

Our ref: General/40b – Planning Conformity/Final responses/North Lincs I&O Aug 06 emailed

29 August 2006

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Dear Marcus

North Lincolnshire LDF Core Strategy Issues and Options: Revised August 2006

Thank you for consulting the Assembly on the above. I am sorry that this response will arrive after your consultation deadline and I trust that you will still be able to take our comments into account at this stage in the process.

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of their 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.

We think it would be helpful if this need for general conformity were set out at the start of the Core Strategy as this demonstrates the need for a strong link between the LDF and the RSS and will help to clarify the significance of the references to the RSS that are made in the document.

Because we are in a moment of time when there is an existing RSS (December 2004) and an emerging RSS (December 2005), these Assembly comments are based on both documents. The comments place emphasis on draft RSS (the 'draft Plan'), 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. The weight attached to the draft RSS will increase as it passes through its Public Examination (September and October 2006) and once the Panel's Report is received (expected Summer 2007) before it is issued by the Secretary of State (expected late 2007).

At this stage in the drafting of the Core Strategy, 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 RSS 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.

Overall, we wish to reiterate what was outlined in our previous response with regards to the locational strategy. We would not wish to see policies that supported a less focused and more dispersed pattern of development across the District, which is a direction that some of the options appear to have taken. In particular, references such as that made in Option 2 of Rural Areas (which promotes significant development within smaller settlements) are not considered beneficial to the implementation of the draft Plan's approach.

We would also reinforce the comments we made previously about some issues needing need careful consideration in relation to the Regional Spatial Strategy. These are related to the Lincolnshire Lakes development (p21), the possible development of airport business parks and development along motorway corridors (pp 14, 22 & 24).

There are some further issues which we wish to raise in response to the revised Issues and Options document, as outlined below:

1. How much new housing will be needed? (p14)

We have concerns over the options included for this key issue and are slightly discouraged that none of the options provided are in conformity with the RSS. In particular, we are concerned at the approach Option 1 has taken in relation to the provision of housing set out in the draft Plan. We are currently proposing to develop a clearer approach to Plan Monitor Manage in the draft Plan, which would allow for housing provision above the rates set in the Plan to take place within regional/sub-regional centres in certain circumstances; and only when it supported the Plan's core approach and sub area policies.

We would therefore only support growth above the RSS targets in Scunthorpe, which is the sole Sub Regional Centre within the North Lincolnshire District. We would not wish to see additional growth (ie over and above that required to meet RSS targets) encouraged in other smaller settlements.

2. Gypsies and Travellers (p16)

We welcome the inclusion of Gypsies and Travellers as a key issue in the document. We are concerned, however, at the inclusion of Option 2 (to develop no specific policy for Gypsies and Travellers) which is inconsistent with Policy H5 of the draft RSS. We would welcome an approach more along the lines of Option 1 - identifying requirements through local needs assessments and providing sites accordingly.

3. North Lincolnshire's Employment Land (p17)

With regards to this key issue, it would be helpful if the employment land forecasts set out in the draft Plan were acknowledged. We would wish to see an emphasis on providing sufficient land in sustainable locations to meet the needs of the modern North Lincolnshire economy, as is outlined in Policy E3 of the draft Plan.

4. Biodiversity (p22)

It is felt that further clarification with regard to 'biodiversity sites' would be helpful for this issue. We welcome the protection of biodiversity sites, as is the basis for Options 1 and 2.

Option 3, however, discusses the loss (albeit limited) of sites for development. We feel that this should be addressed with caution. It would be unfortunate if areas of biodiversity already afforded protection through the Local Plan or Biodiversity Action Plan were lost. Additionally, as you will well be aware, all planning authorities are now required to undertake an Appropriate Assessment on development plans to ensure that 'Natura 2000' sites will not be adversely affected by the implementation of such Plans. The Assembly has recently released a Regional Appropriate Assessment for the Yorkshire and Humber, which identifies several Natura 2000 sites within the North Lincolnshire area. It would not be appropriate for these sites (consisting of the Hatfield and Thorne Moors and Humber Estuary) to be developed. We feel that acknowledgment of the Appropriate Assessment process would be beneficial.

5. Climate Change & North Lincolnshire (p23)

Climate change and its predicted impacts are key issues identified in the draft Plan and are integral to its core approach. We therefore find Option 2 for Climate Change disappointing, in terms of consistency with both regional policy and also national policy. We would support an approach similar to that outlined in Option 1, which we consider a considerably more positive and proactive option.

6. Waste (p24)

The draft Plan places a clear emphasis on sustainable waste management and in moving the management of waste streams 'up the waste hierarchy' (Policy ENV12). We therefore welcome the approach taken in Option 1 for this issue. We do not consider Option 2, however, to be a positive approach to waste management.

7. Business services & Airports (p34)

The key issue is outlined in the document as relating to access arrangements for the Humberside and Robin Hood airports. The suggested options, however, seem to relate to travel on a broader scale. From this angle, we welcome the approach in Option 2, which emphasises the importance of providing alternatives to the car and on improving public transport. Option 1, however, is aimed at supporting car use. We feel that this option is too narrow in its approach to travel in North Lincolnshire.

One further observation we have made with regards to several of the options is that they often appear to be in conflict with the Spatial Objectives provided on pages 10-11 of the document. For example, Option 1 for the issue regarding Promoting Tourism Opportunities (p31) is to limit the growth of tourism in North Lincolnshire. This appears, however, to be in direct conflict with SO15, which identifies the development of North Lincolnshire as a quality and sustainable tourist destination as a key aim for the District.

I hope that these comments are helpful to you. Clearly we wish to see the Core Strategy developing in general conformity with the Regional Spatial Strategy and I would be happy to discuss the points we raise here further if it would help this process.

Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your Core Strategy.

Regards

A handwritten signature in blue ink, appearing to read 'J Poxon', written in a cursive style.

Jenny Poxon
Head of Service
Planning Delivery and Conformity