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Place Planning and Housing Team  
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12<sup>th</sup> November 2021

Dear Sir

### **North Lincolnshire Local Plan Publication (Reg 19) Consultation**

KVA Planning Consultancy has been commissioned to consider the Publication draft version of the North Lincolnshire Local Plan on behalf of the Northern Lincolnshire local group of CPRE The Countryside Charity (CPRENL), to be submitted to North Lincolnshire Council.

The emerging Local Plan, once adopted, will replace the saved policies of the 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 (AAP) and will be a consolidated and comprehensive single Local Plan setting out the principles for development until 2038.

CPRENL commented previously on the Regulation 18 document in both April 2017 and March 2018 and the Preferred Options version in March 2020. Having had the opportunity to read the Publication version of the draft document, CPRENL remains on the whole supportive of the document and pleased to see the commitments to the preservation and enhancement of the North Lincolnshire countryside and open green spaces including to its biodiversity and geodiversity.

CPRENL welcomes the various positive changes to the draft Plan as a result of comments made at the Preferred Options stage particularly the strengthening of policies and text in relation to biodiversity net gain, minerals and a brownfield first priority. The Environment Act 2021 has now been passed as such all developments are required to deliver a measurable net gain for biodiversity. Furthermore, the Prime Minister has recently repeated his party's view that development should be on brownfield land leaving greenfield sites green wherever possible.

The following table highlights those areas most pertinent to this charity, silence on a matter, therefore, should be viewed as an in-principal support for the draft plan. Should the Plan change in future documents, however, CPRENL reserve the right to comment as appropriate.

For ease of interpretation, please see the following acronyms for the tests of soundness as set out in Paragraph 35 of the NPPF:

PP - Positively Prepared; J – Justified; E – Effective; C - Consistent with National Policy

Underlined text sets out the proposed modification.

Section of the Plan / Policy Reference	Sound	Test	Reason	Suggested Modification
Spatial vision	Y	-	-	-
Spatial Objectives	Y	-	-	-
SS6	Y	-	-	-
SS7	N	C	The Environment Act 21 has now been passed into law, as such point 5 should refer to the required 10% target for biodiversity net gain to be consistent with national policy.	Planning applications should also assess the specific impact of development proposals on biodiversity and associated opportunities for ecological protection and enhancement within each strategic allocation and surrounding area to provide a <u>minimum of 10% measurable</u> biodiversity net gain.
SS11	Y	-	-	-
EC1 - 6	N	J	It is considered that development of this site at this location would create indefensible boundaries by developing at this open countryside location	CPRENL believe this should be deallocated
EC1 - 7	N	C	Whilst located close to a major transport interchange, the site is a major greenfield location	CPRENL believe this should be deallocated

			away from a settlement which means that the site is not located where the need to travel can be minimised as such it is not consistent with national policy.	
EC1 - 8	N	C	Whilst located close to a major transport interchange, the site is a major greenfield location away from a settlement which means that the site is not located where the need to travel can be minimised as such it is not consistent with national policy.	CPRENL believe this should be deallocated
EC1 - 9	N	C	Whilst located close to a major transport interchange, the site is a major greenfield location away from a settlement which means that the site is not located where the need to travel can be minimised as such it is not consistent with national policy.	CPRENL believe this should be deallocated
TC2	N	C	The Local Plan does not make reference to the creation of 'high quality, beautiful and sustainable buildings and places' as required by the NPPF 2021. It is thought that to be found sound and	<u>2. Proposals should adhere to the following detailed design points to ensure high quality; beautiful and sustainable developments are delivered throughout North Lincolnshire:</u>



			encourage appropriate place making these words should be included within the policy. The text justification should also be updated to reference these important words.	
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In conclusion, CPRENL welcomes the opportunity to comment on the Publication Draft Local Plan produced by the Council. In general, the charity believes the document is consistent with national guidance and the NPPF subject to the suggested amendments above which we believe provide opportunities to ensure the document is as robust as possible. It is considered the suggested additions would allow effective development management to occur.

CPRENL would wish to be kept informed of the process of this and other planning policy documents as they progress through the plan preparation process.

Yours faithfully

**Katie Atkinson, MRTPI**  
**Director**  
**KVA Planning Consultancy**  
*On behalf of Jenny Haynes, Planning Lead for CPRE Northern Lincolnshire*