

Our ref: General/40b – Planning Conformity/Final responses

6th March 2009

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Dear Chris

North Lincolnshire Local Development Framework: Housing and Employment Land Allocations DPD Pre-Submission Consultation January 2009

The Yorkshire and Humber Assembly, as the Regional Planning Body, welcomes the opportunity to comment on the North Lincolnshire Local Development Framework 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).

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.

The following officer comments are made in relation to the Yorkshire and Humber Plan (Regional Spatial Strategy to 2026) which was published in May 2008. The Assembly did not make comments on the Issues and Options stage of the DPD in November 2007. However, comments were made on the Additional Issues and Options Consultation on Gypsy and Traveller Sites in September 2008 and on the Core Strategy Additional Stakeholder Consultation December 2008.

I would like to take this opportunity to respond to the points raised in your letter of 11 February 2009. You noted that you were concerned at some elements of our response to the Core Strategy on 18 December 2008. You noted that we gave the impression that the spatial focus of development should not be on the Sub-Regional Town of Scunthorpe. To be clear, while the **main focus** of housing development on Scunthorpe is in line with the RSS settlement network (and Policy HE1 which notes that Scunthorpe should be strengthened through town centre renaissance, urban renewal and growth), there will be a need to ensure that an almost **absolute focus** (i.e. 90%) is appropriate. This needs to be clearly evidenced against a range of factors including the identified local needs for affordable housing elsewhere, the wider issues around the amount of housing in lower order settlements necessary to maintain them as sustainable communities and the need to ensure that the strategy does not lead to excessive commuting by locating jobs and homes in different parts of the local authority.

You also expressed concern that you felt our comments suggested the need to look at other growth strategies. From our perspective, recognising the particular local circumstances of North Lincolnshire and the geographic split between the main areas of employment growth and the Sub-Regional Town, there is a need to demonstrate that you have considered alternatives. The sub-area chapter of the RSS should help in this as it provides a strong strategic steer as to the importance of both Scunthorpe and the Humber Ports. Such evidence should underpin both the principles of the spatial distribution of housing and the capacity for Scunthorpe itself (notwithstanding the Sub-Regional Town status in RSS) to deliver sufficient sustainable sites to accommodate the housing growth being directed to it. As we discussed at our meeting, the spatial distribution is inevitably tied to the potential for Scunthorpe to be the prime/near absolute focus for development, which in turn is substantially linked to the outcomes of forthcoming work on flood risk.

We understand that none of this is straightforward and we recognise that North Lincolnshire has a unique set of local circumstances and challenges. However, with the RSS and its sub-area chapter as a starting point, we would expect the Core Strategy and Allocations DPDs to make it clear as to why the chosen strategy is being followed. To that end, the proposed additional work on evidencing this is very welcome.

Key Points on the Allocations DPD

General Comments

I refer you the Assembly's response to the Core Strategy on 18 December 2008 where we made specific comments about the strategic allocations within the document. These comments still stand and are not repeated here.

Accessibility Criteria

It would be helpful to understand how the public transport accessibility criteria in RSS Policy T3 have been used to develop the criteria in the document. Tables 13.8 and 13.9 detail destination and origin accessibility criteria for employment, education, leisure, retail and housing. These tables have also been supplemented by work on Accession, published by the Assembly in June 2008.

Housing Allocations

I note that the site identified in this DPD as Lincolnshire Lakes is different to that identified in the Core Strategy Key Diagram. It would be helpful for the Core Strategy Key Diagram to clarify this. If the land to the east of the M181 and that the west of the M181 is to be included as part of the overall Lincolnshire Lakes development then the Core Strategy Key Diagram should indicate this.

I also note that the Lincolnshire Lakes site to the east of the M181 is not part of this DPP. I understand that it is subject to an Area Action Plan. It would be useful for the Allocations DPD to make this clear.

Employment Allocations

In general the employment allocations proposed provide a great deal of B1 office development out of centre. It is not clear what proportion of office development is proposed in Scunthorpe Town Centre. Policy E2 of the RSS states that the centres of sub-regional cities should be the focus for offices. More clarity on the amount of office development proposed out of centre and evidence to support the intended approach will be required before a judgement can be made on the alignment of the employment allocations with the RSS. The following allocations have the potential to raise such an issue 36-9, 36-12, 36-66.

Moreover, a number of allocations note that "retail" uses may be appropriate future uses (36-20, 36-57, 36-69, 36-70). These appear to be "out of centre". Further clarification on the need and nature of such out of centre retail sites would be required before the DPP would be considered to be in line with RSS policy E2, which states that the centres of sub-regional cities should be the focus for retail and that no further development of new or large scale expansion of existing out of centre retail should be permitted.

Notwithstanding comments made in our response to the Core Strategy I note that the Sandtoft Airfield allocation proposes scope for a major business park. The nature of the employment uses proposed as part of this, potentially B1 and B2, are likely to require further evidence so as to ensure that there is alignment with RSS employment policies and Policy YH7 on the location of development.

Given that the DPD proposes a significant amount of employment land in association with the Humber ports I reiterate the points made in our response to the Core Strategy that consideration should be given to the impact that this will have on demand for housing in neighbouring North East Lincolnshire and potential need for joint working on allocations.

Gypsies and Travellers

It would be helpful if the DPD indicated whether the proposed allocations for Gypsy and Travellers accommodation will meet the requirements for pitch provision identified within your Gypsy and Traveller Accommodation Assessment. It is recommended that further evidence, such as consultation with the Gypsy and Traveller community, is provided so as to demonstrate that the sites identified are suitable for the needs of Gypsies and Travellers. I note that one of the sites is a disused Gypsy and Traveller site. It would be useful to understand the reasons for its disuse given the current unmet need for such sites in the area.

If you have any questions on the issues raised in this letter then please do not hesitate to contact me.

Regards,

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Martin Elliot
Planning Manager

