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Dear Marcus

North Lincolnshire Local Development Framework: Core Strategy Preferred Options October 2006

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the North Lincolnshire Core Strategy: Preferred Options and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the Core Strategy is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.

The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire & the Humber (based on the selective review of RPG12 issued in December 2004) and the Draft Regional Spatial Strategy – the Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005).

The comments place emphasis on the draft Regional Spatial Strategy (RSS), which reinforces and develops the general thrust of existing RSS; furthermore it is more up to date and has significant "weight" in its own right. Prior to adoption (expected late 2007), the weight attached to the draft RSS will increase once the Panel's Report is

received (expected early 2007) and also when proposed changes are published (expected Summer 2007).

Regional Spatial Strategy

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that DPDs drawn up by local authorities as part of the Local Development Framework are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

It will be important in the submitted Core Strategy to highlight the need for there to be 'general conformity' between the RSS and the Core Strategy, to ensure that the two strands of the development plan are mutually supportive. We welcome the regional planning policy context set out in Chapter 2 and reference to the need for local plans to be in conformity with the Regional Spatial Strategy, as well as reference to RSS policy linkages throughout the Core Strategy. We think that it would be helpful, however, to reinforce the fact that RSS does in fact form part of the North Lincolnshire Development Plan. This would help to clarify the significance of references throughout the Core Strategy to RSS.

The aim of existing RSS (December 2004) is to guide development to sustainable locations and to focus development in main urban areas, market and coalfield towns (Policy P1). This key strategic approach is reinforced in the Yorkshire and Humber Plan (Draft RSS December 2005), which is more specific about the desired location of development in Policies YH1 to 9. These clearly provide a policy context and direction that emphasises the need to concentrate development in Regional and Sub-Regional Centres (including Scunthorpe), provide for sufficient development in Principal Service Centres for them to fulfil their important role and to allow limited development in Local Service Centres (identified as Market Towns in the Core Strategy), primarily to meet local need for affordable housing and to enable economic diversification.

It is pleasing to see that many of the issues the Assembly raised previously in the Core Strategy Issues and Options consultation have been addressed in the Preferred Options document. We hope that the further comments provided now will assist in delivering a Core Strategy that more clearly reflects the Regional Spatial Strategy set out in both current RSS (December 2004) and draft RSS (Yorkshire and Humber Plan – December 2005).

Key Points on the Core Strategy

Below is a summary of the main points the Assembly wishes to raise with regards to the Core Strategy. Annex 1 provides further detail for each of these issues.

1. General support for the overall development strategy
2. Concern that there is insufficient differentiation between the settlements identified as "Market Towns", "Rural Service Centres" and "Villages in the Countryside" and further clarification/differentiation of their roles is needed, with an emphasis on meeting local needs overall

3. Need for a clearer sequential approach provided within a single policy
4. Higher housing figures would only be supported if identified through a Plan Monitor Manage approach, and only if focussed in Scunthorpe
5. Concern over the proposed Lincolnshire Lakes development and its implications for the delivery of housing targets
6. Support for policies on housing mix, density, affordability and provision for Gypsies and Travellers
7. Concern over approach taken to employment land- the Core Strategy identifies sites and levels of employment land but does not link this to the findings of an employment land review
8. Concern over proposed location of (airport) business parks
9. Support for transport policies
10. Should provide reference to the need for an Appropriate Assessment to be undertaken
11. Overall support for the Environment and Resource policies, although feel that the issue of flooding needs to be considered in greater detail

I trust that the comments provided here, and expanded on in Annex 1, are helpful to you as you prepare the Core Strategy for submission to the Secretary of State. If you wish to discuss any of the points made here please do not hesitate to get in touch. We look forward to continuing to work with you on your Core Strategy.

Regards



Jenny Poxon
Head of Planning Delivery and Conformity

ANNEX 1: DETAILED COMMENTS (BY SECTION) ON THE CORE STRATEGY

Spatial Vision and Objectives

There is clearly a strong link between the overall vision and spatial objectives for the Local Development Framework that are set out in the Core Strategy, and with both the current and draft Regional Spatial Strategies. We suggest, however, that it would be helpful to include a further spatial objective with regard to the need for travel, for example:

“To locate development such that the need for travel is minimised and to promote the use of public transport where travel is necessary.”

Spatial Strategy (CS1-9)

We support Policy CS1 and the direction it takes with regard to development within North Lincolnshire. We also welcome the emphasis placed on sustainable development in CS2, although suggest that bullet point 2 of the policy should also emphasise public transport as being a key mode of transport.

The introductory text associated with Policy CS3 uses the 2003 ONS Population projections as a basis for outlining the expected population change for North Lincolnshire over the Plan period. These figures, however, do not take into account policy interventions and other local issues likely to influence growth and therefore should be discussed with caution.

We note that Policy CS3 includes an overall total of housing provision for the entire Plan period. In the interests of clarity, it would be helpful if this policy also referred to the phasing approach introduced in Policy CS10, rather than the overall figure.

Policy CS3 sets out a commitment to allocate at least a further 20 ha of employment land in key strategic locations. The draft RSS does not include targets for the provision of employment land but gives an indicative employment land forecast (the change in total employment land in use 2006 – 2016) in table 14.6. This is 2-20ha for North Lincolnshire. It is not clear from the Core Strategy whether the amount of land identified in Policy CS3 has been based on an employment land review, and the wording would in fact indicate otherwise (“...an *additional* 20ha...”). If an employment land review has formed the basis of the Core Strategy’s approach, then this should be made more explicit and the policy wording amended to reflect this. This issue is discussed further in sections below.

It is pleasing to see that Scunthorpe has been identified as a Sub-Regional Centre, and we support the emphasis placed on it as the main focus for development within the District (policies CS1 & CS4), which is consistent with both the current and draft RSS. The draft RSS does not identify any Principal Service Centres in the North Lincolnshire District, and the approach taken to the Market Towns in policy CS5 (acknowledged to equate to Local Service Centres in draft RSS) is generally supported, although a greater emphasis should be placed on meeting local housing needs, particularly for affordable housing.

We are slightly concerned at the inclusion of a further settlement category of Rural Service Centres (policy CS6). We note that several of these settlements were classified as Local Service Centres in the Regional Spatial Study (2004) (Messingham, Broughton and Kirton in Lindsey) and we suggest the other settlements identified in this policy would be more appropriately categorised within "Villages in the Countryside" (policy CS7). It is not clear why there needs to be "Market Towns", "Rural Service Centres" and "Villages in the Countryside", and the Assembly would wish to see a clearer and more focussed settlement network identified.

The Assembly has no comments on policy CS8 and supports policy CS9.

Current RSS (Policy P1) and draft RSS (Policy YH8) set out the need for a clear sequential approach to be followed. Currently, the Core Strategy contains guidance within a number of policies and we feel that it would benefit from a single policy that set out a robust sequential approach for all policies within the document.

Delivering Better Homes (CS10-14)

The Assembly supports the inclusion of the draft RSS housing targets within policy CS10. We understand that the District is seeking a higher target than that set out in the draft RSS, as is stated in the policy. We wish to clarify our position on this matter.

During the Examination in Public of the draft RSS, the Assembly tabled a revised Policy H2, which focussed more strongly on a Plan Monitor Manage Approach to housing provision. This had been discussed previously with members of both the Regional Technical Advisory Group and Regional Planning and Infrastructure Commission, and was met with general overall support. An excerpt of the proposed revision is set out below:

"...the management of the release of land for housing...must enable the delivery of housing provision above the rates set out in policy H1 should regional monitoring show that this is necessary; and provided the delivery takes place in regional and sub regional centres, has adequate infrastructure to support the additional provision and is in accordance with the core and sub area approach in the Plan."

Although we recognise the fact that the housing provision figures set out in draft RSS may be reviewed as a result of debate at the Examination, we wish to reiterate our comments from the Core Strategy Issues and Options consultation. Based on the above proposed approach, growth above the RSS targets would only be supported in Scunthorpe, and *only* where regional monitoring indicated that this was necessary. We would therefore not wish to see any increase in housing provision in the near future.

It is unclear from the Core Strategy what proportion of new housing is to be accommodated within the proposed Lincolnshire Lakes Urban Extension and when this development is due for completion. We would be concerned if delivery of the housing provision targets was too reliant on the completion of the proposed urban extension.

We support the inclusion of a sequential approach to releasing land for housing as outlined in CS10, although we unclear what this adds to policy CS11, which covers the distribution and location of housing in further detail. We support the general approach

taken within policy CS11 (notwithstanding comments made previously with regards to the settlement hierarchy), but feel that much of the detail is already covered adequately in policies CS4-CS7. We suggest that a slightly more generic sequential policy, covering all types of development, could be included within the Spatial Strategy chapter. It would also be helpful to include "suitable infill opportunities" as a 'second priority' within the sequential test, in line with policy YH8B(ii) of draft RSS.

We welcome the inclusion of policies CS12 Housing Mix and Density and CS13 Maximising Provision of Affordable Housing. We also support the further work being undertaken with regards to housing needs in the District and would hope that the findings from this report would assist in the delivery of these policies and inform future development plan documents.

It is pleasing to see the inclusion of a Gypsies and Travellers policy (CS14). We wish to point out that in the recent Regional Gypsies and Travellers Assessment, North Lincolnshire was identified as needing to progress with local assessments and make provision more urgently. We would have expected the Core Strategy to discuss the role of rural exceptions sites in providing sites for Gypsies and Travellers.

We note that there is no reference to an overall Brownfield target for the District. Current RSS provides an overall target for the Region, which has been developed further in draft RSS to include district level targets for housing. The target for North Lincolnshire is 40% and while we note that it is included as a target for policy CS4, we would wish for it to also be referred to explicitly within either policy or associated text.

Creating Greater Economic Success (CS15-17)

Policy CS15 sets out a range of locations where employment land allocations could be made. However, as previously discussed, it is unclear whether this is based on an employment land review. Policy E3 of the draft RSS establishes a context and methodology for local planning authorities to undertake employment land reviews.

Policy CS15 could be strengthened by citing the approach to employment land reviews set out in the existing and draft RSS (Policy E3 B), including the commitment to reallocate (or potentially deallocate) employment land found to be unsuitable for modern economic uses or in unsustainable locations. If an employment land review has been undertaken, then the findings and implications of this study should be made clearer within the Core Strategy.

Although the explanatory text associated with this policy refers to diversifying the economy, we would welcome further reference to the issue within policy CS15. We recognise that policy CS17 also refers to the diversification of the rural economy, although Policy HE1 of the draft RSS states that it is also a particularly priority for Scunthorpe. Policy CS15 could be improved by providing more detail on how the economy will be strengthened and diversified, rather than allocation figures for particular sites. We feel this level of detail would be more appropriately contained within a specific DPD.

In previous consultation on the North Lincolnshire Core Strategy Issues and Options, the Assembly raised concerns regarding the possible development of airport business parks.

We note that policy CS15 proposes an allocation of 20+ha of employment land at the Humberside International Airport, the exact nature of which is unclear. We wish to reinforce our previous comments, and suggest that development such as that referred to above would need careful consideration in relation to the Regional Spatial Strategy.

We support the approach to education and skills outlined in Policy CS16 and to diversification of the rural economy in Policy CS17.

Creating Thriving Towns & Villages (CS18-19)

While we generally support the overall approach to policy CS18, we feel that certain elements of the policy are repetitious (for example "Develop Scunthorpe as a major sub regional centre", which is initially addressed in Policy CS1 and again in CS4). In the interests of clarity, we would also suggest reference to "local service centres" in bullet point 3 be amended to refer to Rural Service Centres, in line with previous terminology. Likewise, the final bullet point could be improved by referring to settlement categories used previously in the Core Strategy.

We have no comments regarding policy CS19.

Environment & Resources (CS20-27)

We support the general approach taken in Policy CS20, and the references to the Humber estuary and Crowle Moors. We wish to reiterate our comments from the Core Strategy Issues and Options consultation with regard to Appropriate Assessment. In addition to the Humber Estuary, the Regional Appropriate Assessment for the Yorkshire and Humber identified the Hatfield and Thorne Moors as internationally significant sites within the North Lincolnshire district. We would welcome recognition of these areas within the Core Strategy and think that a reference to a future local Appropriate Assessment would be helpful.

The issues covered in policy CS21 are generally consistent with both the current and draft RSS. In particular, we support the approach to restoring and expanding existing habitats and also creating new habitats in the district.

It is pleasing to see the inclusion of a policy dealing with general resource protection and consumption (policy CS22). We feel, however, that the policy needs to be developed further in order to successfully deal with these important issues. In particular, water resources have been identified in both the current and draft RSS (policies R3 and ENV2, respectively) as being an important consideration for the Region. More specifically, the draft RSS (Policy ENV2) refers to minimising water-intensive development at the Sherwood Sandstone Aquifer in North Lincolnshire. We would welcome recognition of this issue within a more detailed Policy CS22.

We support Policy CS23.

Policy CS24 is a positive approach to addressing issues associated with climate change. We are particularly pleased to see inclusion of the renewable energy target for the District, as detailed in draft RSS. This issue has also been explored further in policy CS25.

Policy R2 of current RSS and Policy ENV1 of draft RSS both emphasise the importance of flood management and using strategic flood risk assessments to guide the location of development in flood prone areas. Flooding in North Lincolnshire is a serious issue, and much of the District has been identified as Flood Risk Area. It might be that there are some more detailed considerations in relation to flooding that need to be reflected in Policy CS24 before it is submitted.

We support the overall approach to Waste outlined in Policy CS26, in particular reference to the proximity principle for waste management facilities. We would wish future DPDS to provide more detailed information with regards to provision and location of waste treatment facilities and also discuss proposals for reducing waste production in the District.

Creating Sustainable Communities (CS28-31)

The approach to provision and improvement of community services is supported (Policies CS28-31).

The Assembly supports policies CS29-31.

Transport and Communication (CS32-34)

The proposed transport priorities outlined for Policy CS32 are supported, and we welcome the inclusion of electronic and telecommunications technology as an important consideration for the District.

We wish to make a point with regard to the statement that RSS supports growth and expansion of the Humberside International and Doncaster Robin Hood Airports. This is not strictly the case. The approach taken in RSS is a direct response to national policy on air travel, and aims to capitalise on the benefits of airport expansion, as well as mitigate negative impacts associated with it, but does not explicitly support the growth of the airport.

Policies CS33 and CS34 are very positive policies and we welcome their inclusion within the Core Strategy. It is particularly pleasing to see the emphasis on reducing the need to travel, improving public transport and encouraging development of a Rural Transport Strategy for relevant areas within the District.

Urban and Rural Renaissance (CS35-36)

We support the overall approach taken with regards to urban and rural renaissance in policies CS35 and CS36. The principles of urban and rural renaissance are supported in both the current and draft RSS. Furthermore, Policy HE1(F) of draft RSS specifically identifies the renaissance of Scunthorpe as a regionally significant investment priority.

In previous consultation on the North Lincolnshire Core Strategy Issues and Options, the Assembly raised concerns regarding the Lincolnshire Lakes Development. We wish to reinforce our previous comments, and suggest that this development would need careful consideration in relation to the Regional Spatial Strategy.

Delivering Development (CS37) and Monitoring & Implementation

We have no comments regarding policy CS37.

We have forwarded some more detailed thoughts on developing the indicators for the Core Strategy in a separate email.