



TRANSPORT, INFRASTRUCTURE AND HOUSING SCRUTINY PANEL

8th September 2026 at 6.30 p.m.

Present:

Councillor Mill (in the Chair)

Councillors Bright, Crofts, Jackson, Mills, I. Oliver (substitute for Charlesworth) Russell and Wilson

Officers in attendance:

- Martin Dixon (Planning Manager)
- Damien Jaines White (Assistant Director Regeneration)
- Simon Milson (Spatial Planning Policy Manager)
- Beverly O'Brien (Scrutiny and Committee Advisor)
- Emily Warner (Town Planner)

Also in attendance:

- Councillor S Grice (Deputy Leader and Portfolio Holder for Children and Education)
- Councillor Aisthorpe (Ward Councillor)
- Councillor Augusta (Ward Councillor)
- Councillor Downes (Ward Councillor)
- Councillor Goodwin (Ward Councillor)

SPTIH.16 APOLOGIES FOR ABSENCE

Apologies for absence from this meeting were received from Councillors Charlesworth and P. Batson.

SPTIH.17 DECLARATIONS OF INTEREST

There were no declarations of interest received in respect of any item on the agenda for this meeting.

SPTIH.18**PRE-SUBMISSION DRAFT LOCAL PLAN - PUBLIC CONSULTATION**

The panel considered a report from the Portfolio Holder for Housing, Infrastructure and Transport that sought approval to commence public consultation on the draft Local Plan.

One Member asked whether there would be a statement publicised stating what the consultation results said and how that shaped the Regulation 19 draft local plan. Officers explained that the results had been included in the individual consultation section. For Example, comments were made around heritage assets, to hierarchy revisions.

A Councillor asked Officers to clarify some key dates if the Council was not to meet those key dates and what the consequences could be. Mr Jaines-White explained that to understand the current position, it was important to look back to the changes made to the National Planning Policy Framework (NPPF) in December 2024. During the Government's consultation on those changes, officers appeared before a previous iteration of this panel. Several of the current members were present, and it was a matter of public record that both Members and officers expressed significant concerns regarding the proposed reforms, particularly in relation to housing delivery requirements. The principal aim of the revised framework was to support the Government's ambition to deliver 1.5 million new homes nationally. As part of that process, housing targets were distributed across local authorities. For this authority, the current mandatory housing requirement was approximately 621 dwellings per year, although that figure was subject to slight annual variation. Prior to these changes, the baseline housing requirement was determined through a more technical methodology and was significantly lower, at around 200 dwellings per year. This was a level that the authority's housing market would generally have been capable of meeting without difficulty. Consequently, even if local plan delivery targets were not achieved, the authority would still have been able to demonstrate an adequate level of housing supply against the baseline requirement.

Following the adoption of the revised NPPF, however, the increase in housing requirements took immediate effect. As a result, this authority, along with many others across the country, were no longer able to demonstrate a five-year housing land supply against the new targets. Failure to demonstrate a five-year housing land supply had significant planning implications. Most notably, it triggered a presumption in favour of sustainable development. In practical terms, while the Local Plan adopted in 2018 identified sites allocated for development, an inability to demonstrate a sufficient housing supply meant that unallocated sites became increasingly vulnerable to development proposals. As a consequence, landowners, developers and promoters could bring forward speculative planning applications on sites that were not allocated within the adopted Local Plan. In circumstances where the authority could not demonstrate a five-year housing supply, such applications would be afforded a significantly greater weight under national planning policy and have a higher likelihood of

securing planning permission than would otherwise have been the case. While each application should still be considered on its individual planning merits, the revised policy environment has materially altered the balance (through the presumption in favour of sustainable development) that local planning authorities should apply when determining development proposals. This was the context in which many of the current discussions around housing growth, land allocation and planning applications had taken place

One Member asked whether officers believed the Council was legally compliant with the produced document and whether it had passed the tests of soundness as there was a part at the end of the report that noted areas for future referencing. Mr Jaines-White stated that the stage now reached in the process was that, should Full Council ultimately decide to proceed, the next step would be the Regulation 19 consultation. As outlined within the report, that consultation had a specific purpose within the plan-making process. It was important to understand that a Regulation 19 consultation was not intended to reopen discussions on the selection of individual site allocations. Rather, it focused on whether the draft Local Plan was considered legally compliant and sound when assessed against the relevant planning framework and evidence base. That said, respondents were free to make representations on any aspect of the plan, including specific site allocations, should they wish to do so. Those representations would be considered and submitted as part of the examination process soundness.

One Member went on to the issue of the five-year housing land supply, the revised National Planning Policy Framework also introduced changes to the Housing Delivery Test and the application of delivery buffers where authorities had historically under-delivered against housing requirements. Given that the borough had historically delivered an average of around 300 homes per year and had not come close to achieving the current requirement of approximately 622 homes per year, they had two related concerns. Firstly, what confidence did the Council have that the development industry would be able to deliver housing at a level anywhere near the revised target, particularly in the current economic climate. Secondly, if housing delivery continued to fall significantly below the required level, was there a risk that future housing requirements and associated delivery expectations would increase further. The current approach appeared to assume that the market would continue to bring forward development at the scale required, but what assessment had been made of whether that level of development was realistically achievable over the foreseeable future. How confident were officers that the proposed housing targets were deliverable in practice rather than simply creating a continuing shortfall that left the authority exposed to speculative development proposals. Mr Jaines-White stated that they did not suddenly believe that higher levels of housing delivery would be achieved automatically. However, given the significant consequences of failing to meet the required housing numbers, they had to undertake a very thorough assessment of potential site allocations and the likelihood of those sites coming forward for development. Considerable work had been undertaken to test both the availability and deliverability of sites, including engagement with landowners, developers and promoters. Through that process, we had assessed not only whether land was available, but also whether there was a genuine willingness and capacity to bring those sites forward within the plan period.

On the basis of that evidence, they were satisfied that there was sufficient site capacity and that there was an appetite amongst developers and landowners to progress development opportunities. They were therefore confident that the proposed allocations provided a realistic prospect of meeting a five-year housing supply. However, he reiterated the point that delivery was not within the Council's control. Ultimately, housing development was dependent upon micro and macro market conditions, geopolitical events, investment decisions by developers, landowner intentions, and wider economic circumstances. While the planning system could allocate land and create opportunities for growth, it could not compel development to take place at a particular rate. Their role was therefore to ensure that an adequate and deliverable supply of land was available to meet identified needs and to minimise the risks associated with failing national planning policy requirements. Whether those sites were built at the anticipated pace would continue to depend on factors beyond the direct control of the local authority.

One Member asked if housing was delivered much faster than anticipated, and a significantly higher number of homes were built in the early years of the plan period, what happened if the allocated land was used up more quickly than forecasted. Would the Council need to identify and allocate additional sites or was there another process for maintaining the required housing land supply. Mr Jaines-White explained that the annual requirement of 621 homes was a minimum target. If more homes were delivered than required in a particular year, that additional delivery was positive and contributed to overall housing provision. However, over-delivery could not generally be used to reduce future housing requirements. The Council would still need to calculate its five-year housing land supply based on the annual requirement of 621 homes. While excess delivery contributed positively to the Housing Delivery Test, it would not typically offset future housing supply obligations in the same way that under-delivery must be accounted for.

One Councillor mentioned that while the additional jobs forecast for the borough were welcome, many were expected to be in lower-paid sectors and may not generate the demand for market housing that was previously associated with higher-paid industrial employment. Given that affordable housing need had increased significantly and remained unmet, how had the relationship between future employment growth, housing demand and affordable housing need been assessed and more specifically, did the draft Local Plan do enough to address the borough's growing need for affordable and rented housing, rather than focusing primarily on market housing provision. Mr Jaines-White explained that the Local Plan did not directly deliver affordable housing. Its role was to provide a planning framework that must be realistic, sustainable and viable. Requiring the plan to meet all affordable housing need through planning policy alone could make development unviable and result in little or no housing being delivered. The Plan therefore used affordable housing requirements that balanced need with development viability. Addressing affordable housing need required a broader approach beyond the Local Plan, including the Council's emerging housing strategy, government funding programmes, and investment from organisations such as Homes England and registered housing providers. Additional funding opportunities, including support secured through regional bodies, were also intended to help increase the delivery of affordable housing across the borough.

A member mentioned that the report referred to developments delivering significant gains in biodiversity, but the term significant could be subjective. The member wondered how significant was defined, measured, and assessed to ensure there was a clear and consistent standard. Mr Dixon explained that the concept of biodiversity gains had long been a consideration in planning decisions, but it had become more important and formally recognised in recent years through biodiversity net gain legislation. This legislation required certain developments, particularly major developments, to deliver a measurable minimum 10% biodiversity net gain, providing an objective benchmark rather than relying solely on a subjective interpretation of what constituted as a significant gain. The member felt that the Council appeared to be relying on national minimum standards rather than considering local circumstances. They thought that given the environmental characteristics of the area, should the Council not be more ambitious and seek to exceed the national requirements, taking the opportunity to lead the way by adopting higher biodiversity targets supported by scientific evidence.

A Member asked about the distribution of proposed housing development and how it appeared to be concentrated around urban areas, with comparatively little growth in rural communities. The Member wondered whether an overview be provided as to why this approach had been taken and explain the reasoning behind the strategic policy and percentage split between urban and rural areas. Mr Dixon stated that national planning policy promoted sustainable development, which meant locating most new housing in areas with good access to services, facilities, transport links, education, and other infrastructure. As a result, the majority of new development had been directed towards urban areas where these amenities already existed. However, the draft Local Plan also recognised that smaller settlements had local housing needs. This was reflected in the policy approach, which allowed for some housing growth in rural areas through different housing allocation percentages.

A Member asked whether the draft Local Plan had properly considered the cumulative impact of new housing developments and solar farms on the landscape. They were concerned that increasing amounts of land were being covered by development and want to know whether sufficient consideration had been given to the location of solar farms, particularly on greenfield land and near residential areas. Mr Dixon explained that the Local Plan followed national government policy, which supported renewable and low-carbon energy developments such as solar farms. Proposals for renewable energy projects were assessed against planning criteria, including their impact on landscape character and agricultural land quality. The council must apply this policy framework when considering applications and cannot impose blanket restrictions that conflict with national planning policy.

A Member showed concerns that developers could use financial viability assessments to reduce or avoid contributions towards infrastructure and community benefits. They asked whether the viability policy in the draft Local Plan should be reviewed or strengthened, or whether it had simply been carried forward from previous local plans without considering ways to make it more robust. Mr Milson explained that the viability policy was consistent with national planning policy and established practice. Financial viability assessments were

carried out using an open-book approach and recognised valuation standards (the Red Book). Where viability evidence was challenged, the council obtained independent expert valuation advice to verify the figures, because viability assessments were based on factual financial evidence and a defined process. Therefore, Mr Milson noted the policy to be sound and robust.

A Councillor raised concerns with the water management policy and whether the draft local plan does enough to prevent developments from causing pollution or contamination in rivers and waterways. They were concerned that surface water runoff and other pollutants could enter rivers that connect to local docks that people used for swimming. They wondered whether the policy should place a stronger emphasis on keeping contaminants out of rivers and protecting water quality. Mr Dixon explained that the policy already placed a strong emphasis on protecting water quality through sustainable drainage and nature-based solutions. Developments were expected to use features such as swales and other drainage systems that filter and manage runoff before it reached watercourses, helping to reduce pollution. Planning applications were assessed in consultation with bodies such as the Environment Agency and drainage officers, with water quality being a key consideration. The officer therefore considered the policy to be effective in addressing concerns about pollution and protecting rivers and waterways.

A Member asked for an explanation on how tree coverage was included within this draft local plan. Mr Dixon explained that the policy require developers to keep and protect existing trees and hedgerows where possible, improve them where appropriate, and plant new trees as part of development. The aim was to ensure trees contribute to amenity, biodiversity, landscape character, and environmental resilience such as climate adaptation and air quality improvement. Mr Jaines-White added that there were such things as veteran trees, which had the same weight as a listed building.

At Section 8, one Member did not believe it was sound. They had concerns that there was no mention of HMOs. Mr Dixon explained that the Council was currently following national planning policy. Concerns about developments, including HMOs, were already assessed through Strategic Policy 5. They stated that Policy 5 was well established, was frequently used in planning decisions and appeals, and applies to HMOs in the same way as other forms of development. Therefore, planning applications were already assessed against these criteria to determine whether a proposal was appropriate. Therefore, they felt this section covered the necessary factors.

At Section 10, The Chair introduced Councillor Downes to speak on this section of the draft Local Plan. Councillor Downes argued that the Local Plan should not progress to Regulation 19 consultation yet and should be revised to better reflect local needs. She said the plan would shape communities for decades and questioned whether it had sufficient public support. She argued that residents' views from previous consultations had not been properly reflected and that key decisions on site allocations had already been made. She also challenged the Government's housing target of around 621 homes per year, noting that Members had previously argued it was too high and should be reduced. Councillor Downes said the draft Local Plan was only a framework and does not

guarantee that homes, jobs, infrastructure, or affordable housing would actually be delivered. They expressed concern that there was insufficient evidence that the proposed housing numbers were achievable and warned that speculative development could still occur even if the plan was adopted. She urged panel members to prioritise residents' concerns, reconsider the plan, and seek changes before moving to the next stage.

The Chair then introduced Councillor Aisthorpe to speak on this section of the draft Local Plan. Councillor Aisthorpe focused on the opposition to the proposed housing allocation on land between Weelsby Woods and Pennels Garden Centre. She highlighted that a petition calling for the site to be removed from the Local Plan had attracted more than 1,200 signatures, demonstrating significant public concern that should be considered before the plan progresses. She stressed that the petition was not opposed to new housing in principle, particularly affordable and social housing, but argued that developments should take place in suitable locations with adequate evidence and supporting infrastructure. Councillor Aisthorpe expressed concerns that up to 1,500 homes on this site would permanently alter the area's character and could have negative impact on traffic, drainage, wildlife and local services. Councillor Aisthorpe argued that residents had engaged with the democratic process and should have their concerns properly considered before the allocation moves forward to the next stage of the process.

A Councillor asked whether the national planning policy framework for Gypsy and Traveller sites was still in force and being properly referenced in the Local Plan. They recalled that previous guidance included criteria on the suitability of locations, such as avoiding sites where factors like railway noise could negatively affect residents' living conditions. They were concerned that no clear reference to this national policy appeared in the draft Local Plan and wanted confirmation that, if the national framework still applied, it had been incorporated so that the plan remains legally compliant. Officers believed that the draft local plan was legally compliant with this.

A Councillor asked whether developers should contribute towards expanding or improving local household waste recycling centres, arguing that existing facilities were already under pressure. They raised concerns that some sites were ageing, operating at or near capacity, and may not be large enough to cope with additional demand from new housing developments. The question was whether contributions from developers could help fund upgrades or expansions to waste facilities as part of the planning process. Officers explained that the condition and expansion of local waste facilities was primarily a matter for the Council's own infrastructure planning and investment. They noted that the Council had undertaken a waste capacity assessment, supported by several technical studies, which examined waste volumes, capacity and future needs. In relation to developer contributions, officers said there may be scope through planning policies to seek contributions towards waste infrastructure, but this depended on the relevant policy framework and whether such contributions could be justified through the planning process.

As a result of the above discussions the panel remained concerned about certain housing sites identified within the draft Local Plan, as well as biodiversity net gain,

restrictions on HMOs and water outfalls into rivers. Although the Panel supported the recommendations in the report, including the revised recommendation circulated at the meeting, it also agreed to recommend the following additional matters to Cabinet for consideration:

RECOMMENDED TO CABINET -

- 1) That the proposed Strategic Site SH1 (Ref HOU342, Land west of Laceby Acres and Wybers Wood, Grimsby) is removed from the draft local plan in its current format at this time.
- 2) That the Biodiversity Net Gain requirement be increased from the statutory 10% to 15%.
- 3) That within the relevant section of the draft Local Plan, appropriate policy wording to be included to manage the concentration, density and parking impact of HMO's.
- 4) That it be noted within the draft Local Plan that any outfalls from developments into rivers should be clean water.
- 5) That the draft Local Plan includes a requirement for updated Conservation Area Appraisals.
- 6) That the proposed allocated sites HOU287A, HOU338, HOU384 and HOU374 be removed from the draft local plan.

There being no further business, the Chair declared the meeting closed at 10.22 pm.