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Dear Ray

Core Strategy – Further Consultation on Revised Preferred Options, in accordance with New Regulation 25 of the Town and Country Planning (Local Development) (Amendment) Regulations 2008.

The Yorkshire and Humber Assembly (as the Regional Planning Body) welcomes the opportunity to comment on the North East Lincolnshire Core Strategy – Revised Preferred Options document 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 Regional Planning Body'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 DPD is published prior to being submitted to the Secretary of State a formal Regional Planning Body view on its general conformity with the Regional Spatial Strategy will need to be requested (Regulation 29, 2008).

The following officer comments are made in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008.

The Yorkshire and Humber Plan aims to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region.

Previous Correspondence

The Assembly sent a number of officer comments in response to the Core Strategy Preferred Options document on 3 August 2007. In this response we highlighted some key issues to take into account:

- Need for an explanation of general conformity with RSS at the start of the document and what this means/how this needs to be reflected throughout the document.
- Concern that the identification of Immingham as a Principal Service Centre is not backed up by a local evidence base that clearly differentiates its role/potential from other settlements such as Humberston and New Waltham.
- Need to set out what will be the principles behind the local employment study and the basis upon which potential sites will be assessed.
- Concern regarding potential support for out of centre development, including office developments.
- Need to clearly set out how new housing is to be distributed in the District and how the needs of Gypsies and Travellers are to be met.

As you will be aware these comments were made in relation to the then current Regional Spatial Strategy (based on the selective review of RPG12 issued in December 2004) and the draft Regional Spatial Strategy – the Yorkshire and Humber Plan (December 2005). This response will set out officer comments in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008.

Key Points on the Core Strategy: Revised Further Options

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

1. We welcome the fact that the need for there to be 'general conformity' between the RSS and the Core Strategy.
2. The Assembly welcomes the proposed settlement hierarchy as being in line with regional policy.

3. Local evidence should support why a lower PDL target is proposed.
4. The Assembly supports that on a sub-regional basis additional provision to address the housing needs of Gypsies and Travellers will be made based on the sub regional assessment.
5. Concern that there is no reference made to the accessibility criteria set out in RSS (2008).
6. There is a need for this Policy DM7 to place more emphasis on freight movements as the future growth of Immingham and Grimsby will place more pressure on the existing transport system.
7. The Assembly welcomes the reflection of flood risk in Policy DM10.
8. The Assembly is encouraged that Policy HE1 is reflected in Policy DM12.
9. The Assembly is encouraged that this document makes reference to the waste forecasts as set out in Table 10.5 of RSS (2008)

I trust that the comments provided here, and expanded on in Annex A, are helpful to you as you continue to prepare the Core Strategy for submission. Clearly we wish to see the Core Strategy developing in general conformity with the Regional Spatial Strategy. 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 and to commenting on the final document in due course.

Yours sincerely



Jenny Poxon
Head of Service
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Annex A

General Comments

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 the Local Development Framework (LDF) 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 welcome the fact that the need for there to be 'general conformity' between the RSS and the Core Strategy is addressed in **paragraph 1.25** of the document. The Assembly also welcomes references made throughout the document to RSS (May 2008) and welcomes the regional planning policy context that is set out throughout the document.

Spatial Strategy

The Assembly is encouraged that **paragraph 3.5** states that the Settlement Hierarchy has been identified taking into account the initial hierarchy set out in the RSS (2008). Grimsby is identified as the sub regional centre which together with Cleethorpes forms the focus for most development. This is in line with Policy HE1 of RSS (2008), which supports the strengthening of Grimsby/Cleethorpes as Sub Regional Towns. RSS (2008) identifies Grimsby/Cleethorpes as a Sub Regional Town. Policy YH4 of RSS (2008) states that Sub Regional Towns should be the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region.

In the Assembly's response to the Core Strategy Preferred Options (made on 3 August 2007) the Assembly expressed concerns that Immingham had been identified as a Principal Town and this was not backed up by a local evidence base which differentiated its role/potential from other settlements such as Humberston and New Waltham. The Revised Preferred Options document states that the Preferred Options consultation highlighted that the role of Immingham as a Principal Town was not supported.

Policy SP1 sets out the proposed locational strategy for North East Lincolnshire, which concentrates development in and around the urban area of Grimsby/Cleethorpes, with a lesser proportion of development in the service town of Immingham and the service villages of Healing, Great Coates, Laceby, Waltham, New Waltham and Humberston. The Assembly welcomes the proposed settlement hierarchy as being in line with regional policy.

Policy SP1 provides for approximately 70% of new residential development and 15% of new employment development to be accommodated on sites in and on the fringes of Grimsby/Cleethorpes, and approximately 10% of new residential development, with 70% of new employment development on sites in the Estuary Zone (including Immingham). This approach is supported by the Assembly. Policy

HE1B supports economic development in Immingham, which provides for plans, strategies, investment decisions and programmes for the Humber Estuary to foster value-added port-related activities and maximise opportunities around ports and close to the estuary's deep water channel including through safeguarding land north west and south east of Immingham for estuary-related uses.

However, the Assembly would recommend that prior to publication of the core strategy the authority is satisfied that there is a robust evidence base to support the location of jobs and homes so that travel demand is reduced in line with Policy T1 and transport accessibility is promoted in line with Policy T2.

Management Policies

Policy DM1: Supporting the Growth of the Local Economy

The Assembly is encouraged that **paragraph 4.6** makes reference to the North East Lincolnshire Employment Land Study 2008 which has assessed supply and demand of employment land and premises in the district.

Policy DM2: Meeting the Housing Requirements

The Assembly is encouraged that **Policy DM2: Meeting the Housing Requirements** states that provision will be made for the development of homes and associated infrastructure and services and 510 annual average net additions will be made to the dwelling stock over the period of 2008-2026. Table 12.1 in RSS (2008) sets an annual average net addition to the dwelling stock in North East Lincolnshire of 510 units between 2008-2026.

The Assembly is encouraged that **Policy DM2** also states that approximately 55% of the housing supply is expected to be met from previously developed land. It is worth noting that Policy H2 of RSS (2008) includes a regional target for 65% of housing development to be on previously developed land and through the conversion of existing buildings and that local evidence should support why a lower target is proposed.

The Assembly is encouraged that the issue of Gypsies and Travellers is covered in this document. The Assembly in its previous response to the Preferred Options consultation highlighted concerns that the document did not clearly set out how the needs of Gypsies and Travellers would be met. The RSS (2008) recommends that the region needs to make additional provision to meet the needs of Gypsies and Travellers to address a shortfall of least 255 pitches. Policy H6 states that in the Humber district at least 34 pitches will be required by 2010 to address the shortfall in the region. Policy H6 also requires local authorities to carry out an assessment of the needs of Gypsies and Travellers by May 2008.

Policy H6 was therefore set as an interim policy until all local authorities had carried out their own local assessments. The estimates set out in Policy H6 will be superseded by the findings of local Gypsy and Traveller accommodation assessments which are expected to conclude that greater numbers of additional

pitches will be required.

The Assembly welcomes the reference made in **paragraph 4.33** to the *North and North East Lincolnshire Gypsy and Traveller Needs Assessment 2008* which identifies that initial Gypsy and Traveller provision will be made for 1 site, for residential pitches (minimum 10 pitches) in North East Lincolnshire; and 1 site, for transit pitches (minimum 10 pitches) in either North Lincolnshire or North East Lincolnshire.

The Assembly has commissioned consultants to review the local accommodation assessments that have been carried out by local authorities and will provide district targets in the RSS Update.

The Assembly is encouraged that **Policy DM2** states that on a sub-regional basis additional provision to address the housing needs of Gypsies and Travellers will be made based on the sub regional assessment of the patterns of need and adequacy of current provision.

Policy DM3: Addressing the Affordability of Housing

We are pleased to see that the issue of affordable housing has been covered in the Revised Preferred Options document. The Assembly welcomes **paragraph 4.38** that makes reference to the RSS affordable housing targets. The Regional Housing Strategy 2005 identifies affordable housing need in the North East Lincolnshire district as being 'low'. Policy H4 of RSS states that LDFs should set targets for the amount of affordable housing to be provided. Provisional estimates of the proportion of new housing that may need to be affordable in North East Lincolnshire are up to 30%. **Paragraph 3.49** makes reference to the Strategic Housing Market Assessment that the Council is commissioning; this will be an important tool in helping to determine how the Core Strategy will be delivered.

Policy DM7: Managing Travel Demand, Promoting Sustainable Transport Networks

In the Assembly's previous response to the Preferred Options consultation concerns were raised that there was a need for greater emphasis to be placed on public transport and that there was no reference made to the accessibility criteria as set out in the RSS.

The Assembly still has concerns that there is no reference made to the accessibility criteria set out in RSS (2008). Ensuring the accessibility of development by non-car modes is a key principle of regional planning policy. Accessibility criteria are set out in Table 13.8 and 13.9 of RSS (2008) and they provide guidance for developments in terms of accessibility to employment and social infrastructure uses.

The Assembly is encouraged that **Policy DM7** provides for the improvement of public transport facilities; such as making improvements to bus and passenger rail services and facilities.

However, the Assembly feels that there is a need for this policy to place more emphasis on freight movements as the future growth of Immingham and Grimsby will place more pressure on the existing transport system. Policy T4 of RSS (2008) provides for the maximisation of the use of rail or water for freight movements to and from new and existing developments and significant changes of use and recognition of the contribution that these modes can make to the transportation of bulk materials including waste.

Policy DM10: Adapting to Climate Change

The Assembly welcomes the reflection of flood risk in **Policy DM10**, as flood risk is clearly a major issue for North East Lincolnshire. The Assembly is also encouraged that **paragraph 4.119** makes reference to the North and North East Lincolnshire Strategic Flood Risk Assessment which identified that much of the Borough is within the high flood risk zone. This will be an important tool in helping to determine how the Core Strategy will be delivered.

It is also worth noting that Policy ENV1 of RSS (2008) emphasises that the region will manage flood risk pro-actively by reducing the causes of flooding to existing and future development and avoid development in high flood risk areas where possible. It also highlights that flood management will be required in Grimsby where there is little development land available outside high flood risk zones. It also provides for provision of flood storage, habitat creation and managed realignment in areas around the Humber, and other river corridors as required.

Policy DM10 rightly identifies the need for large-scale developments to incorporate on-site renewable energy technology. This policy states that developments of more than 10 dwellings or 1000 sq m of non-residential floorspace, will as a minimum, be required to source 10% of their energy requirements from on site renewable or low-carbon energy sources unless it is demonstrated to not be feasible or not viable.

Policy ENV5 states the Region will maximise improvements to energy efficiency and increase renewable energy capacity. Plans, strategies, investment decisions and programmes should promote and secure greater use of decentralised and renewable or low-carbon energy in new developments, including through Development Plan Documents setting ambitious but viable proportions of the energy supply for new developments to be required to come from such sources.

The Assembly is also encouraged that **Policy DM10** supports renewable energy proposals that contribute to meeting the renewable targets for North East Lincolnshire as set out in RSS (2008). Policy ENV5 of RSS (2008) sets the Humber a target of at least 124MW by 2010 and 350MW by 2021 for installed grid connected renewable capacity. Table 10.2 recommends a renewable energy target in North East Lincolnshire of 23MW to 2010 and 50MW to 2021.

Policy DM12: Extending the Tourism Offer

Policy HE1 of RSS (2008) states that plans, strategies, investment decisions and programmes for the Humber Estuary should enhance the tourism and attraction of Cleethorpes. The Assembly is encouraged that Policy HE1 is reflected in **Policy DM12**. This policy focuses main tourist orientated development on the resort of Cleethorpes, maintaining the high standard of water quality and attraction of Cleethorpes Beach. This is in line with Policy ENV3 in RSS (2008) which provides for Cleethorpes to achieve and maintain a high standard of coastal water quality.

DM13: Waste Management

The Assembly raised concerns in its previous response to the Preferred Options consultation that the document did not build upon RSS policies on waste management. The Assembly is encouraged that this document makes reference to the waste forecasts as set out in Table 10.5 of RSS (2008) and Policy ENV14 of RSS (2005).