include land off South Cliff Lodge, on Gravel Pit Lane Yaddlethorpe within the settlement development limit.

Ulceby

- One amendment was proposed to the settlement development limits of Ulceby during this consultation period.
- A site was suggested for inclusion within the development limits in relation to land south of Cloister Mews. This site abuts the existing settlement and is agricultural in nature.

South Killingholme

- An amendment to include land behind Robinsons Mews on Moat Lane within the settlement development limit was the only change requested for South Killingholme.

West Halton

- There were three amendments proposed to the development limit of West Halton during this consultation period.

- A site was suggested by two comments for the inclusion within the settlement development limits for the land to the rear (south) of the Butchers Arms Public House on White House Lane. This land is an open greenfield site with no buildings present and built form of development.
- A further site north of Winteringham Lane was viewed as ideal by one response for inclusion within the development limit. The site is linear in form and directly abuts the highways, currently predominantly in agricultural use, but with existing dwellings on the eastern edge which are disconnected from the main body of the settlement.

Westwoodside

- One amendment was proposed to the development limit of Westwoodside during this consultation period.
- A site to the west of Nethergate was proposed for inclusion within the settlement development limits. The reason provided for inclusion was that the land is surrounded by residential properties and has the capacity to deliver 10 dwellings.

Winteringham

- There was one amendment proposed to the development limit of Winteringham during this consultation period.
- One site has been proposed for inclusion within the settlement development limits for Winteringham to include the land to the east of High Burgage.

Winterton

- Two suggested amendments to the development limit for Winterton were put forward during the consultation period.
- One response noted that site WINH-2 (Land off Coates Avenue, Winterton) which is a housing allocation in the adopted Housing and Employment Land Allocations DPD (2016) is proposed to fall beyond the development limits and is not now a proposed allocation. The site has been subject to two separate planning applications, both consistent with the requirements of the policy which had been extensively consulted upon and examined by an independent inspector and both recommended for approval by planning officers.
- Land south of South Street was also put forward as an amendment to the settlement development limits as it can be accessed directly from the highway (via South Street). This land is triangular in shape and currently in agricultural use and would extend the development limit significantly in to the open countryside.

Wootton

- Only three suggested development limit change were proposed for the settlement of Wootton.
- One response requested an amendment to include the land behind 40 – 70 High Street. This area of land is largely occupied by the large linear rear gardens to the dwellings on High Street.
- A second response requires land south of Wootton Pond including within the settlement development limits. This site abuts the existing settlement and is agricultural in nature.
- The final response requested the development limit is amended to include land east of no.9 Ulceby Road. This site abuts the existing settlement and is agricultural in nature.

Wrawby

- Two representations were received in relation to the development limit for Wrawby during the consultation period.
- It was felt that the development limit for the village should be reconsidered to allow the consideration of the land between the Bakersfield development and Barton Road within the settlement development limit, which could provide land for additional housing without impacting of the rural nature of the village.
- A view was provided that land to the Rear of Wrawby Care Home should be included in the development limit. The site refused planning permission for the erection of 4 dwellings and subsequently dismissed at appeal with the Inspector citing the incursion into the open countryside and subsequent likely harm to character which would be caused. Since this time, circumstances at the site have materially changed with planning permissions granted for development. With this in mind this site should be reconsidered.

Wroot

- Two responses were received in relation to the development limits for Wroot during the consultation period.
- The first response required the extension of the development limits of Wroot to include land at Field Lane, Wroot. The site is a logical small-scale extension to the village development limit.
- Whilst the second response requires the land behind the Dovecote, High Street including within the development limits as the site currently has operational buildings in business use and adjoins the main body of the settlement in a central location.

Cadney

- Two responses were received in relation to the development limits for Cadney during the consultation period.
- The first supports the proposed development limit as proposed.
- A second requests the inclusion of the rear garden of Shepherds Farm on Pump Hill within the settlement development limit.

Croxton

- One comment was received for the rural hamlet of Croxton suggesting that the settlement should have its own settlement development limit as it does not currently have one. This response submitted a suggested layout for the settlements development limits.

Graizelound

- There was one representation in relation to the proposed development limit for Graizelound, expressing support for the suggested changes to the development limit, particularly the addition of the land running parallel to Main Street and opposite Lound House.

Melton Ross

- A single piece of land in Melton Ross was requested to be considered for inclusion in the settlement development limits. This land is situated at Thornham Lodge and its reasons for inclusion is that the site abuts the existing settlement and is in business use to the north, but vacant to the south.

Sandtoft Airfield Industrial Estate

- One response was received which requires the amendment of the development limit of Sandtoft Airfield Industrial Estate to include an additional parcel of land to the south of Sandtoft Road. The land was formerly part of the former Sandtoft Airfield.

Thealby

- One representation was submitted to amend the development limit of Thealby and this suggested the inclusion of land east of Carr Lane. This land abuts the main body of the settlement and is currently in use as the frontage to an existing business operation.

Wressle

- One representation was submitted to amend the development limit of Wressle and this suggested the inclusion of land off Bridge Road. This land requires the extension of the development limit to the north-east to take the existing dwellings and business operations within the development limit. This land is disconnected from the main body of the settlement by a gap site.

5. MEETING OUR HOUSING NEED

Introduction

- 5.1 A key role of the Local Plan, as emphasised by NPPF, is to meet, where possible, all identified housing needs and to deliver a wide choice of high quality homes, widen opportunities for home ownership and to create sustainable, inclusive and mixed communities. This includes meeting the needs of the various groups that have differing housing requirements. To significantly boost the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets fully the objectively assessed needs (OAN) for market and affordable housing in their housing market area. This needs to be consistent with the policies of the NPPF, including identifying key sites that are critical to the delivery of the housing strategy over the plan period.
- 5.2 The Local Plan needs to provide sufficient homes in order to meet our local needs and to help support the creation of sustainable communities. North Lincolnshire needs more homes because:
- North Lincolnshire's population is growing
 - People are living longer, with increasing life expectancy
 - It helps to maintain a local labour supply and support economic growth; and
 - To meet the housing need for everyone within North Lincolnshire.
- 5.3 Planning Practice Guidance sets out the actions required to identify the need for certain types of housing and the needs of different groups which will be addressed through the Local Plan. These groups are:
- Private rented sector
 - Self-build and custom housebuilding
 - Family housing
 - Households with specific needs
 - Student housing
 - Travelling Communities
 - Housing for older people.

Consultation

- 5.4 The Preferred Options document contained 12 questions relating to subjects that could be covered by meeting our housing needs policies.

Question H1p Do you think the Preferred Policy H1p: Site Allocations is the right approach?

Question H2p Do you think the Preferred Policy H2p: Housing Mix and Density is the right approach?

Question H3p Do you think the Preferred Policy H3p: Affordable Housing is the right approach?

Question H4p Do you think the Preferred Policy H4p: Housing for Older People is the right approach?

Question H5p Do you think the Preferred Policy H5p: North Lincolnshire's Travelling Communities is the right approach?

Question H6p Do you think the Preferred Policy H6p: New Agricultural Workers or Forestry Dwellings is the right approach?

Question H7p Do you think the Preferred Policy H7p: Replacement, Alteration and Extensions to Dwellings is the right approach?

Question H8p Do you think the Preferred Policy H8p: Self-Build and Custom Build is the right approach?

Question H9p Do you think the Preferred Policy H9p: Flats above Shops and the Use of Vacant Buildings for Housing is the right approach?

Question H10p Do you think the Preferred Policy H10p: Backland and Tandem Development is the right approach?

Question H11p Do you think the Preferred Policy H11p: Houses in Multiple Occupation is the right approach?

Question H12p Do you think the Preferred Policy H12p: Children's Homes is the right approach?

Responses – Question H1p Do you think the Preferred Policy H1p: Site Allocations is the right approach?

- 5.5 161 respondents commented on this policy and 26 respondents agreed with contents of the policy (with some amendments), 132 respondents did not agree with the policy contents and suggested some wording changes and 3 respondents not object or agree.

Table 5.1: Responses to Question H1p: Site Allocations

Response	Number of Respondents	Percentage of Respondents
Yes	26	16%
No	132	82%
Other	3	2%
Total	161	100%

Summary of Responses – Question H1p Do you think the Preferred Policy H1p: Site Allocations is the right approach?

General comments

- 5.6 26 respondents supported housing growth distribution proposed within the local plan.
- 5.7 A number of representations supported the development of brownfield land for housing if the correct site investigation and remediation works are undertaken.
- 5.8 A representation made comments regarding garden land and back land development reference not offering a robust resistance to an appropriate level for residential garden development.

- 5.9 Several representations suggested the local plan should consider the impacts of climate change. The local plan should ensure that the sequential and exception tests are undertaken as part of the evidence base to ensure that housing development is built in the lowest areas of flood risk were possible.
- 5.10 Three respondents suggested that Policy H1p is not the right approach. The council have failed to allocate any sites in Smaller Rural Settlements. This is contrary to the NPPF (2019) which seeks to promote sustainable development in rural areas.
- 5.11 The Local Plan should ensure that suitable sites are available for a wide range of types of development across a wide choice of appropriate locations. NPPF (para 61) is clear that the Council need to assess and reflect in their planning policies the size, type and tenure of housing needed for different groups in the community. The representative consider that 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 can be maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.
- 5.12 One respondent expects the when determining housing planning applications policies relating to water efficiency/re-use, foul drainage and surface water management are considered.

Major Sub-Regional Centre - Scunthorpe & Bottesford Urban Area (including Lincolnshire Lakes)

- 5.13 A response raised concerns regarding future growth to Bottesford and the surrounding land including land off Holme Lanes, land at Moorwell Road and Yaddlethorpe High Street to Scotter Road not being suitable for future residential development due to the lack of infrastructure and major drainage issues.
- 5.14 No comments were received on the following committed and proposed housing allocations:
- H1C-1p: Plot 29 Hebden Road
 - H1C-2p: Former Crosby Primary School, Frodingham Road
 - H1C-3p: Woods along Scotter Road
 - H1C-4p: 30-32 Crosby Road
 - H1C-5P: Part of Advance Crosby Scheme Phase 2
 - H1C-6p: Methodist Church Frodingham Road
 - H1C-7p: Land at 1-3 Cliff Gardens Phase1
 - H1C-8p: Land at 1-3 Cliff Gardens Phase 2
 - H1C-9P: Former Tennis Courts Rowland Road
 - H1C-10p: Holgate Road
 - H1C-11p: Brumby Resource Centre, East Common Lane
 - H1C-12p: Land North of Ancholme Road
 - H1C-13p: Lakeside
 - H1C-14p: Land south of Ashby Turn Primary Care Centre, The Link
 - H1C-15p: Land Rear, Ashby Link, The Link
 - H1C-16p: Former Carpark, Collum Avenue
 - H1C-17p: Land off Bottesford Road
 - H1C-18p: Former Darby Glass Offices and Factory, Sunningdale Road
 - H1C-19p: Site of the Lilacs Warwick Road
 - H1C-20p: Land off Burringham Road
 - H1C-21p: Former Site Of The Star, Rochdale Road
 - H1C-22p: Former Priory Lane Infants School
 - H1C-23p: Redevelopment of Westcliff Precinct
 - H1C-24p: Land at Dartmouth Road

- H1C-25p: Cottage Beck Road, Albert Marson Court
- H1C-26p: Land at Dragonby Road
- H1P-1p: Phoenix Parkway Phase 1
- H1P-2p: Phoenix Parkway Phase 2
- H1P-3p: Land at the Council Depot, Station Road
- H1P-4p: Land at former South Leys School , Enderby Road

SSH1p and SSH2p: Lincolnshire Lakes

- 5.15 A number of representation have objected to the SSH1p and SSH2p being allocated due to the lack of housing delivery on the site to date. An outline planning application has been under consideration since 2015 with no progress in issuing the decision notice since planning committee voted to approve the scheme in July 2019. Lichfield's "start and Finish" second edition suggest that on average there is 3 years between granting of outline planning permission and the completion of the first dwelling on the site. At best, completion on this site will not start before 2023/24. This gives 13 years of build.
- 5.16 Comments raised concerns regarding the amount of upfront infrastructure required and the cost associated with it is impact on the overall viability of the scheme. At presently there remains serious questions over whether this location meets the definition of being developable with the NPPF and as such, the policy should not include reference to it.
- 5.17 Several representations raised concerns regarding the deliverability of 3,000 homes within the Lincolnshire lakes area over the plan period.
- 5.18 One respondent was concerned that the council were considering developing 3,000 dwellings on a flood plain.
- 5.19 The scale of development in this location is significant and likely to have an impact on the performance of the sewerage system. Severn Trent have been working with North Lincolnshire Council Planning department and developers to understand how this development will phased and a scheme has been raised to improve our network to accommodate development.

Alternative sites submitted during the public consultation period

- 5.20 **M0QOV Land at Burringham Road:** The site is 5.24 ha in size and is low-grade agricultural land. The respondent suggested that the site could deliver 144 dwellings within the next two to five years. A flood risks assessment, Phase 1 and Phase 2 with Qualitative Risk Assessment Survey, Heritage Impact Assessment, Archaeological Auger Survey and a Geophysical Survey Report are included as part of the representation.
- 5.21 **CFS0300122 Land off High Street, Yaddlethorpe:** The site is a mixture of agricultural and disused grassland. Residential properties surround the north and east of the site and agricultural land lie to the south and west. The respondent suggests the site could accommodate 350 dwellings with access from Yaddlethorpe High Street.
- 5.22 **CFS0300026 Land opposite the Fairways off Scotter Road:** The site is next to the railway in Scunthorpe and is 1.97ha in size. The representation suggests approximately 20 dwellings could be accommodated on the site. The land is currently agricultural land.
- 5.23 **CFS0300089 Land off Holme Lane/Holme Hall Avenue:** The site is 74.32ha in size and is agricultural land. The site is characterised by arable farmland and hedgerows, which demark the field boundaries. A strip of mature woodland runs into the site opposite the entrance into The Pink Pig Farm to the south. Bottesford Beck runs along the western boundary of the site to the north, there is a pond located to the north of the site just off Bottesford Beck. It is not considered that ecology or trees are an impediment to development of this site for residential development. It is only proposed that the area to the north of Holme Lane (50 hectares) is developed for housing at this time. The maximum capacity of this area is

estimated to be between 1,225 and 1,610 dwellings. This figure reflects physical constraints on site and achieves a density which is consistent with the adjacent existing urban areas. 10% of the total dwellings could be provided for affordable housing subject to viability testing.

- 5.24 **CFS0300090 Land off Scotter Road South/Moor Road:** The site is 13.14 ha in size and is vacant and formerly comprised a brickworks (previously developed land). The representation suggests approximately 350 dwellings could be accommodated on this site. The majority of the site comprises semi-improved grassland, with areas of dense scrub along the boundaries of the site. Towards the access at the east of the site lies an area of hardstanding/bare ground with mounds of rubble where former buildings have been demolished. An area of marshy grassland is present at the north eastern corner, while at the north western corner is a large pond. Two further small ponds are located in the south east corner. Drainage ditches delineate the northern and western boundaries of the site, with a small section to the south eastern corner. The southern, western and north eastern boundaries feature a species-poor hedgerow with trees.
- 5.25 **CFS0300091 Land to the west off Scotter Road:** The site is 17.69ha and has been put forward for housing development. The site comprises a commercial plantation woodland in the northern and central areas. The developable area of the site comprises a large meadow in the south with a small area of less dense woodland at the southern site boundary. Vehicular access to the developable part of the site is from Scotter Road at the eastern site boundary via a farm access gate, although this is currently somewhat overgrown. The access point has good visibility in both directions to passing traffic on Scotter Road.
- 5.26 **CFS0300096 Site off Westburn Way:** The site is 0.54ha in size and has been suggested for housing development. The site is directly adjacent to existing residential development and would forms an extension to the existing residential built form in this area. The site is located within a highly thriving residential area of Scunthorpe. The site is within walking and cycling distance of all major retail superstore and smaller retail centres, industrial units, recreation opportunities and schools within the Scunthorpe area. The nearest bus stops are a very short walk and the town centre is less than 3 kilometres from the site.

Principal Towns: Barton upon Humber and Brigg

Barton upon Humber

General comments

- 5.27 Several comments raised concerns regarding the existing infrastructure not being adequate to accommodate the proposed growth within Barton upon Humber. Currently the existing doctor surgery's has inadequate parking disabled parking and no parking facilities for patients.
- 5.28 A number of questions have also been raised asking why does the local plan not include a new primary school within the proposed housing allocations to the north of the A1077? And how will the proposed Barton Link road be developed?
- 5.29 No comments were received on the following committed housing allocations:
- H1C-27P: Land to the rear of 13-19 Pasture Road
 - H1C-28p: Land to the rear of 13-19 Pasture Road
 - H1C-29p: Land adjacent to the White Swan Public House
 - H1C-30p: The Laurels, Preston Lane
 - H1C-31p: 7a, Marsh Lane
 - H1C-32p: Bank House, 8 Holydyke

H1P-5p: Pasture Road South, Barton upon Humber

- 5.30 One respondent identified that half of the proposed site is located in Flood Zone 3 with some in 'Danger for all'. Dwellings should not be located in this area. The council need to undertake a sequential and exception test to provide further evidence and justification.
- 5.31 A respondent raised regarding the additional housing growth proposed on Falkland Way and part of the site being within high flood risk and the recent events have shown that we are seeing much wetter winters. If the existing properties flood after the proposed growth takes, place will North Lincolnshire Council should be responsible.
- 5.32 A representation received supported the proposed housing allocation and requesting that this allocation remain in the emerging local plan.

H1P-6p Land off Barrow Road

- 5.33 Several representations received supported the proposed housing allocation and requesting that this allocation remain in the emerging local plan.
- 5.34 A respondent supported the proposed allocation providing delivery of Barton Relief Road take place prior to or alongside the housing. The respondent also would not object if additional land between the proposed development and the Relief Road east of Eastfield Road were included within the allocation.

H1P-7P Land to the South of Barrow Road

- 5.35 Several representation received supported the proposed housing allocation and requesting that this allocation remain in the emerging local plan.
- 5.36 A respondent supported the proposed allocation providing delivery of Barton Relief Road take place prior to or alongside the housing. The respondent also would not object if additional land between the proposed development and the Relief Road east of Eastfield Road were included within the allocation.

H1P-8p Land at Caistor Road

- 5.37 Several representation received supported the proposed housing allocation and requesting that this allocation remain in the emerging local plan.
- 5.38 A respondent supported the proposed allocation providing delivery of Barton Relief Road take place prior to or alongside the housing. The respondent also would not object if additional land between the proposed development and the Relief Road east of Eastfield Road were included within the allocation.

H1P-9p Land between Caistor Road and Eastfield Road

- 5.39 Several representation received supported the proposed housing allocation and requesting that this allocation remain in the emerging local plan.
- 5.40 A respondent supported the proposed allocation providing delivery of Barton Relief Road take place prior to or alongside the housing. The respondent also would not object if additional land between the proposed development and the Relief Road east of Eastfield Road were included within the allocation.

Alternative sites submitted during the public consultation period

- 5.41 **CFS0300050 North of Barrow Road:** A site was put forward for housing which is to the north of Barrow Road at the Rancher. The site lies immediately adjacent to Barrow Road and Falkland Way. Two prominent routes providing access and egress to and from the town of Barton upon Humber. Access can be provided in a safe and functional manner from Falkland Way which is a straight stretch of highway across the sites longest frontage providing good visibility in both directions which is governed by a 40 mph speed limit. The site is arable grassland and a dwelling. The site is approx. 4.85Ha

comprising of 3.64Ha north & west of 'The Rancher', & 1.2Ha marketed (& subsequently sold to one of the applicants) with potential for light industrial use (presumably with the potential of the adjoining 3.64Ha that forms part of this submission).

Brigg

5.42 No comments were received on the following committed housing allocations:

- H1C-33p: Station Road
- H1C-34p: Island Carr
- H1C-35p: Falcon Cycles, Bridge Street
- H1C-36p: Silversides Lane

H1p-10p: Land north of Atherton Way, Brigg

5.43 The site is located within Flood Zone 3, flood risk will need to be assessed and through discussion with the council in refreshing the SFRA the EA have provided advice how the flood can be mitigated on site.

5.44 A representation received questioned if the site is brownfield land. The adopted Housing and Employment Land Allocation DPD at paragraph 3.293 refers to the character of the site being 'overgrown scrubland' and for BRIH-5, paragraph 3.327 confirms the allocation comprises 'vacant grassland'. We would therefore question the brownfield classification found within draft Policy H1p. In our view, the site is greenfield in character and, therefore, should not be given preferential treatment in terms of its release over other greenfield land within Brigg.

5.45 The delivery of Brigg Link road needs to be considered collectively with H1P-11p.

H1P-11p Land at Western Avenue, Brigg

5.46 A representation received supported the proposed housing allocation H1P-11p. The current policy H1p does not provide any policy requirements regarding maintaining and safeguarding the alignment for the creation of a single access link road to a suitable standard to connect Atherton Way and Wrawby Road. This information needs to be included within the policy.

5.47 A respondent identified there is a number of inconsistencies compared to the proposed allocation H1p-10p immediately to the west of Grammar School Road. For allocation, H1P-10p the Development Limits Boundary (SS10p) has been drawn so that the line immediately abuts and runs in parallel with the M180 Motorway. In contrast to the east of Grammar School Road the Development Limits does not follow a definitive physical feature on the ground. We object to this inconsistency in approach and recommend that the Development Limit adopt the same principles as allocation H1P-10p so that its north boundary closely follows the line of the physical boundary formed by the M180 motorway between Grammar School Road and Brick Yard Lane further to the east. Leading on from this issue, there is also another irregularity and drafting error on the Proposals Map that we recommend should be amended. The proposed landscape enhancement designation Policy DQE 2p falls within the Development Limits for allocation H1P-10p but lies outside of the Development Limits in relation to proposed allocation H1P-11p. In the interest of consistency, allocation H1P-11p should have the same relationship to the boundary with the M180 as allocation H1P-10p. Another advantage of adopting a consistent approach with allocation H1P-10p in terms of its relationship with the M180, is that the development area of allocation H1P-11p would marginally increase in size thereby potentially delivering more houses in a recognised key sustainable settlement thereby reducing the pressure to release new housing allocations elsewhere within the district to meet the future requirement.

5.48 One representation recommended subject to there being no material increase in traffic that would impact severely on the highway network from the benchmark arrangement created as a result of changes to school access in recent years away from Grammar School Road, an appropriate interim access arrangement can be allowed onto Grammar School Road to serve allocation H1P-11p (BRIH-2) prior to the link road eventually connecting to both Atherton Way and Wrawby Road.

H1P-12p Wrawby Road Phase 2, Brigg

- 5.49 One representation received supported the proposed housing allocation H1P-11p. The current policy H1p does not provide any policy requirements regarding maintaining and safeguarding the alignment for the creation of a single access link road to a suitable standard to connect Atherton Way and Wrawby Road. This information needs to be included within the policy.
- 5.50 The terms and conditions for disposal of the site are currently being negotiated with a national house builder and these are well advanced. The respondent anticipates a full planning application will be prepared in the short term to deliver a phase one element of the allocation within the southern portion of the site fronting on to Wrawby Road in association with the whole of allocation H1P-13p. Direct access would be taken off Wrawby Road. The discussions regarding this first phase of development has taken into account a number of key issues which include: The design of the access arrangement onto Wrawby Rd would be of a suitable standard to facilitate the traffic associated with all of the associated housing allocations and the proposed Link Road.
- 5.51 The ability of the scheme to safeguard an appropriate alignment for the future Link Road to access the northern part of this allocation and ultimately provide a connection through to Grammar School Road.
- 5.52 Ensure the coordination of delivery and capacity of strategic infrastructure so that the remaining area of the allocation continues to be well planned and comes forward in an efficient and cost effective manner.

H1P-13p Wrawby Road Phase 1, Brigg

- 5.53 One representation supported the proposed housing allocation H1P-11p. The current policy H1p does not provide any policy requirements regarding maintaining and safeguarding the alignment for the creation of a single access link road to a suitable standard to connect Atherton Way and Wrawby Road. This information needs to be included within the policy.

Alternative sites submitted during the public consultation period

- 5.54 **CFS0300099 Land off the A18:** The site is agricultural land that is approximately 13.3 hectares in size. The site can be access off the A18 and there are no constraints onsite. The landowner and a developer are promoting the site for residential development.

Large Service Centres

Barnetby le Wold

- 5.55 No comments were received on the following committed housing allocations:
- H1C-37p: Land at Windsor Way
 - H1C-38p: Railway Inn Phase 2
 - H1C-39p: Railway Inn Phase 2

H1P-14p Land at King's Road

- 5.56 Several respondents raised concerns regarding the proposed development Land at Kings Roads. This proposal would increase pressure on existing local infrastructure for example schools and doctors. There is already traffic issues on Kings Road and the development would increase this issue.
- 5.57 One comment raised concerns about the design of new dwellings within the village.

Alternative sites submitted during the public consultation period

- 5.58 **CFS0300094 Land of St Barnabas Road:** The site is vacant grassland that could accommodate two self-build plots. Access the site is off St Barnabas Road.
- 5.59 **CFS0300082 Land to the west of Kings Road:** A site of approximately 3.6ha and the representation suggests the site could deliver 100 houses. The land is currently agricultural land and access can to the site is off Kings Road.
- 5.60 **CFS0300083 Land to the east of Kings Road:** A site of approximately 7.71ha has been suggested for housing development. The land is currently agricultural land. Access to the site could be by part on the 6 metre wide track owned but to get sufficient width for a more suitable access would depend on cooperation with the owner (public sector) between the proposed area and Kings Road.

Barrow upon Humber

- 5.61 The site allocations in Barrow upon Humber need to consider the important approach views westward from the A1077 approaching the junction with the B1402 of the tower of the Grade I church of the Holy Trinity, which should be retained and/or enhanced in the proposed housing development east of the junction.
- 5.62 No comments were received on the following proposed housing allocations:
- H1P-15p: Former Spencer Group Mill Lane
 - H1P-16p: Land off Ferry Road/Chestnut Rise

H1P-17p Land off Ferry Road

- 5.63 One representation supported the proposed allocation of H1P-17, however they have material concerns that the allocation is not of a sufficiently large scale. As a large service centre, Barrow upon Humber is a sustainable location for growth, with excellent road and transport links and is one of the most sustainable settlements in North Lincolnshire. The representation suggested that Barrow upon Humber should be the focus of more development than that currently proposed.

Alternative sites submitted during the public consultation period

- 5.64 **CFS0300115 Land to the south of New Holland Road:** A site of 1.67ha in size has been submitted for residential development. The representation suggests the site could accommodate 49 houses. The site is currently agricultural land and access to the site is off New Holland Road.
- 5.65 **CFS0300107 Land off Wold Road Land:** A site of 1.54 ha in size and is agricultural land. The site has been submitted for residential development and can be access of the B1206.
- 5.66 **CFS0300106 Land off Wold Road Land B:** A site of 0.74ha has been submitted for residential development. The site is agricultural land and can be access of the B1206.
- 5.67 **CFS0300049 Land to the east of Ferry Road:** A site of 1.01ha was submitted on the greenfield site, which is currently an area of amenity importance (LC11) area to the north of Millfields Way Barrow Upon Humber. They state this site will be developed in association with the adjoining land to the west, which is proposed for housing development within the emerging local plan, and an outline planning application has been submitted very recently.
- 5.68 **CFS0300109 Land off Ferry Road:** A site of 1.8ha in size has been submitted for residential development. The land is Greenfield Land and an outline planning application has been submitted on the site.
- 5.69 **CFS0300110 Land off Ferry Road:** Another site off Ferry Road of 2.61ha was submitted for residential development. The land is Greenfield and access can be gained off Ferry Road.

- 5.70 **CFS0300108 Land off Ferry Road:** A further site off Ferry Road of 0.8ha was submitted for residential development. The site is Greenfield land and can be accessed from Ferry Road.
- 5.71 **CFS0300064 Land off Ferry Road east:** TA site of 1.72ha was submitted for housing development. The land is agricultural and owned by a developer. They suggest that the site is suitable for some self-build plots with frontage to existing road and also development could include some bungalows for over 55s.
- 5.72 **CFS0300107 Land to off Wold Road:** A site of 1.53ha in size has been submitted for residential development. The site is currently used for equestrian and access is available from the B1206.

Belton

- 5.73 The emerging local plan currently does not propose to allocate any housing within Belton however, several representations received would like a housing allocation or the development limit changed to allow for future housing growth within Belton.

Alternative sites submitted during the public consultation period

- 5.74 **CFS030009A Land off Westgate Road:** site of 1.46ha on Westgate Road Belton was submitted for residential development. The site is currently un-used with the exception of the single residential property 160 Westgate road. It has historically been used for equestrian stabling and grazing. The proposals for the site are for affordable or general residential housing and could accommodate up to 10 large properties or up to 35 smaller or affordable homes.
- 5.75 **CFS0300047 Land off the High Street:** A site of 0.34ha was submitted for a self-build site. The site is currently vacant untidy land.
- 5.76 **CFS0300068 Land to the west of High Street:** A site of 0.66ha which is currently a paddock was submitted for housing development. Gate access via Collinson Cooper hard standing.

Broughton

- 5.77 No comments were received on the following committed housing allocation:
- H1C-40p: Land at Burnside

H1P-18p Land off the B1207

- 5.78 One representation strongly supported the site being proposed for residential development within the emerging local plan. However, they requested that the extent of the site significantly increased in size to include the remaining part of the field.

Alternative sites submitted during the public consultation period

- 5.79 **CFS0300075 Land to the north east of George Street:** A site of 3.95ha was submitted for approximately 100 dwellings. The site is agricultural land and the landowner has had developer enquiries on the site. The representation states the site lies on the edge of the village and would provide a good long term supply for much needed housing in a sustainable mixed use development.
- 5.80 **CFS0300097 and CFS0300100 Land off Estate Avenue:** The combined sites are agricultural land that are approximately 2.4ha in size. The sites are immediately adjacent to the existing housing along all of its boundaries, with the exception of the land to the south of the site that is proposed within the emerging local plan for residential development.

Crowle

- 5.81 No comments were received on the following committed housing allocations:

- H1C-41p: Land adjacent 28 North Street
- H1C-42p: Land adjacent to 17 Low Cross Street
- H1C-43p: Land off Church Street,
- H1C-44p: Manor House, Church Street

H1P-19p: Land to the East of Fieldside

- 5.82 One representation identified the sewage network in Crowle has known constraints. A scheme has already been prepared to review the sewerage network and WwTW to improve system. All Developments need to ensure that surface water is managed sustainably and avoid surface water connections to the foul sewers.

H1P-20p: Land off Mill Road

- 5.83 One representation identified the sewage network in Crowle has known constraints. A scheme has already been prepared to review the sewerage network and WwTW to improve system. All Developments need to ensure that surface water is managed sustainably and avoid surface water connections to the foul sewers.
- 5.84 There is a pair of cottages on the site on Mill Road which are undesignated heritage assets as is the historic strip field form of the site (this was formerly two strips), as such NPPF chapter 16 policies apply. A policy criteria within a site specific policy should be included to retain and sympathetically reuse these two cottages.

H1P-21p: Land off Fieldside

- 5.85 One representation identified the sewage network in Crowle has known constraints. A scheme has already been prepared to review the sewerage network and WwTW to improve system. All Developments need to ensure that surface water is managed sustainably and avoid surface water connections to the foul sewers.

Alternative sites submitted during the public consultation period

- 5.86 **CFS0300005 Land at north of Low Cross Street:** A site of approximately 1.47ha was submitted residential development and the representation suggests the site could accommodate around 25 houses. The land is currently agricultural land and access can be gained off Low Cross Street.
- 5.87 **CFS0300131 Land off Mill Road:** The representation would like the western boundary of the proposed housing allocation H1P-20 Land off Mill Road to be extended to include the additional land identified within this submission.
- 5.88 **CFS0300019 Land at Commonsides:** A site of 0.53ha in size has been put forward for residential development. The site is a grass field and was submitted for up to 9 affordable houses. Access can be gained off Commonsides.
- 5.89 **CFS0300020 Land off Brewery Road:** A site of 1.04ha in size had been submitted for self-build housing. The site is a grass paddock and the self-build homes would support the local equestrian yard.

Epworth

H1P-22p Yealand Flats

- 5.90 A number of representations objecting to this site being proposed for housing development within the emerging local plan. The concerns included the site would have negative impact on the setting and

significance of the Grade II listed Maws Mill, increase of vehicle movement on the A161 and speed restriction requirements.

- 5.91 A number of comments raised the Proposed site is located within the core historic landscapes (church field) to the north of Epworth, one of the best preserved ancient open strip field areas (dating back over a 1000 years) in the Isle of Axholme and the country. Up until a few years ago this site was one of a few fields around Epworth that was farmed in strips again highlighting the historic legacy of this location. The proposed site would be an unacceptable visual intrusion and extension of the current built up environment into the landscape, contributing to adverse character change and effecting the setting of this core historic landscape to the north of the town and the listed Maws Mill that shares this setting. If the proposed development were to be approved as proposed, it would adversely affect the character, appearance and setting of the historic landscape and the setting of the listed building which is contrary to paragraphs 192 and 200 of the NPPF, policy CS6 of the Core Strategy and policies LC14, LC7 and HE5 of the North Lincolnshire Local Plan.
- 5.92 Several representations received supported the proposed housing site on the basis that the site could provide additional housing for older members of the community and the access is not directly off the A161.
- 5.93 One responded requested more housing growth is considered and proposed site is extended to include more land.
- 5.94 One representation stated the site is indicated to be upstream of a number of flooding constraints and is also identified not to have a suitable surface water outfall, as such the development is likely to connect surface water flows into the foul sewers. This network will not have capacity for storm flows and is therefore likely to have the sewerage system capacity exceeded. We would recommend that a suitable surface water outfall is identified prior to the site being allocated within the Local Plan. Please note that both the Network and WwTW assessment are high level assessment based on a number of assumptions, and that any identified solutions would be subject to further feasibility assessments.
- 5.95 An objection identified the site includes a clear historic strip field with reverse S pattern; an undesignated heritage asset which contributes to setting of Conservation Area, also overlapping with the landscape 'designation'. The Isle of Axholme strip fields are a very rare survival of this form of cultivation (at a national scale) and key to the historic landscape character of the area.

Alternative sites submitted during the public consultation period

- 5.96 **CFS0300012 Land off Station Road:** A site of 1.45ha at 46 Station Road Epworth was put forward for residential development. The site is described as brownfield with greenhouses and barns are not in use. Access could be off station Road and the representation suggest number 46 could be demolished if needed.
- 5.97 **CFS0300022 Land to the west of Carrside:** A site of 1.06ha was also submitted to the west of Carrside House Epworth. The site is currently grazing land and states it could accommodate up to 20 dwellings.
- 5.98 **CFS0300060 Land to the north east West End Road:** A site of 0.72ha was put forward for housing development for approx. 12 Starter/Entry Level/Affordable Homes, Semi or terraced and 2 & 3 bedrooms 700sq ft. (65sq m)/1100sq ft. (102sq m).
- 5.99 **CFS0300043 Land off West End Road:** A site of 0.24ha has been submitted for a self-build development. The site is a family owned plot and is vacant.
- 5.100 **CFS0300059 Land off West End Road:** A site of 0.63ha was submitted for housing development. The site is brownfield and has been used for storage for years. Access is through 14 West End Road.

Goxhill

- 5.101 No comment have been received on the committed site with Goxhill (H1C-45p land off Howe Lane and Hawthorne Gardens) identified within the emerging plan.

Alternative sites submitted during the public consultation period

- 5.102 **CFS0300120 Land to the South East of School Lane:** A site of 0.5 ha in size has been submitted for residential development. The site is agricultural land and is located within the settlement of Goxhill. The site is bound by residential development to the north, east and west. This site has also been submitted as part of a wider site including CFS0300041, which has also been submitted by another landowner.
- 5.103 **CFS0300041 Land to rear of Abbeygarth Villas:** The site is greenfield land and is currently being used for agriculture. The site is 1.18 hectares and can be accessed from the southwest corner of Thorn Lane.
- 5.104 **CFS0300084 Land to the south of Thorn Lane:** The site is a greenfield land and is currently agricultural land. The site is approximately 6.49 hectares and the representation suggested 60 dwellings could deliver.
- 5.105 **CFS0300014 Land at Maydale Farm Horsegate Field Road:** The site is greenfield land and is grassland adjacent to Maydale Farm. The site size is 0.37ha and is being put forward for consideration as land up to 5 self-build plots.
- 5.106 **CFS0300113 Land to the north of Horsegate Field Road:** Most of the site has been proposed for residential development within site allocation H1C-45p within the emerging Local Plan. The representation suggested the remaining land to the north site of 0.83ha in size should be included for residential development.
- 5.107 **CFS0300112 Land at Horsegate Field Road:** A site of 4.1ha in size has been submitted to be considered for residential development. The land is currently agricultural land and can be access directly from Horsegate Field Road.
- 5.108 **CFS0300034 Land off Thornton Road:** A site of 1.4 ha at Abbey Boarding Kennels, Thornton Road, Goxhill has been put forward for residential development specifically self-build plots for 4 dwellings. The site is currently residential and a boarding kennel.
- 5.109 **CFS0300084 Land to the south of Thorn Lane:** The site is located to the south of Thorn Lane and is bound by the road to the north and north-west it is envisaged that safe access and egress can therefore be achieved directly into the site off Thorn Lane.

Haxey

H1P-23p Land at Field House

- 5.110 A number of people raised concerns regarding the road infrastructure and car parking capacity within the village especially on Church Street near the doctor surgery and Haxey School. The numbers proposed would be 10% growth for Haxey based on the number of households currently the village.
- 5.111 An objection raised concern the scale of the development and the impact it would have on the historical heritage of the church. It would also join the villages of Haxey and Westwoodside, which would be very inappropriate.
- 5.112 A representation suggested alternative sites should be considered to accommodate the proposed growth.
- 5.113 Several representations raised concerns regarding drainage and road infrastructure.

5.114 One representation identified that the foul sewers to flow through the proposed site, and will need to be protected from development, there are also known constraints downstream, Please provide further certainty regarding this development and the timeline for delivery when available to support us in assessing what improvements may be needed.

5.115 One respondent identified the development proposed to the south also cuts into area of historic strips.

5.116 A representation supported the proposed allocation within Haxey.

Alternative sites submitted during the public consultation period

5.117 **CFS0300010 Land off Netherhome:** A site of 1.05ha off Netherhome Epworth Road Haxey has been put forward for a self-build plot of affordable homes. The site is currently agricultural land.

5.118 **CFS0300017 Land off High Street:** A site at 2-4 High Street, Haxey was submitted for housing. The site is 0.69ha and is a garden land and donkey paddocks.

5.119 **CFS0300018 Land off High Street:** Another site at 2-4 High Street, Haxey was submitted for housing. The site is 0.22ha and is cleared grassland.

5.120 **CFS0300069 and CFS0300070 Land at 52 High Street Haxey:** Two sites were submitted at 52 High Street for residential development. One site was 0.72ha and the other 0.42. Both sites are next to each other and are owned by the same landowner. The land is vacant and states there is large open access from High Street, Haxey with excellent visibility splays. Suitable for adopted highway.

5.121 **CFS0300074 Land to the rear of the Duke William Hotel:** A site of 0.11ha which is proposed for approx. 8 houses. The site is currently Motel chalets and car parking and is owned by a developer.

5.122 **CFS0300086 Land to the west of Graizelound Fields Road:** The site is 0.91ha and is submitted for housing development of up to 30 units. Access is direct from the highway off Graizelound Field Road.

5.123 **CFS0300086 Land to the east & west of Graizelound Fields Road:** The site is 1.56ha and is submitted for housing development of up to 60 units. Access is direct from the highway off Graizelound Field Road.

5.124 **CFS0300093. Land to the west of Graizelound Road:** The site is 0.72 ha and is proposed for 15 dwellings. The land is agricultural and lies to the west of Graizelound Field Road.

5.125 **CFS0300095. Land off Graizelound Road:** The site is 2.84ha and lies to the left of Graizelound Road and the field to the right. The land is agricultural land and has been submitted for housing. The site is on the outskirts of Haxey away from the main settlement.

5.126 **CFS0300098 Land to the north of Blackmoor Road:** The site is 2.24ha and is proposed for housing. The site is currently agricultural land and is under option by a developer. The site included an appraisal in the statement as the site was previously discounted. It was believed that there was a ransom strip in Blackmoor Road between the cul-de-sac end of Lowcroft Avenue and the southern boundary of the proposed site. However, further research on Land Registry has been carried out this time by the land-owners solicitors. No title deeds have been found with regards to a ransom strip in Blackmoor Road. Access is unfettered and the site could be delivered immediately without third party negotiations.

Kirton in Lindsey

5.127 No comments were received on the following committed housing allocations:

- H1C-46p: Gleadells Mill Station Road
- H1C-47p: Land west of Station Road
- H1C-48p: Land at Beechcroft
- H1C-49p: North of Spa Hill

H1C- 50p: Land at Former RAF, Kirton in Lindsey

- 5.128 A number of representations raised concerns about the derivability of the site over the plan period.
- 5.129 One respondent suggested the site is unallocated a parcel of land be used instead on Station Road/ Cleatham Road near the railway line and garden centre or behind the secondary school.

Alternative sites submitted during the public consultation period

- 5.130 **CFS0300071 Land off Gainsborough Road:** The site is greenfield land and approximately 0.44ha in size. The site can be accessed off Gainsborough Road.
- 5.131 One represented suggested land to rear of South Cliff Road to the rear of Mill Lane as a potential area for development post 2036.
- 5.132 **CFS0300138 Land off Ings Road:** The site is greenfield land and approximately 2.80 ha in size. The site can be access off Ings Road and has been put forward for residential development.
- 5.133 **CFS0300016 Land off Station Road:** A site of 0.87ha (was submitted for housing to the east of Station Road in Kirton in Lindsey. The site is currently a paddock and close to the existing development limit.
- 5.134 **CFS0300051-Land to the east of South Cliff Road:** A site of 16.91ha was put forward for residential development. Specific proposals were for 300+ houses, plus playground, Skate Park and open play space. The land is currently Agricultural. The land is south of Huntcliff secondary school & the playing field (to the west of the school).
- 5.135 **CFS0300055 Land to the west of North Cliff Road:** A site of 3.97ha was put forward for approximately 200 dwellings. The site is currently farmland and access could be gained off North Cliff Road.
- 5.136 **CFS0300061 Land to the south of Gainsthorpe Road East:** A site of 12.41ha off Gainsthorpe Road east on the outskirts of Kirton in Lindsey was put forward for housing. The site is currently an Inert Landfill Site and Leisure/Health oriented activity centre and is yet to be marketed.
- 5.137 **CFS0300062 Land to the north of Gainsthorpe Road East:** A site of 85.47ha off Gainsthorpe Road east on the outskirts of Kirton in Lindsey. This is an area of circa 88 Hectares. It is proposed in line with the quarry reinstatement planning to develop the site fully incorporating, in addition to residential market housing, a number of home worker homes, social housing units and a mixture of leisure and parkland areas. The applicant would envisage residential housing units to occupy only up to 25% of the total site area to housing at 30-40 units per Hectare.

Messingham

- 5.138 No comments were received on the following committed housing allocation:
- H1C-52p: 68 High Street

H1P-24p Land to the North of Brigg Road, Messingham

- 5.139 A number of objections have raised concerns regarding the site being proposed for housing development due to the following issues standing water and drainage, access to the site being off a busy road and impact on the wildlife and bird habitat. The council need to explore other more accessible and less prone to flooding/ environmental damaging sites.
- 5.140 A number of representatives did not support the growth of Messingham. The additional development would place pressure on the present infrastructure e.g. schools, doctors and drainage. It would also change the character and identity of Messingham.

- 5.141 Concerns have been raised regarding the road infrastructure on Brigg road not being adequate to support the additional growth. Brigg Road is a very busy road and does not have any parking restrictions on it. Safety fears regarding the access point for the proposed site have been raised.
- 5.142 Comments also stated that the current drainage system within Messingham cannot adequately support the current number of houses within the village and more development would put strain of the system. The proposed site is currently suffering from sitting water even when it not raining. In addition, the drain is constantly backing up and running into the exiting gardens.
- 5.143 One respondent raised concerns about car parking during school pick up and drop off times.
- 5.144 A representation raised concerns about the impact on residents from the construction noise from building this development.
- 5.145 One respondent did not support the allocation of one single site within Messingham and the pan need to be more flexible to ensure that Larger Service Centres have the capacity required to deliver the level of development commensurate to their role in the hierarchy.
- 5.146 Concerns have been raised about the B1400 being narrow and the on street parking.

Alternative sites submitted during the public consultation period

- 5.147 **CFS0300134 Land to the west of Scotter Road (A159):** The site itself comprises two small to medium sized geometric arable fields, a small rectangular copse of young, self-set native trees including ash, sycamore and willow species, and a relatively small area of grassland. The site is approximately 6.80ha and is being proposed for residential development. Access will be gained from the A159 (Scotter Road) via a new access point onto the road.
- 5.148 **CFS0300001 Land at 66 High Street:** A site of 0.2 ha (ref) was put forward for 2 bungalows at 66 High Street Messingham in which the land is garden land.
- 5.149 **CFS0300038 Land east of Northfield Road:** A site of 8.27 ha to the East of Northfield Road Messingham was submitted for housing development. The proposal is for approximately 20 dwellings and the site is currently agricultural land.
- 5.150 **CFS0300118 Land off Northfield Road:** Another site of 11.57ha to the East of Northfield Road Messingham was also submitted for affordable housing. The site is agricultural land and the access to the site is two field access points from Holme Lane.
- 5.151 **CFS0300042 Land to the north of Butterwick Road:** A site to the north of Butterwick Road 2.31ha was submitted for housing development. It was stated that the site benefits from mature, good quality landscaping; with the north, east and south boundaries having complete field hedges. The western boundary has sporadic areas of hedging with gaps in-between. The topography of the site is suitable for development, being relatively flat with a gradual fall from east to west. It is not within a designated area and there is only a single listed building (10 West View) adjacent the north eastern corner. It is within Flood Zone 1 and at the lowest risk of flooding from sources such as watercourses and the sea. There is also no risk of surface water flooding.
- 5.152 **CFS0300057 Land to the north of Egton Avenue:** The site of 0.98ha was put forward for housing development in particular bungalow development. The site is currently part of a large (14+ Acre) Agricultural field and access can be gained off Egton Avenue.
- 5.153 **CFS0300008 Land to the west of Scotter Road:** A site of 1.42ha was submitted for 24 dwellings. The site is grassland and owned by a developer. Access can be gained from Manor farm Close.

Winterton

5.154 No comments were received on the following committed and proposed housing allocations:

- H1C-53p: Land to the rear of North Street and Cemetery Road,
- H1P-25p: Land at Top Road

Alternative sites submitted during the public consultation period

5.155 **WINH-2 Land at Coates Avenue:** One respondent proposed to include this site to deliver 40 dwellings. This site is allocated within the Housing and Employment Land Allocations Development Plan Document to deliver 60 dwellings. A planning application is currently going through the planning appeal process with a decision expected spring 2020.

5.156 **CFS0300015 Land at Northlands Road:** A site of 1.74ha was submitted at the Stables to the Rear of 67 Northlands Road, Winterton for housing development. The site is surrounded by agricultural land.

5.157 **CFS0300111 Land off 6 Park Street:** A site of 2.61ha was submitted for housing. The site is Greenfield and is surrounded by residential and agricultural land.

5.158 **CFS0300021 Land off South Street:** A site of 0.36ha was submitted for self-build development. The site is a Grass Paddock used as extension to garden. The site has two possible uses. 1) a small self-build development of up to 5 detached units. 2) a small bungalow development up to 8 bungalows. Access can be gained from South Street.

Larger Rural Settlements

Burton upon Stather

H1P-26P Land off Darby Road

5.159 A significant number of representations received strongly objecting to the proposed development of Darby Road for 60 plus homes. The concerns raised included the development on greenfield land, impact on the existing sewage system, schools and doctor surgery and limited shops and leisure facilities. In addition, how would the existing road network be able to accommodate the additional growth and issues regarding access to the site and biodiversity and wildlife.

5.160 Concerns raised regarding the loss of agricultural land, lack of local employment opportunities and poor public transport facilities.

5.161 Some comments suggested that there are suitable alternative sites within Scunthorpe for development with the relevant infrastructure to support it.

5.162 A number of representations raised concerns regarding the drainage and sewage system in Burton not being able to cope with any additional growth.

5.163 One respondent raised concerns that the council communication with residents regarding future growth.

5.164 Concerns raised regarding the growth increasing noise pollution and congestion within the village. The new development would significantly affect the feel of the village and its conservation area.

5.165 One representation suggested small-scale development of two and three bedrooms houses would be more appropriate.

5.166 Several representations supported the proposed housing development on Darby Road. This development would providing home ownership opportunities to the young first time buyers within the village. In addition, the development could create more business for the shops and post offices and could provide additional capital and enhancement to the schools and local bus services.

- 5.167 A number of representations suggested brownfield site should be considered before the council build on greenfield land.

Alternative sites submitted during the public consultation period

- 5.168 **CFS0300046 Land off Stather Road:** A site of 0.44ha has been put forward for housing development. The land was formerly part of the extensive rear garden of 8 Stather Road. It housed a tennis court and brick buildings. It is not possible to give a precise outline of the boundaries due to the constraint of the planning tool, but does not include the house and gardens of 8 Stather Road.

Ealand

- 5.169 No comments were received on the following committed housing allocation:

- H1C-54p: 7 Lakes Industrial Estate, Crowle Wharf

H1p-27p: Land adjacent to Ivy House Farm on Main Street

- 5.170 The site is located within Flood Zone 3, ONS maps indicates site levels of 3.5-4.0mAOD so finished floor levels above the critical flood level of 3.8m AOD appear to be achievable, as required by the SFRA.
- 5.171 One representation stated there are known nearby constraints that will need to be assessed in further detail, if development is to come forward at this location.
- 5.172 A representation supported the proposed housing allocation being included with the emerging local plan. The development of this site will restore the 'centre of gravity' to the existing villages and encourage place making and identity. The provide development will also encourage services for residents and permit more choice for the younger generation and incomers.

Alternative sites submitted during the public consultation period

- 5.173 **CFS0300073 Land to the south of Outgate:** A site of 1.5ha, which is agricultural land, was submitted for housing development and the representation suggested approximately 25 dwellings to be accommodated on the site. Access can be gained direct from Outgate.

East Halton

- 5.174 No comments were received on the following proposed housing allocation:

- H1P-28p: Land off Mill Lane

Alternative sites submitted during the public consultation period

- 5.175 **CFS0300067 Land to the west of Townside:** A site of 0.98ha was submitted for housing development to the west of Townside. The site currently vacant and There is a thirty metre entrance onto Townside and there is plenty of land and space to give a range of options for a safe access point.

Hibaldstow

- 5.176 No comments were received on the following committed and proposed housing allocations:

- H1C-55p: Willow Farm, East Street
- H1P-29p: Land to the West of Station Road

Alternative sites submitted during the public consultation period

- 5.177 CFS0300101: The site has been put forward for housing and it is considered that it would be suitable for a small housing scheme. The proposed designation of the site as Important Open Space is noted and it is considered that should the site be developed, some open space could be retained for public use.
- 5.178 **CFS0300002 Land to the east of Station Road:** A site to the east of Station Road was submitted for housing development. The site is agricultural land and can be accessed off Station Road.
- 5.179 **CFS0300027 Land to the south of Manton Lane:** A site of 0.3ha to the south of Manton Lane Hibaldstow was submitted for housing development. The site is agricultural land and can be accessed off Manton Lane.
- 5.180 **CFS0300077 Land behind 100 Redbourne Road:** A site of 0.21ha was submitted for housing in particular a self-build plot. The site lies to the rear of housing at 100 Redbourne Road. The site is currently used for garden land and access can be gained from a track between 100 and 104 Redbourne Road.

Keadby

- 5.181 No comments were received on the following committed housing allocation:
- H1C-56p: Old Railway Sidings, A18 from Althorpe to Gunness

New Holland

H1p-30p: Land at Manchester Square

- 5.182 The site is wholly within FZ3, with hazard rating of 'danger for all' as shown on the Environment Agency's breach hazard mapping (both 2006 and 2115 scenarios), with significant flood depths. Safe residential development will not be possible and we therefore object to the allocation of this site. (We have already expressed this concern and subsequently been advised the site will be removed as an allocation).

Owston Ferry

- 5.183 The emerging local plan currently does not propose to allocate any housing within Owston Ferry however, one representation received would like a housing allocation or the development limit changed to allow for future housing growth within Owston Ferry.

Alternative sites submitted during the public consultation period

- 5.184 **CFS0300029 Land off Bagsby Road:** A site of 0.82 ha was submitted at and off Bagsby Road, Owston Ferry. The site is currently houses and agricultural land and the submission states it could fit approx. 15 to 20 houses on.

Scawby

- 5.185 No comments were received on the following committed and proposed housing allocations:
- H1C-57p: West Street
 - H1C-58p: 19-23 West Street
 - H1P-31p: Land south of Main Street

Alternative sites submitted during the public consultation period

- 5.186 **CFS0300102 Land South East of Gainsborough Lane:** A site of 0.48 in size has been submitted to be considered for over 55 Bungalows. The representation suggests 9-10 dwellings could be delivered and the site is owned by a developer. The site is currently agricultural land and can be accessed off Swannacks Views.

- 5.187 **CFS0300036 land off Messingham Lane:** A site of 6.75ha was submitted at land opposite to 55 Messingham Lane, Scawby. The land is currently horse grazing land and suggests is suitable for approx. 200 dwellings.
- 5.188 **CFS0300037 land off Messingham Lane:** A site of 4.51ha was submitted at land next to 55 Messingham Lane Scawby. The land is Horse Grazing Land & some garden land to number 55 and suggests could fit up to 135 dwellings on the site.
- 5.189 **CFS030006 Land off Messingham Lane:** Another site of 3.23ha was submitted to the south of Messingham Lane Scawby. The site is currently agricultural land and access can be gained off Messingham Lane.
- 5.190 **CFS0300007 Land off Messingham Lane:** A site of 0.23ha was submitted behind 53 Messingham Lane Scawby. The land is vacant.
- 5.191 **CFS0300072 Land off West Street near Coach House Garden:** The site is 3.11ha and has been put forward for housing development with intent to get outline planning for 48 dwellings. The site is yet to be marketed but enquiries have been received. Proposed access is via St Martins Road.
- 5.192 **CFS03088 Land at the Cottage off Messingham Lane:** The site is 0.35ha and is at the corner and junction of Messingham Lane and Vicarage lane. The site is currently the domestic garden area associated with the property at The Cottage off Vicarage Lane. The majority of the site comprises grassed garden land. The southern, eastern and western boundaries contain mature trees. Other trees and planting are located throughout the garden. The site has not yet been actively marketed. However, the owner has over the years received numerous enquiries from interested parties wanting to develop the site for housing

South Killingholme

- 5.193 No comments were received on the following proposed housing allocation:
- H1P-32p: Land at School Road

Ulceby

- 5.194 No comments were received on the following committed housing allocations:
- H1C-59p: Land north of Front Street
 - H1C-60p: land rear of new convenience store, off Church Lane
 - H1C-61p: Land rear of Church Lane

H1P-33p Land east of Brocklesby Road

- 5.195 One representation received supported the proposed allocation H1P-33p and providing additional information regarding the deliverability of the site.
- 5.196 An objection raised concerns regarding further growth within Ulceby. The exiting highways, drainage and sewage infrastructure is not adequate. The village has recently seen a number of planning infill developments.
- 5.197 A number of representations have been received objecting to the proposed housing site being developed. It was suggested that the appeal site at station road should be allocated for housing instead now that the appeal was approved.
- 5.198 Concerns raised on the type and tenure of the dwelling being built on the proposed allocation site.

Alternative sites submitted during the public consultation period

- 5.199 **Land at Station Road:** This site should be allocated for housing within the emerging local plan now it has been granted approval through the appeal process for 90 dwellings.
- 5.200 **CFS0300078 Land off A1077:** The site is located at the western gateway into the village and is accessed via an existing farm track from the A1077. The site is adjoined by residential development along its northern boundary and St Nicholas Church is adjacent to the west. The site is currently in use for agriculture. The scale and L-shape of the land means that its development could fit into the pattern of development in the village, contributing a modest scale of growth within a landscaped buffer.
- 5.201 **CFS0300137 Land east of Brocklesby Road:** The site is agricultural land and part of the site has been proposed housing allocation H1P-33p within the emerging local plan. The site size is 1.71 hectares and the landowner would like the whole site to be considered for residential development.
- 5.202 **CFS0300078 Land to the south of West End Road:** A site of 1.21ha was also submitted for housing development. The site is currently agricultural land and the representation suggests the site could accommodate up to 30 dwellings. However, given its location on the edge of the village, a smaller number may be appropriate set within a landscaped setting. An existing farm track provides access to the site and connects to West End Road (A1077). It is considered that this route could be upgraded to serve any potential development.
- 5.203 **CFS0300076 Land to the south of West End Road:** A site of 2.5ha in size, which is currently agricultural land, has been submitted for housing development. It is suggested the site could accommodate 50 dwellings and the site has not yet been marketed.

Westwoodside

H1P-34: Land south of Doncaster Road, Westwoodside

- 5.204 A comment received supported the growth of within Westwoodside, however they would like to see a number of small sites being allocated instead of one larger development.
- 5.205 A representation received objected to the proposed housing allocations due to a number of alternative site being available within the settlement built form. It was suggested that **HS155928** Land at Upperthorpe Hill should be reconsidered.

Alternative sites submitted during the public consultation period

- 5.206 **CFS0300132 Land South of Upperthorpe:** A site of 1.96ha in size has been submitted to be considered for residential development. The site is currently agricultural land and to access the site an existing dwelling on Brethergate would need to be demolished.
- 5.207 **CFS0300133 Land east of Newbigg:** A site of 1.1ha in size has been submitted to be considered for residential development. The site is currently agricultural land and can be accessed from the southern end of Newbigg.
- 5.208 **CFS0300044 Land off Mill House:** A site of 2.29ha was submitted to the north east of Mill House Westwoodside which is to the south of the B1396 (Tower Hill). The site is agricultural land and has been submitted for market housing.
- 5.209 **CFS0300064 Land to the north of Cove Road:** A site of 0.28ha was submitted for suggested 5No. two bedroom bungalows suitable for a downsizing market. The site forms a small part of the applicant's family farmland which could be made available at any time required.
- 5.210 **CFS0300119 Land off Nethergate:** A site of 0.5ha was submitted for housing development. No further information was submitted.

West Butterwick

- 5.211 The emerging local plan currently does not propose to allocate any housing within West Butterwick however, one representation received would like a housing allocation or the development limit changed to allow for future housing growth within West Butterwick.
- 5.212 **CFS0300103 Land to the north of West Street:** A site of 0.72ha was submitted for housing. The site is agricultural land and is a Field behind 46, 48, 50, 52 West Street, West Butterwick. To the north of these properties. This field is centrally positioned in the village and is surrounded on 3 sides by residential properties. The size of the field makes it difficult to farm with large modern equipment and there are potential problems for farmers being able to apply chemicals (insecticide, weed control etc.) because of the proximity of nearby gardens. Access to the field via West Street between 52 and 54.

Winteringham

- 5.213 The emerging local plan currently does not propose to allocate any housing within Winteringham however, one representation received would like a housing allocation or the development limit changed to allow for future housing growth within Winteringham.

Alternative sites submitted during the public consultation period

- 5.214 **CFS0300121 Land to the east to High Burgage:** The Site is located to the south east edge of the settlement of Winteringham and measures approximately 3.22 hectares. The site abuts existing housing to the north and west. The small part of the north-west corner of the site falls within the Winteringham Conservation area. However, the current application proposes no development in this location.

Wrawby

- 5.215 No comments were received on the following committed housing allocations:
- H1C-62p: Land off Applefields

H1P-35p Land off Melton Road, Wrawby

- 5.216 One representation received objects to the proposed housing allocation H1P-35p as it contradicts the spatial vision and objectives for North Lincolnshire which seeks to protect the landscape character of the area and key historic assets.
- 5.217 A comment received proposed alternative site to deliver the proposed growth for Wrawby.
- 5.218 A representation has strong concerns that the proposed housing would have a harmful impact on the setting and significance of the Grade I church of St Mary by eroding the last element of its rural setting and encroaching on views of the church tower from Kettleby Lane. It is noted that the church is surrounded by mature trees which does reduce the harm.

Alternative sites submitted during the public consultation period

- 5.219 **CFS0300123 Land at Barton Road:** The site is agricultural land and is approximately 7.63 hectares in size. The site can be accessed from Barton Road and Applefields. The representation suggested the development could be phased with first phase being a total of 50 dwellings.
- 5.220 **CFS0300058 Land to the wets of Vicarage Road:** A site of 0.32 ha was proposed for the erection of 4no. 4 bed detached houses with integral garage. The land is vacant and access gained via Vicarage Road.

Wroot

H1P-36: Land at Field Lane Wroot

- 5.221 A representation received supported the proposed housing allocation land at Field Lane Wroot.

Smaller Rural Settlements

- 5.222 A number of representations objected to the emerging local plan not including proposed housing allocations with the smaller rural settlements within North Lincolnshire.

Wootton

- 5.223 A representation received supported Wootton position within the settlement hierarchy. The respondent supported the development limit providing limited sustainable infill opportunities.

Alternative sites submitted during the public consultation period

- 5.224 **CFS0300114 Land off Swallow Lane:** The site is agricultural land measuring 4.55ha and can be access off Swallow Lane. The representation suggests 90 dwellings could be delivered on the site including 2 retail units.

Eastoft

Alternative sites submitted during the public consultation period

- 5.225 **CFS0300136 Land west of Yorkshireside:** The 0.8ha site is located directly to the west of Yorkshireside. It is proposed that the area directly adjacent to the street would provide a logical extension to the existing settlement for circa 4 dwellings in a linear form along the road frontage with off street parking. The western extent would then remain part of the garden associated with the Grade II listed hall and ensure that the setting of this heritage asset is retained.
- 5.226 **CFS0300135 Land north of the Old Moorings:** A 0.5ha site to the north of The Old Moorings is available for residential development and would provide a natural extension to the existing built up area of the settlement. It is considered the site could deliver approximately 10 dwellings.

Appleby

Alternative sites submitted during the public consultation period

- 5.227 **CFS0300025 Land off Risby Road:** A site of 0.07ha was submitted for residential development. The site is described as vacant land and access can be gained off Risby Road.
- 5.228 **CFS0300127 Land at Old Appleby Hall:** The site is land grassland, which was historically associated with Old Appleby Hall and is approximately 0.84ha in size. The site is located outside of the Conservation Area and immediately adjacent to the Development Limit of the village. Residential properties adjoin the site to the west. The representation suggests there is an opportunity for a small sensitive scheme on the site that sits within its historic and landscaped setting. Development could facilitate an improved character to this part of the village, potentially improving traditional features such as the walls and gates to the Old Hall.
- 5.229 **CFS0300128 Old Nursery (adjacent to the Church):** A site of 0.39ha which is currently grassland land has been submitted for housing development. The representation suggests there is an opportunity for a small sensitive scheme on the site that sits within its historic and landscaped setting.
- 5.230 **CFS0300129 Land to the south of School Lane:** A site of 1.27 ha which is currently agricultural land has been submitted for housing development. The representation suggests there is an opportunity for a small sensitive scheme on the site that sits within its historic and landscaped setting.

Burringham

Alternative sites submitted during the public consultation period

- 5.231 **CFS0300079 Land off High Street:** A site of 0.27ha was submitted for 4 self-build houses. The site is currently gardens.
- 5.232 **CFS0300039- Land to the south of South View Avenue:** A site of 2.98ha was submitted for approx. 20 houses. The site is agricultural land and access can be gained off the exiting highway off South View Avenue.

Elsham

Alternative sites submitted during the public consultation period

- 5.233 **CFS0300048A Land off New Street:** A site which is 6.9ha was submitted off New Street, Elsham. The site was put forward for housing and access could be gained off New Street.
- 5.234 **CFS0300030 Land to the west of Main Street:** A site of 1.6ha off Main Street in Horkstow was submitted for housing. The site is currently a grass field and owned by a developer. The site can be accessed off a Gateway entrance onto B1204.

Luddington

Alternative sites submitted during the public consultation period

- 5.235 **CFS0300011 Land off Washinghall Lane:** A site of 0.38ha was put forward for housing off Washinghall Lane and is a Builders Yard and office.

West Halton

Alternative sites submitted during the public consultation period

- 5.236 **CFS0300085 Land at the Butchers Arms off White House Lane:** The site is 0.18ha and is a pub plus surplus land to the rear. Proposed residential use on land to the rear of the site. Approximately 5 units comprising a mix of 2-4 bed units. Density of development would be comparable with adjacent residential development.

Rural Hamlets & Villages

- 5.237 A number of representations objected to the emerging local plan not including proposed housing allocations with the rural settlement and villages within North Lincolnshire.

Cleatham

Alternative sites submitted during the public consultation period

- 5.238 **CFS0300040 and near Cleatham Hall Farm:** A site of 0.24 ha which is an existing farmyard at Cleatham was submitted for self-build plots up to 4 dwellings. Planning consent already exists to relocate farm yard.

Graizelound

Alternative sites submitted during the public consultation period

- 5.239 **CFS0300086 Land to the west of Graizelound Fields Road:** A site of 0.91ha was submitted for housing development.

Horkstow

Alternative sites submitted during the public consultation period

- 5.240 **CFS0300028 Land to the east of Main Street:** A site of 1.24ha which is Agricultural Grass Field, in middle of village currently outside development line was submitted for self-build homes. The site can be accessed from the entrance from B1204 into grass field.

Roxby cum Risby

Alternative sites submitted during the public consultation period

- 5.241 **CFS0300056 Land to the north of North Street:** A site of 9.04ha was put forward for housing approx. 50 to 100 dwellings. Access can be gained off Winterton Road or Off High Street, Roxby.
- 5.242 **CFS0300065 Land off North Street:** A site of 2.22ha was submitted for housing approx. 25 dwellings in which the site is owned by a developer. The site is agricultural land and access can be gained from North Street.
- 5.243 **CFS0300065 Land to the south of Winterton Road:** A site of 8.41ha was submitted for 10 to 20 houses. The site is agricultural land and owned by a developer. It was suggested the site could be accessed off South Street.

Responses – Do you think the Preferred Policy H2p: Housing Mix and Density is the right approach?

- 5.244 29 respondents commented on this policy and 13 respondents agreed with contents of the policy (with some amendments), 16 respondents did not agree with the policy contents and suggested some wording changes.

Table 5.2: Responses to Policy H2p: Housing Mix and Density is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	13	44.8%
No	16	55.2%
Total	29	100%

Summary of Responses – Question Do you think the Preferred Policy H2p: Housing Mix and Density is the right approach?

- 5.245 A number of representations were received objecting to the policy not being flexible enough to consider local circumstance for example there may be instances where it is appropriate, for the proper planning of the area, for development on the edge of settlements and adjacent to the open countryside to achieve less than the density ranges specified. In addition, housing mix requirements for affordable housing developments are likely to be different to open market developments. The policy should not stipulate a closed list of housing mix and should include flexibility to allow for further information or evidence to be considered when determining an appropriate mix.
- 5.246 One comment received broadly support the suggested approach of Policy H2p, particularly the fact that the above policy does not set out a prescriptive approach regarding the specific mix of properties required on new developments
- 5.247 Several respondents expressed caution of seeking to tie the mix of housing types, sizes and tenure to the findings of the SHMA 2019. Instead it is important to recognise an appropriate level of flexibility is required that has regard to demand and needs of certain areas of the district as well as viability

considerations. It is important that the policies are workable and create a housing market that will attract investors as well as being sufficiently aspirational to retain working people and families. It should also be recognised that dwellings per hectare, used in isolation, can encourage particular building forms over others, in ways that may not fully address the range of local housing needs. (see NPPG Paragraph: 005 Reference ID: 66-005-20190722). The policy should recognise that there may be circumstances where variation from these guideline densities may be appropriate where this is justified by individual site circumstances. We suggest that the policy refers to the design and access statement as the basis for determining the appropriate density influenced by local form character topography etc. In tandem with this approach we recommend the density range should form part of the justification text rather than be given prominence within the policy itself.

- 5.248 One representation suggested further amendments to the policy could be made to create greater flexibility to allow developers to take account of the evidence in relation to market aspirations and viability. The Council will also need to consider its approach to density in relation to other policies in the plan and those set nationally, policies in relation to open space provision, housing design and space standards, SuDs, biodiversity, trees and parking provision can all impact upon the density which can delivered upon site.
- 5.249 Several representations overall supported this policy, however some asked for the policy to be amended to include locality information, a 'light touch' should be used by planning to avoid anomalous constraints on one development compared to an equivalent. A Respondent also stated 30 to 35 dwellings per hectare in the small rural/ hamlets settlements and the countryside is too many.
- 5.250 A respondent objected to the policy due to there already enough mix of houses in Messingham.
- 5.251 One representative objected and suggested Larger Service Centre should only have to achieve a density of 25-30 houses per hectare and all smaller settlements should only achieve a density of 20 houses per hectare. Also they think the mixture of housing should provide even more third bedroom houses, especially if a housing needs assessment is carried out for a town for Neighbourhood Plan.
- 5.252 A number of comments have been raised stating the additional growth would put extra pressure on the existing doctors and school in Ulceby, which is already difficult to access.
- 5.253 One respondent suggested need to consider the design standards for new dwellings by increasing garden land, car parking space and providing additional room for home offices.

Responses – Do you think the Preferred Policy H3p: Affordable Housing and the Needs of Different Groups is the right approach?

- 5.254 30 respondents commented on this policy and 12 respondents agreed with contents of the policy (with some amendments), 18 respondents did not agree with the policy contents and suggested some wording changes.

Table 5.3: Responses to Policy H3p: Affordable Housing and the Needs of Different Groups is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	12	40%
No	18	60%
Total	30	100%

Summary of Responses – Question Policy H3p: Affordable Housing and the Needs of Different Groups is the right approach?

- 5.255 One represented commented that the affordable housing policy as drafted is unsound as it is not justified by reference to the evidence base and it is not in accordance with NPPF 2019 paragraph 20 which states that strategic policies should make sufficient provision for housing including affordable housing. The NPPG Paragraph 2a-010 states that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area and that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. The solution to make the plan sound would be to increase or change the allocations so that additional sites can be allocated in viable locations which can deliver a greater percentage of affordable housing.
- 5.256 A number of representations received objected to the emerging local plan using the same approach as the current Core Strategy DPD. The NPPF is clear that the levels and types of affordable housing provision set out within policies should not undermine the deliverability of the plan (para. 34).
- 5.257 One respondent supported the policy. However, it should not be used to allow unsuitable sites to be developed or for communities to develop in a continuing disjointed way. They would also like to see particular emphasis around item 6 under Specialist Housing as previous affordable housing approved for Kirton-in-Lindsey has not provided accessibility to local shops and services, public transport or other sustainable modes of transport nor community facilities appropriate to the needs of the intended occupiers.
- 5.258 One comment suggested the policy needs to include reference to 'entry-level exception sites' within the rural exception section of the policy provide the Council with maximum opportunity for delivering its affordable housing needs over the emerging plan period.
- 5.259 This policy states that new housing developments of 10 or more dwellings must make provision for affordable housing; it requires 20% of affordable homes in major sub-regional centres, principal towns and larger service centres, and 10% for larger rural settlements and smaller rural settlements. The respondent supports the need to address the affordable housing requirements of the borough. However, the NPPF is clear that the levels and types of affordable housing provision set out within policies should not undermine the deliverability of the plan (para. 34). There does not appear to be a viability report available with this document and therefore at this point it is not possible for the HBF to comment on the viability of this policy or others within the document. The Council should be mindful of the impact of an overly aspirational policy requirement or combination of policies that is set too high as this will jeopardise future housing delivery.
- 5.260 Several respondents supported the policy but the plan wide viability assessment need to take into account when setting the percentage of affordable housing. The policy confirms that affordable housing provision will be negotiated at the time of the planning application, having regard to any abnormal cost, economic viability and other requirements associated with the development and we consider this approach is an acceptable approach to follow as it conforms to national advice.
- 5.261 A respondent supports the Council's Affordable Housing draft Policy H3p. It is felt that within the 'Rural Exception Sites' paragraph the wording should be altered to say 'In limited circumstances (most likely due to viability), it will be acceptable to provide an element of market housing on rural exception sites, to cross subsidise the affordable housing.' The sentence as currently worded follows on from one which states that planning permission will be granted for 100% affordable housing sites. By using the phrasing 'some' opens the Council up to negotiations with developers who will claim sites are unviable without an element of market housing. These should be in 'limited' circumstances not 'some' otherwise this will impact the delivery of the required number of affordable homes. It should also contain some reference to the need for this to be demonstrated to the satisfaction of the Council as indicated in paragraph 5.26 of the supporting text.

Responses – Do you think the Do you think the Preferred Policy H4p: Housing for Older People is the right approach?

- 5.262 18 respondents commented on this policy and 11 respondents agreed with contents of the policy (with some amendments), 7 respondents did not agree with the policy contents and suggested some wording changes.

Table 5.4: Responses to Policy Do you think the Preferred Policy H4p: Housing for Older People is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	11	61%
No	7	39%
Total	18	100%

Summary of Responses – Question Do you think the Preferred Policy H4p: Housing for Older People is the right approach?

- 5.263 A number of representations supported the inclusion of policy H4p within the emerging Local Plan. The provision for older people needs to be a priority especially with North Lincolnshire having an aging population.
- 5.264 One respondent stressed the need to work with social care providers to ensure that comprehensive and safe services are provided in the defined accommodation.
- 5.265 Several comments objected to the policy and recommended that all properties to be built to M4 (3) to allow older people to live in their own homes for longer.
- 5.266 One respondent is generally supportive of providing homes for older and disabled persons. It is, however, important that this compliments rather than burdens the mainstream market supply. Paragraph 61 of the NPPF considers that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including those for older people. Therefore, if there is sufficient evidence to support a policy in relation to older people this could be included. The HBF would recommend that the policy is amended to create a supportive framework for housing for older people rather than placing a burden on all housing sites.
- 5.267 A comment stated in the light of the isolation of older people during the current Coronavirus lockdown the future of retirement housing in independent but grouped apartment blocks will help the security, safety and general wellbeing of older people.

Responses – Do you think the Preferred Policy H5p: North Lincolnshire Travelling Communities is the right approach?

- 5.268 16 respondents commented on this policy and 8 respondents agreed with contents of the policy (with some amendments), 8 respondents did not agree with the policy contents and suggested some wording changes.

Table 5.5: Responses to Policy Do you think the Preferred H5p: North Lincolnshire Travelling Communities is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	8	50%
No	8	50%
Total	16	100%

Summary of Responses – Question Do you think the Preferred Policy H5p: North Lincolnshire Travelling Communities is the right approach?

- 5.269 50% of the representations received supporting Policy H5p.
- 5.270 One respondent supported the references in bullet points D and F regarding flood, risk drainage and the provision of sewerage and water.
- 5.271 One representation raised concerns about poor living conditions, crime and antisocial behaviour.

Responses –Do you think the Preferred Policy H6p: New Agricultural Workers or Forestry Dwellings is the right approach?

- 5.272 16 respondents commented on this policy and 14 respondents agreed with contents of the policy (with some amendments), 2 respondents did not agree with the policy contents and suggested some wording changes.

Table 5.6: Responses to Policy Question H6p Do you think the Preferred Policy H6p: New Agricultural Workers or Forestry Dwellings is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	14	87.5%
No	2	12.2%
Total	16	100%

Summary of Responses – Question H6p Do you think the Preferred Policy H6p: New Agricultural Workers or Forestry Dwellings is the right approach?

- 5.273 A number of representations supported the inclusion of Policy H6p within the emerging local plan. One respondent stated these have always been a key feature of the Lincolnshire countryside and work opportunities.
- 5.274 Several objection received did not give a reason for the objection.

Responses – Do you think the Preferred Policy H7p: Replacement, Alteration and Extensions to Dwellings in the Open Countryside is the right approach?

- 5.275 16 respondents commented on this policy and 11 respondents agreed with contents of the policy (with some amendments), 5 respondents did not agree with the policy contents and suggested some wording changes.

Table 5.7: Responses to Policy Question H7p: Replacement, Alteration and Extensions to Dwellings in the Open Countryside is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	11	68.75%
No	5	31.25%
Total	16	100

Summary of Responses – Question H7p Do you think the Preferred Policy H7p: Replacement, Alteration and Extensions to Dwellings in the Open Countryside is the right approach?

- 5.276 A respondent recommended that an additional bullet point 5 is added to reflect the need for ecological survey, especially for protected species such as bats and barn owls, which may require avoidance, mitigation or compensation. This point is already highlighted under Paragraph 5.50. There should be additional consideration to the requirement to provide measurable biodiversity net gains and contribute to Local Nature Recovery Strategies as set out by the 25 Year Environment Plan and the draft Environment Bill.
- 5.277 One respondent objected to the policy and recommended adding a point the following point into the policy ‘in areas at risk of flooding, opportunities are taken to maximise reduction in flood risk and improvements to flood resilience.’

Responses – Do you think the Preferred Policy H8p: Do you think the Preferred Policy H8p: Self-Build and Custom Build is the right approach?

- 5.278 18 respondents commented on this policy and 12 respondents agreed with contents of the policy (with some amendments), 6 respondents did not agree with the policy contents and suggested some wording changes.

Table 5.8: Responses to Policy Question CSC8p Do you think the Preferred Policy CSC8p: Educational Facilities is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	12	66.7%
No	6	33.3%
Total	18	100%

Summary of Responses – Question H8p Do you think the Preferred Policy H8p: Self-Build and Custom Build is the right approach?

- 5.279 Though supportive of aims to increase opportunities for self-build and custom build housing, the respondent believe the provision of self-build and custom build housing could be better addressed through a positive policy framework which promotes the delivery of such products through windfall development. Such an approach could be secured through the application of a more flexible approach to housing development beyond but adjoined to development limits, as set out above in section 4.3
- 5.280 The Council considers that self-build and custom build housing can play an important part in contributing to the supply of housing, increasing the mix of housing types and tenures, and have the potential to increase the delivery of innovative and highly sustainable developments in a cost effective manner. However the Council do not provide strong evidence to justify why they propose a threshold level of sites containing 200 or more dwellings will be expected to supply a proportion of serviced dwelling plots for sale to self-builders of a least 1%.The current evidence suggests that the demand is low.
- 5.281 Concerns have been raised regarding the housing delivery mechanism of self build plots on large scale sites and the time period proposed before the self-build properties can revert back to market housing if the plots are not sold being too long.
- 5.282 One respondent suggested it might be useful to offer some encouragement for such use of portions of smaller sites e.g. by reducing section 106 charges against such a commitment. This is especially useful for rural settlements where it both enables locals to satisfy their aspirations and typically improves placemaking as well as providing work for locals.

5.283 A representation suggested the percentage needs to be greater than 1% and the threshold for providing self-build plots on should be reduce to site of 40plus dwellings. This would provide greater choice of housing for people and provide a more competition in the market.

5.284 Several respondents supported the inclusion of self build and custom build policy within the emerging plan.

Responses – Do you think the Preferred Policy H9p: Flats above Shops and the Use of Vacant Buildings for Housing is the right approach?

5.285 16 respondents commented on this policy and 13 respondents agreed with contents of the policy (with some amendments), 3 respondents did not agree with the policy contents and suggested some wording changes.

Table 5.9: Responses to Policy Question H9p Do you think the Preferred Policy H9p: Flats above Shops and the Use of Vacant Buildings for Housing is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	13	81.2%
No	3	18.8%
Total	16	100%

Summary of Responses – Question H9p Do you think the Preferred Policy H9p: Flats above Shops and the Use of Vacant Buildings for Housing is the right approach?

5.286 One respondent believes this policy seems to be a sensible approach.

5.287 A comment stated it is unclear in which context the use of the term ‘environment’ is being used here. Alterations to these buildings have the potential to affect both the built and natural environments. We would recommend that the policy makes clear that protected species may use these buildings and so ecological surveys will be required to ensure that these are taken into consideration and appropriate avoidance, mitigation, compensation and net gain is provided.

5.288 A representation suggested the adding the following to the policy: ‘and that residents will be safe from flood risk’, as experience shows this is an issue, especially when disused shop units are proposed for conversion in flood zone 3. Conversion to create self-contained ground floor flats in FZ3 poses particular risks and you may wish to note that it is not usually possible to permit these. Flats above shops in FZ3 are less concern although the planning authority should consider access/egress.

5.289 One comment suggested that vacant properties should be used before new housing is built.

5.290 A representation requesting if the permitted development rules can be changed to not allow developers to convert commercial units.

Responses – Do you think the Preferred Policy H10p: Backland and Tandem Development is the right approach?

5.291 15 respondents commented on this policy and 11 respondents agreed with contents of the policy (with some amendments), 4 respondents did not agree with the policy contents and suggested some wording changes.

Table 5.10: Responses to Policy Question H10p Do you think the Preferred Policy H10p: Backland and Tandem Development is the right approach?
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Response	Number of Respondents	Percentage of Respondents
Yes	11	73.3%
No	5	26.4%
Total	16	100

Summary of Responses – Question H10p Do you think the Preferred Policy H10p: Backland and Tandem Development is the right approach?

- 5.292 A respondent believes this seems acceptable so long as neighbours are not affected detrimentally.
- 5.293 A number of representations received supported the policy. One comment suggested the policy should be modified to be more prescriptive and less subjective.

Responses – Do you think the Preferred Policy H11p: Houses in Multiple Occupation approach?

- 5.294 14 respondents commented on this policy and 11 respondents agreed with contents of the policy (with some amendments), 3 respondents did not agree with the policy contents and suggested some wording changes.

Table 5.11: Responses to Policy Question H11p Do you think the Preferred Policy H11p: Houses in Multiple Occupation is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	11	78.6%
No	3	21.4%
Total	14	100

Summary of Responses – Question H11p Do you think the Preferred Policy H11p: Houses in Multiple Occupation is the right approach?

- 5.295 One respondent believed the policy is the correct approach.
- 5.296 A representative suggested a relatively small target of conversions over the plan period and be restricted to major towns.

Responses – Do you think the Preferred Policy H12p: Children's Homes is the right approach?

- 5.297 12 respondents commented on this policy and 11 respondents agreed with contents of the policy (with some amendments), 1 respondents did not agree with the policy contents and suggested some wording changes.

Table 5.12: Responses to Policy Question H12p Do you think the Preferred Policy H12p: Children's Homes is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	11	91.67%
No	1	8.33%
Total	12	100%

Summary of Responses – Question H12p Do you think the Preferred Policy H12p: Children's Homes is the right approach?

5.298 A comment believes this looks to be the right approach.

6. DELIVERING JOBS & SUPPORTING OUR ECONOMY

Introduction

- 6.1 Local Plans are required to proactively drive and support sustainable economic development to deliver jobs that the country needs. As part of this, it must ensure that sufficient employment land of the right type is available in the right places and at the right time to support growth and innovation.
- 6.2 It must also address other issues that are important to businesses such as affordable homes for workers, transport, and infrastructure, and will need to address how many new jobs need to be provided and how best existing and growing employment sectors can be supported. Barriers to investment should be addressed and priority areas identified for economic regeneration, infrastructure provision and environmental enhancement.
- 6.3 The council places a key emphasis on driving economic vitality. It seeks to shape the area into a more prosperous place to live, work, visit and invest, and to be 'safer, greener and cleaner', by increasing economic growth and prosperity through higher employment and increased home ownership.

Consultation

- 6.4 The Preferred Options document contained 7 questions relating to subjects covered by 'Delivering Jobs and Supporting our Economy' policies.

Question EC1p - Do you think the Preferred Policy EC1p: Employment Land Supply is the right approach? (Please include site reference e.g. EC1-1p)

Question EC2p – Do you think the Preferred Policy EC2p: Existing Employment Areas is the right approach?

Question EC3p – Do you think the Preferred Policy EC3p: Defined Industrial Buffer Areas is the right approach?

Question EC4p – Do you think the Preferred Policy EC4p: South Humber Bank - Landscape Initiative is the right approach?

Question EC5p – Do you think the Preferred Policy EC5p: Wharves is the right approach?

Question EC6p – Do you think the Preferred Policy EC6p: Supporting the Rural Economy is the right approach?

Question EC7p – Do you think the Preferred Policy EC7p: A Sustainable Visitor Economy is the right approach?

Responses – Question EC1p: Employment Land Supply

- 6.5 **14** respondents had views on the approach that should be adopted in the Local Plan in terms of the Employment Land Supply policy and/or what it should contain. **13** respondents agreed with contents of the policy (with some amendments), whilst **8** did not. **1** was not able to select an option but provided detailed comments, whilst **1** did not understand the content of the plan.

Table 6.1: Responses to Question EC1p: Employment Land Supply		
Response	Number of Respondents	Percentage of Respondents
Yes	13	56.5%
No	8	34.8%
Other	2	8.7%
Total	23	100%

Summary of Responses – Question EC1p: Employment Land Supply

- 6.6 There was a balanced response to the principles of the question from those who provided detailed comments or views and a number who were against specific proposals gave alternative options. Most comments centred on the particular area of development and therefore there were few areas of commonality between responses, except for a number of positive responses to the development of employment land at Humberside Airport.
- 6.7 One positive response discussed the possibility of extending the capacity of the land north of Tesco/Gallagher retail park (EC1-2p) as well as supporting it as a potential employment site.
- 6.8 Whilst one response was negative, the issue raised was not about the specific sites, but the number of actual sites identified, which it was felt were too few (9) across North Lincolnshire providing a better range of sites. It was also felt that the retention of existing employment sites was not sufficient to create economic growth. Specific consideration was given to the site directly adjacent to the Gefco site (becoming Sandtoft Business Park) and the likelihood that this will come forward in the period of the plan. It was suggested that new allocations near existing employment uses would be an alternative, alongside main transport corridors. There was support however for including the Gefco site and providing additional sites in the Sandtoft area, which it is suggested will improve the likelihood of growth in the area.
- 6.9 One negative response related to the development of employment land at proposed allocations where it was felt that the development was not commensurate with the local area. These were specifically the two sites at Barnetby Top (EC1-7p/8p) and the proposed allocation to the North West of the A15 Barton interchange (EC1-6p), which it was felt represented a significant piece of greenfield land development of open countryside land. An alternative was suggested to include the Humber Bridge Industrial site and land at Falklands Way was have not been included in the table of existing employment areas.
- 6.10 Whilst one response was negative, the respondent supported the inclusion of the operational area of the Port of Immingham for further development. It was suggested that the proposal was extended to include 'port and port related development'; removal of the requirement for proposals to 'accord with the development plan as a whole' as this is duplication and contradictory; removal of the requirements of the Habitats regulations as a duplication as this would be considered as a standard. There is also a suggestion that the importance of the South Humber Gateway is more explicit in the supporting text to the policy and it is suggested that the policy map accompanying the plan incorrectly defines the boundary of the Port of Immingham, with a triangular area of land within the allocated land being compulsorily purchased in 2015.
- 6.11 There were three positive responses supporting development at Humberside Airport (EC1-3 and EC1-4) to promote the local economy and reduce the need for residents to travel to other airports and being consistent with the spatial strategy.
- 6.12 One response was neither positive nor negative but noted the proximity of some of the sites to the Strategic Road Network and wished to ensure evidence that the SRN can safely and efficiently support the delivery of the SRN.

6.13 One response referred to numerous policies in relation to EC1p and the proposed allocations in Barton:

- The respondent believed that the proposed development at Barton (A15) does have an adverse impact of the environment and residential amenity and would does not respect the local context and the right to privacy and amenity
- The respondent also felt that the proposed development is a direct contravention of the policies regarding the natural environment and the intrinsic character of the area, even with a 'landscape boundary' and is adjacent Barton Wolds and would have a negative impact on existing wildlife in the area.
- That the current infrastructure on the western side of the A15 is inadequate.

The alternative suggestion was to support the proposed development in the Falklands Way area of Barton due to its current infrastructure and lack of environmental impact. There was also one response in support of this site due to its transport links and to provide employment for the people of Barton.

6.14 One response related specifically to flood risk management as made the following points:

- EC1-2p; EC1-5p and EC1-9p are in a flood zone but the point was made that employment uses are less vulnerable to flooding and are therefore preferable than residential use.
- Site EC1-5p will require a flood risk assessment to demonstrate that it will be safe and not increase flood risk and will allow access to the river and flood infrastructure.

6.15 One response sited no differentiation between committed and proposed sites and that the listing of sites should be consistent with their intended use and covered by a 106 agreement which ensures future conversion to housing land.

6.16 There was one reference to the quality of life and village life in relation to employment sites, specifically in Ulceby.

Responses – Question EC2p: Existing Employment Areas

6.17 11 respondents had views on the approach that should be adopted in the Local Plan in terms of the Existing Employment Areas policy and/or what it should contain. 10 respondents agreed with contents of the policy (with some amendments), whilst 1 did not.

Table 6.2: Responses to Question EC2p: Existing Employment Areas		
Response	Number of Respondents	Percentage of Respondents
Yes	10	91%
No	1	9%
Total	11	100%

Summary of Responses – Question EC2p: Existing Employment Areas

6.18 One respondent who was not in support of the policy detailed several reasons why and additional comments:

- The Gefco Site is not identified as an existing employment area in the context of this policy and should be recognised as an Existing Employment Site through Policy EC2p
- They disagree with the approach taken by NLC in identifying existing employment areas. They stated it is difficult to distinguish between their clients site and the adjacent land identified as lying within Sandtoft Industrial Estate. The B8 use of the Gefco site could be considered to be larger and more established than those businesses on the adjacent site.

- There appears to be a lack of consistency in the council's approach to identifying existing employment areas and no evidence has been included within this consultation to justify choices made when identifying employment sites.
- The Gefco site is currently in B8 employment use, and has been in this use consistently since 1994. It is a brownfield site and is an area in existing employment use and must be recognised as such.
- The Gefco site must be allocated for the policy to align with NPPF (paragraph 117).
- Without planning policy support and the continued investment and the opportunity for expansion at existing key employment areas such as Sandtoft airfield, occupiers could look elsewhere for premises, potentially out of area.

6.19 One view welcomed the part of the policy that supports the expansion of existing employment sites outside the allocated employment sites, subject to no adverse impact on surrounding land uses, transport network and the character and appearance of the area.

6.20 Two respondents agreed the policy appears to be a manageable way forward.

6.21 A supporting response to the policy provided the view they felt that the Humber Bridge Industrial Estate boundary should be extended to include the large area to the east of the Humber Bridge Industrial Estate, to the north of Wren Kitchens and the south of the Barton to Cleethorpes railway based on 2019 SHELAA recommendation that the site should be retained. The respondent felt that providing job opportunities within the town should be encouraged to reduce commuting and contribute towards sustainability and tackling climate change. This area could play a significant part in creating new jobs within Barton. The respondent also felt that diversity of employment within Barton should be encouraged as too much emphasis on one single employer (Wren Kitchens) carries risks for the town's economy should that single employer encounter difficulties.

Responses – Question EC3p: Defined Industrial Buffer Areas is the right approach.

6.22 **12** respondents (with **14** responses in total) had views on the approach that should be adopted in the Local Plan in terms of Defined Industrial Buffer Areas. **9** respondents agreed with contents of the policy (with no further comments), whilst **5** did not agree (with some comments).

Table 6.3: Responses to Question EC3p: Defined Industrial Buffer Areas is the right approach.		
Response	Number of Respondents	Percentage of Respondents
Yes	9	64%
No	5	36%
Other	0	0%
Total	14	100%

Summary of Responses – Question EC3p: Defined Industrial Buffer Areas is the right approach.

6.23 All respondents in favour of the approach provided no further comment.

6.24 Respondents not in favour of the approach suggested that, the policy should be strengthened to enhance biodiversity. The requirement for measurable net gain should be specifically referenced.

6.25 One comment noted that the policy offers no timeframe to encourage early landscaping and highlighted how this policy could be cross referenced against Policy EC4p. Landscaping and habitat creation, if done appropriately and is sympathetic to the location, could offer multiple benefits, much greater than just visual screening.

- 6.26 Whilst not in favour, one response stated that the approach was encouraging if implemented appropriately. The benefits of buffer areas could be multifaceted if implemented sympathetically to immediate areas and surrounding locations/neighbouring habitats.
- 6.27 One response suggested that with careful planning some areas defined in the policy map should be reconsidered to allow residential development adjacent to industrial areas. Development itself can act as a buffer to existing settlements and various measures can be carefully designed to reduce visual impact, noise impact, and light impact from industrial areas. Many of the measures set out in Policy EC4p can be delivered as part of careful masterplanning and secured through conditions and / or S.106 agreements to ensure these works are undertaken.
- 6.28 A view was provided that the policy wording could better reflect the 25 year Environment Plan and draft Environment Bill.
- 6.29 One comment stated that the South Humber Landscape Initiative policy could be clearer and more ambitious in terms of creating showcase environments.

Responses – Question EC4p: South Humber Bank - Landscape Initiative

- 6.30 **15** respondents had views on the approach that should be adopted in the Local Plan in terms of the ‘South Humber Bank Landscape Initiative’ policy and/or what it should contain. **12** respondents agreed with contents of the policy (with some amendments), whilst **3** did not.

Table 6.4: Responses to Question EC4p: South Humber Bank - Landscape initiative		
Response	Number of Respondents	Percentage of Respondents
Yes	12	80%
No	3	20%
Other	0	0
Total	15	100%

Summary of Responses – Question EC4p: South Humber Bank - Landscape Initiative

- 6.31 Those who provided detailed comments or views on this question generally agreed with its principles.
- 6.32 One respondent requires that the policy and supporting text should be re-drawn so not to restrict new housing opportunities adjacent to settlements of East Halton and North Killingholme as it will support job creation at the South Humber Bank.
- 6.33 A view expressed concerns over the lack of proposed timescales for the implementation of the landscape initiative and requested further information to demonstrate how this policy will be implemented. They are encouraged by this policy and is of the opinion that landscaping and habitat creation, if done appropriately and is sympathetic to the location, could offer multiple benefits, much greater than just visual screening. These proposed habitat buffers could also provide other ecosystem services improvements and could be included as part of a biodiversity net gain across a development site. The respondent also expressed concerns that, tree/hedge planting may not always be the most appropriate landscaping when close to habitat used by SPA/Ramsar bird species.
- 6.34 There were several suggestions that the policy be re-written in the context of the 25 year Environment Plan and draft Environmental Bill, as it currently stands, this policy does not reflect the principles of measurable biodiversity net gain or Nature Recovery Networks. One respondent made specific comments; ‘1. Softening - provision of stepped-back security fences, fringed with native species of shrubs and trees; 2. Screening - establishment of mixed native broad-leaf and conifer tree belts; 3. Habitat conservation - maintenance of wet areas and other existing features, such as woods and hedges, to

provide the core of a nature recovery network good framework for future improvements; 4. Habitat creation - introduction of lakes, ponds and marshes appropriate priority habitats; 5. Field boundary management – careful management of existing hedges to increase height and species diversity; 6. tree and hedge planting - new native, species rich planting, carefully positioned for maximum effect, with minimum impact on farm management industry’s operational needs and sites of archaeological importance’.

Responses – Question EC5p: Wharves

- 6.35 **14** respondents had views on the approach that should be adopted in the Local Plan in terms of the ‘Wharves’ policy and/or what it should contain. **10** respondents agreed with contents of the policy (with some amendments), whilst **5** did not.

Table 6.5: Responses to Question EC5p: Wharves		
Response	Number of Respondents	Percentage of Respondents
Yes	9	64%
No	5	36%
Other	0	0
Total	14	100%

Summary of Responses – Question EC5p: Wharves

- 6.36 Those who provided detailed comments or views on this question generally agreed with its principles. The proposals in the policy, which should help to allow movement of freight to water; where such facilities are more viable and sustainable forms of freight movement, were well received.
- 6.37 One respondent made the following suggestion to the policy that the requirement that proposals for the port and wharf facilities will be permitted providing there is ‘no adverse impact’, is changed and it is made clear in the policy that it is ‘unacceptable’ adverse impacts should be avoided or addressed, not just ‘no adverse impact’ in respect of various matters. The following was suggested ‘proposals for new or extended port, wharf and jetty facilities on the Rivers Humber and Trent will be permitted provided there are no unacceptable adverse impacts on:...’
- 6.38 Several respondents referenced paragraph 6.27 of the supporting text to a further policy – EC6p of the plan and queried whether this is a typographical error as policy EC6p of the plan does not appear to relate to the matters being discussed in this paragraph. A suggestion was made that the policy should include the proposed additional text: ‘...integrity of the South Humber Bank defence system is not compromised and flood risk is not increased by further development’.
- 6.39 A further comment was made in opposition requesting that the policy is to be clearer on the fact that biodiversity should be considered in a broader sense as opposed to just the sites of nature conservation interest.
- 6.40 One respondent made a suggestion that paragraph 6.28 should be re-worded as “In particular, the Humber Estuary and its coastal margins have international, national and local nature conservation designations, including SAC, SPA, Ramsar, SSSI, LNR and SINC...”. The respondent also asked for further clarification on the policy as the current wording could be read to mean that if it has been determined that there will be adverse impacts on “sites of nature conservation interest” (presumably referring to the Natura 2000 sites) then permission will not be granted. Under the Habitats Regulations there may still be the option for compensatory measures to be applied, if they are able to pass through the derogations. New ports, wharves and jetties have the potential to lead to direct loss of habitat as well as increasing

disturbance to the designated site features and therefore this would need detailed assessment within a Habitats Regulations Assessment.

- 6.41 A general concern was expressed by one respondent in relation to the potential additional HGV movements within the surrounding villages.

Responses – Question EC6p: Supporting the Rural Economy is the right approach?

- 6.42 **16** respondents (**17** responses in total) had views on the approach that should be adopted in the Local Plan in terms of the Supporting the Rural Economy. **13** respondents agreed with contents of the policy (with some comments), whilst **3** did not agree (with some comments). **1** did not select an option but provided detailed comment.

Table 6.6: Responses to Question EC6p: Supporting the Rural Economy is the right approach		
Response	Number of Respondents	Percentage of Respondents
Yes	13	76%
No	3	18%
Other	1	6%
Total	17	100%

Summary of Responses – Question EC6p: Supporting the Rural Economy is the right approach.

- 6.43 Most respondents in favour of the approach provided no further comment.
- 6.44 Bullet Point 7 was supported, understanding the importance and value of our watercourses, and the associated ecology and habitats, but a suggestion was made to reword this point to read ‘do not increase the risk of flooding’. In a similar vein Point 7: ‘Flooding’ does not fit well in this sentence after the expression ‘have no unacceptable effect on....’ The response suggests instead ‘...and do not increase the risk of flooding’ if this is a significant concern here.
- 6.45 Subject to appropriate safeguards there was support for diversifying the range of economic activities on farms or in rural areas. There was also support for allowing existing businesses wanting to use new buildings to expand - a policy used well in Central Lincolnshire.
- 6.46 Respondents not in favour of the approach suggested that, consideration be given to potential increased levels of recreational disturbance caused by the development of tourism at designated sites.
- 6.47 Detailed commentary was provided on the duties set out by NPPF paragraphs 170d and 174b to protect and enhance the natural environment and biodiversity. To meet these requirements an amendment was suggested to the policy to include a principle of biodiversity net gain.

Responses – Question EC7p: A Sustainable Visitor Economy is the right approach.

- 6.48 9 respondents (**10** responses in total) had views on the approach that should be adopted in the Local Plan in terms of A Sustainable Visitor Economy. 7 respondents agreed with contents of the policy with no additional comment, whilst 1 did not agree and provided detailed comments. 1 did not select an option but provided detailed comments.

Table 6.7: Responses to Question EC7p: A Sustainable Visitor Economy is the right approach

Response	Number of Respondents	Percentage of Respondents
Yes	8	80%
No	1	10%
Other	1	10%
Total	10	100%

Summary of Responses – Question EC7p: A Sustainable Visitor Economy is the right approach

- 6.49 All respondents in favour of this approach provided no further comment.
- 6.50 Lack of engaging local visitor attractions was the main concern along with a lack of well-maintained cycling infrastructure that would facilitate active travel between existing points of interest. A unique attraction such as a 'Digital Arts Centre' was suggested.
- 6.51 Detailed commentary was provided on the physical impact that visitors have and negative effect on biodiversity created from developments and ongoing operations of visitor attractions. To ensure it remains of high quality, impacts must be managed. The response further outlined that this principle should make it clear that it refers to the impacts of ongoing operations and not just the impacts of the initial development.
- 6.52 A view was provided that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, as set out in NPPF paragraphs 170d and 174b. To meet these requirements this policy should include a principle of biodiversity net gain.

General Comments

- 6.53 As part of the consultation a number of general comments were also provided in relation to Chapter 6 – 'Delivering the Economy and Supporting Jobs'. These are summarised below.
- 6.54 One comment on paragraph 6.12, stated they were concerned that none of the challenges identified reflect the climate or biodiversity crises that have been highlighted by government and by wider society. These points are linked in that environmental net gain, proposed by the 25 Year Environment Plan, can help to address both issues. Delivery of new habitats and protection and management of existing ones provides natural solutions to climate change through natural capital. There should be an additional point on natural capital which draws together both climate and biodiversity emergencies, or these could be split into two additional points.
- 6.55 A respondent who did not support the policy, felt the wording in paragraph 6.16 did not accurately reflect the mitigation hierarchy which should be followed. They felt it should be amended to specify the need to consider avoidance, mitigation then compensation, and then if these cannot adequately address the issues, the application should be refused. The respondent felt the paragraph should also include a reference to the need to provide measurable biodiversity net gains and contribute to delivery of a Nature Recovery Network.
- 6.56 A view that neither agreed nor disagreed with paragraph 6.23 was provided, but felt better communication and joint working between all involved are key ways to achieving a more effective planning system. The respondent states that Section 33A of the Planning and Compulsory Purchase Act 2004 states that there is a duty to cooperate with prescribed bodies (subsection 9) this includes any Local Nature Partnerships relevant to the area. The NPPF supports this in paragraphs 16c. As such environmental bodies must be included in or engaged with by any partnership which aims to protect important sites of nature conservation.

- 6.57 One response supported the sentiment of paragraph 2.25 however felt it should be reworded to mention the potential opportunities to consider and incorporate natural capital accounting. They suggested this could include carbon sequestration, flood mitigation, pollution mitigation and recreational access through habitat provision and should be led by the Local Nature Recovery Strategy or Biodiversity Opportunity Mapping and involve ecological advice.
- 6.58 One respondent stated that paragraph 6.28 should note that that extensive parts of the River Trent are also covered by the Humber Estuary designations.
- 6.59 The respondent supported the recognition of nature as an asset and the need to protect it in paragraph 6.36.
- 6.60 The respondent strongly supported the inclusion of paragraphs 6.21 and 6.22, however, they felt this is not just about an 'attractive' environment but rather development needs to deliver quantifiable biodiversity net gain that helps to secure a functional Nature Recovery Network. The respondent also felt that Paragraphs around the South Humber Bank and the plan more widely, need to explore and encourage greater collaboration between sectors and achieving multiple benefits around for example Biodiversity Net Gain, Nature Recovery Networks, Local Nature Recovery Strategies, natural capital, carbon targets, flood resilience and health and wellbeing.
- 6.61 One respondent supported the intention of paragraphs 6.23 add 6.24. They did feel however that there needs to be recognition of wider stakeholders beyond industry and agriculture, and a better reflection of the statutory changes that will be brought about through the Environment and Agriculture Bills.
- 6.62 In terms of paragraphs 6.35 and 6.36 a view was provided that if the council is considering developing the tourism offer at internally designated sites such as the Humber Estuary and Thorne and Crowle Moors, there needs to be greater consideration of the potential for increasing levels of recreational disturbance. Appropriate assessments and mitigation may be necessary.

7 PROSPEROUS TOWN CENTRES

Introduction

- 7.1 Having access to a range of shops, cultural and leisure facilities that meet local needs is essential to creating sustainable communities and a successful and vibrant economy. The North Lincolnshire Local Plan's approach is to identify, protect and enhance North Lincolnshire's town, district and local centres with the current retail hierarchy being:

- Scunthorpe town centre;
- Market town centres of Barton upon Humber, Brigg, Crowle and Epworth;
- District centres of Kirton in Lindsey and Winterton;
- District centres of Ashby High Street and Frodingham Road; and
- Local centres/corner shops.

Consultation

- 7.2 The Preferred Options document contained 1 question covering to Prosperous Town Centres.

Question TC1p: Do you think the Preferred Policy TC1p: Retail Hierarchy and Town Centre and District Centre Development is the right approach?

Responses – Question TC1p: Retail Hierarchy and Town Centre and District Centre Development

- 7.3 14 respondents had views on the approach that should be adopted in the Local Plan in terms of the 'Retail Hierarchy and Town Centre and District Centre Development' policy and/or what it should contain. 9

respondents agreed with contents of the policy (some with amendments), whilst 4 did not (outlining what changes they required to overcome their concerns).

Table 7.1: Responses to Question TC1p: Retail Hierarchy and Town Centre and District Centre Development		
Response	Number of Respondents	Percentage of Respondents
Yes	9	64%
No	5	36%
Other	0	0%
Total	14	100%

Summary of Responses – Preferred Policy TC1p: Retail Hierarchy and Town Centre and District Centre Development

- 7.4 The majority of respondents who provided detailed comments or views on this question generally agreed with its principles. 7 respondents provided comments of support for the policy with no additional changes required. Most comments centred on the contents of the policy and in some cases particular criteria. Certain comments related the policy back to its interlinkages with the Spatial Strategy and housing and employment growth requirements and allocations.
- 7.5 A clear view was provided by Highways England that the retail hierarchy set out in the policy is consistent with similar hierarchy and spatial policies within the Plan, and as such, the policy aspirations are supported in terms of impact on the strategic highway network as they promote retail development in the more sustainable locations within North Lincolnshire.
- 7.6 One respondent objected to the policy in terms of Scunthorpe Town Centre. They noted the implied reduction in the size of Scunthorpe town centre and they wish to emphasise the need to complement a revitalised retail centre with contiguous investment in improved public realm, cultural, learning and youth facilities and an environmental and urban transformation.
- 7.7 A comment was made that a positive place-making policy should be included within the Local Plan together with policy TC1p.
- 7.8 The objective of policy TC1p to enhance the town centre of Epworth was deemed appropriate by two individuals and supported. However, the monitoring targets suggest the principle aim is to prevent the decline of these town centres which reflects a national problem associated with changing retail patterns. Restricting development opportunities in the Local Service Centres (such as Epworth) will only serve to further undermine the future vitality and viability of those centres. The draft policies make the 'right noises' but the failure to grasp an adequate distribution of new development (both housing and employment) to the Large Service Centres will completely undermine that objective. The corollary is that further allocations in the Large Service Centres will boost their vitality and viability of their town centres.
- 7.9 A view was provided that previously developed land in Epworth with benefits to alleviate parking problems in the town and to provide other solutions to community points which need to be addressed should be allocated for housing.
- 7.10 Anglian Water, whilst not formally objecting, focussed on the increasing strain placed on the performance of the sewerage network caused by restaurants and hot food takeaways. This type of development is not inappropriate, but the need for these uses to be developed with their impact on the sewer understood is an important factor.

- 7.11 Barton Upon Humber had specific mention in two respects. The policy groups Barton upon Humber and Brigg together with Crowle and Epworth, despite Barton and Brigg having larger town centres than Crowle and Epworth. The policy should recognise this. The policy also fails to specifically recognise and offer potential solutions to two challenges faced by Barton Town Centre, as identified in the 2019 North Lincolnshire Retail Study. These are: "that the non-food offer represents a weakness of Barton Upon Humber and a broader comparison goods offer could serve to create a more appealing shopping destination and diversify the wider offer of the town centre."

8. SUPPORTING SUSTAINABLE DEVELOPMENT IN NORTH LINCOLNSHIRE'S COUNTRYSIDE

Introduction

- 8.1 Creating and delivering sustainable development lies at the heart of the planning system. North Lincolnshire is characterised by its high quality landscape and scattered flourishing communities. This character makes North Lincolnshire a safe and attractive place for residents and visitors. Consequently, these rural areas are often subject to significant pressure for development. Whilst the scale of change in rural North Lincolnshire is unlikely to be widespread, the vibrancy of the countryside depends on getting the right balance between developments and protecting the intrinsic rural character of North Lincolnshire.
- 8.2 Policy RD1p lists those types that are most relevant to North Lincolnshire. Proposals not listed in the policy would have to demonstrate why they require a rural location. In all instances, proposals are expected to be of an appropriate scale for their rural location. Therefore, consideration will be given to how the proposal relates to the built and landscape character of the surrounding area and the impact that the development would have on the local road network. Proposals involving the re-use of previously developed land will also be expected to be in an appropriate location, which avoids the use of land that is of high environmental value and would not be subject to significant risks from flooding or other hazards.

Consultation

- 8.3 The Preferred Options document contained one question in relation to Supporting Sustainable Development in North Lincolnshire's Countryside. The question asked was:

Question RD1p - Do you think the Preferred Policy RD1p: Supporting Sustainable Development in North Lincolnshire's Countryside is the right approach?

Responses – Question RD1p: Do you think the Preferred Policy RD1p: Supporting Sustainable Development in North Lincolnshire's Countryside is the right approach?

- 8.4 **22** respondents provided an answer to this question. **15** agreed with the proposed approach to the presumption in favour of sustainable development, whilst **6** did not. **1** did not select either option, but provided comments. **14** provided additional or further comments in support of their choice.

Table 8.1: Responses to Question RD1p: Supporting Sustainable Development in North Lincolnshire's Countryside

Response	Number of Respondents	Percentage of Respondents
Yes	15	68%
No	6	27%
No option selected	1	5%
Total	22	100%

Summary of Responses – Question RD1p: Supporting Sustainable Development in North Lincolnshire’s Countryside

- 8.5 As mentioned above, the majority of respondents agree with the proposed approach to Preferred Policy RD1p. It was considered to be in line with the principles set out in the current version of NPPF.
- 8.6 There was recognition that Policy RD1p is clear that outside settlement development limits, land will be regarded as the countryside and only certain forms of development will be supported, however comment was made that a more proactive approach to sustainable development opportunities that may come forward immediately adjacent to the defined development limits, and this should be reflected in the wording of Policy RD1p.
- 8.7 In contrast to the above there were responses that supported the policy as it stands as it restricts large scale development outside of defined settlement limits and allows infill on unoccupied space; and will ensure that small villages such as Wootton are not adversely affected by the impact on infrastructure and the surrounding environment.
- 8.8 It was highlighted by two respondents that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity and therefore the policy should include a paragraph which requires development to protect and enhance biodiversity as required by the NPPF paragraphs 8c, 170d, 174b and 175d. NPPF also requires planning policies and decisions to enhance the natural environment by “...providing net gains for biodiversity...” (170d) and requires plans to “...pursue opportunities for securing measurable net gains for biodiversity” (174b). All development is an opportunity for securing biodiversity net gain and the NPPF states that “opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity” (175d). To meet these requirements this policy should include a principle of biodiversity net gain.
- 8.9 In respect of the policy criteria one respondents required amendments to include hydrocarbon exploration and production. Hydrocarbons can only be explored and produced where they are found and this is often in the countryside. Paragraph 205 of NPPF advises that great weight should be given to the benefits of mineral extraction, including to the economy and quoted two local appeal decisions as evidence.
- 8.10 In respect of best and most versatile agricultural land four comments were received. One required reference to development being directed to areas of lower quality agricultural land in preference to areas of higher quality. For consistency with national planning policy this should refer to 'significant' development proposals to avoid unnecessarily placing requirements on all proposals regardless of scale. The second comment required protection, especially for grade 1 land, as the current corona crisis has proved to us all that we need to use this land for food production not development. One comment stated no development should be allowed on high quality agricultural land at all.
- 8.11 The Environment Agency highlighted that paragraph 8.3 recognises that flood risk should be taken into account when considering proposals for re-use of previously developed land in the countryside. Flood risk is also relevant to conversion of buildings to residential use and to new agricultural workers dwellings, with their respective constraints. The response suggests that the policy itself refers to this in relevant places as well.
- 8.12 Of the other comments received in support of the policy the reasons given include: it is important to protect the agricultural assets of our rural economy; keep the villages what they should be kept, keep industry away from rural areas including villages; and to support sustainable development but not large scale developments on agricultural land (reason for this is to keep the character of the village, ensuring that any future development is restricted to brownfield and infill sites).

General comments

- 8.13 As part of the consultation a number of general comments were also provided in relation to Chapter 8. These are summarised below.
- 8.14 A comments was received supporting the recognition in paragraph 8.3 that the re-use of previously developed land should avoid sites of high environmental value.
- 8.15 A further comment states all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, as the natural environment and biodiversity are key elements of what makes up the countryside specific mention of the protection and enhancement of these should be mentioned in this paragraph or within their own paragraph. This would contribute to requirements of the NPPF (paragraphs 8c, 170d, 174b and 175d).

9. DELIVERING A QUALITY ENVIRONMENT

Introduction

- 9.1 Residents of North Lincolnshire enjoy and value its rich and distinctive natural environment. The North Lincolnshire Local Plan must consider these characteristics whilst also addressing climate change, sustainable use of resources and flood risk.
- 9.2 National policy set out in NPPF and associated guidance outlines a number of core principles in respect of the natural environment for those that work, visit and invest here. The condition of the surrounding natural environment, including many ecological assets, are critical to North Lincolnshire's image, having a significant impact on the quality of life as well as bringing both social and economic benefits to its communities.
- 9.3 Environmental considerations are, therefore, fundamental to all planning policy areas whilst achieving the council's ambition and outcomes where everyone is safe, well, prosperous and connected. They are also central to creating a place that is cleaner, greener and safer.

Consultation

- 9.4 The Preferred Options document contained 13 questions relating to subjects covered by the 'Delivering a Quality Environment' policies.

Question DQE1p - Do you think the Preferred Policy DQE1p: Protection of Landscape, Townscape and Views is the right approach?

Question DQE2p - Do you think the Preferred Policy DQE2p: Landscape Enhancement is the right approach?

Question DQE3p – Do you think the Preferred Policy DQE3p: Biodiversity and Geodiversity is the right approach?

Question DQE4p – Do you think the Preferred Policy DQE4p: Local Nature Reserves is the right approach?

Question DQE5p – Do you think the Preferred Policy DQE5p: Nature Conservation and Recreational Land Uses is the right approach?

Question DQE6p – Do you think the Preferred Policy DQE6p: Managing Flood Risk is the right approach?

Question DQE7p – Do you think the Preferred Policy DQE7p: Sustainable Urban Drainage Systems is the right approach?

Question DQE8p – Do you think the Preferred Policy DQE8p: Climate Change & Low Carbon Living is the right approach?

Question DQE9p – Do you think the Preferred Policy DQE9p: Renewable Energy Proposals is the right approach?

Question DQE10p – Do you think the Preferred Policy DQE10p: Local Green Space is the right approach?

Question DQE11p – Do you think the Preferred Policy DQE11p: Important Open Space is the right approach?

Question DQE12p – Do you think the Preferred Policy DQE12p: Green Infrastructure Network is the right approach?

Question DQE13p - Do you think the Preferred Policy DQE13p: Protection of Trees, Woodland and Hedgerows is the right approach?

LANDSCAPE PROTECTION

Responses – Question DQE1p: Protection of Landscape, Townscape and Views

- 9.5 There were responses to this policy from **26** respondents. **20** respondents agree with contents of the policy (some with amendments), whilst **11** respondents agree with the policy contents but have no comments to make. **4** respondents do not agree with the policy contents and **2** of these suggest wording changes, whilst **2** neutral responses emphasise the local planning authority's role.

Table 9.1: Responses to Question DQE1p: Protection of Landscape, Townscape and Views

Response	Number of Respondents	Percentage of Respondents
Yes	20	77%
No	4	15%
Other	2	8%
Total	26	100%

Summary of Responses – Question DQE1p: Protection of Landscape, Townscape and Views

- 9.6 Of the 20 respondents that support Policy DQE1p they welcome, for example, the aims of the policy to protect the character and quality of and landscape and to ensure that development has regard to maintaining and responding positively to any natural and man-made features within the landscape and townscape; state that it is a key area of the Local Plan and must be given serious priority; strongly agree that development should be sympathetic to the surroundings and low density in small rural villages; and acknowledge that landscape and biodiversity needs to be protected.
- 9.7 A respondent welcomes that the Council are proposing to retain existing woodland at Brumby Grove and Brumby Common in Scunthorpe, but considers that the Council should be more proactive and require

developers in these areas to create new ‘planted’ areas of trees and woodland in the interest of mitigating the effects of climate change and the Government pledge to plant 1.5 billion trees across the country.

- 9.8 Two respondents suggest that the policy should include a principle of biodiversity net gain in order to enhance the natural environment through the provision of measurable net gains to biodiversity, with one of them suggesting that reference should be made to “establishing coherent ecological networks”.
- 9.9 Support is shown regarding the need to address long-term management and maintenance of proposed landscaping and planting, though a respondent suggests that a caveat should be included in the policy to acknowledge that tree planting, and even tree retention, may not be appropriate in all locations within North Lincolnshire. The same respondent suggests that the policy could be strengthened by adding reference to maintaining and extending tree cover, where practicable, through the retention of important trees, appropriate replacement of trees to be lost and new planting to support green infrastructure where this is appropriate to the landscape and with respect to habitat priorities.
- 9.10 Three respondents’ comments relate to the Proposed Extension to the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB). The first respondent supports the policy, in particular regarding the AONB classification for the Wolds. The second states that if it is to be considered then it must be for the right reasons, that the landscape is our finest asset and a case can be made that it is especially desirable to do so. However, these landscapes are highly managed, and their visual appearance and beauty depend on farmers and land managers actively maintaining them. Indeed, designation should be a catalyst for innovation not a barrier for development. The third respondent, however, requires that all reference to the Proposed Extension to the AONB should be removed from the policy until it has been approved, that it should merely be regarded as an aspiration, and that remaining provisions are adequate to protect the landscape. They state that the area under consideration would include, for example, the M180, ‘A’ roads, and a number of industrial locations/features.
- 9.11 Other less supportive comments state that, for example, inadequate mention is made in the policy of a commitment by North Lincolnshire Council to the maintenance of the quality of the landscape, particularly with regard to the scourge of litter, and that there should be a strategy to instil a community commitment to such improvements in quality. The same respondent states that definite targets are also needed here.
- 9.12 Another consultee supports the requirements to provide an appraisal which responds to landscape character, climate change, flood alleviation and including amenity and improvements to biodiversity, but queries whether a landscape appraisal is the correct document for this. Indeed, they state that issues surrounding biodiversity, including any improvements, should be dealt with by an ecologist.
- 9.13 A respondent also highlights the lack of specific reference in the policy to rivers or the coast, unlike trees which have more than one reference. They suggest that an additional point should be added to section 3 to cover this and/or that a reference to rivers, streams and coastal features is added to point d.

Responses – Question DQE2p: Landscape Enhancement

- 9.14 **17** respondents replied to this policy. **12** respondents agree with contents of the policy; **3** of these included supportive text whilst **9** respondents agree with the policy contents but have no comments to make. **5** respondents do not agree with the policy contents and **2** of these suggest some wording changes; **4** made comments and **1** had no comments to make.

Table 9.2: Responses to Question DQE2p: Landscape Enhancement

Response	Number of Respondents	Percentage of Respondents
Yes	12	71%
No	5	29%
Total	17	100%

Summary of Responses – Question DQE2p: Landscape Enhancement

- 9.15 23 landscape enhancement schemes are shown on the Policies Map in an indicative manner. Support for the policy and the environmental protection reflected in the Plan is emphasised in responses which state that the proposed schemes all seem like suitable areas.
- 9.16 Two general objections to the Policy relate to its relationship to the biodiversity opportunities mapping (BOM). One respondent comments that there are many more sites highlighted as part of the biodiversity opportunities mapping (BOM) and there should, therefore, be greater overlap between that document and the policy. A second respondent states there should be a requirement that the schemes deliver biodiversity gains and there should, therefore, be a clear link to the Biodiversity Opportunity Mapping and Local Nature Recovery Strategy to ensure that they maximise the creation of priority habitats and assist with the establishment of a Nature Recovery Network.
- 9.17 One respondent requires that the policy should include an indication of what is required at the named sites, whilst another suggests that additional wording within this policy should require that these proposed landscape enhancement areas provide multiple benefits, as described within paragraph 9.7. Strategies for habitat management/creation could link with these schemes to create efficiencies and deliver multiple targets.
- 9.18 Two site- specific comments relate to the 12 Brigg North and 7 Barton East schemes. Concern over the Brigg site states that it falls within the development limit for allocation H1P-10p but lies outside of the development limit in relation to proposed allocation H1P-11p and that, in the interests of consistency, allocation H1P-11p should have the same relationship to the boundary with the M180 as allocation H1P-10p.
- 9.19 An objector to the Barton East scheme claim that it should be removed from the landscape enhancement programme and instead be used for housing or preferably commercial development, and investment instead put into Waters Edge Country Park. The respondent states that none of the areas of the Barton East scheme are currently publically accessible, and unless this was amended the amenity value of the scheme would be very low. They state that the remainder of the site would be ideal for office or trade counter use complementing the Humber Bridge Industrial Estate whilst being suitable neighbours for the nearby housing.

General Comments

- 9.20 A number of general comments were made to the contents of the Landscape Protection chapter, and these are summarised below.
- 9.21 A respondent suggests that Para 9.17 could include some explanation of how the council sees the BOM fitting with new requirements for Nature Recovery Networks and Biodiversity Net Gain. They support the reference to an ecosystem approach, however this point should be further expanded and explained. This should include an explanation of natural capital and how this will be integrated into policy. They also recommend that the links to related policies such as Policy DQE1p: Protection of Landscape, Townscape and Views and Policy DQE2p: Landscape Enhancement, could be made clearer both here and within those policies. An appropriate approach might be to create an SPD which provides greater detail for applicants on the requirements around Biodiversity Net Gain, the mechanisms for securing these and how these are

expected to fit with BOM, Local Nature Recovery Strategies and other partnership work both within the council area and across borders on a landscape scale.

- 9.22 The same respondent suggests that Para 9.20 should make it clear how developers are expected to demonstrate a measurable net gain. The Defra metric 2.0 is set to become the standard tool for this and use of this metric should be embedded within the policy and supporting text. The expected protocols should also be made clear, for example, that completed calculations (not just assessments of the type of habitat and its condition) should be submitted at the validation stage to avoid delays in determining applications and that they should be carried out by appropriately qualified ecologists. They would strongly recommend that there should also be an explanation that the metric only considers habitats and not species, so that protected species surveys will still be required along with details of any specific avoidance, mitigation or compensation that may be required for those.
- 9.23 They go on to state that it is not clear what is meant by the 'main document' in Para 9.21. Is this referring to the expectations of an ecological report for a development, the Local Plan or the Local Nature Recovery Strategy? The paragraph sounds like it has been cut and pasted so the context isn't exactly clear. They welcome the mention of on-site and off-site delivery options, however the hierarchy of biodiversity net gain delivery should be strengthened and explained more fully including details of how a levy or tariff system will work in cases where on site provision isn't possible and where suitable land nearby isn't available. Details of the mechanism for securing levy or tariff payments should also be included and embedded within other relevant policies within the plan for example Policy ID1p: Delivering Infrastructure.
- 9.24 A respondent supports in principle chapter 9 of the emerging Local Plan 'Delivering a Quality Environment'. Paragraph 9.3 could be strengthened by the addition of the text 'Key views within the landscape and in to and out of settlements are valued by the local community and can also define the local identity of a place, therefore, will be maintained and enhanced.' The respondent also welcomes the recognition afforded to the need to protect the 'non-designated wider countryside' in line with the key principles of NPPF in paragraph 9.4.
- 9.25 In relation to Paragraph 9.38 a respondent strongly supports the inclusion of the need to include SuDS and their multifunctional benefits within the earliest design stages. They also suggest that there could be mention of the design using information gathered from the ecological surveys to ensure maximum benefits.
- 9.26 Full support is given to the proposal to extend the Lincolnshire Wolds Area of Outstanding Natural Beauty and its inclusion within the policy is justified. However, this respondent suggests that Paragraph 9.5 of the textual justification should be amended to read: 'The Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB) designation provides the same level of protection as that afforded to National Parks.' Paragraph 172 of the NPPF clearly states that 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these areas.' This clearly sets them on the same footing in policy terms.
- 9.27 A comment relates to Paragraph 9.7, with the respondent strongly supporting the recognition of the multiple benefits that landscape and natural features can provide, and they would wish for this approach to come out more strongly within the policies and ambitions of the plan.
- 9.28 A final respondent states that sourcing and maintaining credible data is central to ensuring effective local planning and policy making, with NPPF stating that "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence" (paragraph 31). The respondent believes that the Local Landscape supporting text Paragraphs 9.1 to 9.4 should make reference to all national character areas present in North Lincolnshire not just the Lincolnshire Wolds to prove that this section and policy attached is informed by the proper evidence.

BIODIVERSITY & GEODIVERSITY

Responses – Policy DQE3p: Biodiversity and Geodiversity

- 9.29 **21** respondents replied to this policy. **18** respondents agree with contents of the policy (some with amendments). **3** of these included supportive text whilst **7** respondents agree with the policy contents but have no comments to make. **3** respondents do not agree with the policy contents and **2** of these suggest some wording changes.

Table 9.3: Responses to Question DQE3p: Biodiversity and Geodiversity		
Response	Number of Respondents	Percentage of Respondents
Yes	18	86%
No	3	14%
Total	21	100%

Summary of Responses – Question DQE3p: Biodiversity and Geodiversity

- 9.30 One respondent welcomes various aspects of this policy. For example, references to non-statutory sites, river banks and watercourses, the local biodiversity opportunities mapping, the requirement for net gain, the importance of networks and linkages between habitats, and the creation of new nature reserves.
- 9.31 Five respondents provided site-specific support for the Policy, stating that:
- a New Nature Reserve should be created in Barton Upon Humber (on land behind Lidl) and maintained as green space;
 - it would assist in management of the Stainforth & Keadby Canal;
 - it recognises and considers the likely significant effects on Thorne Moor Special Area of Conservation (SAC) and Special Protection Area (SPA) and the Humber Estuary SAC, SPA & Ramsar Site;
 - they support options relate directly to Worlaby; and
 - and the plan should ensure that the environment in currently biodiverse villages such as Wootton which are a natural habitat for a diverse mix of wildlife are not damaged by major construction projects outside the defined settlement limit.
- 9.32 General support was provided by a number of respondents, relating to:
- the inclusion of net gain within this principle – however, in light of the current draft Environment Bill which will make a 10% biodiversity gain mandatory, even stronger wording containing a minimum gain of 10% and reference to the Defra Biodiversity Metric 2.0, should be considered;
 - strong support for Point 6 and would suggest that a reference to Nature Recovery Networks is added;
 - support the mention under Point 8 of protected or important species alongside habitats;
 - will help to ensure that priority is given towards protecting the natural environment from pollution and that efforts will be taken to promote biodiversity enhancements;
 - the environmental protection reflected in the Plan;
 - specifically supportive of bullet point d, which details the need to protect watercourses and waterbodies;
 - would hope that the need for development would never outweigh the need to maintain biodiversity and geodiversity;
 - supports the intentions of the policy and the recognition and means it affords to mitigating unavoidable impacts on biodiversity; and
 - hope that the need for development would never outweigh the need to maintain biodiversity and geodiversity.

- 9.33 Whilst welcoming various aspects of the policy one respondent seeks clarity, as follows:
- point 1a states that schemes must protect...sites of international, national and local importance, but points 3, 4 and 5 suggest that for certain habitats, if the benefits of the development can clearly be demonstrated to outweigh the loss of habitat, they may still be permitted;
 - a target or targets for net gain should be set - the statutory minimum will be 10% but some authorities have adopted more ambitious targets;
 - there needs to be consideration of the mechanisms the council will put in place to ensure net gain is demonstrated, secured and implemented;
 - where impact cannot be avoided, or anything within this policy could not be adhered to, a full explanation must be provided;
 - point 9 states 'Provision will be made for the creation of nature reserves....'. It is not clear who will make these provisions, for example North Lincolnshire Council or those proposing development, or by what process;
 - it would be useful to clarify whether there are actually any sites of particular 'geodiversity' value in North Lincolnshire.
- 9.34 Biodiversity net gain requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were pre-development. One respondent states that the existing policy framework could be improved to better reflect the strengthened wording for biodiversity net gain in the revised NPPF (2019) and include the intent to produce a more detailed SPD. A respondent supports the ambition in the policy but also queries how net gain can be achieved. Five respondents propose improvements to the wording of the policy, with three of these respondents also relating to biodiversity net gain, as follows:
- All development is an opportunity for securing biodiversity net gain;
 - essential that the local authority establishes a mechanism to monitor that they are achieving the statutory minimum of 10% biodiversity net gain;
 - a target for net gain could be provided as an SPD, kept up to date once the evidence base grows (the SPD describing the requirements for applicants, mechanisms to secure it, including long term management and monitoring, and considerations around wider strategies required by the Environment Bill and should also include consideration of natural capital and wider environmental net gain which is currently lacking throughout the plan);
 - biodiversity net gain does not apply to irreplaceable habitats and any requirement for a development which may impact on protected sites is additional to any existing legal or policy requirements for statutory protected areas;
 - this is an opportunity to bring the policy up to date and for it to work within a mandatory system when we get there;
 - there is no detail on the threshold for applying net gain policy, or what approach will apply to all developments (regardless of their scale);
 - it should be clear that biodiversity net gain is in addition to any mitigation and compensation measures required to make the development acceptable;
 - point 5 should be amended to include references to net gain;
 - there are no monitoring targets specified relating to delivery of a net gain in biodiversity and/or geodiversity across North Lincolnshire;
 - need to consider what mechanisms will be used to secure net gain (e.g. s106);
 - need to reference the use of a metric to measure net gain.
- 9.35 Other proposed improvements to the Policy relate to how development will be linked to the habitat networks referenced, and will these networks be mapped. Green Infrastructure opportunities should be joined up with the Biodiversity Opportunities Mapping Study, and an explanation is needed to explain what is meant by 'priority habitats'. The requirement to contribute to strategies and networks should be separate to the hierarchy of biodiversity offsetting and should be split into two separate points, reflecting on site, off-site nearby, off-site within wider network or payment of an offsetting levy/tariff. Ecological surveys should identify avoidance, mitigation, compensation and enhancement measures for protected and priority species. Point 1e could be amended to specify 'ecological connectivity'. One respondent

supports the wording in Point 4 but thinks it should be extended to make it clear that there are other habitats which are also considered to be irreplaceable besides ancient woodland and veteran trees.

- 9.36 It is not clear how nature reserves and new wildlife habitats differ from the compensation sites or landscape areas covered elsewhere in the Plan. Point 10 dealing with Local Wildlife Sites should be moved up to follow those for international and national designated sites.
- 9.37 One respondent states that the policy does not recognise temporary uses which may not be of a scale or duration to justify a net gain in biodiversity and or geodiversity throughout the development period, and that it should be tied in to Policy MIN8p for Restoration, Aftercare & After use of Mineral Extraction Sites.
- 9.38 Another respondent requires that the policy needs additional and equal emphasis on issues such as removal of litter and fly tipping and prevention of illegal hunting, with targets needed.
- 9.39 Finally, one respondent objects to the following specific policy bullets:
- Point 1b should include reference to the full mitigation hierarchy, including ‘avoid, minimize, mitigate and compensate’;
 - Point 1c includes a target for measurable net biodiversity gain - they would like to see the council being ambitious and seeking to achieve above the 10% statutory minimum level;
 - Point 4 is weaker than the up to date NPPF paragraph 175(c) which relates to the loss or deterioration of irreplaceable habitats;
 - suggest the wording in Point 4 for irreplaceable habitats however is amended to ‘...irreplaceable habitats such as ancient woodland and aged or veteran trees...’;
 - ‘maintenance’ should be added to Point 7 (conditions/obligations requirements), and monitoring if it is appropriate/practicable or for larger schemes.

General Comments

- 9.40 A number of general comments were made to the contents of the Biodiversity & Geodiversity chapter, and these are summarised below.
- 9.41 A respondent stated that the Lincolnshire Biodiversity Action Plan will have reached the end of its lifespan in 2020 and plans are being made for this to be revised and refreshed as the Greater Lincolnshire Nature Strategy. It will be important, therefore, that the council makes full and proper use of this document, including with regards to planning decisions and future delivery of biodiversity net gain.
- 9.42 Another respondent highlights that England’s wildlife areas do not currently represent a coherent and resilient ecological network. Managing, restoring and creating habitat in the right places helps rebuild the network and enables species to thrive not just in one place but across wider landscapes. NPPF requires commitment to “establishing coherent ecological networks” (170d) and, therefore, the GLNP supports the inclusion of Paragraph 9.15. However, it feels a reference to “coherent ecological networks” would tie it into the following paragraph (9.16) and wording on the Nature Recovery Network.
- 9.43 Whilst we welcome discussion of the Nature Recovery Network in Para 9.16, there could be greater consideration here of how the council will go about creating a Nature Recovering Network in North Lincolnshire through its planning policies and development control decisions. There needs to be recognition of the fact that previous planning policies have not done enough to halt biodiversity declines, and therefore there needs to be a shift towards policies requiring biodiversity net gain. There should also be mention of the draft Environment Bill (updated as required) and the implications within this for planning.
- 9.44 Strong support for the recognition of the importance of site layout and building design in biodiversity consideration in Paragraph 9.23 is stated in a comment. The respondent also recommends the addition of words to include other parts of a development where biodiversity and geodiversity could be included,

for example: ‘...design of new buildings and proposals for existing buildings, and landscaping schemes, including consideration of the multiple benefits of features such as SUDs’.

- 9.45 With reference to Paragraph 9.26, where thresholds are met for the requirement of the development to provide Biodiversity Net Gain, the ecologist should use the Defra Biodiversity Metric 2.0 to calculate the biodiversity units pre and post development and make recommendations for net gain. It should be noted that this Local Plan does not stipulate anywhere what the expected thresholds will be in terms of the scales of development that will trigger the need for biodiversity net gain.

LOCAL NATURE RESERVES, NATURE CONSERVATION AND RECREATIONAL LAND USES

Responses – Policy DQE4p: Local Nature Reserves

- 9.46 **54** respondents replied to this policy. **50** respondents agree with contents of the policy, some with amendments to improve or clarify the policy whilst **11** respondents agree with the policy contents but have no comments to make. **3** respondents do not agree with the policy contents and suggest some wording changes, whilst **1** respondent was neutral in their comments.

Response	Number of Respondents	Percentage of Respondents
Yes	50	93%
No	3	5%
Other	1	2%
Total	54	100%

Summary of Responses – Question DQE4p: Local Nature Reserves

- 9.47 The vast majority of support for the Policy is related to the possibility of the operational Biffa landfill site at Roxby/Winterton near the A1077 being transformed into a nature reserve at the end of its current planning consent period. Indeed, **36** respondents support the proposal with a variety of reasons being put forward in its favour, as follows:
- Years of unpleasant odours have turned into months of near suffocating smells, and the lovely village is blighted by the smells coming from the landfill site;
 - A nature reserve would be a wonderful transformation and beneficial idea for the local environment;
 - There is already a lot of wildlife around the lake to the north of the site, and the area would thrive once Biffa’s contract is up;
 - It would complement Normanby Hall as a place for people to visit;
 - The site could incorporate a community hub with a cafe, car park, walk routes and even mountain bike tracks;
 - The tip is now so high that it can be seen from the A1077;
 - Planting trees, etc., will help with the local ecology;
 - The Roxby site and the surrounding area would greatly benefit from a similar transformation as that at the ‘Blue Lagoon’ nature reserve off Normanby Road, Scunthorpe; and
 - It would also link with trying to sustain areas for wildlife, some of which are in serious decline.
- 9.48 One respondent states that the environmental protection reflected in the Plan and in the relevant maps has their full support, especially where they relate directly to Worlaby.

- 9.49 Two respondents suggest that sites should be added to the policy. The first respondent stresses the need to protect local nature reserves and proposes Nebraska Farm and Jessica's Wood off Ings Lane in Kirton in Lindsey and the site of the old refuse tip off Redbourne Mere in Kirton in Lindsey; if not added to the list then they should be classified as Local Wildlife Sites. The second respondent proposes that a local nature reserve should be protected at the very bottom of Ings Lane in Kirton in Lindsey, and that Klassic Park in Kirton in Lindsey should also be protected.
- 9.50 The neutral respondent states that all development is an opportunity for securing biodiversity net gain and that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity. They suggest that this policy should include a principle of biodiversity net gain, with suggested wording as follows: "Development must enhance the natural environment through the provision of measurable net gains to biodiversity as appropriate to their nature and scale".
- 9.51 One respondent, whilst supporting bullet 2 in the policy, states it would be useful if the policy or supporting text made reference to how many hectares are still required and how this will change over the life of the plan given the proposed housing allocations. They also state that reference could be made to prioritising sites which would contribute to a Nature Recovery Network as highlighted by the Biodiversity Opportunity Map, and that Point 4 should include a clearer reference to the mitigation hierarchy.
- 9.52 Finally, an objector to the policy requires clarity regarding whether reference to 'future LNRs will be selected by prioritising sites with high wildlife value' in Point 2 is by the Council or by the Council in partnership. They also claim that some of the LNRs referred to (and actually SSSIs) on the south bank of the Humber are at risk from climate change and sea level rise. There is potential that the preferred approach in the new Humber Strategy may include measures that negatively impact freshwater habitats and such measures would meet the policy as there would be demonstrated need (and the aim would be that they form part of a wider scheme that would provide compensatory habitat).

Responses – Policy DQE5p: Nature Conservation and Recreational Land Uses

- 9.53 **15** respondents replied to this policy. **12** respondents agree with contents of the policy, some with amendments to improve or clarify the policy whilst **10** respondents agree with the policy contents but have no comments to make. **2** respondents do not agree with the policy contents and suggest some wording changes, whilst **1** respondent was neutral in their comments.

Response	Number of Respondents	Percentage of Respondents
Yes	12	80%
No	2	13%
Other	1	7%
Total	15	100%

Summary of Responses – Question DQE5p: Nature Conservation and Recreational Land Uses

- 9.54 A supportive respondent comments that the policy looks alright.
- 9.55 A second respondent has concerns that this policy appears to promote recreation in the area, and they query whether the policy is necessary at all. They state that the separation of the areas described in the policy is confusing and that it should instead refer to a single area from Chowder Ness to New Holland Mere which includes several of Lincolnshire Wildlife Trust's nature reserves. Reedbeds within the area are designated as part of the Humber Estuary SSSI, and the whole area adjoins the internationally-

designated site and supports birds which form part of the SPA designation. The area is, therefore, very sensitive and any additional access or development - even for quiet recreation - is likely to cause additional recreational disturbance. This will need assessing against the conservation features of the designations and should be recognised more clearly within the policy.

- 9.56 The neutral respondent states that all development is an opportunity for securing biodiversity net gain and that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity. They suggest that this policy should include a principle of biodiversity net gain, with suggested wording as follows: “Development must enhance the natural environment through the provision of measurable net gains to biodiversity as appropriate to their nature and scale”.
- 9.57 In relation to Paragraph 9.28 a third respondent notes that the Humber Estuary SSSI, SPA and Ramsar site covers water bodies to the east as well as to the west of the Humber Bridge at Barton upon Humber and that it is not merely noise disturbance which may be detrimental to nature conservation. Therefore, even though fishing may be a quiet activity in itself, poorly managed fisheries can have a significant impact on water quality and the sustainability of a healthy wetland ecosystem. In terms of Barton and Barrow Clay Pits, Humber Bridge to Chowder Ness and Humber Bridge to New Holland Mere, noise disturbance is not the only factor which may impact on these SSSI, SPA and Ramsar waterbodies. Also development related to “general water-based recreation” (currently supported by the Plan east of the Bridge) may also be detrimental.
- 9.58 They also state that noise disturbance is not the only factor which may impact on these SSSI, SPA and Ramsar waterbodies, and development related to “general water-based recreation” (currently supported by the Plan east of the Bridge) may also have detrimental impacts. Finally, the same respondent questions whether the following target is of very much practical use: “No specific target but the amount of loss of, or demonstrable harm done to, existing nature conservation and recreational land uses to be minimised”. Also, use of the phrase “demonstrable harm” suggests that it does not incorporate the precautionary principle.
- 9.59 A final respondent notes that the policy gives the three sites mentioned stronger protection than policy DQE3p, as there are no exceptions for ‘benefits outweighing impact’.

General Comments

- 9.60 A number of general comments were made to the contents of the Local Nature Reserves, Nature Conservation and Recreational Land Uses chapter, and these are summarised below.
- 9.61 A respondent supports the presumption against noisy sports in the vicinity of Far Ings National Nature Reserve as referenced in Paragraph 9.28, which is located within the sensitive area to the west of the Humber Bridge. However, it should also be recognised that even quiet recreation can result in disturbance to the internationally designated sites and species associated with these.

MANAGING FLOOD RISK

Responses – Policy DQE6p: Managing Flood Risk

- 9.62 **18** respondents replied to this policy. **12** respondents agree with contents of the policy, some with amendments to improve or clarify the policy whilst **4** respondents agree with the policy contents but have no comments to make. **6** respondents do not agree with the policy contents and suggest some wording changes.

Table 9.6: Responses to Question DQE6p: Managing Flood Risk		
Response	Number of Respondents	Percentage of Respondents

Yes	12	67%
No	6	33%
Total	18	100%

Summary of Responses – Question DQE6p: Managing Flood Risk

- 9.63 A supportive respondent states that it is necessary to continue to focus on cross-boundary planning issues that are of strategic importance for both authorities on either side of the Humber. There are extensive areas of high flood risk surrounding the Humber that cross the local authority boundary, and it will be important for the two authorities to continue to ensure that flood risk is appropriately managed through their respective SFRAs. A second supportive reply states that the policy sounds alright but that they are not experts in flood risk. Kirton in Lindsey has previously experienced flooding, and they would, therefore, stress that this issue must always be in the forefront of the minds of any planning consideration.
- 9.64 Two final supportive respondents state that the Local Plan proposed ensures that flooding is controlled to best effect in villages such as Wootton where extensive building outside the development limits could severely effect water run off tables where there is currently excellent natural drainage through grade 1 agricultural land that would be lost if the area was paved over a built on; and that more dredging of main and small waterways is needed.
- 9.65 A further postive respondent is particularly supportive of Points e and f within the policy. A key part of any design solution will be consideration of how the system will be maintained, ensuring that appropriate access is retained. This needs to be a key consideration within the design process and where multiple bodies will be responsible for maintaining assets an understanding of what will be undertaken by each party will be needed.
- 9.66 Five respondents require clarity in the policy, along the following lines:
- The current Humber Flood Risk Management Strategy (2008) 'Planning for the Rising Tides' identifies Flixborough Grange (in flood area 15) and Goxhill (in flood area 22) as planned flood storage areas.
 - Whilst they recognise that the Flood Risk Management Strategy is currently being reviewed, this process is not due for completion until 2021, therefore it would be advisable to reflect the current strategy within the local plan, whilst noting that changes could be made in the future. In particular, it would be useful to identify these sites as having potential for flood storage of strategic value.
 - Important from a surface water management perspective to consider the Drainage Hierarchy as outlined within bullet point f, this approach is something that Severn Trent will support. However consideration will also be needed to ensure the protection groundwater and surface water from contamination.
 - Option A should be used as there is plenty of land in flood zone 1 that can be used.
 - There appears to be an increasing amount of localised flooding from changing weather patterns that misses being accounted for.
 - There needs to be tighter and/or more advanced testing for flooding caused by the rain that can no longer be absorbed into land.
 - Wootton village pond which acts as a drainage system taking water from the higher southern part of the village appears to no longer have the capacity to capture excess water in heavy periods of rain. This results in flooding on the bend just before the school as well as flooding along Swallow Lane, particularly where one of the sink holes in the village was.
 - More needs to be done regarding defence work in North Lincolnshire.
- 9.67 Another respondent outlines several significant concerns with this policy/section, and is providing a suggested redraft (see 'General Comments relating to Chapter 9: Delivering a Quality Environment' at the end of this section). For example, they state that the policy starts by saying that the Council will support developments that "avoid areas of current or future flood risk" which, they claim, is at odds with support

for the Lincolnshire Lakes project which relies on extensive mitigation measures. Specific concerns relating to paragraphs within the policy are as follows:

- 9.30: This is an incomplete and misleading explanation of the Flood Map for Planning.
- 9.31: The text needs to be more precise. It refers loosely to 50% of land being located 'within high flood risk' without defining what this means.
- 9.32: References to climate change and Humber Strategy needed updating.
- Concerned that 9.34 and 9.36 suggest a somewhat dismissive attitude to the sequential test that would be found to be inconsistent with NPPF (although paragraph 9.33 suggests not).
- The list in 9.36 covers various ways of mitigating flood risk which are not alternatives to the sequential approach - some detail as to how the sequential test will be applied/has been applied locally would be helpful in this section and/or in the policy
- 9.35: this is an outdated definition of the exception test; NPPF (para 160) has only two parts.
- For clarity, the paragraph referring to the Lincolnshire Lakes and 'other areas' is better split in two.
- Four options were suggested at the Issues and Options stage, with Option D being the most popular. Although the Environment Agency did not support Option D they have aimed to amend the policy such that it will be acceptable to NLC and in line with national planning policy and guidance.

9.68 A final response is generally supportive of the approach to managing flood risk including sewer flooding and surface water management but has a number of comments relating to the risk of sewer flooding and the surface water hierarchy, as follows:

- The policy states that planning permission will only be granted where there is capacity within final discharge locations including public sewers, but public sewers are not designed for all flows from new development proposals.
- Policies DQE7p and DQE8p both refer to use of water re-use measures to encourage the conservation of water: it is, therefore, suggested that water re-use measures be considered in the first instance before infiltration to manage surface water wherever this is feasible.

9.69 The same respondent proposes that the policy should be amended, as follows:

"d. the final discharge locations have the capacity to receive all foul and surface water flows from the development, including discharge by infiltration, into water bodies and into sewers.

e. there is a management and maintenance plan for the lifetime of the development, which shall include the arrangements for adoption by any public authority, statutory undertaker or management company and any other arrangements to secure the operation of the scheme throughout its lifetime; and.

f. the final destination of the discharge complies with the following priority order

- firstly, to, water re-use at point off run-off;
- firstly secondly, to ground via infiltration;
- secondly thirdly, to a water body; and
- thirdly fourthly, to a surface water sewer."

General Comments

9.70 The following general comments were made to the contents of the Managing Flood Risk chapter, summarised below.

9.71 In relation to Paragraph 9.36, a respondent is supportive of the general principles behind the managing Flood Risk and Sustainable Urban Drainage Systems section. Paragraph 9.36 references "improving the capacity and effectiveness of drainage Infrastructure", and they are supportive of the inclusion of this statement in principle, but would note that drainage infrastructure is wider than the provision of Sewers and will incorporate land drainage, SuDS, highway drainage, sewers and watercourses, etc. Consideration of how these systems will interact will need to be considered, and inappropriate connections such as land drainage into sewers are not permitted through the planning process.

SUSTAINABLE URBAN DRAINAGE SYSTEMS

Responses – Policy DQE7p: Sustainable Urban Drainage Systems

- 9.72 **15** respondents replied to this policy. **11** respondents agree with contents of the policy, some with amendments to improve or clarify the policy whilst **5** respondents agree with the policy contents but have no comments to make. **4** respondents do not agree with the policy contents and **3** of these suggest some wording changes.

Table 9.7: Responses to Question DQE7p: Sustainable Urban Drainage Systems		
Response	Number of Respondents	Percentage of Respondents
Yes	11	73%
No	4	27%
Total	15	100%

Summary of Responses – Question DQE7p: Sustainable Urban Drainage Systems

- 9.73 Support for the Policy in principle is provided by a respondent who, however, states that the absolute requirement that all development proposals “must” incorporate SUDS is questioned as it leaves no room for exceptions, regardless of location, scale or circumstance.
- 9.74 Support from a second respondent relates to the inclusion of SuDS within new development to manage surface water in a sustainable and resilient way. They note that the policy highlights the need to consider more than water quantity when designing SuDS in accordance with current best practice, and they are supportive of this approach where it can be implemented. They are also supportive of the need to manage surface water close to source, incorporating rainwater harvesting, where appropriate.
- 9.75 Another respondent is generally supportive of the approach to surface water management and particularly welcomes the reference made to water re-uses measures, though they suggest that the wording of Policy DQE7p be amended as follows:
- “Maximum use has been made of low land take drainage measures, such as rain water recycling, storm water recycling, green roofs, permeable surfaces and water butts”.
- 9.76 Support from two final respondents state that:
- The policy seems right within their understanding.
 - The amount of oversized piped solutions that are used should be limited, and visible SUDs solutions should always be used, if possible.
- 9.77 Two respondents suggest that the term ‘Sustainable Drainage Systems’ (i.e. without the word ‘urban’) is used throughout the Local Plan in order to be consistent with national planning policy.
- 9.78 Improvement to the policy wording is proposed by three different respondents. The first suggests that care must be taken when considering SuDS for brownfield sites or for development including potentially contaminating uses, and they suggest an additional supporting paragraph be added, as follows:
“When redeveloping brownfield sites, or proposing development including potentially contaminating uses, drainage systems must be designed to ensure there is no adverse impact on ground or surface waters.”
- 9.79 They also state that a new point should be added after point (e), as follows:

“The condition of brownfield sites has been adequately investigated and the surface water drainage systems designed to avoid any mobilisation of existing contamination”

- 9.80 The second respondent to propose an improvement to the policy suggests that land drainage should be looked at more closely with a policy added for the return of lost dykes, streams and hedgerows. They state they should be included within new developments and encouraged instead of fencing as they are better for the environment, offer better protection of properties, and help in reducing water-logged land.
- 9.81 The third respondent to propose an improvement supports the policy but feels that the importance of creating hedges and ditches has been overlooked. Not only do hedges increase security, biodiversity and enhance the natural surroundings, they also help in absorbing excess water. Ditches also help with water drainage and provide outside entertainment for children, they can be created to be very natural to modern rills.
- 9.82 A single respondent objects to the policy on the grounds that far too many dykes on farmers’ land are being filled in causing flooding in other areas.

General Comments

- 9.83 General comments were also made to the contents of the Sustainable Urban Drainage Systems chapter, and these are summarised below.
- 9.84 The respondent is supportive of the inclusion of this section with particular support for the expectation that SuDS will be provided in new development and that they should be considered from the beginning of the design and master planning process (9.39). They are also supportive of the principles outlined within the SuDS Manual C753 and Paragraph 9.40 that SuDS should effectively manage water considering more than just water quantity, but also considering water quality, biodiversity and amenity, where possible.

CLIMATE CHANGE & LOW CARBON LIVING

Responses – Policy DQE8p: Climate Change & Low Carbon Living

- 9.85 **23** respondents replied to this policy. **14** respondents support the contents of the policy, some with amendments to improve or clarify it, whilst **5** respondents agree with the policy contents but have no comments to make. **8** respondents do not agree with the policy contents and **7** of these suggest some wording changes.

Table 9.8: Responses to Question DQE8p: Climate Change & Low Carbon Living		
Response	Number of Respondents	Percentage of Respondents
Yes	14	61%
No	8	35%
Other	1	4%
Total	23	100%

Summary of Responses – Question DQE8p: Climate Change & Low Carbon Living

- 9.86 Support was made to the emerging Local Plan where the options relate directly to Worlaby, and the environmental protection reflected in the Plan has the full support of that Parish Council. Another respondent states that, in these uncertain times, it shows more than ever that more trees need planting; the ozone layer is repairing itself and we need to keep this going.

- 9.87 A respondent states that the Policy ensures that the carbon footprint is kept at a low level as it provides housing in the areas where there are already existing transport infrastructure links. If additional development outside the settlement limits in small villages was allowed this would mean considerably more road vehicles commuting to work and shops. Positive comments were also made relating to the environment being protected, with large scale development being in sustainable areas and close to employment to reduce the need to travel.
- 9.88 Another respondent supports the intentions of the policy and that 'proposals for development should be designed to mitigate the impacts of climate change and reduce carbon emissions to meet the climate change challenge'. However, there will inevitably be a continued reliance on hydrocarbons within and beyond the plan period that will contribute in the transition to a zero carbon economy. It is important, therefore, to recognise this contribution and the fact that it can be derived from an indigenous resource within the Plan boundary and or region rather than by outsourcing industry from the UK. It is essential, therefore, that recognition and support is given to proposals to explore, appraise and potentially produce hydrocarbons from within the Plan boundary and in adjoining authorities where proposals are close to the Plan boundary subject to meeting other criteria set out in the policies to the Plan.
- 9.89 The inclusion of bullet point b to ensure that development incorporates good design principles, to meet high water efficiency standards is supported, as this represents the most sustainable approach to water provision.
- 9.90 Finally, one respondent stresses the need for all developments to be taking environmental issues very seriously; if we neglect the impact of climate change we will not be serving our population as we should.
- 9.91 One respondent asks for clarity in the Policy relating to the impact we will see from the climate emergency, with the need for areas of land across North Lincs to be designated for tree planting and other mitigation schemes which should be on suitable brownfield sites and on lower grade agricultural land. The designation of land is two-fold: large areas for tree planting that can be achieved by contractors and also areas for community planting to engage communities in doing their bit to help prevent global heating. So, a new category of 'tree planting' needs to be added to the Proposals Map.
- 9.92 Suggested improvements to the policy were suggested by five respondents. The first suggests that the policy is out of date, not recognising the 'climate emergency' or the Government's net zero target for carbon emission. They would welcome more specific targets for specific issues. They also state that point 2(a) adds nothing to the introductory line, and that Plan's spatial policy SS3p, point 4, states that developments should 'minimise the use of ...resources, including energy, water and materials, during both construction and use'.
- 9.93 Improvements to the Policy are also suggested by three other respondents along the following lines:
- Section 3a that states that development should be located to reduce the need for travel and thus to the discrepancy referred to earlier in respect of employment and housing policies that fail to comply. More thought should be given to increasing the amount of new housing to be directed to the east of the district to support the South Humber Bank employment project.
 - The policy should recognise the requirement set by the CCC and not disincentivise lower carbon footprint UK oil and gas production. They therefore feel that the word 'reduce' should be replaced with 'minimise' or clarified to demonstrate compatibility with CCC recommendations.
 - The same respondent also notes the comments made by the inspector at Egdon Resources' appeal on the Wressle development which stated that it is no part of national policy to attempt to reduce emissions by restricting the production of hydrocarbons in the UK.
 - Anglian Water and the Environment Agency has issued advice to Local Planning Authorities stating that there is evidence to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development. Therefore, reference should be made to this water efficiency standard and to specific water re-use measures in the wording of Policy.
 - The text relating to SuDs should be positively phrased and should refer to an integrated approach to water management, and amended as follows:

- “a. Incorporating the use of sustainable drainage systems, wherever practicable, to minimise and control surface water run-off and provide environmental and community benefits; and
- c. Incorporation of design features and measures to meet high water efficiency standards to support water recycling and the conservation of water resources. Including measures such as rainwater recycling, stormwater recycling and grey water recycling wherever practicable. Dwellings should meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in building regulations part G2 or any higher national water efficiency standard that applies at the time of the application.”

- 9.94 A respondent objects to the policy wording for a number of reasons. The first being that Point 2(b) refers to meeting ‘high water efficiency standards’ but it does not specify what this means, and the standard of 110 litres/per person/per day allowed for in Building Regulations should be made a requirement of the Policy. They also state that text should be added to highlight the link between water availability and climate change. Concern is also expressed that the wording of the Sustainability Appraisal (SA) states that ‘Potential minor negative effects were also predicted, particularly in relation to SA objectives 3 (water quality and water resources), 6 (air quality) and 7 (climate change). This is primarily due to a lack of specific policy protection for the water environment.’
- 9.95 The same respondent also states that, in terms of water supply and demand considerations, the Local Planning Authority should consider viability taking account of local circumstances and policy requirements but research has shown that the cost of the optional higher water efficiency standard and associated cost can be as low as £6-94 per dwelling. They, therefore, consider that this does not make Local Plans, or individual development proposals, unviable.
- 9.96 They go on to state that, in light of the current climate emergency and the stage in which this plan is being drafted, it is considered that the Council’s ambition to reduce CO2 by 25% in the period 2017-22 as set out in the Council’s Carbon Management Strategy should not be included within the Local Plan as it is not aspirational enough. By setting out a minimum of only ‘10%’ this will allow developers to present schemes which only meet that low-level minimum as required or to try and justify as to why 10% is not viable – which will not help North Lincolnshire and the country at large’s ability to meet the target of net-zero by 2050.
- 9.97 They also state that all new homes have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). 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. They recommend that the following wording is included in the Plan and implemented through the use of planning conditions, as set out in Building Regulations: “Development proposals should demonstrate: dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in building regulations part G2.”
- 9.98 Finally, the same respondent lists a number of paragraph specific points, as follows:
- Points 4 and 5 should be merged.
 - Puzzled by the inclusion of point 6.
 - Para 9.43 should include updated legal targets as this Local Plan should be considering how it will support the area and the UK in meeting them.
 - Para 9.45 refers to a target covering the period 2017-2022; it should cover the Plan period to 2036.
 - 9.46 refers to DQE7p but should be DQE8p.
 - Para 9.49: the target for sale of petrol/diesel cars has shifted and may now include hybrids (however, the respondent recognises that this may change again by the time the plan is finalised).
- 9.99 Two respondents object to the policy referring to the need that at least 10% of the energy needs of residential development of 11 dwellings or more should be met from renewable and/or other low carbon energy source(s). They do not consider that the Council needs to include a policy on climate change and low carbon living, as these policies are being set by central Government and provide a more certain and

consistent policy requirement for developers. It is not the place of the planning system to repeat the requirements of the building regulations.

- 9.100 A final respondent suggests that the requirements of point 1 are too non-specific and should include a definite requirement to demonstrate this. Whilst they strongly support Point 2e and 3e and f, which recognize the benefits that habitats and green spaces can bring for climate change adaptation and carbon storage, they state that it is disturbing to see a lack of recognition within the Plan of any climate emergency or specific net zero carbon targets. It could be seen that North Lincolnshire Council is falling behind neighbouring authorities. The Humber region is one of the biggest emitters of carbon within the UK, so if North Lincolnshire Council wish to see continued industrial development in this area they should be doing more to proactively help drive the reduction and mitigation of that carbon source through planning.

General Comments

- 9.101 A number of general comments were made to the contents of the [Climate Change & Low Carbon Living](#) chapter, and these are summarised below.
- 9.102 Two respondents inform the council that Paragraph 9.46 should be amended to read 'our policy DQ8p: Climate Change & Low Carbon Living', a typographical error.
- 9.103 A respondent strongly supports the need for an SPD taking into account current best practice around climate change and carbon. It should be ambitious and in line with neighbouring authorities who have declared climate emergencies so that unequal expectations are not set. It should also include a strong focus on the role of natural solutions to climate change, including but not limited to creation and management of tree and woodland planting, heathland and peatland, saltmarsh, wetlands and permanent grasslands.

RENEWABLE ENERGY PROPOSALS

Responses – Policy DQE9p: Renewable Energy Proposals

- 9.104 **18** respondents replied to this policy. **10** respondents support the contents of the policy, **7** respondents agree with the policy contents but have no comments to make, and **1** respondents submitted neutral comments. **6** respondents do not agree with the policy and suggest wording changes.

Table 9.9: Responses to Question DQE9p: Renewable Energy Proposals		
Response	Number of Respondents	Percentage of Respondents
Yes	9	56%
No	6	38%
Other	1	6%
Total	16	100%

Summary of Responses – Question DQE9p: Renewable Energy Proposals

- 9.105 A supportive respondent understands that Renewable Energy Proposals are crucial to our joint future and must be given support, and if all the provisos are taken into account they can support the policy.
- 9.106 Five respondents present proposed improvement to the wording of the policy along the following lines:
- At para 9.50 it states that energy from waste proposals are covered by this policy; guidance should be provided in the Plan that ensures these do provide energy that can be utilised, preferably locally,

rather than functioning simply as waste disposal facilities. Guidance on carbon capture/re-use could also be provided, and there should be cross-referencing to the waste management section and policy WAS1p. However, it is good to see that the Council has undertaken a renewable energy opportunity mapping study to identify broad areas suitable for wind and ground mounted solar PV.

- All development is an opportunity for securing biodiversity net gain, this policy should include a principle of biodiversity net gain. Suggested wording could be as follows: "Development must enhance the natural environment through the provision of measurable net gains to biodiversity as appropriate to their nature and scale".
- Decommissioning proposals should also include net gain as part of plans for the enhancement of biodiversity. Suggested wording could be as follows: "and opportunities should be taken to enhance these features, for example through biodiversity net gain."
- Details of the Renewable Energy Opportunity Mapping Study, which is not included on the evidence base page, should be provided. The broad areas specified in criteria 5 of the Policy may be an area of significant concern/objection, and criteria a and d are welcomed but in themselves may not be of sufficient protection.
- The respondent is preparing a masterplan for the redevelopment of Killingholme Power Station (KPS), a 600MW Open Cycle Gas Turbine Power Station, for energy projects comprising both renewable energy and low carbon energy. They consider it is appropriate to include the site within the Renewable Area Proposals policy (DQE9p) as the redevelopment proposals for the Killingholme site are consistent with the objectives of the policy. However, Policy DQE9p should be extended across the Killingholme Power Station site (as shown in the attached plan).

9.107 Anglian Water states that it is unclear whether energy proposals would be acceptable in principle outside of these location or how they would be considered. Anglian Water is investing in renewable technologies such as solar to reduce their reliance on electricity which, they state, will significantly reduce carbon emissions and enhance the resilience of their operations. They suggest that Policy DQE9p should be amended to support in principle renewable energy proposals on existing Anglian Water operational sites.

9.108 A second objector states that the policy should have an additional point requiring provision of Biodiversity Net Gain and consideration of Biodiversity opportunity Mapping/Local Nature Recovery Strategies. There could be a greater emphasis on the climate emergency and the need to prioritise the use of renewable energy sources, with too much focus on the potential visual impacts of renewable schemes. There could also be better recognition that some schemes e.g. solar farms can provide opportunities for significant biodiversity net gain through habitat creation and management, this creates possibilities also for carbon sequestration and other ecosystem services.

9.109 A final respondent objects to the policy for the following reasons:

- It includes areas of the Humber Estuary SSSI, SPA and Ramsar site (green hatching), which are fields which have been specifically identified as nationally and internationally important for SSSI, SPA and Ramsar waterbirds. Wind turbines or solar panels in this area would have a direct adverse impact on the designated site.
- The allocation area lies adjacent to the South Humber bank mitigation area which has the same protection in planning legislation as part of the designated site. Wind turbines/solar panels in fields adjacent could adversely affect the ecological function of the mitigation area.
- Fields adjacent to the Humber Estuary are very important as functionally linked land, which is habitat that supports the ecological function of the Humber Estuary SSSI, SPA and Ramsar by providing feeding and roosting areas for birds, particularly at high tide.
- Wind turbines adjacent to an SSSI, SPA and Ramsar site have the potential to result in fatalities of birds due to collisions or result in birds avoiding the wind turbines and thereby having other adverse impacts (such as birds having to fly further to foraging/roosting areas).
- In addition, part of the area (flood area 22) has been identified as a planned flood storage area in the current Humber Flood Risk Management Strategy (2008).

9.110 In addition to the above points, the respondent is of the opinion that the area of the allocation would need to be significantly amended in order to meet the requirements of the Habitats Regulations. The

Habitats Regulations Assessment does not identify direct habitat loss or disturbance of important habitat areas as impact mechanisms in section 4.2 - The HRA should be amended to include this impact. Furthermore, this policy and the allocation have been 'screened out' as not being likely to have a significant effect on the European site features. The respondent advises that this policy should be 'screened in' for further assessment which is likely to lead to an adverse effect on the integrity of the Humber Estuary designated sites without significant amendment.

General Comments

- 9.111 A number of general comments were made to the contents of the Renewable Energy Proposals chapter, and these are summarised below.
- 9.112 A respondent supports the text in Para 9.54 but states that the mitigation hierarchy should be strengthened and a reference added regarding delivery of Biodiversity Net Gain contributing to Nature Recovery Networks.
- 9.113 All planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, and a respondent supports the reference to Policy BG1 within Paragraph 9.54. All development is an opportunity for securing biodiversity net gain.

LOCAL GREEN SPACE

Responses – Policy DQE10p: Local Green Space

- 9.114 **18** respondents replied to this policy. **15** respondents support the contents of the policy, **7** respondents agree with the policy contents but have no comments to make. **3** respondents do not agree with the policy contents and **2** of these suggest some wording changes.

Table 9.10: Responses to Question DQE10p: Local Green Space		
Response	Number of Respondents	Percentage of Respondents
Yes	15	83%
No	3	17%
Total	18	100%

Summary of Responses – Question DQE10p: Local Green Space

- 9.115 Support was made to the emerging Local Plan where the options relate directly to Worlaby, and the environmental protection reflected in the Plan has the full support of that Parish Council.
- 9.116 A supportive respondent wishes to register for the non-development on any of the 'local green spaces' in the Scunthorpe area, and thinks that the community and all groups concerned in the protection of land should be able to consider any such proposals before development is allowed. They request the fullest protection of all green space sites identified within Scunthorpe in the new Local Plan. Local green spaces are great for leisure and health needs and are safe places for children to play.
- 9.117 Anglian Water are supportive of the principle of local green spaces subject to these excluding that organisation's existing operational sites.
- 9.118 Another respondent wholeheartedly supports the maintenance and protection of open green space. The respondent particularly wants to preserve the space near the ex-RAF gymnasium at York Road, Kirton in Lindsey, and other areas designated in the town. They note that an area at the top of York Road should be identified within the boundary of the Local Green Space identified in that location. In addition, they

note that the new allotment area off the B1400 should be identified as either Local Green Space or Important Open Space in order to afford it protection.

9.119 A respondent states that the policy ensures that green spaces in small villages are kept and not developed on, whilst another suggests that the neighbourhood plan is the best layer of planning policy to protect these type of spaces/places.

9.120 Suggested improvements in Barrow upon Humber are proposed by a respondent, as follows:

- More Local Green Space is needed in and around Barrow upon Humber, in particular woodland, to increase biodiversity, for carbon capture, flood mitigation, public amenity, education and community projects.
- The areas designated Important Open Space between Chestnut Rise, Millfields Way, and Thorngarth Lane would be very suitable for Local Green Space, being easily accessible from the primary and nursery schools and offering the potential of a wildlife corridor between existing housing and Proposed Housing area off Ferry Road. This would also allow for the potential of a path (along the wildlife corridor) linking Ferry road and High Street for pedestrians and cycles.
- Another opportunity for creating Local Green Space is the old Bentley's site on Beck Lane (currently no designation on the proposed development plan). This could be designated part Local Green Space (to create a wildlife corridor along the Beck) and part proposed housing, if required.

9.121 A respondent proposes the land in Thornton Curtis, locally known as Hilly Pits, for Local Green Space designation (previous ref. KL1CF) for the following reasons, it is:

- within the village boundary.
- extremely valued by the community as a wildlife area, being home to deer, foxes, badgers and many species of nesting songbirds and birds of prey. It is an extremely tranquil, quiet area and is also a breeding area for great crested newts. It is historically significant as in mediaeval times the chalk extracted would have been used to make the original tracks from the village to the abbey.
- It is the only area within the village that is a natural habitat and not used for commercial farming.
- the land was subject to a planning application WD/2013/0339 for use as a landfill site and to make a conservation area for the village afterwards.
- The purpose of this request to designate the area as Local Green Space is to protect the area from any future unsuitable planning applications and also hopefully in the future the village may be able to purchase the land in order to fulfil its potential.

9.122 A respondent understands the need for Local Green Space and the need for it to be protected, but states that local green spaces can provide suitable locations for, for example, flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation can result in additional benefits to the local green space in the form of biodiversity or amenity improvement. The respondent, therefore, recommends that the following is added to Policy DQE10p: "Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space."

9.123 An objector to the policy suggests that greenspaces are being 'mopped up' with the benefit of planning permission.

IMPORTANT OPEN SPACE

Responses – Policy DQE11p: Important Open Space

9.124 **26** respondents replied to this policy. **9** respondents support the contents of the policy, **7** of these agree with the policy contents but have no comments to make, and **1** respondent made neutral comments. **9** respondents do not agree with the policy contents and suggest some wording changes.

Table 9.11: Responses to Question DQE11p: Important Open Space

Response	Number of Respondents	Percentage of Respondents
Yes	16	62%
No	9	35%
Other	1	3%
Total	26	100%

Summary of Responses – Question DQE11p: Important Open Space

- 9.125 Settlement specific support was made to the emerging Local Plan where the options relate directly to Worlaby, and the environmental protection reflected in the Plan has the full support of that Parish Council. Support was also made by a respondent in relation to the allocation of land adjacent to the bowling green in Barton Upon Humber as 'Important Open Space' which they would like to see as mixed, open woodland with good public access. The development of adjacent land should be supported by a S106 Agreement. A resident of Wootton strongly agreed with proposals for the village, stating that they have a central open space being grade 1 farmland which adds to the character of our village. It is bordered by narrow lanes which are used by the community for walking, riding and cycling and they can watch the field changing through the seasons; it is a very important space to them. Another respondent states that there is plenty of space in Kirton in Lindsey that should benefit from this policy.
- 9.126 More general positive comments relate to greenfield areas should not be developed as these are protected lands, whilst another comment states that they are happy they will now be able to continue to plant more trees and add a wider range of plants. Another respondent would like to see more open space areas without any future building proposals.
- 9.127 Support for the policy was registered via a respondent's resistance to development on any of the numerous, large, small and valued green spaces in Scunthorpe. They have become seriously concerned at the emergence of, and development pressure on, 'contingency' sites and request the fullest possible protection of all the green space sites identified in Scunthorpe in the new Local Plan.
- 9.128 A respondent advocates for important open space to be preserved. However, they also ask that North Lincolnshire Council should provide information on the reasoning behind the designation of all the areas designated as Important Open Space within Kirton in Lindsey. It is unclear why the areas on Moat House Road near to Boggart Cottage, and further along Moat House Road where it joins with Cornwall Street, the area within Dunstan House off South Cliff Road and opposite this at junction with Queen Street has this designation. This is particularly problematic as some of these areas are within the boundaries of private dwellings. The same respondent suggests that land known locally as 'Squatters' at the Redbourne Mere and South Cliff Road junction in Kirton can be developed for much needed car parking within the town and incorporate a picnic area and other factors which incorporate the conservation and green nature of the current piece of land.
- 9.129 A respondent states that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, and NPPF requires planning policies and decisions to enhance the natural environment. All development is an opportunity for securing biodiversity net gain and to meet these requirements this policy should include a principle of biodiversity net gain. Suggested wording could be as follows: "Where permitted development must enhance the natural environment through the provision of measurable net gains to biodiversity as appropriate to their nature and scale."
- 9.130 Another respondent would like clarification of what is meant by 'important open space', and proposed improvements to sites in Barrow upon Humber for the following reasons:

- More Local Green Space is needed in and around Barrow upon Humber, in particular woodland, to increase biodiversity, for carbon capture, flood mitigation, public amenity, education and community projects.
- The areas designated Important Open Space between Chestnut Rise, Millfields Way, and Thorngarth Lane would be very suitable for Local Green Space, being easily accessible from the primary and nursery schools and offering the potential of a wildlife corridor between existing housing and Proposed Housing area off Ferry Road. This would also allow for the potential of a path (along the wildlife corridor) linking Ferry road and High Street for pedestrians and cycles.
- Another opportunity for creating Local Green Space is the old Bentley's site on Beck Lane, Barrow (currently not designation in the proposed development plan). This could be designated part Local Green Space (to create a wildlife corridor along the Beck) and part proposed housing, if required.

9.131 Objections to proposals in the policy are outlined by a number of respondents, as follows:

- the inclusion of land to the north of Asda within an area of Important Open Space is objected to. The southern portion of the overall site is characteristically different to the northern portion which is more densely wooded than the southern, the meadow itself which is being promoted for development pertains very little ecological value. The whole basis for this allocation is misplaced. The larger area was originally planted for commercial timber but this use has been prevented by the imposition of a blanket TPO. The draft plan should recognise the potential for significant change in this location and should work with the landowners to secure a long term beneficial use of the wider sites as well as this southern portion of the area. This allocation wrongly infers to the public that the area has formal public access.
- this policy relies on a desk-based assessment which is inadequate. If it is to remain then land to be included should be properly assessed using accepted procedures such as the Guidelines for Landscape and Visual Impact Assessment.
- object to this Policy and the inclusion of land at Beechwood Drive Scawby and south of Ingram Gardens being within the designation. It is completely unnecessary for this land to be included in the designation given the character of the surroundings. The site lies amid modern residential development outside the Conservation Area and is most suitable for infill residential development. There is no justification whatsoever for this allocation in the evidence base documents on open space.
- object to the allocation of the land east of Beechwood Drive and south of Ingram gardens as important open space. This is an area that is not important open space, it is in fact an ideal residential infill opportunity and the plan should be amended to remove this land from a green space allocation. The landowners do not object to the land to the north being an open space allocation but strongly object to the land shown below being included in this notation.
- Policy DQE11p seeks to restrict the development of certain areas of land within and around the village. However, it is not considered necessary to allocate areas of Important Open Space in those villages with made Neighbourhood Plans. Sites of significance to local character or of particular significance should have been tested and designated through the Neighbourhood Plan process. The Local Plan should not be used as a mechanism to further restrict development over and above those policies in a Neighbourhood Plan.
- the paddock at the base of 1 and 1a Low street, Winterton, which abuts onto Watery Lane, is is not publicly accessible land, is not used for recreational use, and there would be no detrimental impact on heritage assets. A change would not compromise the gap between the existing properties as these are all residential. Propose a preservation order be placed on hardwood trees planted at the bottom of the paddock in the 1990's.
- In relation to land belonging to Olcote House, King Edward Street a Habitat Survey & Arboricultural Impact Assessment was undertaken in 2014 and nothing was found on the land. The land does not contribute to an amenity to others or provide a buffer between conflicting land and has no benefits to wildlife, with the Greenway nearby providing any LC11 required. Land at the Jeffrey Lane entrance to the Greenway gives the same open space as Olcote House yet this has not been designated.

General Comments

9.132 General comments were made to the contents of the Important Open Space chapter, and these are summarised below.

9.133 A respondent relates to Paragraphs 9.67, 9.69 and 9.70, stating that the planning system should recognise the wider benefits of natural environment such as a regulated climate. A reference to the role of open green space within these supporting paragraphs would help the Local Plan show that it is working towards NPPF requirements such as “mitigating and adapting to climate change” (8c), making sufficient provision for “planning measures to address climate change mitigation and adaptation” (20d) and evidence that the Plan policies “take a proactive approach to mitigating and adapting to climate change” (149).

PROVISION OF GREEN INFRASTRUCTURE

Responses – Policy DQE12p: Green Infrastructure Network

9.134 15 respondents replied to this policy. All 15 respondents support the contents of the policy, some of which propose wording amendments in order to improve or clarify the Policy. 8 respondents agree with the policy contents but have no comments to make.

Table 9.12: Responses to Question DQE12p: Green Infrastructure Network		
Response	Number of Respondents	Percentage of Respondents
Yes	15	100
No	0	0
Total	15	100%

Summary of Responses – Question DQE12p: Green Infrastructure Network

9.135 A supportive respondent believes the wording of the Policy is good, whilst two respondents propose that clarity is needed in the policy wording, as follows:

- Part 3 of this policy seeks to promote the use of decentralised, renewable and low carbon energy, which is generally welcome. They would recommend, however, that the explanatory text could be expanded with examples of Stems that the policy is seeking to promote, which could make it clearer to developers and decision makers, which would make the plan more effective. For example, thermal energy for heating and cooling from water is a low carbon solution which contributes to UK Government targets to reduce the UK's greenhouse gas emissions at least 80% (from the 1990 baseline) 2050.
- generally supportive of the principles of Policy DQE12p but would ask that it is explicit about how it would be applied to proposals for new and improved infrastructure. Reference is made to development proposals contributing to the establishment, enhancement and ongoing management of green infrastructure.
- As currently drafted it appears to apply to all development proposals including those proposed by infrastructure providers. It remains unclear what form contributions would take particularly for developments that would not be expected to have a recreational impact. It is, therefore, proposed that Policy DQE12p be amended as follows: “6. Contributions will be expected from new development towards the establishment, enhancement and ongoing management of green infrastructure by contributing to the development of the existing green infrastructure network in accordance with the Developer Contributions SPD. Any contributions would be proportionate to scale and nature of proposals including whether there is a need for recreational access.”

9.136 Similarly, three respondents suggest wording that would improve the policy, as follows:

- The first states that Point 1 should be amended to include a reference to the GI network contributing to the Nature Recovery Network. Not all types of GI will necessarily provide habitats that will benefit

wildlife so a clear link should be made between the two, for example: “....well connected to each other and the wider countryside and contribute to a Nature Recovery Network.”

- They support bullet point 4 which requires development design to consider GI from the start and that this should maximise delivery of ecosystem services. However, they would query whether there needs to be an extra point added which clarifies the linkage between this policy and Policy DQE3p: Biodiversity and Geodiversity.
- The second respondent is supportive of the general principles within Policy DQE12p, but note that whilst the policy supports the protection of watercourses within bullet point 5, there is limited reference to the opportunities to enhance these features including, on key direction would be to daylight culverted watercourses, enabling surface water to naturally return to the watercourse rather than be directed towards sewers.
- The third welcomes the inclusion of this policy, reflecting the growing understanding of the importance of networks and corridors to biodiversity and people. They are pleased to see the inclusion of ‘blue’ spaces and infrastructure, but at 9.76 and in DQE12p, 2 refer to the GI network, the Biodiversity Opportunity Mapping could also be referenced here.

General Comments

- 9.137 A number of general comments were made to the contents of the Provision of Green Infrastructure chapter, and these are summarised below.
- 9.138 A respondent recommends that Paragraph 9.71 could also highlight the role that footpaths, road verges, etc., have in providing green infrastructure as well as their role in providing corridors for people and wildlife. The blue infrastructure discussion should also mention the field drainage network which is extensive and is of considerable value for wildlife in some areas, for example many of the drains within the Isle of Axholme are known to be of Local Wildlife Site quality for their botanical richness.
- 9.139 Another respondent welcomes the mention of ecosystem services in Paragraph 9.73. However, this should be expanded and also include natural capital. The 25 Year Environment Plan and the Environment Bill have a key focus on a natural capital approach and this should start to be better reflected in Local Plans.
- 9.140 Paragraph 9.74 acknowledges that the term green infrastructure should encompass both green and blue infrastructure. A respondent is supportive of this approach as, they state, the protection of the natural water systems help to protect water which is a valuable resource needed to accommodate both existing development and proposed development, these blue pathways also represent sustainable ways to help manage flood risk and drain development sites.
- 9.141 We welcome the discussion of the value of a well-connected green infrastructure network in Paragraph 9.75. However, the respondent states that it is a missed opportunity to include the point that they will be vital in creating functioning Nature Recovery Networks, as required by the draft Environment Bill.
- 9.142 In 2019 this respondent produced a Biodiversity Opportunity Map for the council which could be used at a strategic level to help identify the Nature Recovery Network. Paragraph 9.76 should be altered to reflect the two mapping exercises that have been done and how they complement each other.
- 9.143 It is recommended that Paragraph 9.77 should include more detail on how the new requirements for delivery of Biodiversity Net Gain will influence the GI network and how the Nature Recovery Network and GI network can overlap or where they differ.
- 9.144 This response relates to Paragraph 9.78 and states that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, with the NPPF requiring planning policies and decisions to enhance the natural environment by “...providing net gains for biodiversity...”.

- 9.145 A respondent suggests that Paragraph 9.80 should be amended to highlight the particularly strong links between this policy and Policy DQE3p: Biodiversity and Geodiversity. If a Biodiversity Net Gain SPD is produced, there should also be a reference here.

TREES, WOODLAND AND HEDGEROWS

Responses – Policy DQE13p: Protection of Trees, Woodland and Hedgerows

- 9.146 **15** respondents replied to this policy. **14** respondents support the contents of the policy, **6** respondents agree with the policy contents but have no comments to make. **5** respondents write in support of the policy whilst **3** propose improved wording. **1** respondent does not agree with the policy contents and suggests wording changes.

Table 9.13: Responses to Question DQE13p: Protection of Trees, Woodland and Hedgerows		
Response	Number of Respondents	Percentage of Respondents
Yes	14	93
No	1	7
Total	15	100%

Summary of Responses – Question DQE13p: Protection of Trees, Woodland and Hedgerows

- 9.147 Support for the policy is provided by five respondents. The first believes that this is a very important consideration and that these protections are supported wholeheartedly, whilst a second is supportive of the need to protect trees and woodland and are committed to helping to improve the environment. They have committed to planting trees to help improve the environment, reduce flood risk and improve water quality and would, therefore, also recommend that new development looks to incorporate new treeing into their layouts and designs, where possible.
- 9.148 A third respondent suggests that we must protect trees, woodland and hedgerows but they would like to see where development takes place overlooking open fields/countryside hedges are planted not installed with wooden fencing. This would be better for birds and the environment.
- 9.149 The final supportive respondents state that the policy ensures that existing trees and hedgerows in small rural villages such as Wootton are not destroyed as part of construction of new housing outside the development limits; and trees, woodland and hedgerows are important for animals, birds, oxygen, etc.
- 9.150 Three respondents suggest wording that would improve the policy, as follows:
- The first strongly supports draft Policy DQE13p. However, they believe that the Council could take this policy further still in the interest of securing net gain for biodiversity – especially through the requirement of additional tree planting which has the added benefit of carbon sequestration. By way of example, Wycombe District Council adopted Local Plan Policy DM34 (2019) delivering green infrastructure and biodiversity in development sets out at paragraph 3 that:
 - “Development (excluding householder applications) is required as a minimum to:
 - a) Secure adequate buffers to valuable habitats;
 - b) Achieve a future canopy cover of 25% of the site area on sites outside of the town centres and 0.5 ha or more. This will principally be achieved through retention and planting of trees, but where it can be demonstrated that this is impractical the use of other green infrastructure (e.g. green roofs and walls) can be used to deliver equivalent benefit;
 - c) Within town centres and on sites below 0.5 ha development is required to maximise the opportunities available for canopy cover (including not only tree planting but also the use of green roofs and green walls);

- d) Make provision for the long-term management and maintenance of green infrastructure and biodiversity assets;
- e) Protect trees to be retained through site layout and during construction.”
- The second welcomes this policy but suggests it could be strengthened by adding targets/requirements for additional hedges or woodland in the case of schemes over a certain size.
- The third states that point 1a should be amended from “the amenity value of trees, woodland and hedgerows within settlements;” to “the amenity value of trees, woodland and hedgerows within and adjacent to settlements;”.

9.151 One respondent objects to the policy. They state that the phrase ‘where appropriate’ in Point 4 weakens the policy and should be removed. There should be closer links within this policy to related policies such as Policy DQE3p: Biodiversity and Geodiversity and Policy DQE2p: Landscape Enhancement. Point 4 could be expanded or a new point added which requires tree, woodland and hedgerow planting schemes to have regard to the Biodiversity Opportunity Mapping and contribute to Nature Recovery Networks. The policy could be strengthened by adding a target requiring replanting of, for instance, a minimum of 25% greater length of hedgerow than that removed and by specifying planting of native species rich hedgerows and use of native species of local provenance for tree and shrub planting.

General Comments

9.152 A general comment was made to the contents of the Trees, Woodland and Hedgerows chapter, summarised below.

9.153 A respondent suggests that Paragraph 9.81 should recognise the value trees, woodland and hedgerows have for wider ecosystem services such as carbon sequestration and natural flood management.

General Comments relating to Chapter 9: Delivering a Quality Environment

9.154 A respondent provided detailed comments on a number of Paragraphs throughout Chapter 9, as follows:

9.155 Paragraph 9.29 - NPPF requires a risk based sequential approach to flood risk, to avoid high risk areas and steer development to areas at lower risk. As well as minimising risk to the development itself, development should not increase flood risk elsewhere, and opportunities should be taken to reduce risk downstream, such as by reducing runoff rates.

9.156 Paragraph 9.30 - The Environment Agency (EA) publishes the Flood Map for Planning, which identifies areas at low, medium and high annual probability of flooding, known as flood zones 1, 2 and 3 respectively. The map does not take account of existing flood defences but shows where they are present. The definitions of the flood zones are as set out in PPG, Flood Risk and Coastal Change section (paragraph 065).

9.157 Paragraph 9.31 - Flood risk is a significant issue in North Lincolnshire with approximately 50% of land being located within flood zone 3, and the Humber Estuary, Rivers Trent and Ancholme and the Isle of Axholme all set in a low-lying landscape. The sources of flooding in North Lincolnshire include tidal (from the sea and tidal rivers/estuaries) fluvial (from rivers) and pluvial (from surface water runoff following rainfall). In recent years, surface water flooding has become an increasing concern because of more intensive rainfall events. Climate change is likely to increase the frequency and severity of extreme weather events and the likelihood of surface water and fluvial flooding.

9.158 Paragraph 9.32 - However, tidal flooding is of particular concern, due to the potential consequences to the coastal areas should the defences breach or be overtopped; the likelihood of such events occurring will also increase with climate change. During the next 100 years North Sea tidal surges (as seen, for example, in December 2013) will become more frequent and, unless coastal and tidal defences are improved as sea level rises, breaches and overtopping will become increasingly likely. Such events will impact industry and the North Lincolnshire economy unless an appropriate flood risk management strategy is in place.

- 9.159 Paragraph 9.33 - Where flood risk is a significant issue Local Plans must be supported by Strategic Flood Risk Assessments (SFRA) and develop policies to manage flood risk from all sources. North Lincolnshire has a SFRA (2011) in place that is currently being updated as evidence for this new Local Plan. Alongside this the Environment Agency is developing, in partnership with 12 Local Authorities (including North Lincolnshire Council) and the Humber LEP, a new tidal flood risk management strategy for the Humber known as H2100+. Its aim is wider than managing tidal flood risk and includes supporting sustainable development and a prosperous Humber. Consequently H2100+ is a key strategy for the future of North Lincolnshire (and the wider Humber). This is due to be submitted to Defra for approval at the end of 2021. When H2100+ is adopted it will be important for the Local Plan to reflect the aspirations of this strategy, as it will have a key role to play in delivering flood risk management into the future. This could involve safeguarding areas of land for future flood risk management infrastructure or securing long-term managed adaptive approaches (MAA), such as that agreed for the Lincolnshire Lakes area.
- 9.160 Paragraph 9.34 - NPPF (paragraph 157) states that local plans should apply a sequential, risk-based approach to the location of development - taking into account the current and future impacts of climate change - to avoid, where possible, flood risk to people and property. It is only in truly exceptional circumstances - such as those relating to the Lincolnshire Lakes development - that it may be appropriate to develop land at risk of flooding for sustainability reasons or to avoid economic and social blight in an area.
- 9.161 Paragraph 9.35 - If it is not possible for particular development to be located in zones with a lower risk of flooding (taking into account wider sustainability objectives), the exception test may have to be applied. This depends on the vulnerability of the proposed use, as set out in Planning Practice Guidance (paragraph 066). The sequential test for the site allocations for the Local Plan has been undertaken. Sequential test – Council's approach to allocation of sites/area of search/exceptional needs to be explained here, together with an explanation as to why the Lincolnshire Lakes development was so exceptional, and that such large scale development in the flood plain is not something we are likely to see again.
- 9.162 Paragraph 9.36 - The sequential test will need to be applied to and passed by all developments proposed in flood zones 2 & 3 (combined in the SFRA on the basis that areas currently in flood zone 2 will be at greater risk in future owing to climate change, thereby becoming flood zone 3) and areas of hazard shown on the Environment Agency's hazard mapping. As part of this process consideration must also be given to risks identified from other sources including ground water, surface water, and other drainage infrastructure. These risks are identified in the developing SFRA and shown on Map/Maps?. The search area for reasonably available alternative sites will normally be the whole of the council area but in some places issues of national or regional policy may restrict the area that needs to be considered – this should be discussed with the Council at pre-application stage. Although the council officer determining a planning application will assess the sequential test, it is the responsibility of the applicant to supply all the information needed to do this. Appendix E in the SFRA provides further guidance on the application of the sequential test to assist applicants. Any further guidance available should be referenced here.
- 9.163 Paragraph 9.37 - If it is not possible for development to be located in zones with a lower risk of flooding certain types of development, as outlined in PPG (paragraph 067), will then need to pass the exception test. The exception test seeks to ensure that such development:
- would provide wider sustainability benefits to the community that outweigh flood risk; and
 - will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 9.164 Paragraph 9.38 - All planning applications in flood zones 2 and 3 must be accompanied by a site specific flood risk assessment and the above tests applied where necessary as set out in the PPG. In flood zone 1 a site specific flood risk assessment will be required for sites of 1 hectare or more; land identified in the strategic flood risk assessment as being at increased flood risk in future; or that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

- 9.165 Paragraph 9.39 - Where the Council is satisfied that development is exceptionally necessary in areas of high flood risk, it will be particularly important to integrate water management into the area, with people's safety being the top priority. This will involve a number of measures including:
- locating the most vulnerable types of development in areas of lowest flood risk;
 - raising floor and/or land levels;
 - designing and constructing buildings to be resilient and resistant to the effects of flooding and safe for human occupation;
 - providing safe flow paths within and outside development and safe routes for people;
 - improving capacity and effectiveness of drainage infrastructure;
 - providing, enhancing and maintaining flood defences and flood warning systems; and
 - ensuring there will be no resulting increase in flood risk to existing development or occupants.
- 9.166 Paragraph 9.40 - Those proposing development should refer to the Strategic Flood Risk Assessment 2020, for further guidance on managing flood risk.
- 9.167 As outlined in the Summary of Responses to Question DQE6p: Managing Flood Risk, this respondent highlights several significant concerns with the Policy/section and provides a suggested redraft of the policy, as follows:

Policy DQE6p: Managing Flood Risk

- 1) The Council will support development proposals within areas at risk of flooding (flood zones 2 and 3 or at risk as shown on the flood hazard maps in the Strategic Flood Risk Assessment), where it meets the following prerequisites:
 - a) It can be demonstrated that there are no other sites available at a lower risk of flooding (i.e. that the sequential test is passed). The sequential test will be based on a District wide search area of alternative sites, unless local circumstances relating to the catchment area for the development justify a reduced search area, i.e. there is a specific need for the development in that location. The sequential test is not required for sites allocated in the Local Plan, minor development (as defined in the National Planning Practice Guidance, paragraph 046 (Reference ID:7-046-20140306) or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site);
 - b) It can be demonstrated that the development provides wider sustainability benefits to the community and the area that outweigh flood risk;
 - c) A flood risk assessment has demonstrated that the development will be safe for its lifetime, taking into account the latest guidance and allowances for climate change, without increasing flood risk elsewhere, has integrated water management methods into the development and incorporated mitigation measures in line with the Standing Advice set out in the SFRA, which has been agreed between the Council and the Environment Agency;
- 2) All development, including proposals in flood zone 1, will be permitted providing it is demonstrated that:
 - a) The peak rate of runoff over the lifetime of the development, allowing for climate change, is no greater for the developed site than it was for the undeveloped site;
 - b) The post-development volume of runoff, allowing for climate change over the development lifetime, is no greater than it would have been for the undeveloped site. If this cannot be achieved then the maximum discharge from the site should not exceed the calculated greenfield runoff rate for all rainfall events up to and including the 1% annual probability event plus allowance for climate change;
 - c) The development incorporates appropriate mitigation so that flooding of property in and adjacent to the development would not occur for 1% annual probability event, with appropriate allowance for climate change, and exceedance flood flow paths are taken into account;
 - d) The final discharge locations have the capacity to receive all foul and surface water flows from the development, including discharge by infiltration, into water bodies and into sewers;
 - e) There is a management and maintenance plan for drainage and flood risk management infrastructure (where appropriate) for the lifetime of the development, which includes the arrangements for adoption

- by any public authority, statutory undertaker or management company and any other arrangements to secure the operation of the scheme throughout its lifetime; and
- f) The final destination of the discharge complies with the following priority order:
 - i. firstly, to ground via infiltration;
 - ii. secondly, to a water body; and
 - iii. thirdly, to a surface water sewer.
 - g) Where appropriate, SuDS have been included in line with Policy DQE7p.
- 3) Development within the Lincolnshire Lakes area will be required to comply with the flood management principles set out in the Lincolnshire Lakes Flood Risk Assessment and Drainage Strategy. Any additional or alternative flood management proposals will have to be agreed by both the Council and the Environment Agency.

10. MANAGING OUR HISTORIC ENVIRONMENT

Introduction

- 10.1 North Lincolnshire has a rich and distinctive natural and historic environment that is valued and enjoyed by those who live here. This needs to be understood and taken fully into account as developments are being planned, designed and implemented. National policy set out in NPPF and associated guidance outlines core principles in respect of the natural and historic environment for those that reside and invest here. The condition of the surrounding natural and historic environment, including many heritage assets, are critical to North Lincolnshire's image, having a significant impact on the quality of life as well as bringing both social and economic benefits to its communities.
- 10.2 Environmental considerations are, therefore, fundamental to all planning policy areas whilst achieving the Council's ambition and outcomes where everyone is safe, well, prosperous and connected. They are also central to creating a cleaner, greener and safer place.
- 10.3 National policy set out in the NPPF and associated guidance outlines a number of core principles in respect of the natural and historic environment for those that work, visit and invest here. The condition of the surrounding natural and historic environment, including many heritage assets, are critical to North Lincolnshire's image, having a significant impact on the quality of life as well as bringing both social and economic benefits to its communities.
- 10.4 Environmental considerations are therefore fundamental to all planning policy areas whilst achieving the council's ambition and outcomes where everyone is safe, well, prosperous and connected. They are also central to creating a place that is cleaner, greener and safer.

Consultation

- 10.5 The Preferred Options document contained 2 questions relating to subjects that could be covered by 'Historic Environment' policies.

Question HE1p Do you think the Preferred Policy HE1p: Conserving and Enhancing the Historic Environment is the right approach?

Question HE2p Do you think the Preferred Policy HE2p: Area of Special Historic Landscape Interest is the right approach?

Responses – Question HE1p: Conserving and Enhancing the Historic Environment

- 10.6 **14** respondents commented on this policy. **12** respondents agreed with contents of the policy (with some amendments), whilst 7 respondents just ticked the yes box and agreed with the policy contents but had

no comments to make. 2 respondents did not agree with the policy contents and suggested some wording changes.

Table 10.1: Responses to Question HE1p Conserving and Enhancing the Historic Environment		
Response	Number of Respondents	Percentage of Respondents
Yes	12	86%
No	2	14%
Total	14	100%

Summary of Responses – Question HE1p Do you think the Preferred Policy HE1p: Conserving and Enhancing the Historic Environment is the right approach?

- 10.7 Those who provided detailed comments or views on this question generally agreed with its principles. Most comments centred on the particular criteria of the policy.
- 10.8 One respondent stated that Policy HE1p is strongly welcomed. However there was some concern that, with the detail provided in points 1-4, the policy may be interpreted as allowing for mitigation rather avoiding harm. Point 6 could be reworded to read “Sustain and enhance non-designated heritage assets and their setting”.
- 10.9 It was also stated that The Stainforth & Keadby canal, which is over 200 years old, contains several elements of historic merit, which includes a scheduled ancient monument at Keadby Lock. It was agreed that the proposed policy wording would support the overall aims of NPPF towards ensuring that heritage assets are appropriately recorded and impacts towards them assessed as part of the planning application process. This would help to ensure that the historic environment can be appropriately protected.
- 10.10 It was noted that conservation is very important and the policy was supported. However It was asked if Kirtton-in-Lindsey, a very ancient and historic Market Town could be added to the list of Market Towns.
- 10.11 Comments regarding the LC14 designation were received. They stated that it was hoped that the Preferred Options would review the stranglehold that the current LC14 policy exerts upon development in Central and South Axholme but this is not the case in spite of comments by leading planning consultants in support of planning applications and admissions by planning officers that the far reaching policy cannot be defended! The proposed policy is still based upon outdated Miller's Report etc. (10.9) which describes an environment which has changed beyond recognition.
- 10.12 It was also stated that Non-designated heritage assets should also be mentioned in the policy as they should benefit from a level of protection.
- 10.10 Another respondent stated that reference to Historic England within section 13 is welcomed, however reference should not be restricted to the built environment. The historic environment and heritage assets and their settings, should be embedded and considered within the entirety of the plan. Historic England should also be referenced in relation to any potential allocations or policies which may impact upon the historic environment, such as waste and minerals and the scale and distribution of housing and employment, such as sections 2, 5, 6, 14 and 16 (which may subsequently impact upon allocations for example). It would be helpful to include Historic England within section 9, both referencing our recent Local Plan consultation response and ongoing HAZ work.

Responses – Do you think the Preferred Policy HE2p: Area of Special Historic Landscape Interest is the right approach?

- 10.11 **14** respondents commented on this policy and all respondents agreed with contents of the policy (**3** with some amendments), whilst **11** respondents just ticked the yes box and agreed with the policy contents but had no comments to make.

Table 10.2: Responses to Policy HE2p: Area of Special Historic Landscape Interest is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	14	100%
No	0	0
Total	14	100%

Summary of Responses – Question Do you think the Preferred Policy HE2p: Area of Special Historic Landscape Interest is the right approach?

- 10.12 All the respondents supported the policy. Specific comments received were that Policy HE2p and its supporting text is welcomed. It was also stated that its worthwhile protection of recognisable special historic landscape and this is supported but this 20 years+ old policy has been overtaken by changes in farming making the so called protected landscape no different to any other arable landscape. This massive ocean of green/white historic landscape designation is an unreasonable restriction upon development and needs to be substantially reduced to meaningful proportions. See 10.55 and 10.56.

General comments

- 10.13 As part of the consultation a number of general comments were also provided in relation to Chapter 10 Managing Our Historic Environment These are summarised below:-
- 10.14 Respondents made comments on some of the paragraphs within this chapter. These were that paragraph 10.14 in particular, the last two sentences were welcomed and that at paragraph 10.2 it would be helpful to add ‘and their settings’ after heritage assets in the last sentence. Other comments related to 10.36 and it was welcomed however it would be helpful to change the word ‘listed building’ to ‘heritage asset’ in the last sentence.

11. CREATING SUSTAINABLE COMMUNITIES AND BETTER PLACES

Introduction

- 11.1 The planning system can play an important role in facilitating social interaction and create healthy, inclusive, sustainable communities. A healthy community is described as a good place to grow up and grow old in. It is one, which supports healthy behaviours, reductions in health inequalities and enhances the physical and mental health of the community.
- 11.2 The link between planning and health is long established; the built and the natural environments are major influences on health and wellbeing and delivering sustainable communities is at the heart of the planning system. This means ensuring that alongside homes, jobs and transport infrastructure; all local people have ready access to those services and facilities they need for their everyday lives and that contribute positively to the health and wellbeing of the community.
- 11.3 National planning guidance emphasises the link between planning and health. It recommends that Local Plans should aim to achieve health objectives through the quality of new places. This includes securing access to open space and sport and recreation facilities, which can make an important contribution to the health of communities and can help in tackling obesity. The Government also attaches great importance to

ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.

Consultation

- 11.4 The Preferred Options document contained 17 questions relating to subjects that could be covered by 'Creating Sustainable Communities and Better Places' policies.

Question CSC1p Do you think the Preferred Policy CSC1p: Health and Wellbeing is the right approach?

Question CSC2p Do you think the Preferred Policy CSC2p: Health Care Provision is the right approach?

Question CSC3p Do you think the Preferred Policy CSC3p: Protection and Provision of Open Space, Sports and Recreation Facilities is the right approach?

Question CSC4p Do you think the Preferred Policy CSC4p: Allotments is the right approach?

Question CSC5p Do you think the Preferred Policy CSC5p: Golf Courses is the right approach?

Question CSC6p Do you think the Preferred Policy CSC6p: Water Based Leisure is the right approach?

Question CSC7p Do you think the Preferred Policy CSC7p: Commercial Horse Riding Establishments is the right approach?

Question CSC8p Do you think the Preferred Policy CSC8p: Educational Facilities is the right approach?

Question CSC9p Do you think the Preferred Policy CSC9p: Nursery and Children's Day Care Provision is the right approach?

Question CSC10p Do you think the Preferred Policy CSC10p: Community Facilities and Services is the right approach?

Question CSC11p Do you think the Preferred Policy CSC11p: Entertainment and Cultural Facilities is the right approach?

Question CSC12p Do you think the Preferred Policy CSC12p: Restaurants and Hot Food Takeaway Establishments is the right approach?

Question CSC13p Do you think the Preferred Policy CSC13p: Burial Grounds and Cemetery Provision is the right approach?

Question CSC14p Do you think the Preferred Policy CSC14p: Churches, Prayer Houses and other Places of Worship is the right approach?

Question CSC15p Do you think the Preferred Policy CSC15p: Tourism and Visitor Attractions is the right approach?

Question CSC16p Do you think the Preferred Policy CSC16p: Hotel and Guest House Accommodation is the right approach?

Question CSC17p Do you think the Preferred Policy CSC17p: Camping and Caravan Sites is the right approach?

Responses – Question CSC1p Do you think the Preferred Policy CSC1p: Health and Wellbeing is the right approach?

- 5.299 15 respondents commented on this policy and 6 respondents agreed with contents of the policy (with some amendments), 6 agreed but had no comments to make and 3 respondents did not agree with the policy contents and suggested some wording changes.

Table 11.1: Responses to Question CSC1p: Health and Wellbeing		
Response	Number of Respondents	Percentage of Respondents
Yes	12	80%
No	3	20%
Total	15	100%

Summary of Responses – Question CSC1p Do you think the Preferred Policy CSC1p: Health and Wellbeing is the right approach?

- 5.300 The importance of this policy was welcomed and the emphasis it puts on green space. It was asked if at point 2 could the word 'nature' and 'blue and green infrastructure' be added. Another respondent stated that the policy was supported and stressed the need to give these issues priority. As more people live closer together these issues become more important. Any new development must include shared communal space and facilities that enable communities to come together in joint activities.
- 5.301 One respondent stated that they welcomed the recognition of the need to improve the health outcomes for people in the district. They also believed that our canals and towpath network can provide access for communities to spaces for leisure, recreation and active travel, which can help to encourage people to adopt healthier lifestyles as evidenced by their 2017 nationwide Community Survey (carried out in conjunction with Kanter TNS). Another respondent stated that health and wellbeing is so important and development should not impede on people's health and wellbeing.
- 5.302 It was also stated that Local Plan policies must recognise the value of Greater Lincolnshire's natural environment to public health and wellbeing and that interaction with nature is beneficial to both physical and mental health and wellbeing. This is supported by the Government's commitment to connect people with the environment to improve health and wellbeing by "Working with the Ministry of Housing, Communities and Local Government to see how our commitments on green infrastructure can be incorporated into national planning guidance and policy." (25 year plan for the environment, pg77). Therefore it was felt that a principle should be included which highlights the natural environment's importance in this respect. The principle could read as follows: "Recognise the vital role nature plays in people's lives by safeguarding and enhancing the quality of our natural surroundings to ensure positive impacts on individuals and communities."
- 5.303 Comments welcomed the fact that this policy has incorporated the principles of Active Design. Whilst the policy refers to the ten principles of Active Design and encourages its use, the policy is not particularly active in requesting its use. It was suggested that the policy is amended to include a criterion that states that new development of (over a certain level i.e. number of houses, area etc.) shall include a health impact statement setting out how the principles of Active Design and the principles of policy CSC1p have been incorporated into the new design. This will ensure that developers consider the requirements of this policy and Active Design and allows Development Management to proactively consider whether the requirements of this policy have been met in new development.
- 5.304 Comments also stated that our towpaths provide public access to the Green Infrastructure network, which can promote active lifestyles and access to relaxing recreational spaces that provide benefits to wellbeing. The responder believes that access to our waterways can provide multiple economic, social and environmental benefits to local communities, which has been supported by the findings by their towpath surveys (Kanter TNS, 2017).

- 5.305 The aspirations of policy CSC1p, were welcomed notably part 2, which recognises the benefits to wellbeing that could be brought about through improvements to accessibility to green infrastructure corridors, which can include our spaces. For clarity, we advise that the wording of part 2 could be amended to reference blue and green infrastructure corridors.
- 5.306 A respondent supported this policy and stressed the need to give these issues priority. It was stated that as more people live closer together these issues become more important. Any new development must include shared communal space and facilities that enable communities to come together in joint activities.
- 5.307 An objection was raised to criterion 10 of this policy which requires a health impact assessment (HIA) to accompany any planning application seeking planning permission for 1,000 sq.m of commercial floorspace. They state this requirement is contrary to paragraph 5 of the Health and Wellbeing PPG. This advises local planning authorities that a HIA is a useful tool where there is likely to be a significant impact on the health and wellbeing of the local population or particular groups within it. There is no justification for a blanket requirement for all major development proposals to require a HIA. This would be a burdensome and unnecessary requirement. Criterion 10 should therefore be deleted.
- 5.308 Strong support was given and the recognition in this section for the health and wellbeing benefits of access to green open spaces, however a respondent wished to see this expanded to recognize the value specifically of access to nature. There could be greater links here with policies such as Policy CSC3p: Protection and Provision of Open Space, Sports and Recreation Facilities and Policy DQE12p: Green Infrastructure Network. We support a health and wellbeing policy and the references within it to green space and green infrastructure, however we would wish to see this go further to specifically mention access to nature and 'accessible natural greenspace'.

Responses – Do you think the Preferred Policy CSC2p: Health Care Provision is the right approach?

- 5.309 10 respondents commented on this policy and all respondents agreed with contents of the policy (5 with some amendments), whilst 5 respondents just ticked the yes box and agreed with the policy contents but had no comments to make.

Table 11.2: Responses to Policy CSC2p: Health Care Provision is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	10	100%
No	0	0
Total	10	100%

Summary of Responses – Question Do you think the Preferred Policy CSC2p: Health Care Provision is the right approach?

- 5.310 All the respondents supported the policy. Specific comments received were firstly that the Town Council welcome support for more health facilities in Kirton-in-Lindsey. Another comment stated more health care provision should be provided in Kirton in Lindsey over the plan period. It was also stated that large scale development in small rural village's areas with no health care facilities should not be allowed as the extra workload on the nearest facility and the impact of traffic needed to get there on the environment is worrying.
- 5.311 Support was given to the opportunity that North Lincolnshire Council and other partners could engage in the preparation of the Local Infrastructure Plan, to ensure that healthcare infrastructure and funding requirements arising from planned and unplanned growth across the District are appropriately represented and measures are put in place to secure developer funding. A vital part of this is ensuring the NHS continues to receive a commensurate share of s106 and CIL contributions to mitigate the

healthcare impacts arising from growth and help deliver transformation plans. The cumulative impacts of smaller residential developments should also be recognised, and health facilities should be put on a level footing with affordable housing and public transport improvements, given their strategic importance, when receiving funds. Healthcare facilities are essential infrastructure and where new or improved facilities are required; they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The authority should continue to work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new housing growth is sustainable. It was also commended that the policy introduces a sustainable approach on the provision of new health facilities / infrastructure. The respondent supported the recognition that proposals for additional health care infrastructure ought to be located where they can be served by public transport or well related to walking and cycling routes. NHSPS also welcomes the support for the opportunities, where appropriate, for the multi-use and colocation of facilities with services in order to assist in the co-ordination of local service provision and allow greater convenience for residents. The NHS requires flexibility in its estate. All NHS organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

- 5.312 A respondent advised the Council through their comments that policies aimed at preventing the loss or change of use of surplus healthcare facilities can have a harmful impact on the NHS's ability to reconfigure its estate. Where such policies are overly restrictive, the disposal of unneeded and unsuitable healthcare facilities for best value, which is an important component in funding new/improved health facilities, can be prevented or delayed. Similarly, much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for other appropriate uses (including housing), and should not be subject to restrictive policies or periods of marketing. It was stated that all NHS organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively. We are constantly reviewing our sites, and we would support engagement with the Council on this matter as part of the Local Plan preparation.

Responses – Do you think the Preferred Policy CSC3p: Protection and Provision of Open Space, Sports and Recreation Facilities is the right approach?

- 5.313 14 respondents commented on this policy and 13 respondents agreed with contents of the policy (5 with some amendments), whilst 8 respondents just ticked the yes box and agreed with the policy contents but had no comments to make. 1 objection was raised against the policy as they did not agree with its contents.

Table 11.3: Responses to Policy CSC3p: Protection and Provision of Open Space, Sports and Recreation Facilities is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	13	93%
No	1	7%
Total	14	100%

Summary of Responses – Question Policy CSC3p: Protection and Provision of Open Space, Sports and Recreation Facilities is the right approach?

- 5.314 A respondent stated that Local Plan policies must recognise the value of Greater Lincolnshire's natural environment to public health and wellbeing therefore paragraph one policy CSC3p should cite "...open space, sport and recreation facilities" so that open space is seen on an equal footing with more traditional

facilities, due to its appropriateness for a range of users. It should also state that they are “...well maintained in an appropriate manner” as not all open space should be manicured amenity grassland. All planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, the NPPF requires planning policies and decisions to enhance the natural environment by “...providing net gains for biodiversity...” (170d) and requires plans to “...pursue opportunities for securing measurable net gains for biodiversity” (174b). All development is an opportunity for securing biodiversity net gain and the NPPF states that “opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity” (175d). To meet these requirements this policy should include a principle of biodiversity net gain.

- 5.315 Bullet point 1 was welcomed which recognizes that some types of open space could cause disturbance to nearby habitats, though this should be amended to read ‘...habitats and species...’ Point 6 was also supported which seeks to secure long term management and maintenance of open spaces. It was noted that the provision within this policy for developments over 10 dwellings to provide open space and for those smaller developments to pay a commuted sum, with reference to the Developer Contributions SPD. It was recommended that consideration is given to establishing a similar system for provision of Biodiversity Net Gain. Support was given to the final paragraph of the policy advocating a holistic approach to designing open spaces to consider the various points mentioned. However, it was suggested that this is amended slightly to include specific reference to the Biodiversity Opportunity Mapping and Nature Recovery Networks, for example: ‘A holistic approach to the design of new open space should be taken including considering the contribution to place making, the green infrastructure network and protecting and enhancing nature conservation and the water environment through use of the Biodiversity Opportunity Mapping to maximise contribution to the Nature Recovery Network.’ Figure- North Lincolnshire’s Current Open Space Surplus or Deficiency. This table provides no explanation or reference to what the different sub-areas relate to, or the unit of measurement i.e. is this hectares per 1,000 population? The table appears to highlight significant deficiencies in some categories of open space for example, sub area 4 has a figure of -628.57 for natural and semi-natural greenspace. There does not seem to be any discussion or interpretation of the results of this table or indeed the implications for policy and wider action.
- 5.316 A respondent welcomed this policy and supported it. They stated that they look forward to receiving support for the development of recreational and sports facilities on the ex RAF land at York Road at Kirton in Lindsey and further development of public footpaths and cycle ways between Huntcliff Academy and the old RAF gym and also down Clay Lane at the bottom of Dunstan Hill. The Kirton in Lindsey Town Council also asked that the play area on the Green is designated as playing fields within this plan.
- 5.317 Another representation stated that they welcomed the stress on ‘quality’ and space ‘fit for purpose’, and commitment that this will be secured through developer contribution SPD. Developers should not simply provide a % of open space without assessing how it can be used to benefit residents.
- 5.318 The general principles of the policy are supported; however a statutory consultee is concerned that there may be a conflict between this policy and the table titled “North Lincolnshire’s Current Open Space Surplus or Deficiency”. The table identifies in some areas a surplus of outdoor sports facilities. It was stated that this policy includes a criterion that proposals will be supported where there is an excess of provision in the area. When considering the surplus identified in the table, this means the policy would automatically support the loss of outdoor sport facilities in the areas identified with a surplus. This would not have any regard to the individual circumstances of a specific sport facility and how it is used and supports the local community. Whilst there may be a surplus in an area, there will also be sport facilities that area actively used. This policy has the potential to allow the loss of valued sport facilities that are actively used. For the reasons set out above, Sport England objects to this policy. Sport England would consider withdrawing its objection to this policy, if it was amended to include a criterion that proposals that result in the loss of a sport facility will be supported where there is an up to date and robust evidence base in the form of a Playing Pitch Strategy or Built Sports Facility that clearly evidences that the specific sport facility that will be lost be the development is genuinely surplus to both current and future sporting re-equipment’s. North Lincolnshire are producing a Playing Pitch Strategy (PPS) that has been led, checked and challenged by a steering group including Sport England and various National Governing

Bodies for Sport. The PPS is nearing completion and therefore this should be referenced in the policy supporting text. Currently the Preferred Options document reverences a 2013 PPS which is now out of date.

Responses – Do you think the Do you think the Preferred Policy CSC4p: Allotments is the right approach?

- 5.319 10 respondents commented on this policy and all 10 respondents agreed with contents of the policy. 8 agreed but did not make any further comments and 2 respondents only submitted comments.

Table 11.4: Responses to Policy Do you think the Preferred Policy CSC4p: Allotments is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	10	100%
No	0	0
Total	10	100%

Summary of Responses – Question Do you think the Preferred Policy CSC4p: Allotments is the right approach?

- 5.320 A respondent welcomed this policy and they and look forward to support for the development of more allotments in Kirton-in-Lindsey. In addition it notes that the new allotments area off the B1400 is not shown on the plan as Local Green Space nor Important Open Space and requests that this area is added in for the protection it deserves going forward.
- 5.321 Another respondents agreed with the policy and stated that modern development gardens are miniscule so allotments are very important. Maybe the developer could allow larger gardens.

Responses – Do you think the Do you think the Preferred Policy CSC5p: Golf Courses is the right approach?

- 5.322 12 respondents commented on this policy. 10 respondents agreed with contents of the policy. 5 agreed but did not make any further comments. 2 did not agree. 7 respondents submitted comments.

Table 11.5: Responses to Policy Do you think the Preferred CSC5p: Golf Courses is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	10	80%
No	2	20%
Total	12	100%

Summary of Responses – Question Do you think the Preferred Policy CSC5p: Golf Courses is the right approach?

- 5.323 A respondent stated that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, the NPPF requires planning policies and decisions to enhance the natural environment by “...providing net gains for biodiversity...” (170d) and requires plans to “...pursue opportunities for securing measurable net gains for biodiversity” (174b). All development is an opportunity for securing biodiversity net gain and the NPPF states that “opportunities to incorporate

biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity” (175d). To meet these requirements this policy should include a principle of biodiversity net gain.

- 5.324 It was recommended that this policy is amended to ensure that the potential biodiversity gains recognized within paragraph 11.60 are included, for example: ‘8. provides measurable biodiversity net gain in line with the Biodiversity Opportunity Mapping to maximise contribution to the Nature Recovery Network and Local Nature Recovery Strategy.’
- 5.325 It was also stated that Golf courses provide a particular opportunity for net gain in biodiversity; this should be emphasised here. They can also have a significant need for water. The respondent asked to add a point to the effect that the proposal ‘demonstrates that it can meet its needs for water sustainably (without adverse effect on the environment) including though the use of efficiency measures’.
- 5.326 Another respondent stated that as a golfer they agree strongly with the policy. Whilst another respondent did not agree and stated there were too many golf courses.

Responses – Do you think the Preferred Policy CSC6p: Water Based Leisure is the right approach?

- 5.327 12 respondents commented on this policy. 11 respondents agreed with contents of the policy. 8 agreed but did not make any further comments, 1 did not agree and 4 respondents submitted comments.

Table 11.6: Responses to Policy Question CSC6p Do you think the Preferred Policy CSC6p: Water Based Leisure is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	11	92%
No	1	8%
Total	12	100%

Summary of Responses – Question CSC6p Do you think the Preferred Policy CSC6p: Water Based Leisure is the right approach?

- 5.328 A respondent requested an additional point in the policy and additional supporting text: ‘4 – There is no adverse effect on flood risk management infrastructure, its maintenance or operation and the development incorporates measures to mitigate and where possible reduce flood risk.’ Paragraph after 11.64: Water based leisure activities on or adjacent to rivers or the coast have the potential to adversely affect the integrity, operation and maintenance of flood defence banks and infrastructure. Developments must be located and designed to prevent this and opportunities should be sought to reduce flood risk overall. They will usually need an ‘environmental permit for flood risk activities’ from the Environment Agency in addition to planning permission and advice on this should be obtained at an early stage in the design process.
- 5.329 It was also stated that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, the NPPF requires planning policies and decisions to enhance the natural environment by “...providing net gains for biodiversity...” (170d) and requires plans to “...pursue opportunities for securing measurable net gains for biodiversity” (174b). All development is an opportunity for securing biodiversity net gain and the NPPF states that “opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity” (175d). To meet these requirements this policy should include a principle of biodiversity net gain.
- 5.330 A respondents stated they would be concerned about promoting the potential for water based recreation at Barton Claypits as any additional access or activities within this area of the Humber may have

recreational disturbance impacts on the Humber Estuary SPA which would need to be assessed by the competent authority. Therefore they did not support the policy.

- 5.331 It was also stated that the Stainforth & Keadby canal provides a waterspace that has the potential to be used for watersports, fishing and general boating leisure. Such activities can provide local economic employment and can also provide recreational facilities for local residents, which can help enhance their wellbeing. It is vital that the Local Plan includes a policy to promote appropriate water based leisure facilities, which may be required during the plan period to ensure that the opportunities of the canal for water based leisure are taken full advantage of. We welcome the recognition of the canal in paragraph 11.62, but note that the policy wording itself does not refer to canals; instead referring to the Ancholme, Trent and Humber and inland lagoons and water areas. The Stainforth and Keadby canal does not clearly fall within any of the waterspaces listed. As a result, to ensure that the policy also includes the canal, and is consistent with the recognition of the role of canals in paragraph 11.62, we respectfully request that the Stainforth & Keadby Canal is included within the policy wording.

Responses – Do you think the Preferred Policy CSC7p: Commercial Horse Riding Establishments is the right approach?

- 5.332 9 respondents commented on this policy. 6 respondents agreed with contents of the policy. 4 agreed but did not make any further comments, 3 did not agree and 5 respondents submitted comments.

Table 11.7: Responses to Policy Question CSC7p Do you think the Preferred Policy CSC7p: Commercial Horse Riding Establishments is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	6	67%
No	3	33%
Total	9	100%

Summary of Responses – Question CSC7p Do you think the Preferred Policy CSC7p: Commercial Horse Riding Establishments is the right approach?

- 5.333 A respondent stated that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, the NPPF requires planning policies and decisions to enhance the natural environment by “...providing net gains for biodiversity...” (170d) and requires plans to “...pursue opportunities for securing measurable net gains for biodiversity” (174b). All development is an opportunity for securing biodiversity net gain and the NPPF states that “opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity” (175d). To meet these requirements this policy should include a principle of biodiversity net gain.
- 5.334 The objections raised stated firstly that they recommend that Bullet 3 is amended to read: ‘3. the proposal does not adversely affect protected or priority species or sites of nature conservation value or archaeological or historic importance;’ Given that many horse riding stables and ménages include proposals for bright lighting which can disrupt dark corridors used by bats and other nocturnal wildlife, we would recommend that an additional point is added which requires submission of a lighting scheme. This should conform to the best practice guidelines prepared by the Bat Conservation Trust and aim to retain dark corridors along tree and hedgelines. For example this could read: ‘7. The proposal is accompanied by an integrated lighting scheme which retains dark corridors along landscape features and conforms to guidance issued by the Bat Conservation Trust in order to minimize impacts to protected species.’
- 5.335 Another objector stated that they believe the area required should be greater than 0.6ha. I think it needs to be 1ha or more. Another stated that this was the minority requirement.

Responses – Do you think the Preferred Policy CSC8p: Do you think the Preferred Policy CSC8p: Educational Facilities is the right approach?

- 5.336 10 respondents commented on this policy and all 10 respondents agreed with contents of the policy. 5 agreed but did not make any further comments and 5 respondents' submitted comments.

Table 11.8: Responses to Policy Question CSC8p Do you think the Preferred Policy CSC8p: Educational Facilities is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	10	100%
No	0	0
Total	10	100%

Summary of Responses – Question CSC8p Do you think the Preferred Policy CSC8p: Educational Facilities is the right approach?

- 5.337 A respondent supported this approach and would stress that, if all the proposed development prior to March 2020 for Kirton-in-Lindsey is completed, there will be a need for the towns education provision to expand. Another respondent stated that large developments in a small rural villages like Wootton should be looked at very carefully who only have a small school which is full would mean transporting children around to other schools which is not good for the children's wellbeing or the environment.
- 5.338 It was also stated that in terms of developments providing remuneration to schools to allow for expansion there should be no loop holes whereby developers chop up developments into smaller segments to avoid such obligations. i.e. progress a number of small developments over a number of years (creep) to avoid the obligations imposed by a single large development.

Responses – Do you think the Preferred Policy CSC9p: Nursery and Children's Day Care Provision is the right approach?

- 5.339 9 respondents commented on this policy and all 9 respondents agreed with contents of the policy. 8 agreed but did not make any further comments and 1 respondent submitted comments.

Table 11.9: Responses to Policy Question CSC9p Do you think the Preferred Policy CSC9p: Nursery and Children's Day Care Provision is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	9	100%
No	0	0
Total	9	100%

Summary of Responses – Question CSC9p Do you think the Preferred Policy CSC9p: Community Facilities and Services is the right approach?

- 5.340 The one comment received on this policy stated that they felt the policy was reasonable and supported it.

Responses – Do you think the Preferred Policy CSC10p: Community Facilities and Services is the right approach?

- 5.341 11 respondents commented on this policy and all 11 respondents agreed with contents of the policy. 7 agreed but did not make any further comments and 4 respondent submitted comments.

Table 11.10: Responses to Policy Question CSC10p Do you think the Preferred Policy CSC10p: Community Facilities and Services is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	11	100%
No	0	0
Total	11	100%

Summary of Responses – Question CSC10p Do you think the Preferred Policy CSC10p: Community Facilities and Services is the right approach?

- 5.342 A comment received stated they agree with the emphasis on strong communities. North Lincolnshire has many villages where residents are proud to live, get on well together and support each other. This adds weight to the argument that any planning of large developments in small villages is unadvisable - they are often viewed as outsiders and don't usually integrate well. Another comment gave support to the policy.
- 5.343 Another comment stated that they are supportive of this policy which recognises the value of community services and facilities and seeks their protection. It is made clear this policy includes cultural facilities which will include theatres. We would recommend that detailed guidance is provided to ensure the robustness of the protection element of this policy and enhance compliance with paragraph 92 of NPPF. At a minimum we suggest a requirement for evidence of marketing over a period of at least 12 months which shows efforts to sell or let the use or site at an appropriate market price/rent taking into account size and condition. This marketing should be through recognised local and national agents relevant to the nature of use. We also recommend an additional criteria to this policy which requires effort to explore alternative community, cultural or social uses before loss to other uses.
- 5.344 Another respondent stated that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, the NPPF requires planning policies and decisions to enhance the natural environment by "...providing net gains for biodiversity..." (170d) and requires plans to "...pursue opportunities for securing measurable net gains for biodiversity" (174b). All development is an opportunity for securing biodiversity net gain and the NPPF states that "opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity" (175d). To meet these requirements this policy should include a principle of biodiversity net gain.

Responses – Do you think the Preferred Policy CSC11p: Entertainment and Cultural Facilities is the right approach?

- 5.345 9 respondents commented on this policy and all 9 respondents agreed with contents of the policy. 7 agreed but did not make any further comments and 2 respondent submitted comments.

Table 11.11: Responses to Policy Question CSC11p Do you think the Preferred Policy CSC11p: Entertainment and Cultural Facilities is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	9	100%
No	0	0

Total	9	100%
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Summary of Responses – Question CSC11p Do you think the Preferred Policy CSC11p: Community Facilities and Services is the right approach?

- 5.346 A respondent stated they supported this policy which promotes cultural and entertainment facilities. These uses are becoming increasingly important in maintaining the vibrancy of town centres and providing opportunities for people to come together, particularly in more rural areas. Another response also stated they support the policy.

Responses – Do you think the Preferred Policy CSC12p: Restaurants and Hot Food Takeaway Establishments is the right approach?

- 5.347 10 respondents commented on this policy and 9 respondents agreed with contents of the policy. 4 agreed but did not make any further comments, 4 respondent submitted comments and 2 comments did not agree with the policy.

Table 11.12: Responses to Policy Question CSC12p Do you think the Preferred Policy CSC12p: Restaurants and Hot Food Takeaway Establishments is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	9	80%
No	2	20%
Total	10	100%

Summary of Responses – Question CSC12p Do you think the Preferred Policy CSC12p: Restaurants and Hot Food Takeaway Establishments is the right approach?

- 5.348 Anglian Water stated that increasing strain is placed on the performance of our sewerage network as a result of some types of employment, one of these employment usages is that of restaurants and hot food takeaways. Whilst we are not proposing that this type of development is inappropriate we would like to highlight the need for these uses to be developed with their impact on the sewer understood. They would therefore recommend that an additional bullet point is added to ensure that any proposed development / redevelopment / change of use applications for a restaurant / Hot Food Takeaway incorporate appropriate measures to manage and mitigate the amount of Fats, Oils and Grease's entering the sewers.
- 5.349 Another comment stated that they thought takeaways should be limited as over the years many people have moved away from healthy home cooked meals which has created a burden on our NHS. Another comment stated that there were enough takeaways and restaurants already. The policy also received support from a respondent.

Responses – Do you think the Preferred Policy CSC13p: Burial Grounds and Cemetery Provision is the right approach?

- 5.350 11 respondents commented on this policy. 5 agreed but did not make any further comments, 6 respondent submitted comments and 4 comments did not agree with the policy.

Table 11.13: Responses to Policy Question CSC13p Do you think the Preferred Policy CSC13p: Burial Grounds and Cemetery Provision is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	7	64%

No	4	36%
Total	11	100%

Summary of Responses – Question CSC13p Do you think the Preferred Policy CSC13p: Burial Grounds and Cemetery Provision is the right approach?

- 5.351 The Environment Agency asked to consider adding an additional supporting paragraph: A high priority is placed on protecting groundwater within principal aquifers and groundwater catchments used for drinking water supply, and new larger cemetery developments in such areas might not be appropriate.
- 5.352 Comments also stated that the old cemetery, on Ferry Rd in Scunthorpe, is not marked as the cemetery on the local planning map, hence my worry that soon it will turn into a building plot. Is there a policy in place protecting this particular space from selling it and turning into housing estate? Could it be protected in the same way as the Memorial Garden, on West Street, is? Another commented stated that the Town Council would like to note that there is no land close to Kirton-in-Lindsey cemetery suitable for use as a burial ground and so a new site would be needed.
- 5.353 It was also stated that the policy should also consider creating a natural woodland cemetery to allow for burials and cremations in a landscaped woodland park to allow people to enjoy the space and help create a reduction in the carbon footprint of cremations. A place where people can contemplate and celebrate the lives of their loved ones. Another comment stated that land should be allocated for an extension to Barton Cemetery before it becomes totally surrounded by housing.

Responses – Do you think the Preferred Policy CSC14p: Churches, Prayer Houses and other Places of Worship is the right approach?

- 5.354 9 respondents commented on this policy. 6 agreed but did not make any further comments, 5 respondent's submitted comments and 1 comment did not agree with the policy.

Table 11.14: Responses to Policy Question CSC14p Do you think the Preferred Policy CSC14p: Churches, Prayer Houses and other Places of Worship is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	8	89%
No	1	11%
Total	9	100%

Summary of Responses – Question CSC14p Do you think the Preferred Policy CSC14p: Churches, Prayer Houses and other Places of Worship is the right approach?

- 5.355 General comments of support were given and a respondent who did not agree with the policy stated 'why use building for religious needs and then build houses for occupation?'

Responses – Do you think the Preferred Policy CSC15p: Tourism and Visitor Attractions is the right approach?

- 5.356 10 respondents commented on this policy. 7 agreed but did not make any further comments, 5 respondent's submitted comments and 3 comment did not agree with the policy.

Table 11.15: Responses to Policy Question CSC15p Do you think the Preferred Policy CSC15p: Tourism and Visitor Attractions is the right approach?

Response	Number of Respondents	Percentage of Respondents
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Yes	7	70%
No	3	30%
Total	10	100%

Summary of Responses – Question CSC15p Do you think the Preferred Policy CSC15p: Tourism and Visitor Attractions is the right approach?

- 5.357 The policy was supported and comments stated how important tourism is. One respondent stated that they would recommend that bullet point 3 is amended to read: ‘3. It does not have an unacceptable adverse impact on the area’s valuable natural, built or heritage assets and helps to enhance any affected asset, including through the provision of measurable Biodiversity Net Gain.’
- 5.358 Another comment stated that there is nothing wrong with the policy proposal but they didn’t think the policy was enough to really attract tourists. How about a sculpture park / walk using mainly local artists for the installations with one or two investment pieces that would attract tourists (Anthony Gormley making something out of steel for example). There also seems to be no real thought for attractions for the average child from 10-18. They're more technology buffs or thrill seekers then nature lovers.
- 5.359 Another comments stated that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, the NPPF requires planning policies and decisions to enhance the natural environment by “...providing net gains for biodiversity...” (170d) and requires plans to “...pursue opportunities for securing measurable net gains for biodiversity” (174b). All development is an opportunity for securing biodiversity net gain and the NPPF states that “opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity” (175d). To meet these requirements this policy should include a principle of biodiversity net gain.

Responses – Do you think the Preferred Policy CSC16p: Hotel and Guest House Accommodation is the right approach?

- 5.360 9 respondents commented on this policy. All agreed but 7 did not make any further comments and 2 respondent’s submitted comments.

Table 11.16: Responses to Policy Question CSC16p Do you think the Preferred Policy CSC16p: Hotel and Guest House Accommodation is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	9	100%
No	0	0
Total	9	100%

Summary of Responses – Question CSC16p Do you think the Preferred Policy CSC16p: Hotel and Guest House Accommodation is the right approach?

- 5.361 Comments of support were given and a respondent stated planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, the NPPF requires planning policies and decisions to enhance the natural environment by “...providing net gains for biodiversity...” (170d) and requires plans to “...pursue opportunities for securing measurable net gains for biodiversity” (174b). All development is an opportunity for securing biodiversity net gain and the NPPF states that “opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity” (175d). This is as much a case within the boundaries of a settlement. To meet these requirements this policy should include a principle of biodiversity net gain.

Responses – Do you think the Preferred Policy CSC17p: Camping and Caravan Sites is the right approach?

- 5.362 11 respondents commented on this policy. 9 people agreed but 6 did not make any further comments and 2 respondents did not agree.

Table 11.17: Responses to Policy Question CSC17p Do you think the Preferred Policy CSC17p: Camping and Caravan Sites is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	9	82%
No	2	8%
Total	11	100%

Summary of Responses – Question CSC17p Do you think the Preferred Policy CSC17p: Camping and Caravan Sites is the right approach?

- 5.363 Two comments gave support to the policy with no further comments. Another respondent stated that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, the NPPF requires planning policies and decisions to enhance the natural environment by “...providing net gains for biodiversity...” (170d) and requires plans to “...pursue opportunities for securing measurable net gains for biodiversity” (174b). All development is an opportunity for securing biodiversity net gain and the NPPF states that “opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity” (175d). To meet these requirements this policy should include a principle of biodiversity net gain. Suggested wording could be as follows: “4. proposals enhance the natural environment through the provision of measurable net gains to biodiversity as appropriate to their nature and scale.” To be consistent with other similar policies within this Local Plan the following criteria should be included in the decision making process: “proposals do not adversely affect sites of nature conservation value or archaeological or historic importance.”
- 5.364 Another comment stated that they would recommend that bullet point 2 is amended to include the opportunity to reference Biodiversity Net Gain, for example: ‘2. The site can be suitably screened by existing land forms and includes the provision of a scheme of landscaping which contributes to measurable Biodiversity Net Gain;’.
- 5.365 One comment which did not agree with the policy said that no more camp sites were needed.

Call for sites

- 5.366 Sites which were submitted through Call for Sites for the land uses in this chapter. There were for allotments, a café farm shop and a nature reserve.
- 5.367 A site (reference CFS0300003) was put forward for allotments and community gardens, nature reserve and wild meadow at a site adjacent to Advent court, off Station Road Ulceby.
- 5.368 A site (reference CFS0300080) was put forward for a potential café/ farm shop on a cycle route was put forward at Burringham Road, Althorpe near Derrythorpe at an ex storage compound which is situated next to the River Trent. It was stated enquiries had been made about using this site for this facility as it’s popular for cyclists.

- 5.369 Two sites for allotments were also submitted in Kirton in Lindsey one site suggested at York Road and the other off Redbourne Mere. A Local Nature Reserve was also suggested at the former tip site at Redbourne Mere.
- 5.370 A further site (reference CFS0300116) was submitted for community facilities and comments supporting the site stated that the commitment of a further significant acreage to add to the existing area for which Planning Permission was previously granted to excavate gravel & sand in order to provide Community Facilities. As a result a lake now exists after the excavation. The site is near the River Torne & parallel Ring Drain on the southern & eastern boundary of the land. Triangular natural wood to the west & planted spinneys surrounding our 6 acre lake which is the result of previous gravel excavation.

12. PLANNING FOR A SUSTAINABLE SUPPLY OF MINERALS

Introduction

- 12.1 Minerals play a vital role in society. Aggregates and other types of construction minerals are needed to build homes, factories, offices and transport infrastructure. Other minerals are used in industry, food production and agriculture. Energy minerals like oil and gas provide the country with power and heating. Whilst seeking to deliver development, increase our quality of life, and create sustainable communities, it is essential that we plan appropriately for minerals. Doing so ensures that the need for minerals by society and the economy, together with the impacts of extraction and processing on communities and the environment, are managed in an integrated way.
- 12.2 The Local Plan will set out policies based on the outcomes of the preferred options consultation on this chapter. These policies will guide the future development for mineral extraction in the area in addition to safeguarding existing sites and infrastructure. Doing so will ensure that growth and development is sustainable and contributes to meeting our ambitions and outcomes for North Lincolnshire as well as creating a place that is cleaner and greener.

Consultation

- 12.3 The Preferred Options document contained 8 questions relating to subjects that could be covered by mineral supply policies.

Question MIN1p - Do you think MIN1p: Mineral Supply Requirements is the right approach?

Question MIN2p – Do you think MIN2p: Mineral Safeguarding is the right approach?

Question MIN3p – Do you think MIN3p: Mineral Extraction is the right approach?

Question MIN4p – Do you think MIN4p: Recycled & Secondary Aggregates is the right approach?

Question MIN5p – Do you think MIN5p: Energy Minerals (Oil & Gas/Hydrocarbons) is the right approach?

Question MIN6p – Do you think MIN6p: Minerals Allocations is the right approach?

Question MIN7p – Do you think MIN7p: Borrow Pits & Ancillary Extraction is the right approach?

Question MIN8p – Do you think MIN8p: Restoration, Aftercare & Afteruse of Mineral Extraction Sites is the right approach?

Responses – Question MIN1p: Mineral Supply Requirements

Table 12.1: Responses to Question MIN1p: Mineral Supply Requirements

Response	Number of Respondents	Percentage of Respondents
Yes	7	64%
No	4	36%
Other	0	0
Total	11	100%

Summary of Responses – Question MIN1p: Mineral Supply Requirements

- 12.4 One respondent recommended that table 8.1 in the Plan, and paragraph 12.7 in the supporting text, are updated with the latest available minerals data (2018) from the Humber Area Local Aggregates Assessment (LAA). It was also stated that the East Riding of Yorkshire Council and North Lincolnshire Council should continue to work closely to produce future LAAs for the Humber area. It was stated that future LAAs are likely to continue to recognise that there are two distinct markets for aggregates, north and south of the Humber.
- 12.5 Three of the representations commented on highways and traffic impacts as a result of minerals extraction. One of the responses considered that any intensification of current sites, or the promotion of new sites, should be supported by the appropriate transport evidence and mitigation, where identified, to ensure that the strategic road network is not adversely affected. A further two respondents stated that consideration should be given to the assessment of HGV movements and their impacts through towns and villages and that transport surveys should be required in addition to public consultation.
- 12.6 Two representations broadly supported the policy but considered that the policy must recognise that poor/incomplete data of both historic sales and landbank figures, and the significant difference between the 3 and 10 year rolling averages, could lead to supply issues. Whilst the supporting text recognised these issues the policy did not and it was that the policy should make reference to calculation/updating of landbanks throughout the plan period based on the latest available information available within the LAA.
- 12.7 One respondent mainly agreed with paragraph 12.27 but considered that additional wording be included to explain that some conventional hydrocarbon extraction required downhole stimulation (approximately 10% of conventional wells) in order to improve recovery, but it was less likely to be high volume hydraulic fracturing. It was pointed out, that for clarity, paragraph 12.28 should be amended to make it clear that the split between conventional and unconventional hydrocarbon extraction refers to the formation, rather than the extraction process or technique, as the technique for extraction can be very similar for both conventional and unconventional hydrocarbons. A definition for both unconventional and conventional hydrocarbon extraction was provided which highlighted the difference between the two being formation in relation to the hydrocarbon location.
- 12.8 Paragraph 12.32 was supported which reinforces national energy policy that oil and gas makes an essential contribution to the country's prosperity and quality of life. However, it was considered that further information be provided in relation to the net zero report conducted by the Committee on Climate Change which recognises the role for oil and gas over the next 30 years. It was highlighted that due to gas production decline in the UK there will be a requirement to import more gas over the coming years.
- 12.9 It was also considered in relation to paragraphs 12.35, 12.36 and 12.37 that whilst the council is responsible for the granting of permission, in relation to wells and well pads, and would impose conditions accordingly to ensure impacts occurring due to the land use are acceptable, these conditions should not obtain information that falls into the remit of other regulators. The Inspector's decision regarding the Wressle well-site was highlighted in this regard who stated that 'I am entitled to assume that other regulatory regimes will operate effectively and that it is not necessary for me to carry out my own assessment because I can rely on the assessment of other regulatory bodies. There is no evidence that other regimes are incapable of operating effectively and adequately regulating the development.' The respondent did therefore not agree with the requirement set out for a hydrological assessment to

be provided with any planning application for hydrocarbon extraction, as the matters of hydrological risk falls within the remit of the Environment Agency and not the local planning authority.

- 12.10 One representation considered that the policy approach did not recognise the importance of industrial minerals, or the methods required to ensure steady and adequate supply of industrial minerals that are inherently different to aggregate minerals. It was considered that the policy was contrary to the provisions of paragraph 208 of the National Planning Policy Framework (NPPF) in this regard. It was suggested that that the policy should include reference to industrial minerals or a new policy be to cover such matters be incorporated into the plan. Specific reference was made to the requirements of the NPPF footnote 68 which requires silica sand landbanks to be at least 10 years for individual sites and 15 years where significant capital investment is required.
- 12.11 General support for the policy was given by three representations.

Responses – Question MIN2p: Mineral Safeguarding

Response	Number of Respondents	Percentage of Respondents
Yes	9	75%
No	3	25%
Other	0	0%
Total	12	100%

Summary of Responses – Question MIN2p: Mineral Safeguarding

- 12.12 One response noted that the policy in criterion 3 required minerals to be extracted prior to non-minerals development taking place. It was considered that the extraction of minerals prior to non-minerals development which is within of very close proximity to nature conservation sites may pose a greater risk that the proposal itself. It was recommended that the policy and supporting text be amended to exclude sites which are within close proximity to, or within, nature conservation sites. Paragraphs 12.14,12.19 and 12.20 were welcomed in addition to criterion 1 of policy MIN3p.
- 12.13 Clarification and additional detail was sought in one representation in relation to the proposed 500m chalk buffer which adjoins the Grade I Brocklesby Registered Park & Garden (RPG). It was stated that development in such a location would be within the setting of the Grade I Listed RPG.
- 12.14 It was considered by one respondent that the policy did not comply with the provisions of paragraph 204 or 208 of the NPPF as policy approach did not recognise that importance of industrial minerals, or set out requirements to appropriately safeguard these finite resources. It was commented that silica sand was not specifically referred to by the policy but was grouped together within sand and gravel. Given the national significance of silica sand it was recommended that a larger buffer be established around such reserves compared to that of sand and gravel. It was also noted that the industrial mineral ironstone was not referred to by the policy.
- 12.15 A number of policy suggestions were made in one representation. It was considered that the buffer areas seemed excessive and it was commented that the policy does not expand on the purpose of these buffers or indicate what is required within them. It was suggested that criterion 2 be amended to state ‘that the extraction of the mineral would not be physically or economically viable or practicable’ and that criterion 3 be amended to state ‘the mineral can be extracted or partially extracted satisfactorily, having regard to policy MIN3p, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development’. It was also recommended to amend appendix 8 to include developments within existing development limits to limit the requirement for unnecessary Mineral Resource Assessments in areas where mineral working would not be viable, and to make reference to the ability to economically recover any mineral identified. It was advised that appendix

8 make reference to national safeguarding guidance and be closer aligned to the latest mineral safeguarding practice guidance dated April 2019.

12.16 Seven representations provided general support for the policy.

Responses – Question MIN3p: Mineral Extraction

Table 12.3: Responses to Question MIN3p: Mineral Extraction		
Response	Number of Respondents	Percentage of Respondents
Yes	10	72%
No	3	21%
Other	1	7%
Total	14	100%

Summary of Responses – Question MIN3p: Mineral Extraction

- 12.17 Two representations received commented on ecological issues and highlighted the requirement set by the NPPF for biodiversity enhancement through planning decisions and policies. One of these representations considered that the policy should be amended to include reference to securing biodiversity net gain. Whilst the other representation recommended that the policy should include a stronger point specifically about avoidance, mitigation, and compensation of impacts to protected and priority, habitat and species, on mineral extraction sites. It was also advised that the policy and supporting text should make reference to site restoration and link to the need to meet the requirements of policy MIN8p which deals with such matters.
- 12.18 One respondent considered that the policy could be strengthened by including the words ‘water pollution’ at criterion 2 which was considered relevant to the rural nature of North Lincolnshire that is dependent on aquifers.
- 12.19 A further representation objected to the policy owing to the requirement to demonstrate the quality, significance, and need for the resources as it applies to hydrocarbon minerals. It was considered that there was no justification or reasoning for this requirement. It was stated that only after exploration and appraisal can the quality and significance of hydrocarbon minerals be determined and this may only become known after the point of granting planning permission. The recent appeal decision of APP/Y/2003/W/19/3221694 makes no requirement for such matters in the assessment of the appeal case. It was also stated that consideration should be given in the policy towards the economic benefits of hydrocarbon production and their significant contribution towards the provision of secure energy supplies.
- 12.20 One representation provided support in principle for the policy, but considered that the policy appeared only to target aggregate minerals only. It was advised that the policy should recognise that minerals can only be worked where they are found and acknowledge that some impacts will occur, although these could be mitigated to an acceptable level. It was also recommended that the policy give consideration to mineral extraction being of a temporary nature over an extended period of time and that in the case of hydrocarbons the scale of development is usually small in terms of physical land use with limited impact.
- 12.21 One positive response asked for consideration to be given to the preserve the peace and tranquillity of rural settlements when assessing applications for mineral extraction.
- 12.22 A further eight of the representations provided general support for the policy.

Responses – Question MIN4p: Recycles & Secondary Aggregates

Table 12.4: Responses to Question MIN4p: Recycled & Secondary Aggregates

Response	Number of Respondents	Percentage of Respondents
Yes	7	88%
No	1	12%
Other	0	0%
Total	8	100%

Summary of Responses – Question MIN4p: Recycled & Secondary Aggregates

- 12.23 Two representations suggested amendments to the policy wording to address issues where the primary use is temporary, where there is no conflict with an approved restoration scheme where mineral sites are involved, and to require on construction sites, where practicable, to carry out the recovery and recycling of inert materials to be recycled and reused on site.
- 12.24 Two of the respondents who supported the policy considered that such activities must be well managed to prevent adverse impacts to amenity and that it must be kept away from residential areas.
- 12.25 General support for the policy was given by four representations.

Responses – Question MIN5p: Energy Minerals (Oil & Gas/Hydrocarbons)**Table 12.5: Responses to Question MIN5p: Energy Minerals (Oil & Gas/Hydrocarbons)**

Response	Number of Respondents	Percentage of Respondents
Yes	10	63%
No	6	37%
Other	0	0%
Total	16	100%

Summary of Responses – Question MIN5p: Energy Minerals (Oil & Gas/Hydrocarbons)

- 12.26 The policy MIN5p was considered to be a permissive policy that made no distinction between conventional and unconventional hydrocarbon applications and that supported energy mineral applications received generally positive feedback. Paragraph 12.32 of the supporting text was generally supported by a number of respondents as it reinforced national energy policy which states that oil and gas makes an essential contribution to the country's prosperity and quality of life. However, it was considered by one respondent that further information be provided in relation to the net zero report conducted by the Committee on Climate Change which recognises the role for oil and gas over the next 30 years. It was also highlighted that due to gas production decline in the UK it will be required to import more gas in the coming years. Support was given to the fact the policy acknowledged that oil and gas would remain key elements of the energy system for years to come and was welcomed.
- 12.27 However, objections from a number of respondents were received in relation to criterion 1 of the policy as it was deemed unnecessary. This was because it was considered that it duplicated paragraph 104 of the Minerals Planning Practice Guidance that only permits exploratory, appraisal or production of hydrocarbons in areas licensed by the Oil and Gas Authority.
- 12.28 A number of representations considered that criterion 2 of the policy was contrary to paragraph 205 of the NPPF and various Written Ministerial Statements. This was due to the policy setting out a requirement for the applicant to demonstrate significant benefits of hydrocarbon extraction on the local economy. Paragraph 205 of the NPPF states that 'when determining planning applications, great weight

should be given to the benefits of mineral extraction, including to the economy.’ It was highlighted that there is no distinction between the local and national economy in paragraph 205 and that the policy should not require applicant’s to demonstrate significant benefits to the local economy to receive council support. It was stated that mineral resources can only be worked where they are found and as hydrocarbons are nationally important they impact the national economy. Two respondents suggested that the policy should be amended to remove the word ‘local’ from ‘local economy’ from criterion 2 so it reads ‘economy’ only.

- 12.29 Two respondents raised concern with regard to the requirement for adequate separation distances to be provided. The Minerals Planning Practice Guidance was referred to as this specifically recognises that extraction sites are limited in where they can be situated due to the location of natural resources. It was considered that the Guidance therefore makes it clear that buffer zones around an extraction site are not required. It was suggested that an alternative approach would be to set thresholds for noise at an unacceptable level to protect residential amenity.
- 12.30 Conversely, one representation considered that the policy would benefit from a stated ‘separation distance; between residential building and other sensitive receptors’. The respondent referred to a letter received from the Inspector for the North Yorkshire, York and North York Moors National Park Authority with regard to the emerging Joint Minerals and Waste Plan. The Inspector stated that she is minded to find sound the proposals to create a 500m separation distance between residential receptors and wellpads given the potential environmental risks with unconventional hydrocarbon extraction.
- 12.31 Criterion 3 was also considered unsound by one representation as the supporting text did not justify the level of information required by the criterion to support an application for mineral extraction which is over and above that required by national guidance. The standard requirements for a minerals application in paragraph 115 of the Minerals Planning Practice Guidance was highlighted, as was paragraph 117 which states that the precise nature of what constitutes an application for exploration is in part down to the applicant.
- 12.32 One representation provided support for points a), b), c) and f) of criterion 3, but considered point d) unreasonable. This was because the extent of the hydrocarbon resources field would not be understood until such a time the exploration and appraisal stages have been carried out following the interpretation of seismic data. It was suggested by a further representation to delete the phrase ‘appraisal or’ from criterion 3 point d) as a completed appraisal of the hydrocarbon resource cannot be expected for an application at the appraisal stage. A number of representations considered that point e) of criterion 3 should be removed, as the hydrocarbon resources field is within the remit of the Oil and Gas Authority thus the requirement would duplicate matters carried out by another regulator.
- 12.33 It was recommended by a number of respondents that the policy be amended to distinguish between the three phases of development and to recognise the potential short duration of exploitation and appraisal and the potentially limited impacts associated with such. It was also stated that each application should be determined on a case by case basis and references to cumulative effects should be removed.
- 12.34 A number of representations considered that amendments should be made to paragraph 12.27 to explain that some conventional hydrocarbon extraction requires downhole stimulation in order to improve recovery, but that it was less likely to be high volume hydraulic fracturing. It was pointed out that for clarity the paragraph 12.28 should be amended to make clear that the split between conventional and unconventional hydrocarbon extraction refers to the formation rather than the extraction process or technique, as the technique for extraction can be very similar for both conventional and unconventional hydrocarbons. A definition for both unconventional and conventional hydrocarbon extraction was provided which highlighted the difference between the two being formation in relation to the hydrocarbon location.
- 12.35 Two representations provided comments with regard to paragraphs 12.35, 12.36 and 12.37 of the supporting text. Whilst it was recognised that the council is responsible for the granting of permission in relation to wells and well pads and accepted that it would impose conditions to ensure that impacts occurring due to the land use are acceptable, that these conditions should not deal with matters that fall

into the remit of other regulators. The requirement for a hydrological assessment to be provided with any planning application for hydrocarbon extraction was not agreed as the matter of hydrological risk falls within the remit of the Environment Agency and not the local planning authority. It was also considered that the phrase 'water availability may be a limiting factor in any proposal' in paragraph 12.37 be deleted as this would not be a material consideration and that it is a matter between the developer and water supplier only.

- 12.36 It was highlighted that Anglian Water is a statutory consultee in relation to development involving the boring for, or the getting of, oil and natural gas from shale, as defined by Schedule 4 the Town and Country Planning (Development Management Procedure) (England) Order 2015 in one representation. It was stated that the policy required proposals to not have an unacceptable impact on the environment or amenity, but that it did not provide further guidance as to what would constitute an unacceptable impact in this context, or what would be required for each stage identified in policy MIN5p. It was considered that the policy should specifically refer to water resources/environment and require an applicant to demonstrate that their proposal would not have an adverse impact on potable water sources and to include sufficient technical details at the planning application stage regarding how any risks to potable water would be addressed. It was recommended that additional wording be incorporated into the policy to state that 'proposals at each stage must provide appropriate evidence to demonstrate that there will be no unacceptable impact on surface and groundwater quality'.
- 12.37 One positive respondent advised that acknowledgement should be given to carbon targets and that these are referred to. It was recommended that the following text be added to the policy: 'In view of the potential risks associated with exploration and production of both conventional and unconventional sources of oil and gas, it is essential operators apply the highest environmental standards so that ground pollution does not occur. Operators are encouraged to begin communications with regulators early to understand the appropriate planning and permitted controls. More information is contained within 'The Environment Agency's approach to groundwater protection'. In all cases the Environment Agency will work with the relevant planning authority during the planning consultation process to ensure the necessary controls are put in place through the planning and permitting processes.'
- 12.38 Two representations considered that emphasis should be put on renewable energy, not gas and oil, but accepted the need for energy sources and provided support for the policy.
- 12.39 One respondent supported the policy but stated that fracking was only acceptable as a short term solution to energy supply.
- 12.40 Five further representations received provided general support for the policy.

Responses – Question MIN6p: Minerals Allocations

Table 12.6: Responses to Question MIN6p: Minerals Allocations		
Response	Number of Respondents	Percentage of Respondents
Yes	9	56%
No	6	38%
Other	1	6%
Total	16	100%

Summary of Responses – Question MIN6p: Minerals Allocations

- 12.41 It was considered that some existing areas of mineral extraction and associated infrastructure were omitted from the Messingham Quarry site as permitted under MIN/2009/0356 and PA/2018/1242. A drawing was provided to confirm the extent of the extant permissions. It was stated that these sites form part of the silica sand landbank and was considered to go some way to 'provide for the extraction of mineral resources of local and national importance' as set out in paragraph 204 of the NPPF.

- 12.42 Whilst the allocation of Land at Holme Lane (Silica Sand) (New Site) was welcomed under policy MIN6-16p, it was noted that policy MIN6p did not include a provision to monitor whether a steady and adequate supply of silica sand, or other industrial minerals, would be maintained over the local plan period. This was considered to be contrary to paragraph 208 of the NPPF.
- 12.43 One respondent raised concerns regarding the justification for the approach taken, as the criteria or methodology used to identify specific sites, preferred areas, or areas of search, was not provided. It was considered that this was contrary to the provisions of the Planning Practice Guidance and the ability to appropriately designate sites in a prioritised manner based on a knowledge of required supply was compromised. It was considered that the approach of policy MIN6p was therefore unjustified and contrary to the NPPF. It was noted that policy also did not make allowance for new sites to come forward that are unknown, or that have not been considered as part of the site allocation process.
- 12.44 Three representations were received raising concerns with regard to MIN6-10 (consented site), MIN 6-17 (proposed allocation) and MIN6-18 (extent of search) in relation to the historic environment as the sites are adjacent to the Old Winteringham Roman Settlement. It was queried as to what extent the council archaeologist had been involved with regard to the MIN6-18 area of search. It was considered that the setting and related remains impacts of MIN6-17 allocation required assessment. It was questioned as to whether the Roman site extends beyond the scheduled area.
- 12.45 Concerns were raised with regard to the ecological impact mineral extraction sites could have on the natural environment. It was noted that MIN6-17p Eastfield Farm, Winteringham and MIN6018p, Land South of Composition Lane are within, at their closest point, 400m of the Humber Estuary SSSI/SPA/SAC and Ramsar. It was recommended that the potential for impacts on functionally linked land for birds and impacts of the discharges and disturbances resultant from extraction on the ecologically designated sites are also considered. It was however noted that the sites are small in scale and that the land is already within an area which has been disturbed which may be mitigating factors.
- 12.46 With regard to MIN-6-16p, Land at Holme Lane (Silica Sand) (New Site) it was noted that the large scale of the proposed site has the potential to affect the best and most versatile land. It was recommended that an Agricultural Land Classification Survey be carried out prior to the allocation of land in order to properly assess the impact of the proposal on soil resources. It was also noted that the allocation was in close proximity to the Twigmoor Site of Special Scientific Interest (SSSI) and the Messingham Sand Quarry SSI. It was stated that both of these ecologically designated sites included wetland habitats and would be sensitive to both dewatering and water pollution. It was recommended that a hydrological assessment be carried out to determine the risk of mineral extraction in this area on both SSSIs. In addition it was stated that the Messingham Sand Quarry SSSI is designated for an assemblage of breeding birds and it was recommended the impacts of the functionally linked land be considered.
- 12.47 The proximity of MIN6-15p, Cove Farm, Westwoodside (Extension) (Sand) (Area of Search) to the Haxey Turbary SSSI and the Hatfield Ditched SSSI was noted. It was stated that as these are both wetland sites and that a hydrological assessment should be carried out to determine the risks of mineral extraction in this area on the SSSIs.
- 12.48 Comments were also made with regard to the Habitat Regulations Assessment (HRA) of policy MIN6p. It was noted that no assessment of individual mineral allocation had been carried out in the HRA at this stage. It was recommended that at the next stage of the local plan production that the HRA assesses the impacts of the MIN6-17p and MIN6-18p allocations on the Humber Estuary SAC/SPA and Ramsar site both alone and in combination.
- 12.49 Further comments were made in the representation regarding the overall Preferred Options HRA. It was stated that more detail should be provided within the HRA regarding how recreational disturbance from the impact of recreational pressures from the plan as a whole on European designated sites has been assessed. It was considered that further justification was required to explain how recreational pressure would be addressed through the plan to ensure that there would be no adverse effects on European designated sites. It was considered that the HRA places a reliance on undertaking HRAs at the project

stage with regard to recreational pressures. It was advised that a strategic solution may be required rather than relying on individual assessments at the project stage. To ensure that there are no adverse effects on European designated sites it was considered that there needs to be a level of certainty that avoidance, and/or mitigation measures, are available, and can be secured, through the planning application stage which was considered to be crucial in order to ensure that allocated sites can be delivered without resulting in an impact to designated sites. It was advised that once such solution may be to set out a stronger policy requirement for green infrastructure where developers would be required to contribute to green infrastructure provision in areas where there are recreational pressures on the coast. This may then provide alternative areas of recreational green space instead of ecological sites being used for recreational purposes. It was recommended that Natural England's Accessible Natural Greenspace standards (ANGst) be used to inform any green infrastructure deficiencies which in turn could then be met through planning obligations at the planning application stage. It was advised that if site specific surveys are not undertaken then a precautionary measure should be taken with the strategy outlined for detailing with recreational pressures with further work being required in order to determine how the local plan would increase recreational opportunities. In order to remove the burden from individual developers at the planning application stage where mitigation may prove to render development unviable, it was recommended that reports be undertaken for European designated sites for ecological importance to feed into a strategic solution to deal with recreational through the Community Infrastructure Levy that all developers would feed into.

- 12.50 Paragraph 32 of the NPPF was also highlighted the requirement for the Sustainability Appraisal (SA) to inform plan making by demonstrating how relevant economic, social and environmental objectives have been addressed, inclusive of the opportunity to provide net gain. It was considered that the objectives of the SA could include a commitment to deliver Biodiversity Net Gain which could then be tested as the plan develops. It was stated that baseline data could be used to form an evidence base for the SA in which to identify issues that require consideration in the development plan. It was commented that priorities should then be focused on the issues identified through the SA scoping stage and be considered alongside other economic, social and environmental objectives linking as to how Biodiversity Net Gain could help tackle these issues as part of a wider green infrastructure network. It was considered that the local plan should include a requirement to monitor Biodiversity Net Gain with the indicators demonstrating the type and amount of Net Gain being provided through development. It was stated that these indicators should be specific in order to build an evidence base to inform future reviews of the plan.
- 12.51 One respondent stated that the Wressle wellsite and Lodge Farm, Appleby, should be included within the list of sites with planning permission.
- 12.52 One representation considered that any new mineral extraction sites should be supported by the appropriate transport evidence and mitigation, where identified, to ensure that the strategic road network is not adversely affected.
- 12.53 A number of updates to the policies map in relation to mineral sites were suggested by one respondent. It was recommended that the boundaries of MIN6-5p Hibaldstow Quarry (Limestone) be updated to reflect the boundaries of permissions PA/2011/0641 and PA/2019/235 which together form the operational quarry at the site. MIN6-15p Hibaldstow Quarry (Extension) (Limestone) was supported, but it was advised to be included as a new site or area of search and to remove land which now has the benefit of planning permission under PA/2019/235. It was considered that MIN6-14p would provide sustainable and deliverable future extensions to Hibaldstow Quarry.
- 12.54 It was considered that the policies map boundaries for MIN6-6p Manton Quarry (Limestone) should be updated to reflect those of planning permission MIN/2016/556.
- 12.55 Support for given for MIN6-17p: Eastfield Farm, Winteringham (Silica Sand) (New Site) as it would provide a sustainable and deliverable future extension to the current silica sand site which would secure the continuity of supply to the South Ferriby Cement Works. The adjacent area of search proposed by MIN-6-18p: Land South of Composition Lane, Winteringham (silica Sand) was also supported for the same reason.

12.56 Eight respondents provided general support for the policy.

Responses – Question MIN7p: Borrow Pits & Ancillary Extraction

Table 12.7: Responses to Question MIN7p Borrow Pits & Ancillary Extraction		
Response	Number of Respondents	Percentage of Respondents
Yes	9	90%
No	1	10%
Other	0	0%
Total	10	100%

Summary of Responses – Question MIN7p: Borrow Pits & Ancillary Extraction

12.57 One representation recommended that additional requirements be included at the end of the policy to include reference to the proposed development not being resultant in damage to the natural environment. It was also considered that development should provide measureable Biodiversity Net Gain in accordance with Biodiversity Opportunity Mapping and contribute to the Nature Recovery Network.

12.58 Nine representations provided general support for the policy.

Responses – Question MIN8p: Restoration, Aftercare & Afteruse of Mineral Sites

Table 12.8: Responses to Question MIN8p: Restoration, Aftercare & Afteruse of Mineral Sites		
Response	Number of Respondents	Percentage of Respondents
Yes	10	77%
No	3	23%
Other	0	0%
Total	13	100%

Summary of Responses – Question MIN8p: Restoration, Aftercare & Afteruse of Mineral Sites

12.59 It was considered by one representation that the policy was contrary to the provisions of paragraphs 54 and 205 of the NPPF. These paragraphs state that planning obligations should only be used where unacceptable impacts cannot be addressed through planning conditions and that bonds or other financial guarantees to underpin planning condition should only be sought in exceptional circumstances. It was recommended that the policy be amended to reflect that bonds should only sought in exceptional circumstances and legal agreements should be only used where it is not possible to address unacceptable impacts through planning condition.

12.60 Support was given for the requirements of criterion 3 to provide public benefits, including biodiversity and enhancement of the wider area. Criterion 4 part d) was also supported as it specified that proposals should seek to make a positive contribution to biodiversity and wildlife conservation. However, it was considered that this could be strengthened by requiring proposals to demonstrate these benefits rather than just being sought.

12.61 It was considered that the policy should be amended in light of the statutory requirements for Biodiversity Net Gain and to recognise that mineral site restoration could contribute significantly to the Nature Recovery Network and targets as set out within the Local Nature Recovery Strategy. It was also recommended that restoration schemes should address the on-going arrangement for long term

management of the site post restoration and include a requirement for monitoring to ensure that management of the site can be altered should the site not be meeting its targets.

- 12.62 It was stated that in line with Schedule 5 of the Town and Country Planning Act 1990 an after care period (usually 5 years) should be required in order to ensure that the site is capable of a beneficial after-use, where agriculture, forestry, or amenity (including biodiversity) is proposed. It was considered that after-care uses should be locally relevant to the site and respond to their context within wider green infrastructure network in addition to contributing to them. It was also recommended that alongside promoting recreation the promotion of access to nature and public rights of way should be included.
- 12.63 Two respondents considered that not all of the listed requirements in appendix 8.4 were applicable and suggested the text be amended to state that ‘a restoration plan should, where appropriate, include’.
- 12.64 One representation supported the policy requirement for restoration of mineral extraction sites, but it was considered that the policy should be linked to policy DQE3p: Biodiversity and Geodiversity. However, it was stated that there are some circumstances where development is temporary and short term where biodiversity net gain may not be deliverable due to the wishes of the landowner should the site be leased.
- 12.65 General support for the policy was given by seven of the representations.

General comments

- 12.66 One general comment was received in relation to paragraph 12.32 where it was considered that the term ‘unconventional techniques’ be expanded to state ‘and other unconventional techniques, including but not limited to, acidisation’ at the end of the sentence.
- 12.67 It was also considered that paragraph 12.31 should be reworded to reflect the latest Government Written Ministerial Statement on unconventional Oil and Gas Extraction which placed an immediate moratorium on hydraulic fracturing activities with the Energy Policy Update: Written Ministerial Statement (HCWS68) dated 4th November 2019. It was stated that this statement effectively superseded Government support for the hydraulic fracturing industry in previous written ministerial statements. It was considered that there can be no justification was including support for the unconventional recovery of oil and gas at the present time within the local plan given this publication.
- 12.68 Points in paragraphs 12.48 and 12.49 that recognised that site restoration should be influenced by strategies for the area, including the biodiversity action plan priorities, which were welcomed. However, it was stated that as the Lincolnshire Biodiversity Action Plan has come to the end of its 10 year plan period it would likely be superseded by a Greater Lincolnshire Nature Strategy. It was stated that this could fulfil the role of a Local Nature Recovery Strategy as introduced as part of the 25 Year Environment Plan itself mandated by the draft Environment Bill. It was suggested that references to the Biodiversity Action Plan are amended accordingly. It was also advised that reference be made to the Biodiversity Opportunity Mapping being produced by the council. In addition, reference should also be given to the Greater Lincolnshire Nature Strategy and other strategies, such as Catchment Plans, being produced in support of the River Basin Management Plan under the Water Framework Directive.

13. SUSTAINABLE WASTE MANAGEMENT

Introduction

- 13.1 Nearly all activities create waste, whether it is through the production or consumption of goods and services as part of the economy and wider society. This means that it needs to be managed in the most appropriate and sustainable manner. Waste is viewed as a resource rather than something that is to be disposed of, whilst its management is seen as being a part of efforts to reduce carbon emissions and combat climate change. Government policy set out in the National Waste Strategy (2013) clearly points towards a zero waste economy. This means that material resources like waste are re-used, recycled or

recovered, wherever possible, and only disposed of as the last option. This contributes to developing a place that is cleaner and greener.

- 13.2 The Local Plan will set out policies based on the outcomes of the preferred options consultation on this chapter. These policies will guide the future development of waste facilities in the area in addition to safeguarding existing sites and infrastructure. Doing so will ensure that growth and development is sustainable and contributes to meeting our ambitions and outcomes for North Lincolnshire as well as creating a place that is cleaner and greener.

Consultation

- 13.3 The Preferred Options document contained 7 questions relating to subjects that could be covered by waste management policies.

Question WAS1p - Do you think WAS1p: Waste Management Principles is the right approach?

Question WAS2p - Do you think WAS2p: Waste Facilities is the right approach?

Question WAS3p - Do you think WAS3p: Waste Management Provision is the right approach?

Question WAS4p - Do you think WAS4p: Safeguarding Existing Waste Sites & Infrastructure is the right approach?

Question WAS5p - Do you think WAS5p: Wastewater Treatment is the right approach?

Question WAS6p - Do you think WAS6p: Waste Management in Development is the right approach?

Question WAS7p - Do you think WAS7p: Restoration & Aftercare is the right approach?

Responses – Question WAS1p: Waste Management Principles

Table 13.1: Responses to Question WAS1p: Waste Management Principles		
Response	Number of Respondents	Percentage of Respondents
Yes	9	100%
No	0	0%
Other	0	0%
Total	9	100%

Summary of Responses – Question WAS1p: Waste Management Principles

- 13.4 All of the responses received in relation to WAS1p provided general support for the policy.

Responses – Question WAS2p: Waste Facilities

Table 13.2: Responses to Question WAS2p: Waste Facilities		
Response	Number of Respondents	Percentage of Respondents
Yes	9	90%
No	1	10%

Other	0	0%
Total	10	100%

Summary of Responses – Question WAS2p: Waste Facilities

- 13.5 Nine of the responses to WAS2p were positive with seven of these responses providing general support.
- 13.6 One of the positive responses stated that reference should be made to energy from waste plants with links to renewable energy policy DQE9p.
- 13.7 One further positive response provided general support for the policy principles that identified the potential impacts from operational processes with new development being required to account for, or mitigate, impacts so that the operation of assets is not affected with criteria e, r and g being of particular note.
- 13.8 One negative response was received stating that as currently drafted the policy focuses waste management facilities to those with the benefit of planning permission, on employment land, previously developed land, existing farm buildings and minerals workings.

Responses – Question WAS3p: Waste Management Provision

Table 13.3: Responses to Question WAS3p: Waste Management Provision		
Response	Number of Respondents	Percentage of Respondents
Yes	8	100%
No	0	0%
Other	0	0%
Total	8	100%

Summary of Responses – Question WAS3p: Waste Management Provision

- 13.9 All of the responses received in relation to WAS3p were positive with one recognising that society must reduce, but collect and recycle waste as much as possible.

Responses – Question WAS4p: Safeguarding Existing Waste Sites & Infrastructure

Table 13.4: Responses to Question WAS4p: Safeguarding Existing Waste Sites & Infrastructure		
Response	Number of Respondents	Percentage of Respondents
Yes	7	78%
No	2	22%
Other	0	0%
Total	9	100%

Summary of Responses – Question WAS4p: Safeguarding Existing Waste Sites & Infrastructure

- 13.10 Seven of the responses received regarding policy WAS4p were positive and provided general support.
- 13.11 Two of the responses were negative highlighting that water recycling centres operated by Anglian Water and Biobanix, Bonby Lane, an anaerobic digestion site were not included in table 9.3 and appendix 9.1.

It was also commented by one of these responses that section 13.19 is out of date as it refers to waste licences and that these are now referred to as either waste or environmental permits and the policy should be updated to reflect this.

Responses – Question WAS5p: Wastewater Treatment

Table 13.5: Responses to Question WAS5p: Wastewater Treatment		
Response	Number of Respondents	Percentage of Respondents
Yes	8	73%
No	3	27%
Other	0	0%
Total	11	100%

Summary of Responses – Question WAS5p: Wastewater Treatment

- 13.12 Eight of the responses received in relation to WAS5p were positive and provided general support. One of these respondents noted the care needed with regard to waste water treatment and considered the policy sound.
- 13.13 Three negative responses were received. One of the negative responses provided general support for the principles outlined within the policy but highlighted that existing and future water waste treatment works discharge permits are set and regulated by the Environment Agency and would not be impacted by the local plan.
- 13.14 It was also stated that the key approach to minimise waste production would be to support the use of separate surface water drainage systems in new development in accordance with the drainage hierarchy.
- 13.15 Within a negative response it was commented that at the preferred options stage consideration should have been given to the issue of wastewater infrastructure capacity. The council was encouraged to work with the water companies with the results of discussions incorporated into the plan as a high priority.
- 13.16 Whilst a further negative response welcomed a policy specifically for waste water treatment sites, it was considered that the policy was not positively phrased to support additional investment at existing water recycling centres or effective as it was focused on additional growth from development only. It was considered that point 5 of the policy be removed as it was unclear in what circumstances proposals by a sewerage undertaker would adversely affect water supply and waste water infrastructure. It was also stated that to limit waste management uses on water recycling centres to that of composting and anaerobic digestion was unjustified as other uses may be suitable dependant on both the scale and location. A number of policy wording improvements were suggested to address these issues, ensure compliance with the Water Framework Directive and to provide consistency of terminology within the local plan, such as the replacement of 'quality of life' with 'amenity'.

Responses – Question WAS6p: Waste Management in Development

Table 13.6: Responses to Question WAS6p: Waste Management in Development		
Response	Number of Respondents	Percentage of Respondents
Yes	8	100%
No	0	0%
Other	0	0%

Total	8	100%
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Summary of Responses – Question WAS6p: Waste Management in Development

- 13.17 All responses received were positive and provided general support for the policy WAS6p.

Responses – Question WAS7p: Restoration & Aftercare

Table 13.7: Responses to Question WAS7p Restoration & Aftercare		
Response	Number of Respondents	Percentage of Respondents
Yes	8	90%
No	1	10%
Other	0	0%
Total	9	100%

Summary of Responses – Question WAS7p: Restoration & Aftercare

- 13.18 Eight of the responses received in relation to WAS7p were positive and provided general support for the policy.
- 13.19 The negative response received provided support for the requirement for waste site restoration schemes to include details of biodiversity enhancement and improvements to the green infrastructure network but, suggested that criterion two should include reference to demonstrating how site restoration would contribute to a Nature Recovery Network and how it would respond to the priorities within the Biodiversity Opportunity Mapping and Greater Lincolnshire Nature Strategy.

General Comments

- 13.20 One general comment was made in relation to waste site restoration schemes that welcomed the wording to consider planting, usually of local species, but suggested improvements to the wording stating, *‘a suitable scheme of planting, utilizing native species of local provenance’* should be used. The representation also considered that a further bullet should be added to require waste site restoration schemes to consider *‘how they reflect the priorities within the Biodiversity Mapping for North Lincolnshire and the Greater Lincolnshire Nature Strategy.’*
- 13.21 A further comment was received stating general support to the section on wastewater treatment and highlighted commitment to supporting North Lincolnshire Council to provide the sewerage and treatment network to cater for new and existing development. Updates were provided regarding each waste water treatment works site operated by Severn Trent in North Lincolnshire and included a high level assessment of the network infrastructure.

14. CONNECTING NORTH LINCOLNSHIRE

Introduction

- 14.1 Transport has an important role to play in facilitating sustainable development through the promotion of walking, cycling and public transport as key modes of travel as an integral part of all developments. This also contributes to wider aspects of sustainability including improving people’s health and environmental quality, through reduced vehicle emissions and increasing active travel. Whilst behaviours, working patterns and lifestyle choices, coupled with emerging technological changes and innovation in how we

travel, are changing transport choices, it is clear that new development will continue to generate additional transport movements, both now and in the future.

14.2 The availability and use of transport can have a significant impact, both positive and negative on people's physical and mental health and wellbeing.

14.3 Transport, particularly vehicle emissions, are a major source of carbon dioxide emissions which, in turn, is a major cause of climate change. Other pollutants from vehicles include Particulate Matter and Nitrogen Dioxides, which impact on local air quality. Both of these can cause health problems. Short journeys are generally more polluting as vehicles tend to emit more pollution during the first few miles, while the engine is warming up. Traffic noise and vibration can also affect people's physical and mental health and wellbeing. If traffic movements continue to increase then these adverse impacts will also be exacerbated.

Consultation

14.4 The Preferred Options document contained 8 questions relating to subjects covered by the 'Connecting North Lincolnshire' policies.

Question T1p - Do you think Policy T1p: Promoting Sustainable Transport is the right approach?

Question T2p – Do you think the Preferred Policy T2p: Promoting Public Transport is the right approach?

Question T3p – Do you think the Preferred Policy T3p: New Development and Transport is the right approach?

Question T4p – Do you think the Preferred Policy T4p: Parking is the right approach?

Question T5p – Do you think the Preferred Policy T5p: Cycle and Motorcycle Parking is the right approach?

Question T6p – Do you think the Preferred Policy T6p: Freight is the right approach?

Question T7p – Do you think the Preferred Policy T7p: Safeguarding Transport Infrastructure is the right approach?

Question T8p – Do you think the Preferred Policy T8p: Safeguarding Aviation is the right approach?

Responses – Question T1p: Promoting Sustainable Transport

14.5 The majority of respondents who provided detailed comments or views on this question generally agreed with its principles. 12 respondents commented on this policy and 10 respondents agreed with contents of the policy (with some amendments), 5 agreed but had no comments to make and 2 respondents did not agree with the policy contents and suggested some wording changes.

Table 14.1: Responses to Question T1p: Promoting Sustainable Transport

Response	Number of Respondents	Percentage of Respondents
Yes	10	83%
No	2	17%
Other	0	0
Total	12	100%

Summary of Responses – Question T1p: Promoting Sustainable Transport

- 14.6 A comment received stated that promoting sustainable transport needs to be given priority in the rural areas of North Lincolnshire. The situation will change considerably over the lifetime of this Local Plan and charging points are crucial. Another respondent stated that the future provision for electric vehicles needs to be included in plans.
- 14.7 Highways England stated that in broad terms support was given to the policy aspirations to promote sustainable transport measures and initiatives as such aspirations will help to minimise the number of single-occupancy private vehicle trips generated as a consequence of the development aspirations of the Plan. However, it will need to be ensured that the Strategic Road Network can safely and efficiently support the delivery of the Plan. Evidence directly relating to this will be essential and while mention is made of an update to the Local Transport Plan [LTP], it is not clear if this evidence workstream would extend to a consideration of the SRN.
- 14.8 Another respondent queried where the cycling paths were? They stated they and friends frequently cycle to Brigg, Messingham, Winterton, Barton etc. and they also use our bicycles to go around town, to get to work. They asked if there were any plans on expanding and improving the network of cycling paths?
- 14.9 It was also stated that in paragraph 14.6, the distances for "short trips" for walking and cycling should be specified. In 14.8, the only modes of transport to be available to all irrespective of mobility impairment should be walking and bus. Facilities for safe cycling, i.e. segregated from the roadway wherever significant traffic is experienced or expected, should be available too. They also stated that buses should run much more frequently, both weekday daytime and evening and Sundays.

Responses – Question T2p – Do you think the Preferred Policy T2p: Promoting Public Transport is the right approach?

- 14.10 10 respondents commented on this policy and 8 respondents agreed with contents of the policy (with some amendments), 2 agreed but had no comments to make and 2 respondents did not agree with the policy contents.

Table 14.2: Responses to Question T2p: Promoting Public Transport is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	8	80%
No	2	20%
Other	0	0
Total	10	100%

Summary of Responses – Question T2p: Promoting Public Transport

- 14.11 It was stated that in broad terms support was given to the policy aspirations to promote public transport measures and initiatives as such aspirations will help to minimise the number of single-occupancy private vehicle trips generated as a consequence of the development aspirations of the Plan. The contribution of such measures to minimising trips should be included within the transport evidence base. It was also stated that getting people out of the car and onto transport is key to the environment and that there is a need to ensure that there is adequate public transport for rural communities.
- 14.12 Comments stated that more investment in the local railway is required and they would like to see investment in reopening the rail line through Kirton-in-Lindsey on a daily basis.
- 14.13 Objections to the policy were received regarding strong opposition to paragraph 14.23. Demand Responsive Transport (DRT) has a role to play as a 'safety net' for journeys the bus network could never realistically provide. However they state DRT places two major barriers on using the bus. Firstly there

is a need to register and secondly every journey must be pre-booked in advanced. Users are required to plan ahead and the ease of just being able to turn up at a bus stop is lost. As a car owner, DRT is not attractive whereas the ease of a scheduled bus service is, especially when a frequent service is offered, such as between Barton and Hull. It was stated that the council should instead be investing heavily in expanding scheduled bus services, funded through increased council tax if necessary. Another objector stated that the statement in 14.5 that the area is well-served by rail is untrue, as the area's major town, Scunthorpe, only has one rail line running through it, meaning that there are no direct links with the major destinations of Lincoln, Hull, Goole, Leeds, York, or London. 14.17 states that busses are the most viable alternative to the car, but walking and/or cycling are the most viable alternatives for short journeys, and train for places served directly from Scunthorpe. The respondent also stated that they do not find the Call Connect bus service at all user-friendly the only time they investigated using it, having to register as a user, and having to book the required journey the day before at the latest as they recall.

Responses – Question T3p – Do you think the Preferred Policy T3p: New Development and Transport is the right approach?

- 14.14 10 respondents commented on this policy and 8 respondents agreed with contents of the policy (with some amendments), 4 agreed but had no comments to make and 1 respondent did not agree with the policy contents.

Table 14.3: Responses to Question T3p: New Development and Transport is the right approach?		
Response	Number of Respondents	Percentage of Respondents
Yes	8	89%
No	1	11%
Other	0	0
Total	10	100%

Summary of Responses – Question T3p: New Development and Transport is the right approach?

- 14.15 The policy aspirations promoted through Policy T3p were welcomed and supported as it looks to ensure that when developments are promoted, due cognisance is paid to the potential impact on the road network. Where appropriate, it is considered that developers should scope their Transport Assessments with Highways England in advance of planning submission and in this respects, the policy should be updated. For the avoidance of doubt, a transport evidence base considering the Plan and its development aspirations should be available to support the Plan, to ensure that the SRN can safely and efficiently support the delivery of the Plan (including this employment land supply).
- 14.16 Comments stated that they welcomed the recognition in part 2 of this policy of the promotion of sustainable travel, which would potentially include access to the towpath network for walking and cycling. They also welcome the reference to the need for developers to contribute towards measures in the vicinity of the development towards facilities for pedestrians and cyclists. It was stated that significant new developments in the vicinity of the canal network place extra liabilities and burdens upon the waterway infrastructure and it is therefore essential that appropriate contributions are secured from developers, where necessary, in order to mitigate the impact of new development on Canal Trust assets. Examples could include the need for towpath improvements to accommodate the needs of new development to prevent excessive erosion of the path that could otherwise render it impassable to users. The wording of this policy would make the need for such investment apparent to decision makers where is it required and necessary to make the development acceptable.
- 14.17 Further comments stated that in all new developments, pedestrian and cycle access must be safe, i.e. all routes with any significant traffic must have segregated paths for walking and cycling. In Option B

of the "Alternatives considered", the public transport information given to new residents should be maps and timetables of all bus and rail routes serving the locality. Traffic calming measures on all new residential estates should include all the following as used on the Normanby Grange estate:- gently winding roads, varying road surfaces, roadway often shared by vehicles and pedestrians, occasional small speed bumps not highlighted.

Responses – Question T4p – Do you think the Preferred Policy T4p: Parking is the right approach?

- 14.18 11 respondents commented on this policy and 6 respondents agreed with contents of the policy (with some amendments), 5 agreed but had no comments to make and 5 respondent did not agree with the policy contents.

Table 14.4: Responses to Question T4p Do you think the Preferred Policy T4p: Parking is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	6	55%
No	5	45%
Other	0	0
Total	11	100%

Summary of Responses – Question T4p Do you think the Preferred Policy T4p: Parking is the right approach?

- 14.19 A respondent concurs with the policy aspirations contained within Policy T4p, and parking can be a factor in minimising the number of single-occupancy private vehicle trips generated as a consequence of the development aspirations of the Plan. While not a direct consideration of the respondent, the level of provision of electric vehicle charging points should be reflective of the aspirations to switch to electric vehicles and the provisions of the Plan should be considered against this ambition, with a view to the length of the Plan period.
- 14.20 Another respondent stated that Policy T4p states that electric vehicle charging points are required on all new developments, and outlines how they should be provided to the detailed standards. Before requiring electric vehicle charging points in residential development through planning policies, the Council should engage with the main energy suppliers to determine the network capacity to accommodate any adverse impacts if all dwellings were to install a charging facility. If recharging demand became excessive, there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables, and new substation infrastructure may be necessary. Furthermore, such costs should be included in the Council's viability testing otherwise there may be an adverse impact on housing delivery.
- 14.21 It was also stated that Councillors remain anxious that the provision of entirely adequate off-street parking be a fundamental requisite for all new-build and change of use planning applications of both residential and business/commercial nature.
- 14.22 Another comment received stated that the policy sets standards for electric charging points. It requires 1 electric vehicle charging point per dwelling. In order to ensure that this policy can deliver at the rates proposed and not impede on the delivery of homes, the respondent would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others.

- 14.23 A respondent who did not agree with the policy stated the need to provide at least two off-road vehicle parking spaces for each dwelling in all new developments. It also notes the need for more public parking in small towns and villages. They stressed the need to provide enough parking in all new developments and also seek support for new parking facilities in Kirton-in-Lindsey to cope with current demand but also to cope with the developments approved prior to March 2020. It was also stated that NLC Highways need to state what the minimum standard of car parking spaces are for different types of settlements.

Responses – Question T5p – Do you think the Preferred Policy T5p: Cycle and Motorcycle Parking is the right approach?

- 14.24 8 respondents commented on this policy and all respondents agreed with contents of the policy (with some amendments). 6 agreed but had no comments to make.

Table 14.5: Responses to Question T5p – Do you think the Preferred Policy T5p: Cycle and Motorcycle Parking is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	8	100%
No	0	0
Other	0	0
Total	8	100%

Summary of Responses – Question T5p – Do you think the Preferred Policy T5p: Cycle and Motorcycle Parking is the right approach?

- 14.25 A respondent supported this policy and stated they support any policy initiative that would increase cycling trips, as this would minimise the number of single-occupancy private vehicle trips generated as a consequence of the development aspirations of the Plan. Another respondent also provided support to the policy.
- 14.26 Another respondent supports the inclusion of this policy and supporting text which, amongst other things, recognises the significance of the efficient movement of freight in North Lincolnshire and the role the Ports of Grimsby and Immingham play in this regard. The response further welcomes the indication given in the policy that support will be given to the development of a freight strategy and would very much wish to be part of the development of such a strategy.

Responses – Question T6p – Do you think the Preferred Policy T6p: Freight is the right approach?

- 14.27 10 respondents commented on this policy and all respondents agreed with contents of the policy (with some amendments). 6 agreed but had no comments to make.

Table 14.6: Responses to Question T6p – Do you think the Preferred Policy T6p: Freight is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	10	100%
No	0	0
Other	0	0
Total	10	100%

Summary of Responses – Question T6p – Do you think the Preferred Policy T6p: Freight is the right approach?

- 14.28 A respondent welcomed and supported the inclusion of this policy and supporting text within the emerging plan which, amongst other things, recognises the significance of the efficient movement of freight in North Lincolnshire and the role the Ports of Grimsby and Immingham play in this regard. They also welcome the indication given in the policy that support will be given to the development of a freight strategy. A respondent also states Policy T6p looks to encourage increased use of rail for freight movements, which is an aspiration they can support as it would reduce the number of HGVs using the Strategic Road Network.
- 14.29 It was also stated that North Lincolnshire benefits from the presence of the River Trent and the Stainforth & Keadby canal, which are both capable of handling waterborne freight. Both waterways provide a direct route to the Humber Ports (and marine sourced aggregate) and provide an alternative route for bulky freight materials without the need for HGV traffic. The use of waterways for the transportation of waterborne freight, especially bulk materials and of sustainable transport which can help in reducing greenhouse gas emissions and reduce congestion on the local highway network. The River Trent and Stainforth & Keadby Canal are waterways capable of handling waterborne freight, which is a more sustainable form of transport than road based transit, and a policy approach that recognises and promotes the use of waterborne freight would accord with the general aims of the NPPF. The wording of paragraph 14.39 was supported which recognises the potential role of water based transport. Concerns were raised that the wording of this policy neglects to refer to the potential of waterborne freight, with a focus on the promotion of rail-based freight. It was therefore suggested that the wording is expanded to include a section to promote waterborne freight. Suggested wording is "The use of the waterway network for waterborne goods movement will be encouraged ensuring that existing wharfs and landings are protected from development where there is a reasonable prospect of their reuse for transport purposes; and by ensuring that new development which generate freight capable of bulk transport assess the potential use of waterborne transport as part of their travel plan and construction management plan where they lie within close proximity to the River Trent, Humber or Stainforth & Keadby Canal".
- 14.30 Another comment stated that freight needs to get back on the rails to reduce the lorry carbon emissions.

Responses – Question T7p – Do you think the Preferred Policy T7p: Safeguarding Transport Infrastructure is the right approach?

- 14.31 41 respondents commented on this policy and 14 respondents agreed with contents of the policy (with some amendments). 6 agreed but had no comments to make. 27 respondents did not agree with the policy and out of these 19 made comments. A large majority of all comments were objections in relation to Barton Link Road proposals.

Table 14.7: Responses to Question T7p – Do you think the Preferred Policy T7p: Safeguarding Transport Infrastructure is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	14	34%
No	27	66%
Other	0	0
Total	41	100%

Summary of Responses – Do you think the Preferred Policy T7p: Safeguarding Transport Infrastructure is the right approach?

- 14.32 All the responses received on this policy apart from 3 comments all related to the Barton Link Road. All the responses objected to the policy apart from 3 which gave support.
- 14.33 Specific concerns raised regarding Barton Link Road were firstly the location of the road, lack of detail about the road and the lack of information on the funding for it. Specific comments stated that the planned place for the “Relief Road” may take some of the heavy Lorries but would not relieve the general congestion in the main town. Indeed, with the increased housing there will be more people going into the town, more cars and more pressure for schools, doctors and shopping facilities, none of which seemed to be dealt with in the plans on display.
- 14.34 It was also stated that the proposal for a relief road from the Wren site across country to join Brigg Road is not practical and the town would not benefit in reduction of traffic if the proposed route goes ahead. The Wren Lorries and any other companies currently travelling through the centre of Barton Upon Humber as they do now, will continue along the current route as it is the shortest and least costly route to major trunk roads and motorways. To expect Lorries to access the A15 from the junction on Brigg Road will not give the shortest route and as now Lorries wanting to get to the Motorway are traveling through Barton, South Ferriby, Winterton and Robby to join the motorway in Scunthorpe. The traffics going over the Humber Bridge will still come through the town as it is the shortest route. If the proposed plan were to go ahead there would need to be a weight restriction put on roads in Barton Centre, Market Place, Ferriby Road and the back road 1077 into Scunthorpe to force lorries to take the primary routes. Already the traffic in Barton has reached saturation point and I have seen no impact studies on how the developments locally are going to affect the ordinary individual living in Barton along the access routes to Wren's site.
- 14.35 Further comments stated that any new road needs to link directly to the A15 as this is the only solution to a reduction of traffic through the centre of Barton. There appears to be no provision at all that takes into account how the developments at Wren are already impacting on people in Barton. People not living directly on the route through and out of Barton were incensed by the current state of traffic in Barton and those along the route were all complaining of the unacceptable increase of traffic noise. It was suggested the only acceptable new route for traffic to by-pass Barton is one that would directly link into the A15 with weight restrictions put on the roads going through Barton, along the 1077 through South Ferriby, Winterton and Robby forcing lorries to take the main A and motorway routes after all that is why the investment was put into place along the A15 and motorways. It was also stated that it's not just about money, what is most important is that people who are affected by large scale developments should not have to put up with a diminished quality of life. It was also stated that if HGVs are to be diverted along the B1218 to the A15 at Bonby Lodge serious money will have to be spent on the B1218 which is already collapsing at the edges in many places and is riddled with potholes. Brigg road, Horkstow road, Tofts road, and Forkedale may well become the preferred route for car drivers from the Wren factory at shift changes looking to avoid the town centre on their way to the A1077/A15 roundabout on Ferriby road.
- 14.36 Further comments stated that there was a lack of detail about the road. What size (single carriageway?) is proposed for the new road? What arrangements are proposed where it crosses Barrow Road? – Traffic lights? Crossroad? Bridge? What arrangements are proposed where it joins Brigg Road (another narrow single carriageway road)? Wren Lorries are often articulated, with a trailer, so those swinging round to join a road at 90° could well be an issue. What arrangements are to be made at the junction with the A15? (the “plan” didn’t even extend as far as the A15). It was stated this junction was an afterthought, and is extremely poorly laid out. Vehicles joining the A15 from either direction, are not visible from the A15 until just before joining, so a vehicle doing a legitimate 70mph in lane 1 has little reaction time. Again, an articulated lorry with trailer will be a significant obstacle.
- 14.37 It was also stated that if the new link road goes ahead, provision should be made for a new modern industrial park to the south east of WREN for support businesses to WREN who will want to be closer to their main client. Another possible option to help with the movement of cars would be to extend

Butts Road to Falkland Way, improving direct access to the Ferriby Road via Butts Road, Dam Road and Gravel Pitt Road. Some improvement works would need to be done at the Rail Station, some of which is already being planned. Some minor upgrades by NLC should be made immediately to the A1077 so that traffic flows better as follows: Double yellow lines need to be painted outside the Chapel so that cars are not parked there allowing flow of traffic. A speed limit of 20 mph be put in place within the historical centre. A town centre plan needs to be done, purchasing of the old Heron building would provide more spaces for shoppers.

- 14.38 Further comments stated that they would prefer there to be a roundabout built at the junction where the proposed bypass would join Barrow Road (A1077) / Falkland Way. The proposals they expected to see that Wren Lorries would be entering and exiting the Wren site at their proposed new entrance adjacent to Barrow Mere and travelling along Barrow road to the new roundabout at Barrow Road (A1077) / Falkland Way, thus reducing the wear and tear on Falkland Way. An alternative suggestion for the road was suggested which they suggested was a shorter, more convenient route than the former suggestion of going through the old industrial site. This would be to go from Maltkiln Road close to the Tesco car park, through the small industrial site currently for sale for housing, and onto Humber Road approximately halfway down its length. From there, traffic could join Far Ings Road and exit up Gravel Pit Lane to join the A1077 at the top. An attachment showing this route was also submitted.
- 14.39 Regarding the field adjacent to Lidl, it was suggested that it's mainly a grass area with a few trees either around the perimeter, and / or a few dotted around the grass area. It is presumed the idea on the relief road is that the A15 traffic approaches the proposed bypass (and visa-versa) via the Junction on the A15 onto the B1206 / Bring Road to the South of Barton.
- 14.40 Funding of the road was also questioned and where this money would come from. Loss of habitats and wildlife were also raised as an issue as well all the loss of valued Greenspace. It was also stated that the plans would also cause significant disruption, noise and detrimentally affect the quality of life for residents in the lovely quiet area. The impact on schools and doctors surgery were also raised from the new proposed housing to support the link road .The expansion to the Wren Factory was also raised and the impact of further lorries on the local roads from this.
- 14.41 Support for Barton Relief Road stated that they strongly agree with the need for a Barton link road from the 1077 to the A15 as they believe the traffic at the minute is already to heavy and dangerous, before any large business expansions, with large amounts of industrial (and associated) vehicles navigating a once small and pretty market town making it into an area which appears now to be more heavy industry based over residential including any visitors and tourists.
- 14.42 Comments which did not relate to Barton Link Road were that the policy seemed right and asked if consideration could be given to a road from Station Road to Ings Lane in Kirton-in-Lindsey to support the town's sports facilities. Support was also given to the proposals to replace Melton Ross Bridge in order to ensure this section of the A18 remains open to all vehicles and promotes improved connectivity between Humberside Airport and the M180, as well as assisting in opening up development land at the airport. It was also stated that Ulceby village should be given priority over any new road schemes in the area due to the amount of HGV's coming through this village when the A180 is shut in excess of 15,000 over a 16 hr period.

Responses – Question T8p – Do you think the Preferred Policy T8p: Safeguarding Aviation is the right approach?

- 14.43 10 respondents commented on this policy and 9 respondents agreed with contents of the policy. 8 agreed but had no comments to make. 1 respondent did not agree with the policy contents.

Table 14.8: Responses to Question T8p – Do you think the Preferred Policy T8p: Safeguarding Aviation is the right approach?

Response	Number of Respondents	Percentage of Respondents
Yes	9	90%
No	1	10%
Other	0	0
Total	10	100%

Summary of Responses – Do you think the Preferred Policy T8p: Safeguarding Aviation is the right approach?

- 14.44 Comments which supported this policy agreed with the contents and they stated they wished to maintain the gliding club site in Kirton-in-Lindsey which is described as a vital tourism and recreation site within this town and North Lincolnshire due to the unique position.
- 14.45 The objection raised regarding this policy proposal stated that following the court ruling of 27/02/20 against the third runway of Heathrow Airport, any development of Humberside Airport must be shown to be compatible with our national climate change commitments such as the Paris Agreement.

15. DEVELOPMENT MANAGEMENT

Introduction

- 15.1 Development Management is the process of working with developers to facilitate development whilst protecting the environment through the granting or refusal of planning permission and controlling unauthorised developments.
- 15.2 The Local Plan will set out policies based on the outcomes of the preferred options consultation on this chapter. These overarching policies will guide the future development of the area but will not necessarily provide the level of detail required to adequately assess planning applications. Therefore, it is essential for the Local Plan to set out the detailed policies to assess and determine planning applications. Doing so will ensure that growth and development contributes to meeting our ambitions and outcomes for North Lincolnshire as well as creating a place that is cleaner, greener and safer.

Consultation

- 15.3 The Preferred Options document contained 5 questions relating to subjects that could be covered by 'development management' policies.

Question DM1p - Do you DM1p: General Requirements is the right approach?

Question DM2p – Do you think DM2p: Temporary Building is the right approach?

Question DM3p – Do you think DM3p: Environmental Protection is the right approach?

Question DM4p – Do you think DM4p: Telecommunications and Broadband is the right approach?

Question DM5p – Do you think DM5p: Advertisements and Shopfronts is the right approach?

Responses – Question DM1p: General Requirements

- 15.4 13 respondents had views on the approach that should be adopted in the Local Plan in terms of the 'General Requirements' policy and/or what it should contain. 8 respondents agreed with contents of the

policy (with some amendments), whilst 4 did not. 1 did not select an option but provided detailed comments.

Table 15.1: Responses to Question DM1p: General Requirements		
Response	Number of Respondents	Percentage of Respondents
Yes	9	64%
No	4	29%
Other	1	7%
Total	14	100%

Summary of Responses – Question DM1: General Requirements

- 15.5 Those who provided detailed comments or views on this question generally agreed with its principles. Most comments centred on the particular criteria of the policy.
- 15.6 One respondent requires that the policy and supporting text should acknowledge that some elements of the policy may not be relevant to minerals development (including hydrocarbons), primarily in relation to positively contributing to local character, landscape and townscape. Whilst another considered development character and siting is very important as are the local people's opinions who will be affected by it.
- 15.7 A view was provided that paragraph 15.9 it is not clear that 'the purpose of policy DM1p is to help encourage the growth and development of small businesses.....' as the policy appears to refer to development of all types. This should be clearer in the final section, 'Changes of Use'.
- 15.8 A comment was made that all planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, NPPF requires planning policies and decisions to enhance the natural environment by "...providing net gains for biodiversity..." (170d) and requires plans to "...pursue opportunities for securing measurable net gains for biodiversity" (174b). All development is an opportunity for securing biodiversity net gain and the NPPF states that "opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity" (175d). This representation was accompanied by two other respondents recommending an additional criteria that reflects the new mandatory requirements to secure measurable biodiversity net gain and contribute to nature's recovery through establishment of Nature Recovery Networks.
- 15.9 A number of comments highlighted additional areas that should be added. These include:
- Acknowledging the need to promote high quality design principles, but to maximise the benefits of the policy;
 - The need to incorporate SuDS and the Drainage Hierarchy is incorporated in this section as this will ensure that these design considerations as picked up within this policy support the other policies within the Plan;
 - Requests additional wording on maximising pedestrian mobility and avoiding barriers to movement for the sake of clarity;
 - More provision should be made for temporary operations where impacts may be higher but for a short duration and which may be considered acceptable subject to conditions controlling such impacts; and
 - Amending 'must achieve high quality sustainable design' to say 'must achieve the highest quality sustainable design'.

Responses – Question DM2p: Temporary Buildings

- 15.10 7 respondents had views on the approach of a 'Temporary Buildings' policy and/or what it should contain. All 7 respondents agreed with the policy approach.

Table 15.2: Responses to Question DM2p: Temporary Buildings		
Response	Number of Respondents	Percentage of Respondents
Yes	7	100%
No	0	0
No Option Selected	0	0
Total	7	100%

Summary of Responses – Question DM2: Temporary Buildings

- 15.11 Those who provided detailed comments or views on this question generally agreed with its principles.

Responses – Question DM3p: Environmental Protection

- 15.12 12 respondents had views on the approach that should be adopted in the Local Plan to in terms of an 'Environmental Protection' policy and/or what it should contain. 8 respondents agreed the policy (with suggested amendments), whilst 4 did not.

Table 15.3: Responses to Question DM3p: Environmental Protection		
Response	Number of Respondents	Percentage of Respondents
Yes	10	67%
No	5	33%
Other	0	0
Total	15	100%

Summary of Responses – Question DM3p: Environmental Protection

- 15.13 A number of comments highlighted areas that should be included in the policy. These include: Paragraph 170 (part e) of NPPF seeks to ensure that development does not result in unacceptable adverse impacts with regards to pollution or water quality), which both could impact our waterways. The wording of the policy and supporting paragraphs would help to ensure that impacts from contaminated land and the consideration of impacts from water quality are adequately assessed in line with the plan.
- 15.14 The Environment Agency stated whilst policy DM3p includes a point on water quality, there are no paragraphs within the supporting text. There needs to be mention of the Water Framework Directive, catchment approaches to water management and polluter pays. There should be discussion of the use of SUDs trains to improve water quality prior to discharge and the presumption against development that will negatively impact on water quality or quantity, as well as the requirement to submit suitable assessments and plans to avoid, mitigate or compensate for any potential impacts.
- 15.15 A view was provided that Point 5 on light pollution only recognises adverse impacts on local amenities, and this should be amended as suggested under paragraph 15.26 to include potential impacts on biodiversity. Another comment on paragraph 15.26 stated that the introduction of new light sources can have detrimental impacts on more than just residential amenity. This paragraph should be amended to include reference to the potential impacts on wildlife which have been recognized elsewhere. It should also require that development aims to retain dark corridors.

- 15.16 In terms of 'Odour' applicants should demonstrate that proposed developments would not be adversely affected by the normal operation of Anglian Water's existing assets e.g. water recycling centres (formerly sewage treatment works). Nuisance may be caused by noise, lighting and traffic movements but its most prevalent source will be odours, unavoidably generated by the treatment of sewerage. Reference is made to sensitive development providing an odour impact assessment where there is a potential risk of odour from existing uses. They suggest that the policy refers to avoiding potential odour impacts through site layout and design where feasible and that the continued operation of existing uses should not be prejudiced.
- 15.17 In terms of 'Water quality' section of DM3p one respondent suggested the text should include a section on protecting the water environment (quality and quantity, ground and surface waters), to support point 9 of the Policy. They suggest Point 9 would better be titled 'Water' or 'the Water Environment' rather than 'Water quality' and/or the supporting text should address wider issues to protect the water environment as well as encouraging opportunities for environmental improvement. E.g. the availability of water to support the development; the capacity to effectively and sustainably manage foul and surface water; and sustainable drainage systems. Another response suggested reference is made to development not being permitted where it would have an adverse effect on the quality and quantity of ground water sources.
- 15.18 Also in relation to 'Water quality' a view was provided that reference is made to development not being permitted where it would have an adverse effect on the quality and quantity of ground water sources. The policy is fully supported, but suggest that the policy sets out what information should be provided by the applicant where there is a potential risks to groundwater sources for public water supply to enable the application to be determined.
- 15.19 More provision should be made for temporary operations where impacts may be higher but for a short duration and which may be considered acceptable subject to conditions controlling such impacts.
- 15.20 A response was made regarding the Air Quality section, which requires an air quality impact assessment. The view was that this is not appropriate. The Institute of Air Quality Management has produced guidance for air quality and planning which provides thresholds for when an assessment is required. This policy contradicts that and the phrase "significant impact" does not follow best practice.
- 15.21 Also a comment strongly supported the inclusion of a reference to the 25 Year Environment Plan in supporting paragraph 15.23 and to the commitment to embed environmental net gain. Their view is it's strange that this is mentioned here in relation to air quality but is not mentioned anywhere else within the plan. There is barely any mention of the ecosystem services or natural capital that is required to underpin environmental net gain.

Responses – Question DM4p: Telecommunications and Broadband

- 15.22 9 respondents had views on the approach that should be adopted in the 'Telecommunications and Broadband' policy and/or what it should contain. All 9 respondents agreed with the policy approach.

Table 15.4: Responses to Question DM4p: Telecommunications and Broadband

Response	Number of Respondents	Percentage of Respondents
Yes	9	100%
No	0	0
Other	0	0
Total	9	100%

Summary of Responses – Question DM4p: Telecommunications and Broadband

15.23 Those who provided detailed comments or views on this question generally agreed with its principles.

Responses – Question DM5p: Advertisement and Shopfronts

15.24 9 respondents had views on the approach that should be adopted in the 'Advertisements and Shopfronts' policy and/or what it should contain. All 9 respondents agreed with the policy.

Table 15.5: Responses to Question DM5p: Advertisements and Shopfronts		
Response	Number of Respondents	Percentage of Respondents
Yes	9	100%
No	0	0
Other	0	0
Total	9	100%

Summary of Responses – Question DM5p: Advertisement and Shopfronts

15.25 Those who provided detailed comments or views on this question generally agreed with its principles. Particular support was received for Criteria 4 in terms of enforcement in a conservation area.

General comments

15.26 As part of the consultation a number of general comments were also provided in relation to Chapter 15 – Development Management. These are summarised below.

15.27 One response recommended that SPDs are considered to provide additional guidance around Biodiversity Net Gain and development within the South Humber Bank employment allocation.

15.28 A comment was made regarding paragraph 15.24 which states the council will be flexible and consider metrics relevant to the 25 Year Environment Plan. This response doesn't think it sets out how the council will update their systems and requirements and keep the Local Plan up to date/in line with emerging legislation and policy. One of the metrics which we have certainty will be adopted nationally to support delivery of measurable Biodiversity Net Gain is the Defra Biodiversity metric. The Local Plan should include reference to this in relevant policies now in order to bring this Local Plan up to new standards now to provide certainty and clarity for developers.

16. DELIVERING INFRASTRUCTURE

Introduction

14.46 It is critical that North Lincolnshire receives the infrastructure it needs to support the delivery of housing and jobs growth, and to ensure that existing communities can be sustained. It is important that the growth should bring benefits to, and not adversely affect the quality of life of, existing communities. To achieve this it is important to have the correct tools in place to help implement these policies and ensure the successful delivery of the overall vision for this Plan.

14.47 There are a number of ways to ensure infrastructure delivery through the planning system. The existing system in North Lincolnshire includes developer obligations secured in Section 106 Agreements, which cover on and off-site requirements including affordable housing, open space provision, transport measures, and education provision. However, this system has not adequately picked up more strategic

infrastructure impacts or needs, and can be accused of lacking transparency for developers when providing for standard off-site infrastructure in particular.

- 14.48 This Plan will be supported by an Infrastructure Delivery Plan (IDP), which provides detail of the infrastructure that is essentially necessary to enable growth to occur and delivery issues in relation to key proposals. The IDP also includes a number of infrastructure projects, which although not essential to the delivery of this Plan, are desirable. Their inclusion within the IDP will assist the Council in its attempts to secure funding for these projects. The Council will keep these documents under review to measure progress. It should be noted that the IDP principally identifies high level strategic infrastructure and does not include site specific infrastructure requirements, which will be dealt with through individual planning applications.

Consultation

- 14.49 The Preferred Options document contained one question relating to delivering infrastructure.

Question ID1p - Do you think the Preferred Policy ID1p: Delivering Infrastructure is the right approach?

Responses – Question ID1p: Delivering Infrastructure

- 14.50 19 respondents had views on the approach that should be adopted in the Local Plan in terms of the 'Delivering Infrastructure' policy and/or what it should contain. 13 respondents agreed with contents of the policy (with some amendments), whilst 5 did not. 1 did not select an option but provided detailed comments.

Table 16.1: Responses to Question ID1p: Delivering Infrastructure		
Response	Number of Respondents	Percentage of Respondents
Yes	13	69%
No	5	26%
Other	1	5%
Total	19	100%

Summary of Responses – Question ID1p: Delivering Infrastructure

- 14.51 Those who provided detailed comments or views on this question generally agreed with its principles.
- 14.52 A number of respondents recognised that planning obligations are necessary to make the development acceptable in planning terms. The planning obligations should be directly related to the development, fairly and reasonably related in scale and kind to the development. They welcome the acknowledgement that some development proposals may be unable to meet all of the relevant policy and planning obligation requirements while remaining economically viable and deliverable, either in whole or in part. In such circumstances they support the approach of considering requests to reduce the level of planning obligations to a level which ensures that a scheme remains viable. In these instances, they note the Council's preference being given to the needs and priorities of an area and the wider benefits of development, such as, for example, regeneration and meeting housing need.
- 14.53 One respondent identified a number of National Grid assets are within the North Lincolnshire. These assets should be considered when preparing the plan.
- 14.54 A comment was made that the policy provides no mechanism for delivery of the use of Compulsory Purchase Order (CPO) powers when necessary. There is a distinct weakness in the Plan that many large

scale land allocations rely on infrastructure, particularly so called link roads, for which there is no adequate commitment by the Council to guarantee delivery.

- 14.55 A respondent would like the policy to be more flexible in respect of temporary developments, which may not support or justify the need to make a planning obligation contribution through whatever mechanism the council may propose.
- 14.56 One comment asked that local knowledge from the Town and Parish Council and residents should be taken into account when making decisions.
- 14.57 A comment made identified that all infrastructure required to support the aspirations of the plan should have funding streams identified as part of the supporting evidence. This will provide surety that the plan can be delivered.
- 14.58 Development must be sustainable and have minimum impact on the environment and local population.
- 14.59 Concerns raised regarding the road infrastructure not being adequate. The council need to consider improving the road infrastructure for example new bypasses.
- 14.60 It was suggested this section needs to consider how planning obligations in relation to Biodiversity Net Gain is secured. There is a need for a Developer Contribution SPD that will include guidance on the mechanism for securing obligations with respects of Biodiversity Net Gain.

