

Combined Comments with Responses

Spatial Strategy

Settlement Hierarchy

Comments were mixed, with both support and objection expressed regarding the proposed Settlement Hierarchy. Respondents highlighted concerns about whether villages and Local Service Centres have sufficient infrastructure, services and public transport provision to accommodate additional growth. Particular concern was raised regarding the expectation that new housing development should be located within 400m of public transport, with respondents suggesting this may not be achievable in some settlements in their current form. There were requests to strengthen commitments to improvements in arterial road networks, parking provision, public transport, utilities, drainage, telecommunications and local services, particularly within Level 2 Local Service Centres. Respondents also emphasised that growth should be supported by upgrades to waste management capacity, flood resilience measures and other infrastructure identified through the Infrastructure Delivery Plan. Comments also highlighted the importance of aligning growth with existing water and wastewater infrastructure capacity, with some respondents suggesting that development should be directed towards locations where treatments capacity already exists and away from areas where significant upgrades may be required. A recurring theme across both consultations was the importance of protecting the character, identity and distinctiveness of villages and preventing settlement coalescence. Several respondents considered that landscape designations and development boundaries should be drawn to defensible features. Whilst some respondents argued that development on the edge of settlements risks urban sprawl and erosion of rural character, others considered that small-scale housing allocations in villages and rural settlements could support local services, contribute towards housing delivery and assist in meeting the scale of development required to support economic growth. Specific requests included clarification of the Humberston settlement boundary and the provision of additional information regarding the estuary zone and future economic development proposals. Several comments also emphasised that affordable housing delivery should not be compromised by viability considerations when applying the Settlement Hierarchy.

How We've Responded

The sustainability of settlements is an important consideration within the Local Plan. It recognises that smaller settlements have less access to amenities than the larger settlements in the Borough. It therefore directs the majority of development to the most

sustainable areas whilst still recognising the need for some growth on a smaller scale in the smaller settlements to ensure places stay prosperous.

Specific constraints are assessed within the Housing and Employment site selection documents. This gives an overall view of each allocation in these areas and any potential issues that will need to be addressed. Development outside of these allocations would be considered individually and would need to meet the criteria of not only this policy, but all policies within the Local Plan. Viability as a whole has been explored through an independent viability assessment.

Preventing the merging of settlements in order to protect their individual identity and character is also a concern that has been raised and the use of policies such as the Strategic Wedges policy will aid in preventing this supported by the Council's Landscape Character Assessment.

Growth and Distribution/Housing Requirements

Comments demonstrated a wide range of views regarding both the scale and distribution of growth. During the 2024 consultation, respondents expressed support for different growth options, with Options 7, 8 and 9 all receiving support for differing reasons. Option 7 was supported as it directed development closer to employment opportunities, Option 8 was considered capable of supporting a greater number of smaller developments and potentially improving build-out rates, whilst Option 9 was supported for its protection of strategic gaps. Some respondents also supported Option 10 due to its promotion of development within rural areas. Historic England highlighted potential concerns regarding Option 8 due to possible impacts on historic relationships between settlements and cumulative heritage impacts. Across both consultations, there was a strong and recurring theme that previously developed land and vacant properties, particularly within Grimsby, should be prioritised before the release of additional greenfield sites. Respondents raised concerns regarding the loss of greenfield land, woodland, wildlife habitats, ecological networks and chalk streams associated with some proposed housing allocations. Significant concerns were raised regarding the proposed allocation at Grimsby West (Freshney Valley), including impacts on greenfield land, chalk streams, ecological assets, flood risk, highway capacity, traffic congestion and pressure on infrastructure.

Numerous respondents questioned whether the scale of housing growth proposed is justified given population projections, an ageing population profile and the number of vacant homes within the Borough. There were objections to the proposed stepped housing requirement, with commenters arguing that this delays housing delivery to later years of the plan period, potentially worsening current housing shortages, reducing affordable housing delivery and harming economic growth. Several representations

suggested that the Plan's approach would not meet identified affordable housing needs. There was widespread concern regarding reliance on a relatively small number of large strategic allocations to deliver housing growth. Respondents advocated a broader portfolio of allocations, including more small and medium-sized sites, infill opportunities and additional sites capable of coming forward early in the plan period. Concerns were raised regarding the deliverability of strategic allocations and the continued reliance on allocations carried forward from the 2018 Local Plan which remain undelivered. Respondents questioned assumptions regarding delivery trajectories, lead-in times, build-out rates, windfall assumptions, lapse rates and contingency allowances. A recurring theme related to the spatial distribution of growth. Some respondents considered that housing growth is being directed too far from key employment locations, particularly along the A180 corridor and within employment areas. Concerns were raised that settlements such as Waltham and Humberston are expected to accommodate disproportionate levels of growth despite infrastructure constraints.

Conversely, respondents suggested that Arc settlements and villages such as Aylesby and Bradley could accommodate additional housing growth to support delivery and reduce reliance upon major allocations. Respondents also stressed the importance of maintaining separation between settlements, protecting strategic gaps and avoiding coalescence. Infrastructure impacts, including healthcare, transport, water, wastewater, energy and digital infrastructure, were identified as critical considerations throughout the consultation responses. Specific comments also requested assessment of retirement accommodation needs and greater recognition of sustainable transport connections, including locating housing in areas where existing public transport services could be expanded efficiently. Comments are raised that the overall housing requirement will not meet the affordable housing need and advocate for it to be increased.

Employment is discussed and it is suggested that a wider range of employment types and locations are included, reference to data centres and modern economic uses is mentioned. It is also suggested that 86 ha of employment may not reasonably generate the 5,375 jobs forecast, suggesting job generation could be far lower.

How We've Responded

In terms of heritage, the initial set of sites was refined with various sites discounted, which resulted in only a small number with potential impact. The Council produced a whole Plan Historic Impact Assessment (HIA) to address this.

Draft Policy 18 includes reference to accommodation for older people, other people of all ages, supported living, extra care, and requires a certain number of properties are built to accessible and adaptable homes standards (as per the evidence in the Housing

and Economic Needs Assessment). The supporting text to Draft Policy 11 now includes reference to a variety of different types of housing need. The supporting text to Draft Policy 11 also now includes reference to those with accessibility considerations including sensory and perception deficits with the policy wording requiring development to be accessible to all.

Development has been split with the majority in the urban area of Grimsby and Cleethorpes but with other smaller allocations in outlying sustainable settlements - 24% in the 5 key villages in the Arc. Windfall often provides smaller sites, and several smaller sites are included in the allocations.

In terms of the strategic sites, there are a wide variety of housing sites allocated of different sizes, which avoids an over reliance on the large strategic sites. Further, there are multiple references within the plan to promoting regeneration within the urban area and recognising the role of Grimsby and Cleethorpes as the borough's main service centres.

In order to help preserve the individual identity of rural settlements and to enhance green corridors out into the countryside, Draft Strategic Policy 3 introduces Strategic Wedges which protect the separate identities of settlements and protect the openspace for biodiversity and access to the public for enjoyment.

Development Boundaries

Respondents generally supported the principle of development boundaries but raised a number of detailed concerns regarding their implementation and flexibility. During the 2024 consultation, respondents expressed reservations regarding whether development boundaries would be robust enough to resist pressure for expansion whilst also remaining sufficiently flexible to accommodate sustainable development opportunities. Some respondents considered that boundaries should be strategically positioned to reduce travel distances to places of employment and services. Others argued that development adjacent to existing settlement boundaries should be capable of being considered where it would support rural communities or provide affordable housing. During the Preferred Options consultation, comments generally continued to support the policy approach but highlighted concerns regarding specific boundary locations. Respondents objected to development boundaries being drawn too tightly in certain locations, particularly in relation to HOU096 and HOU371, arguing that this may unnecessarily constrain development opportunities. Several representations requested that the policy better distinguish between land beyond a development boundary and land immediately adjoining settlements which may represent sustainable development opportunities capable of enhancing the vitality of rural communities. Respondents also suggested that the policy should more clearly distinguish between isolated countryside

locations and land adjacent to existing settlements where sustainable forms or development may be appropriate. Respondents also noted that land outside settlement boundaries may continue to have an important role for agriculture, leisure and landscape purposes. Some comments raised concerns regarding an apparent contradiction between support for affordable housing exceptions beyond development boundaries and the protection of open character and landscape quality. Further comments sought clarification regarding how the policy would operate should the Council be unable to demonstrate a five-year housing land supply.

How We've Responded

Comments around the development boundaries both wanted strong protection of the open countryside and settlement and landscape character whilst not being a total barrier to development. To strike that balance, the policy clearly sets out when development may be acceptable outside of and adjacent to the development boundary. The development boundaries have been adjusted to include development which has come forward since the Plan was adopted and new allocations for development.

It is noted that a 5 year supply needs to be demonstrated to fully ensure speculative development does not occur outside of the development boundaries; however, the suite of policies as a whole can still influence and shape development that comes forward even where the tilted balance is applied.

Green Wedges (now Strategic Wedges)

Comments across both consultations were generally supportive of the principle of Green Wedges/Strategic Wedges and their role in maintaining separation between settlements, preventing coalescence, limiting urban sprawl and protecting the character and identity of villages including Waltham, Humberston and other Arc settlements. Many respondents considered Strategic Wedges to be an important component of the spatial strategy and supported their continued inclusion within the Local Plan. Several respondents requested the extension of Green Wedge designations in various locations across the Borough to provide greater protection against settlement merging. However, a significant number of comments raised concerns that the Green Wedge approach could restrict housing delivery opportunities and impose additional constraints on development. Respondents argued that some urban fringe locations could accommodate development without harming settlement separation and that Strategic Wedges should provide greater flexibility where development could be accompanied by landscaping enhancements, biodiversity gains or other mitigation measures. Several comments also suggested that Strategic Wedges should play a stronger role in delivering wildlife corridors, ecological connectivity and BNG opportunities whilst maintaining separation between settlements. Concerns were also

raised regarding the interaction between Green Wedges and proposed housing allocations, with suggestions that some allocations could be unnecessarily constrained by the designation. Specific requests were made to amend Strategic Wedge boundaries, including the removal of **HOU096** and **HOU371** from **GW6**, exclusion of **HOU365** from **GW8**, exclusion of **HOU369** from **GW3**, review of **GW1** where it overlaps with **ELR044**, and reduction in the extent of **GW5** where it affects **HOU135**. Respondents also sought a reduction in some Green Wedges to allow development opportunities and promoted **HOU087**, which had been omitted due to its Green Wedge designation. A recurring theme throughout both consultations was the need for clearer policy wording regarding acceptable forms of development within Strategic Wedges, with some respondents considering existing wording to be ambiguous and potentially open to differing interpretations. There were also consistent calls for additional evidence, assessment and review work to justify the identification, extent and boundaries of Green Wedge designations, with some respondents questioning whether sufficient evidence currently exists to support the proposed approach.

How We've Responded

The now named Strategic Wedges have been carefully considered to ensure they are strategically placed for their main function to prevent settlement coalescence and preserve settlement identity. The Green Wedge Methodology document (2023) and the natural environment topic paper set out the Council's considerations around this policy. The Plan offers plenty of opportunities for housing development outside of these areas which are clearly allocated. The policy clearly sets out the position for when development may be supported in these areas.

Boundaries have been amended to better interact with proposed allocations. This is not to favour any particular site, but more to work in harmony across the whole plan and its proposed allocations.

Whilst the policy itself is not intended as a "green" policy, it will work in harmony with the natural environment policies in creating wildlife corridors and ecological connectivity. BNG credit sites were specifically mentioned within the comments and the policy would not preclude this kind of allocation in areas such those outlined within the SW.

Infrastructure

Comments relating to infrastructure were mixed but generally supportive of an infrastructure-led approach to growth. Throughout both consultations, respondents stressed the importance of ensuring that housing and employment growth is accompanied by appropriate infrastructure provision and that infrastructure planning

should be integrated with the distribution and timing of development. A recurring theme was the need to recognise a wider range of infrastructure requirements, including healthcare facilities, educational provision, sports and recreation facilities, public transport, rail services, highways, active travel networks, utilities, digital infrastructure, telecommunications, waste management facilities, drainage systems, flood mitigation measures and climate resilience infrastructure. Comments also highlighted the importance of infrastructure investment supporting key economic sectors, including ports and logistics, renewable energy, manufacturing and industrial development, with requests for stronger links between infrastructure planning and employment growth. Concerns were raised regarding the cumulative effects of development on the highway network, road junction capacity and freight movement, with requests for stronger policy wording relating to transport infrastructure, public transport and active travel. Several respondents highlighted the need for improved bus connectivity, accessibility and reliability, support for developer contributions towards bus service enhancements, alignment with BSIP and Local Transport Plan objectives, and provision of high-quality accessible bus stops within walking distance of new homes. Network Rail and other respondents sought explicit recognition of rail infrastructure and rail travel within the policy framework, echoing comments from the earlier consultation which noted a lack of consideration of rail services. Healthcare infrastructure was identified as a key issue throughout both consultations. Respondents also highlighted pressures on Special Educational Needs (SEN) provision and requested that sufficient education infrastructure and associated developer contributions are secured to meet future demand arising from growth. Respondents requested that healthcare facilities be explicitly recognised as infrastructure requiring developer contributions and that healthcare planning take place alongside housing growth. NHS Property Services sought a clearer mechanism for securing healthcare contributions and requested flexibility regarding future NHS estate rationalisation and redevelopment opportunities. Sport England objected to the earlier consultation draft on the basis that sports facilities were not sufficiently recognised as key infrastructure and requested their inclusion within the policy framework. Water, wastewater and drainage infrastructure generated significant comment. The Environment Agency advised that greater consideration should be given to sewerage infrastructure and Anglian Water highlighted the need for the Infrastructure Delivery Plan to identify water and wastewater requirements associated with proposed allocations. Anglian Water further advised that whilst current wastewater treatment capacity exists, accommodating development at the proposed scale may prove challenging and that employment growth implications remain uncertain. Respondents also sought stronger support for Sustainable Drainage Systems (SuDS), opposed development where drainage infrastructure cannot be provided or flood risk adequately mitigated, and requested that infrastructure planning be informed by the Water Cycle Study, Integrated Water Management Study and Strategic Flood Risk Assessment. Numerous comments advocated stronger recognition

of digital infrastructure, including requirements for full-fibre broadband, 5G coverage and telecommunications infrastructure for major developments. Respondents also requested a phased and mapped infrastructure delivery schedule identifying infrastructure requirements, delivery responsibilities, costs and funding sources. Finally, whilst many respondents supported infrastructure contributions being secured through development, concerns were raised regarding viability implications. Several representations argued that increasing infrastructure contribution requirements, together with affordable housing obligations and strategic site infrastructure costs, could affect development viability, and requested plan-wide viability testing to ensure that infrastructure requirements remain deliverable. Respondents also questioned whether existing viability evidence appropriately reflected market conditions and cumulative policy costs, arguing that infrastructure contributions should be regularly tested to ensure that development remains deliverable.

How We've Responded

The LP is supported by an Infrastructure Delivery Plan. This forms the main evidence base for infrastructure requirements along with specialist consultee comments. Further support is given by other evidence documents such as the Water Cycle Study and flood risk analysis documents and topic papers. The Plan sets out the requirements and when they apply across housing, employment and all other development across the Borough. Appropriate assessment will be required through the development management process which will also detail requirements, costs and contribution triggers through section 106 agreements.

The LP does not directly influence funding bids or schemes. Generally, it supports sustainable solutions and meeting the needs of its residents.

Climate Change, Flooding and Energy

Flood Risk

Comments were generally supportive of the proposed approach to flood risk management and the stronger emphasis on addressing flood risk within the Local Plan. Respondents supported the need to reduce flood risk and improve resilience to the impacts of climate change but requested additional detail regarding how policy objectives will be delivered, monitored and reported. Concerns were raised regarding the allocation of development within areas at risk of flooding and the potential impacts this may have on existing communities and infrastructure. Several respondents recommended that the Strategic Flood Risk Assessment (SFRA) is fully integrated into decision-making processes and that the implications of removing green space, trees and other natural features for flood risk management are carefully considered. There were calls for development to be avoided within the fluvial floodplain unless adequate

compensatory flood storage can be provided. Respondents also sought clarification regarding how changes to flood zone boundaries and flood risk evidence over time will be reflected in planning decisions. Beyond flooding, comments identified wider climate change risks including drought, heat stress and wildfires, with requests for stronger recognition of these issues within the Plan. Concerns were also raised regarding the adequacy of existing drainage and flood management infrastructure and the ability of some locations to accommodate additional development without infrastructure improvements.

The Environment Agency have suggested that additional land should be safeguarded for future flood defence improvements, with a recognition that future defences may need to be wider and higher due to climate change. They also request clarification of how updated flood mapping climate change flood zones have informed allocations. Anglian Water support directing development away from flood prone areas and recommend updating Shoreline Management Plans.

How We've Responded

The SFRA and the recently commissioned SFRA update support the decisions within the plan around allocations. The update takes into account the more recently introduced climate change layer and other updated mapping from the EA. This will also be used at a development management level. Where possible, allocations for more sensitive uses in flood zones have not been utilised. Where this is unavoidable, proper mitigation will be expected.

Infrastructure and other climate change effects are addressed in the relevant sections of the Plan.

Water Management

Comments were broadly supportive of the need for a comprehensive approach to water management but raised a number of concerns regarding infrastructure capacity and implementation. A recurring theme across both consultations was the relationship between planned growth and pressure on existing water, drainage and sewerage infrastructure. Respondents expressed concern regarding development proposed within flood risk areas and requested greater clarity regarding how water management measures would operate in practice. Several comments sought clearer standards, targets and monitoring arrangements, including greater transparency regarding infrastructure improvements and expected outcomes. The Environment Agency requested that policies be strengthened in relation to sewerage capacity, sewage treatment infrastructure, water efficiency standards and non-mains foul drainage arrangements. It also requested greater evidence to support policy requirements and

early engagement between developers, the Environment Agency and Anglian Water where development could affect water infrastructure. Anglian Water's role was highlighted throughout the consultation process, with respondents requesting stronger consideration of wastewater infrastructure constraints. Specific concerns were raised regarding sewerage capacity in **Laceby**, with suggestions that the existing network may not be capable of accommodating further development without investment. Respondents also advocated the greater use of sustainable water management measures including rainwater harvesting, rainwater recycling systems and water re-use technologies within new development. Comments further questioned the proposed reduction of the residential water efficiency standard to **110 litres per person per day**, requesting clearer justification through the evidence base.

Anglian Water support higher water efficiency standards of **85 litres/person/day** on larger developments and 100 litres on others. They also raise concerns about regional water supply deficits. There is support for water resource plans for major developments and requests for updated wastewater capacity evidence.

How We've Responded

The water management policy is supported by a Water Cycle Study to provide its evidence base, particularly around water efficiency standards. Wastewater issues are addressed through the Waste Needs Assessment. It is noted that there are some capacity issues with wastewater, particularly in Laceby. This has been considered with allocations for housing in this area which have been moved back towards the end of the plan period in terms of delivery to allow time for improvements to infrastructure to be carried out.

Sustainable approaches to water management are encouraged through the policy.

Low Carbon Energy Infrastructure

Comments relating to low carbon energy infrastructure were mixed. Whilst respondents generally supported the principle of transitioning to a low carbon economy and reducing carbon emissions, concerns were raised regarding the location and implementation of renewable energy infrastructure. Objections were received regarding the development of solar farms on agricultural land, whilst other respondents suggested that specific policies should be introduced to support solar energy development and identified **Immingham** as a potentially suitable location for further solar energy generation. Several respondents requested greater detail regarding how progress towards net zero objectives would be measured, monitored and reported over the plan period. There were requests for stronger references to carbon capture technologies and suggestions that the carbon footprint of development should include emissions associated with

construction as well as operational use. Comments also linked low carbon infrastructure to wider transport and town centre objectives, suggesting that increased pedestrianisation, reduced traffic levels and improvements in air quality would support carbon reduction objectives whilst enhancing town centre attractiveness. Respondents promoted public transport, particularly bus services, as a cost-effective means of reducing carbon emissions and considered that planning policies should support bus service enhancement and sustainable transport provision. Additional comments highlighted the potential role of parking management, parking pricing, controlled parking provision and park-and-ride facilities in contributing towards a lower carbon transport network.

There are requests for a Local Area Energy Plan (LEAP), net zero delivery frameworks, carbon capture projects, hydrogen projects, and water and wastewater implications of energy transition projects.

How We've Responded

The Council produces monitoring of progress towards net zero within the Carbon Roadmap. This sits outside of the planning function.

Generally, the policy supports low carbon solution. Regard will be given to location at an individual application level. For ground-based solar, the plan sets out conditions around the grade of agricultural land a proposal is located on and the cumulative effect. All renewables a subject to several considerations set out in this policy. Construction Management Plans are generally required for all new build development and is assessed at a development management level.

Comments also raised the role public transport can play in carbon reduction. The Plan generally supports sustainable modes of transport and sets this out in the Sustainable Transport policy.

Low Carbon Energy

Comments were generally supportive of the proposed policy approach and there were no significant objections to the principle of supporting low carbon and renewable energy generation. Respondents supported the ambition to achieve net zero and promote carbon-neutral development; however, several representations requested greater clarity regarding how progress towards net zero targets would be measured, monitored and reported. Some respondents considered that the net zero ambition may be difficult to achieve due to land constraints, competing infrastructure priorities and funding pressures associated with other forms of social infrastructure. A number of comments sought additional policy measures to support renewable energy generation, including specific references to solar energy, compulsory installation of solar panels on

new buildings and stronger support for renewable energy technologies. Respondents also requested clearer references to carbon capture technologies within the policy framework. Whilst renewable energy was generally supported, comments suggested that safeguards should be included to prevent wind turbines and wind farm developments being located too close to residential properties. Further comments sought greater flexibility within the policy wording to ensure it can be applied to smaller-scale property improvements, retrofitting measures and minor alterations, rather than focusing solely on major development proposals. NHS Property Services expressed support for policies promoting carbon-neutral development and highlighted that NHS properties may benefit from the use of carbon offset funding mechanisms as part of the transition towards net zero.

Anglian Water have requested support for renewable energy infrastructure at Anglian Water operational sites, battery storage and resilience measures to maintain operation during power outages and extreme weather events.

How We've Responded

The Council produces monitoring of progress towards net zero within the Carbon Roadmap. This sits outside of the planning function.

Building regulations provide the mechanism for installation of renewables on new development and the Plan supports this approach without duplicating it. Additionally, viability has to be a consideration.

Whilst the Plan allows for renewable energy, it does also seek to control any undue negative impacts on various aspects as set out in the Low Carbon Energy Infrastructure policy. The Low Carbon Energy policy presents a hierarchy to provide more drive towards renewable methods. The policy now also addresses how smaller projects can contribute towards low carbon living and includes the encouragement of retrofitting existing properties with cleaner methods.

The Local Plan does not specifically generate fundings but broadly supports renewable projects.

The Natural Environment

The Natural Environment (General)

Comments across the consultation stages demonstrated broad support for the emphasis placed on protecting and enhancing the natural environment. Respondents

generally agreed that the planning system should seek to balance the delivery of housing, employment and infrastructure with the protection and enhancement of ecological assets, green spaces and biodiversity. There was support for requiring development to provide ecological enhancements to offset impacts and for ensuring careful consideration is given to development within environmentally sensitive locations. Commenters emphasised the importance of wildlife corridors, habitat connectivity and integrating biodiversity within new development. Specific comments were received regarding allotments, including concerns around land procurement, long-term management arrangements and funding for new allotment provision. Consultation with the Lincolnshire Wildlife Trust was specifically recommended. A stronger emphasis on the LNRS specifically identifying improvement opportunities where the public can access.

How We've Responded

Commenters asked for housing, employment and infrastructure needs to be balanced with enhancing natural assets. All policies support natural gain and expect all development to consider and add to where appropriate add to the natural environment. As a minimum, enhancements will be required to offset loss through BNG and open space creation and other ecological enhancements on appropriate schemes.

Sensitive ecological sites are identified through the Council's HRA and the plan responds to this through all policies ensuring this is considered through relevant developments. Sites are also mapped in the Local Plan supporting maps. The Council also commissioned a Green and Blue Infrastructure Study which looks at green and blue networks more generally across the Borough. The policies respond to this by requiring developers to consider these spaces through development, provide enhancements where possible and create a connected green and blue network. The biodiversity and geodiversity policy also requests ecological enhancements to development including bat boxes etc on development at all levels.

Allotment procurement through new development is considered through the Open Space and Recreation policy. Allotments, along with any new open space obtained through housing development will need to provide details of lifetime management of the facility. There may also be opportunities for commuted sums where a new facility is not the right solution.

The LNRS is referred to in the Plan and will be considered through individual applications at a development management level. This is also the case for consulting with LWT.

Health and Wellbeing

Comments were generally supportive of the policy approach and the principle of embedding health and wellbeing considerations within the planning process. However, concerns were repeatedly raised regarding the requirement for Health Impact Assessments (HIAs) for developments of 150 dwellings or more. Some respondents argued that there is insufficient evidence to justify HIAs on all developments above this threshold and questioned whether a significant health impact could be assumed solely on the basis of scale. Others suggested the policy should be strengthened to discourage developers from artificially subdividing schemes in order to avoid HIA requirements. Sport England emphasised the importance of design in promoting physical activity and encouraged stronger references to active lifestyles. Respondents noted that the loss of greenfield land can affect informal recreation opportunities such as walking and cycling and that these impacts should be considered as part of development proposals. Several representations highlighted the need to ensure infrastructure and transport capacity are assessed alongside development. During the Preferred Options consultation, respondents suggested that the policy should align more closely with NPPF Section 8 and the Joint Strategic Needs Assessment. Additional themes included the need for proactive engagement with NHS bodies and public health partners, consideration of physical and mental health impacts, reducing health inequalities, promoting active travel and connectivity, supporting community cohesion, addressing the health impacts of climate change, improving access to healthy food, providing key worker affordable housing, increasing access to the natural environment and ensuring sufficient healthcare infrastructure is delivered alongside growth. Active travel in natural environment should be considered.

How We've Responded

The justification around the requirement of dwellings over 150 requiring a HIA is because developments of this scale are generally considered large enough to have significant transport, infrastructure and public health implications. It also mirrors the threshold at which Active Travel England becomes a statutory consultee, reflecting the importance of considering the health impacts of larger developments on walking, cycling and sustainable transport. All developments are required to do a rapid HIA in any case which will be properly assessed and if more is required, this can be highlighted through the development management process. This ensures developers cannot subdivide developments to avoid the requirement.

This policy does emphasise the importance of physical activity and active lifestyles and indeed this is echoed through other policies in the plan including open space and recreation and sustainable transport to name two.

Particularly with major housing development, the loss of recreational opportunities is recognised with requirements through the Open space and recreation policy ensuring these developments provide opportunities. Through the natural environment policies, connectivity is reiterated throughout with accessibility of open spaces by foot being a key consideration. Opportunities for active travel such as pedestrian and cycle routes are supported throughout the Plan.

Health infrastructure is identified as a key consideration in the Plan. It both safeguards and supports current and future provision.

Comments requested that the Plan broadly aligns with Section 8 of the 2024 NPPF (Promoting healthy and safe communities). The JSNA was also used to inform the creation of the policy.

Through the Local Plan process, the document has been available for consultation including with health bodies. Relevant planning applications will also consult with relevant health bodies.

Both physical and mental health has been considered through the document. One area of physical health that was highlighted as being a particular issue locally was high rates of obesity in young children. To respond to this, a new requirement restricts hot food development in wards with particularly high rates. For mental health, the natural environment is highlighted as being important to mental health generally.

Health inequality is an issue the Local Plan looks to address where possible. Where possible, the Plan will assist in addressing this. Additionally, effects of climate change are also looked at through the Plan.

It is noted that access to healthy food was noted in the comments. Allotments are supported through the Open space and recreation policy; however, it is difficult to specify healthy food uses through planning. Broadly, the Plan would support healthier approaches to food.

Affordable housing for key workers is broadly supported through the plan through the affordable housing policy which looks to secure AH generally.

The natural environment policies encourage the creation of green and blue networks with access being a consideration. The Open space and recreation policy considers access to open spaces specifically and where necessary can direct open spaces to where they are most needed. New spaces will also need to consider accessibility standards.

Creation of healthcare infrastructure is encouraged particularly through new housing developments where need is highlighted.

Green (and Blue) Infrastructure

Comments were generally supportive of the Green Infrastructure approach and the importance of protecting and enhancing green infrastructure networks. Respondents advocated stronger recognition of blue infrastructure and wider multifunctional green and natural spaces. Several comments sought the inclusion of additional strategic green infrastructure connections, including references to **Humberston and Tetney**, **Wybers Wood and Great Coates**, **Wybers Wood and Laceby Acres**, and amendments relating to **Great Coates and Healing**. There were requests to recognise the role of smaller multifunctional natural spaces alongside larger strategic corridors. Concerns were raised regarding potential impacts of development on public rights of way and anti-social use of green spaces by motorcycles. Some respondents considered **GW7** to be excessively broad and unnecessarily restrictive on development opportunities. During the Preferred Options consultation, concern was raised that the Strategic Green Infrastructure Corridor overlaps with the proposed employment allocation at **Manby Road**, with requests for boundary revisions. The NELC Ecology Officer highlighted the relationship between Green Infrastructure and ecological networks, recommending stronger recognition of wildlife corridors, ecosystem services and natural flood management functions. Further comments suggested developers should be required to incorporate sustainable measures including SuDS, permeable paving, native planting schemes, wildlife-friendly lighting and strategic biodiversity enhancements linked to the emerging Local Nature Recovery Strategy (LNRS). Respondents also requested clearer identification of areas suitable for off-site biodiversity enhancement following publication of the LNRS. Blue infrastructure should also be included alongside access to green spaces.

How We've Responded

Blue infrastructure is now specifically referenced throughout the plan. Additionally, multifunctionality is encouraged for natural spaces to fulfil many functions. For example, SuDs, natural flood management, recreation and landscaping.

Connecting spaces across the borough is high on the agenda across all of the natural environment policies. This includes both larger and smaller open space offerings. This will help to strengthen wildlife corridors. spaces will need to have regard to key strategies such as the LNRS. Some requirements will be considered at an application level such as the suitability of lighting in relation to wildlife, native planting and the use of permeable paving.

Boundaries have been updated to reflect proposed allocations. No sites have been specifically allocated for BNG purposes, but the policies do not preclude this type of proposal coming forward.

Landscape

Comments were generally supportive of the proposed Landscape policy and particularly welcomed the increased emphasis on tree canopy protection. Respondents requested stronger protection for mature trees, hedgerows and long-distance landscape views. Particular concern was raised regarding the need to consider long-distance views associated with development proposed at **Stallingborough**, whilst later comments extended this principle more generally to new housing developments. Respondents emphasised the positive role that trees can play in climate change mitigation and requested stronger references to their contribution within policy wording. Several comments suggested that landscape assessments should be undertaken by appropriately qualified professionals and that this requirement should be explicitly stated in the policy. Further comments sought stronger provisions regarding the management of landscaping schemes where biodiversity uplift is not secured through Biodiversity Net Gain. During the Preferred Options consultation, the NELC Ecology Officer recommended greater use of nature-based solutions, including SuDS, tree planting and landscape buffers to address issues such as run-off, pollution and noise. Respondents also sought stronger wording around planting requirements, with particular emphasis on native species, resilience to future climate change and ensuring flexibility where street tree provision may not always be feasible. Anglian Water request involvement in updating landscape evidence relating to operational sites.

How We've Responded

The policy seeks to protect existing landscape features such as trees and hedgerows, recognising their contribution to ecology. Development will generally need to have regard to key views. The North East Lincs LCA supports helps to identify and protect these views.

The request for a qualified person to carry out landscape assessments is noted. Landscape assessments would be assessed at an application level, and the adequacy of any submitted reports would be addressed at that level. Management of landscaping schemes is generally secured at an application level.

The use of multifunctional spaces is generally supported across the natural environment policy to provide nature-based solutions for climate change and drainage. Landscape buffers between development and other uses will also be encouraged. Suitable planting is also requested through the policy which allows consideration at an individual application level to ensure suitable planting is included including native planting which is also climate resilient. The policy allows for flexibility for suitability.

Anglian Water have requested consultation for updated landscaping of operation sites.

This will be possible through Local Plan consultation with the suite of evidence made public.

Local Green Space

Comments were broadly supportive of the Local Green Space designation process and the continued protection of valued local green spaces. Respondents proposed a number of additional sites for designation, including **Grimsby West** and land between **Waltham Windmill and Cheapside**. There was support for incorporating Natural England greenspace standards into the Local Plan and for retaining existing protections for open space, woodland and recreational land. Several respondents sought the designation of additional green spaces and wider protection of undeveloped areas. However, it was recognised that some proposed sites already benefited from alternative planning protections, including existing open space designations, woodland protection, recreation designations or the proposed Green Wedges policy. Other sites were identified as being constrained by extant planning permissions which limited opportunities for Local Green Space designation. Some comments also suggested that wider green wedge designations could provide complementary protection for larger areas of green space vulnerable to urban infill. Minor amendments were requested to references and paragraph numbering within the NPPF and these issues were identified through the consultation process.

How We've Responded

Several spaces were put forward as potential LGS allocations. Ultimately, the decision was taken that no spaces would be allocated. None specifically met the requirements set out in the NPPF for this type of allocation at this time. Open spaces are well protected through their current allocation, and we don't anticipate the additional LGS allocation would afford protection over and above this. The Natural Environment Topic Paper supplies more information on this.

Green Space and Recreation (Open Space and Recreation)

Comments were generally supportive of the proposed approach to open space, green space and recreation provision. Respondents supported the use of recognised standards and suggested that green space designations should reflect updated Natural England accessibility standards. There were requests for greater transparency regarding the collection and expenditure of commuted sums, including suggestions that parish councils should be consulted regarding how these funds are spent. During the Preferred Options consultation, the NELC Ecology Officer requested strengthened policy wording to ensure that green spaces provided through development are maintained in

accordance with approved management plans over the long term and continue to deliver their intended recreational, ecological and amenity functions.

How We've Responded

The open space and recreation policy has been updated to provide a clearer framework including NE and FiT guidance. A stronger position on maintenance has also been including ensuring new open spaces come with a management plan which accounts for the lifetime of the development. Commuted sums would be a rare occurrence with an on-site first approach taken in most instances. Where a commuted sum was sought, clear discussions would be held at an individual application level.

Comments around the spending of S106 money are taken on board but fall outside the scope of the Local Plan itself. Parishes are encouraged to interact with developers where a site is within their jurisdiction to shape the way commuted sums may be spent. Parishes can also make suggestions through individual applications for any open space requirements that they may have directly relating to that development. S106 information for individual applications is made public on the associated application case and can be viewed on the public website.

Secured by design principles are encouraged through design.

Protected Habitats (Biodiversity and Geodiversity)

Comments were generally supportive of the proposed policy approach but raised a number of detailed issues regarding habitat protection and ecological enhancement. Respondents expressed concerns that Biodiversity Net Gain requirements on employment sites along the Humber Estuary could affect viability and limit economic development opportunities. Particular concern was raised regarding protection of the chalk stream associated with the proposed **Grimsby West** development. During the Preferred Options consultation, respondents requested stronger provisions requiring biodiversity features within new development, including the installation of swift bricks and artificial nesting features for house martins. Additional comments suggested that protected habitats should be more explicitly reflected within the Local Nature Recovery Strategy to strengthen their strategic significance and maximise opportunities for environmental enhancement. Environmental net gain should include adequate soil volumes and quality standards for street trees. Integrated designs for TPOs, SuDS, lighting and highways infrastructure.

How We've Responded

Viability issues were raised with reference to the Humber Estuary employment sites. The Plan has been viability assessed independently and has not specifically flagged this as an issue.

Specific requirements for integrated nature solutions are set out in the design policy. The natural policies more widely include integration of multiple elements such as SuDS, TPOs and highways infrastructure (particularly cycle and pedestrian ways).

The policy ensures protected habitats are properly assessed and accounted for with new development. That includes the chalk stream (which is specifically referenced in the policy) associated with Grimsby West. It also asks developments to respond specifically to the LNRS. Whilst street tree soil standards and adequate soil volumes for tree planting are not specified, the policy would broadly support specialist consultees raising specific concerns at an application level with support of this policy.

Biodiversity Net Gain

There was widespread support for the principle of Biodiversity Net Gain and for securing measurable biodiversity improvements through development. Respondents generally supported the mandatory 10% biodiversity uplift but also raised concerns regarding implementation, monitoring and policy wording. Some representations argued that habitat loss should be avoided wherever possible and questioned whether a biodiversity gain mechanism can adequately compensate for the loss of important habitats, particularly mature trees and hedgerows. Respondents stressed the importance of comprehensive ecological surveys and site assessments before development takes place and highlighted the need for baseline conditions to accurately reflect site characteristics. Several comments focused on long-term monitoring arrangements and sought greater clarity regarding how biodiversity gains would be secured and monitored over the required 30-year period. The emerging Local Nature Recovery Strategy was repeatedly referenced, with comments requesting stronger links between BNG delivery and wider strategic ecological priorities. Respondents also requested enhanced protection for birds, including the provision of swift bricks and nesting opportunities. Further comments sought consistency with national legislation and guidance, with concerns raised that some aspects of the Local Plan duplicated provisions already established through the Environment Act and associated regulations. The NELC Ecology Officer recommended stronger wording requiring developers to deliver BNG, clearer guidance on biodiversity gain plans, monitoring arrangements, monitoring fees, off-site gains and the relationship between biodiversity gain plans and planning permissions. One respondent questioned whether a flat 10% uplift always delivers meaningful ecological improvements where baseline biodiversity values are already very low due to intensive agricultural practices.

How We've Responded

A decision was taken to remove the BNG policy from the plan as it was considered it added no further value than the national regulations. However, points raised including

loss of habitat in the first instance, loss of mature trees and hedgerows, the need for comprehensive and accurate ecological surveys including baselines, links with LNRS and the inclusion of solutions such as swift bricks are met in other policies within the natural environment suite and are detailed in the summaries above.

The remaining comments would be satisfied by the BNG regulations. It is noted that comments expressed whether 10% gain is enough to produce meaningful results, but this is in line with Government guidelines.

Habitat Mitigation

Comments generally recognised the importance of habitat mitigation measures, particularly in relation to the Humber Estuary and internationally designated sites. There was broad support for habitat mitigation proposals and the safeguarding of ecological networks. Respondents supported the expansion of mitigation areas and acknowledged the importance of protecting bird populations and internationally important habitats. However, some representations argued that the loss of agricultural land and undeveloped countryside associated with housing and employment growth cannot always be fully mitigated and continued to advocate the prioritisation of brownfield development opportunities. Several respondents sought greater detail regarding how mitigation sites would be delivered, managed and monitored, including lessons learned from mitigation projects already undertaken. During the Preferred Options consultation, concerns focused on the proposed increase in South Humber habitat mitigation contributions. Respondents suggested that rising contribution levels, index linking and the cumulative impact of multiple developer obligations could affect development viability and should be fully tested through viability evidence. Several comments highlighted the need to better explain the relationship between Habitat Mitigation and Biodiversity Net Gain and how mitigation requirements interact with off-site biodiversity provision. The NELC Ecology Officer recommended that developer-delivered mitigation opportunities should be recognised, that contribution requirements should be applied consistently to brownfield and greenfield development, that donated mitigation land should be assessed for suitability, and that clearer policy wording should explain when mitigation contributions become payable. Respondents also sought assurance that mitigation calculations achieve full cost recovery and requested the inclusion of the **SHIP boundary** on the Policies Map. Details of the delivery and governance of the SHM sites including RWE land, mitigation headroom, alternative mitigation provision, transparency of monitoring, South Humber Gateway Ecology Group membership and robustness of the HRA evidence base.

How We've Responded

The policy continues to respond to protected habitats.

Careful consideration of the mitigation zone for the South Humber Bank has been carefully considered and at this time, it is considered that expansion is not required. Other requirements will apply outside of this area which will yield ecological benefits. Consideration was given to how the current sites have worked and how this will continue going forward. A higher indexed fee has been included with the policy and clear guidance of when this needs to be paid. The plan has been viability tested with this increased figure specifically and found to be acceptable. Other schemes can be put forward by developers for consideration for their scheme should they wish to explore alternate solutions, however, this would need to be assessed and considered adequate. The HRA makes reference to the SHB mitigation sites.

It is acknowledged that brownfield sites are the best option for development, however, to achieve the growth required to support the Borough, greenfield sites need to be utilised. Where possible, on-site habitats are maintained but the mitigation sites help to protect areas directly within the vicinity.

The relationship between BNG and the mitigation scheme was raised in comments, specifically to explain their interaction. The mitigation scheme addresses the loss of functionally linked land. This is not a biodiversity gain. This takes the site back to a 0% loss position of a specific constraint on the site. BNG seeks an enhancement so this will be over and above the mitigation of the impact of that particular development. Additionally, the assessments for BNG have different requirements.

Comments asked for the SHIP boundary to be included in the policies maps however, as the projects have now been completed, it is felt this is not necessary.

Design and Amenity

Design Principles

Comments were generally supportive of the proposed design policy approach and associated wording. Respondents welcomed the emphasis on achieving high quality design but suggested that stronger references should be made to national design guidance, including the National Design Guide and National Model Design Code. Several representations emphasised that good design should not only focus on the appearance of development but also ensure that development is located in appropriate and sustainable locations, with requests for policy wording to more explicitly reflect the importance of ensuring development takes place in the right place. Respondents requested that biodiversity considerations are incorporated into design requirements, including the provision of ecological enhancement measures within development. Additional comments sought stronger recognition of sustainable design measures, including minimising embedded carbon, improving water efficiency, reducing and reusing wastewater, rainwater harvesting, application of the drainage hierarchy and

incorporation of SuDS. Across both consultation stages, comments were received requesting that new development should include the provision of swift bricks, with some respondents advocating at least one swift brick per dwelling on average and suggesting artificial nesting cups for house martins as an alternative. Several respondents sought stronger recognition of Sport England's Active Design principles, arguing that the design of development should actively encourage physical activity and healthy lifestyles. Comments were also made regarding the weight afforded to supporting design documents referenced within the policy, including the Design Guidance for North East Lincolnshire, Lincolnshire Wolds Area of Outstanding Natural Beauty Management Plan, Landscape Character Assessment, and Conservation Area Appraisals. Some respondents argued that, as these documents are not development plan documents, Local Plan policies should not elevate them to development plan status.

How We've Responded

The National Design Guide is referenced as an evidence-based document in Draft Policy 4. Draft Section 8.1 states that good design goes beyond aesthetics of visual appearance and involves consideration of the suitability of the location and the developments compatibility of neighbouring uses. Draft Strategic Policy 13 incorporates biodiversity considerations and the need to achieve environmental benefits within design requirements. Sustainable design measures such as renewable energy and low carbon developments, water efficiency, reduced wastewater generation, wastewater reuse, Rainwater harvesting, application of the drainage hierarchy, and incorporation of SuDS are incorporated throughout the Plan. Draft Strategic Policy 11 states that the council will have regard to enhancing biodiversity with features such as swift bricks, bat boxes and hedgehog highways explicitly mentioned. Reference is given to active habits and behaviour within Draft Strategic Policy 13, which reflects Sport England's ten principles of active design, specifically their foundational principle (Principle 1 Activity for all). Draft Policy 1 states that the authority will expect development proposals promote, support and enhance physical and mental health. Further, Strategic Policy 15 states that where appropriate proposals should seek to prioritise pedestrian and cycle access to and within the site promoting active travel choices. The inclusion of Design Guidance for North East Lincolnshire, Lincolnshire Wolds AONB Management Plan, Landscape Character Assessment, and Conservation Area Appraisals is intended to signpost applicants to relevant evidence, guidance and management documents that provide further detail to assist the interpretation and implementation of policy requirements. Decision making will continue to be led by the Development Plan as a whole, with these documents acting as supporting material considerations where relevant.

Historic Environment

Comments were broadly supportive of the proposed policy approach and wording relating to the historic environment. A recurring theme throughout both consultation stages was the desire to strengthen protection for The Humberston Fitties, with respondents highlighting its significance as a heritage asset and distinctive feature of the Borough. Historic England indicated support for the introduction of a specific policy relating to The Humberston Fitties. Respondents also sought stronger safeguards for sites of archaeological interest, emphasising the importance of ensuring that archaeological assets are identified, protected and appropriately considered as part of development proposals. Comments generally supported the principle of conserving heritage assets whilst accommodating appropriate development, with requests for policy wording to provide robust protection for locally distinctive historic features and heritage interests.

How We've Responded

Draft Section 9.2 Historic Environment states that the authority considers the Humberston Fitties to be of particular importance to the borough's distinctive character and sense of place. Further, Draft Strategic Policy 14 states that development will be supported where it conserves and enhances the design, character, appearance and significance of The Fitties. The determination of planning applications will be based on the assessment of the impact to assets' heritage significance, including archaeological sites. Draft Strategic Policy 14 states that development will be supported where proposals are designed to preserve archaeological assets in situ or make appropriate provision to effectively record and disseminate the recovered information. Further, locally distinctive historic features and heritage interests will be protected as Draft Section 8.2 states that the determination of planning applications will be based on the assessment of the potential harmful impact to assets' heritage significance.

Sustainable Transport

Comments were broadly supportive of the overall policy direction but identified a significant number of areas where respondents considered the policy could be strengthened. Respondents consistently emphasised the need for greater recognition of public transport, active travel and rail infrastructure as key elements of a sustainable transport strategy. During the 2024 consultation, comments suggested that Table 8.3 should be strengthened to ensure the strategic highway network has sufficient capacity to accommodate growth and avoid congestion. There were repeated requests for stronger cycling infrastructure, including improved cycle routes and facilities, alongside enhanced overnight lorry parking provision. Additional comments highlighted the importance of ensuring safe, inclusive and accessible roadside facilities, including

overnight HGV parking provision, and suggested that future proposals should regard to the requirements of Circular 01/2022. Respondents also requested more explicit recognition of rail travel as a sustainable transport mode and suggested that a more comprehensive cycle strategy should be developed. During the Preferred Options consultation, concerns were raised regarding whether major housing allocations, particularly those located some distance from employment areas and rail infrastructure, would be capable of achieving genuinely sustainable travel patterns. Respondents highlighted stronger links between transport provision, health outcomes and wellbeing and sought greater emphasis on active travel opportunities. Network Rail requested greater recognition of both passenger rail and rail freight within the policy framework. Public Transport (NELC) suggested that the Local Plan should play a stronger role in supporting bus services and reducing the need to travel. Specific suggestions included requiring developer contributions towards bus service improvements through Section 106 agreements, improving connectivity, enhancing bus infrastructure, locating development within walking distance of bus stops, aligning policies with Bus Service Improvement Plan (BSIP) objectives, and supporting bus priority measures, mobility hubs and park-and-ride facilities. The need to ensure transport infrastructure is delivered alongside growth remained a recurring concern throughout both consultations.

How We've Responded

Draft Strategic Policy 15 promotes sustainable transport choices, seeks to reduce the need to travel, supports accessibility by non-car modes, and encourages development in locations with appropriate access to public transport. In addition, Draft Strategic Policy 4 provides a mechanism for securing infrastructure improvements, including transport-related infrastructure, where necessary to mitigate the impacts of development through developer contributions. The Local Plan provides a strategic planning framework and does not seek to prescribe specific transport interventions. Such measures are more appropriately progressed through separate transport strategies, infrastructure programmes and transport delivery plans prepared by the relevant authorities and partners.

Draft Policy 1 states that the authority will expect development proposals promote, support and enhance physical and mental health. Further, Draft Strategic Policy 15 states that where appropriate proposals should seek to prioritise pedestrian and cycle access and Draft Strategic Policy 4 explicitly states that contributions towards physical infrastructure should be provided such as provision for cyclists and pedestrians. Draft Strategic Policy 15 states that development should seek to support and enhance rail connections and infrastructure.

Draft Strategic Policy 17 states that the development of strategic housing sites will be expected to address necessary improvements to the highway network, both on and off-site. The detailed design and assessment of roadside facilities, including HGV parking provision, will be considered through the development management process where relevant. National policy and guidance, including Circular 01/2022, will continue to apply to relevant development proposals and it is not considered necessary to specifically reference this guidance within the Local Plan. The Borough benefits from a range of public and community transport initiatives which assist access to employment, education and services, including the Phone n Ride demand-responsive bus service, the Wheels to Work scooter scheme, and the Dial a Ride service. In addition, the Local Plan supports enhanced public transport, active travel and sustainable transport infrastructure to improve connectivity between homes, employment areas and key services.

Parking

Comments relating to parking were mixed but generally highlighted concerns regarding whether sufficient parking provision is being planned for future development. During the 2024 consultation there was broad support for the policy approach, although respondents requested stronger links between parking provision, electric vehicle infrastructure and wider sustainability objectives. Several representations sought greater clarity regarding parking standards, including the number of parking spaces required per dwelling, provision for mobility scooters and the integration of electric vehicle charging infrastructure. Concerns were raised regarding the cumulative parking impacts associated with new housing developments and whether sufficient measures are proposed to mitigate additional demand. Respondents highlighted the importance of ensuring that parking provision is considered alongside wider transport planning to avoid creating pressure on existing residential streets and public spaces. During the Preferred Options consultation, the comments received were largely objecting to the proposed parking approach, with one representation arguing that significantly more free car parking should be provided. Overall, respondents sought greater clarity regarding parking standards, future parking demand and the relationship between parking provision, sustainable transport objectives and emerging technologies such as electric vehicles. Additional comments highlighted the need for adequate overnight HGV parking provision and safe roadside facilities, with suggestions that future parking standards should take account of national guidance relating to freight and strategic road network users.

How We've Responded

Draft Policy 4 states that the form and scale of off-street parking required will be assessed based on site-specific considerations and development needs. In terms of Electric Charge Points. It is recognised that the provision of electric charging points is now a requirement of Part S of Building regulations for new homes and existing homes undergoing major renovations (of 10 dwellings or more). Supporting this, the Council adopted an Electric Vehicle Charging Strategy in March 2024 which lays out a number of goals to accelerate public charging point infrastructure. It is also indicated in Draft Policy 4 that at least 5% of parking bays should be designed, set out and reserved for people with mobility impairments. Further, whilst developers will have been expected to minimise parking provision to encourage sustainable transport modes, it is specified that this shouldn't be to the detriments of local amenity and safety.

The detailed design and assessment of roadside facilities, including HGV parking provision, will be considered through the development management process where relevant. National policy and guidance, including Circular 01/2022, will continue to apply to relevant development proposals and it is not considered necessary to specifically reference this guidance within the Local Plan.

Employment

Employment Requirements

Comments demonstrated a range of views regarding the scale of employment growth and the preferred employment land requirement. During the 2024 consultation, respondents were divided between the two growth options. Supporters of Option 1 considered it to be based on more realistic evidence and employment forecasts, avoiding the risk of overestimating future growth. Conversely, supporters of Option 2 considered that a more ambitious, policy-led approach was appropriate and aligned more closely with the growth aspirations of the NPPF. During the Preferred Options consultation there was generally strong support for the proposed requirement of 86 hectares of employment land, although several respondents requested additional justification regarding future employment demand and the assumptions underpinning employment growth forecasts. A recurring theme was the need to ensure that employment growth and housing growth are planned together to support workforce requirements, economic regeneration and sustainable travel patterns. Respondents highlighted the importance of ensuring employment land allocations are deliverable, supported by appropriate infrastructure and aligned with investment priorities. Several comments noted that, despite the overall supply of employment land being substantial, there is an identified shortage of modern employment premises and sites suitable for

general business needs. Concerns were raised that market demand may not be fully met by the existing land supply. Respondents emphasised the importance of supporting strategic growth sectors, including logistics, ports, renewables, clean energy, chemical processing, advanced manufacturing and food production. Brocklesby Estate requested that Strategic Policy 2 be updated to reflect changes in national policy and include explicit recognition of modern economic sectors such as gigafactories, laboratories, data centres and digital infrastructure. Other respondents highlighted the potential importance of supporting the expansion of existing businesses, particularly SMEs, in addition to allocating new employment land. Concerns were also raised regarding infrastructure provision, transport connectivity and public transport access, with Stagecoach emphasising the importance of bus services linking residential areas to employment locations including Europarc, Immingham, industrial areas, food manufacturing centres and emerging South Humber Bank growth locations.

How We've Responded

In terms of providing justification for employment growth, the authority has produced an Employment Topic Paper which provides detailed justification for the volume of employment land proposed. Further, the Employment Site Selection document assesses each allocated employment site in terms of its proximity to key services and infrastructure, among other things, to ensure that they are deliverable and supported by the necessary infrastructure.

The indicative sector of each allocated employment site is set out within section 9.1, which shows that the majority of allocations are suitable for manufacturing and general use. Transport connectivity and public transport access are also assessed within the Employment Site Selection document.

Policy has also been updated to ensure that support is given for windfall proposals that come forwards for general employment uses to ensure other industries can be catered for.

Employment Allocations

Comments were generally supportive of the employment allocation strategy but raised a number of detailed concerns regarding the quantity, distribution and justification of allocated employment land. During the 2024 consultation there were mixed views regarding whether existing employment land allocations should be maintained, increased or reduced. Respondents objected to the removal of some allocations and argued that existing employment sites should be retained. Others suggested that sufficient employment land had already been identified and questioned whether additional allocations were necessary, citing recent job losses and wider economic

conditions including energy costs. Several new sites were promoted for allocation, including Land North of Hewitts Avenue, Land South East of Peaks Parkway, and Land South of Energy Park Way. Respondents also raised concerns regarding specific allocations, including suggestions that Clee Fields and ELR041 should not be identified for employment use. There was support for continued growth at Europarc, with comments emphasising that policy wording should remain flexible, support a broad range of employment uses and facilitate larger strategic employment opportunities of 30 hectares and above. Several respondents also emphasised the importance of protecting operational ports and port-related employment activities. During the Preferred Options consultation, respondents requested clearer justification for the scale of employment allocations. In particular, East Lindsey Council questioned why approximately 659 hectares of employment land was allocated when the HEDNA identifies a requirement of approximately 86 hectares, seeking greater transparency regarding the Council's chosen employment strategy. Concerns were raised that the assessment of Europarc Phases III and IV had not fully taken account of Call for Sites submissions regarding remaining capacity and development status. Respondents sought clearer explanation of the Council's preferred spatial strategy and how employment allocations support wider growth objectives. Several comments emphasised the importance of aligning employment allocations with housing growth, infrastructure provision and sustainable transport networks. Concerns were raised regarding potential mismatches between employment growth concentrated in the northern and eastern parts of the Borough and significant housing growth in the southern Arc settlements, which could increase travel demand and congestion. Respondents advocated strategic growth locations where homes, jobs and infrastructure can be delivered together. Additional comments sought stronger policy recognition of MOD safeguarding areas, protection of operational assets, water supply and wastewater infrastructure requirements, rail infrastructure constraints and the need for accessibility by public transport. Comments were also received promoting additional housing and employment site allocations beyond those already proposed.

The Environment Agency notes that many employment sites are within Flood Zone 3 and advise that future flood defence improvements may be required to safeguard land. It is suggested that construction and maintenance access for flood defences should be considered when assessing site deliverability. There are requests for flexibility where associated land beyond the allocation may be required, such as mitigation land. National Highways undertook an assessment of employment allocations and identifies several sites where further SRN mitigation is likely required including ELR016A (Stallingborough Interchange), ELR011 (Europarc Phase IV), ELR025b (Cristal/Tronox), ELR001 (Kings Road), ELR043 (Mauxhall Farm), ELR044 (Manby Road) and ELR021 (Novartis). It is stated that although the remaining sites are assessed as having no significant individual impacts, most still affect Stallingborough Interchange, meaning a

cumulative impact assessment will be essential to ensure the continued safe and efficient operation of the SRN.

National Grid identified that ELR016A and ELR019 are crossed by or in close proximity to NGET assets and request wording which appropriately recognises and responds to the presence of NGET infrastructure within the sites. They further request state that there is a need for allocation policies to recognise overhead transmission lines; safeguard National Grid assets; and support for future network reinforcement and the Great Grid Upgrade. Further, the following sites are identified as being within 5 metres of the Grimsby to Walpole project, ELR011 and ELR016A, as well as HOU342. It is suggested that they most likely won't have impacts on the project but their proximity should be considered.

How We've Responded

It is acknowledged that the Plan allocates significantly more land than the HEDNA requirement of 80ha. Detailed reasoning for this is set out in the Employment Topic Paper, but generally the increased amount of land proposed for allocation in the Local Plan recognises the ongoing growth of the economic activity along the South Humber Bank and supports the aspirations for continued investment and expansion. The high level of jobs that could potentially be created in this way help support the target of 621 dpa. In terms of Europarc, a detailed assessment has been undertaken, including contact with owners to better understand their progress to date and intent. Therefore, it is considered the site is now up to date. In terms of protection of the operational ports and port-related employment activities, draft policy 11 states the proposals for port related uses will be supported and approved by the council provided it is in accordance with the development plan and satisfies habitat regulations. There are requests for a stronger recognition of infrastructure constraints. Draft Strategic Policy 4 states that developers are expected to meet the infrastructure needs of the proposed development. Draft Policy 5 states that account should be taken of MOD safeguarding areas and Draft Policy 9 specifically references rail crossings. Account has been taken of water supply and wastewater infrastructure requirements in the Water Cycle Study produced by NELC. The WCS advocates reducing to 110 l/p/s, which has been incorporated into Draft Policy 1. Transport Statements, Transport Assessments and Travel Plans will be requested where mitigation is required. A Strategic Flood Risk Assessment has been carried out which includes Flood Risk Assessments for specific sites at risk of flooding and mitigation measures. The need for SRN mitigation and a cumulative impact assessment is acknowledged within the Employment Site Selection. ELR016A and ELR019 are crossed by or located close to National Grid Electricity Transmission (NGET) assets and ELR011, ELR016A and HOU342 are within 5 metres of the Grimsby to Walpole project. This is acknowledged within the Employment Site Selection document.

Existing Employment Sites

Comments were generally supportive of the approach towards safeguarding and supporting existing employment sites. During the 2024 consultation, concerns were raised regarding whether infrastructure within Laceby is sufficient to accommodate further business growth, particularly in relation to traffic congestion and parking capacity. Respondents noted that existing pressures on the local highway network may affect the ability of the area to accommodate additional employment development. During the Preferred Options consultation, respondents emphasised the importance of ensuring that infrastructure investment directly supports key economic sectors, including ports and logistics, energy, renewables, advanced manufacturing, chemical processing and food production. A recurring theme was the need to protect and support existing employment areas whilst ensuring they remain attractive and capable of accommodating future investment and expansion.

It is suggested that some developments may be affected by AW's 20 cubic metre per day threshold for water supply to expanding or new non-domestic developments. Some commenters suggest that new development should incorporate ambitious water-efficiency measures, including rainwater harvesting and non-potable water reuse. The need for ambitious water-efficiency measures in employment development, and the implications of major projects such as the Immingham Green Energy Terminal and Viking Carbon Capture and Storage schemes for future water and wastewater infrastructure capacity is also mentioned.

How We've Responded

In terms of traffic congestion and parking capacity at Laceby, future undeveloped allocations have been pushed to the end of the Plan period to allow this infrastructure to come forwards. Draft policy 11 states the proposals for port related uses will be supported and approved by the council provided it is in accordance with the development plan and satisfies habitat regulations. The port benefits from an Enterprise Zone and Simplified Planning Zone specifically to support the growing renewables sector. A range of chemical processing and food production development opportunities are allocated within the Local Plan. Draft Strategic Policy 6 states that opportunities should be taken to include features such as surface water retention basins or provide rainwater harvesting solutions for water reuse and recycling. Account has been taken of water supply and wastewater infrastructure requirements in the Water Cycle Study produced by NELC. Draft Strategic Policy 4 states that developers are expected to meet the infrastructure needs of the proposed development.

Skills

Comments were mixed but generally supportive of promoting skills development and workforce growth alongside economic development. During the 2024 consultation, respondents emphasised the importance of increasing opportunities for young people and upskilling the local workforce to support future economic growth and emerging industries. Some respondents questioned the extent to which certain elements of the policy relate directly to land use planning and suggested that aspects of skills delivery may be beyond the remit of the Local Plan. The consultation responses nevertheless reflected broad support for ensuring that the planning framework supports investment, employment opportunities and skills development. No significant new themes emerged through the Preferred Options consultation, although responses continued to reflect mixed views regarding the role the Local Plan can realistically play in delivering skills outcomes.

How We've Responded

Draft Policy 6 states that the authority will support proposals which develop local skills and training opportunities. A *North East Lincolnshire Skills Action Plan* has been developed in collaboration with local education, skills and training providers. From this, developers of major developments will be encouraged to contribute to local employment development, skills and training.

Visitor Economy

Comments were mixed but generally supportive of strengthening the visitor economy and recognising its importance to North East Lincolnshire. Respondents emphasised the need to protect and enhance key tourism assets whilst supporting opportunities for sustainable tourism growth. A recurring theme was the importance of safeguarding The Humberston Fitties and ensuring that the parts of the wider Cleethorpes Resort Area located within Humberston are appropriately recognised and protected. Respondents also highlighted the need for tourism within the Lincolnshire Wolds to respect its nationally designated landscape status and suggested that policy wording should have regard to the Lincolnshire Wolds AONB Management Plan. Several comments promoted the role of green infrastructure, open space and countryside assets in supporting a broader, year-round visitor economy rather than one focused solely on seasonal tourism. Respondents suggested that strengthened cycle routes, green tourism initiatives, management plans for green areas and investment in recreational infrastructure could help support tourism throughout the year. Additional comments sought stronger wording relating to the protection and enhancement of geodiversity and natural assets, consistent with NPPF objectives. Across both consultations there was

recognition of the opportunity to diversify the visitor economy whilst ensuring tourism growth remains compatible with environmental protection and landscape objectives.

How We've Responded

Draft Section 9.2 Historic Environment states that the authority considers the Cleethorpes seaside resort to be of particular importance to the borough's distinctive character and sense of place, stating explicitly that this includes part of Humberston. Further, Draft Strategic Policy 14 states that development will be supported where it conserves and enhances the design, character, appearance and significance of The Fitties. The supporting text for Draft Strategic Policy 16 states that the development within the Wolds National Landscape should have regard to its national designation and should follow approaches set out in the Lincolnshire Wolds AONB Plan. Draft Strategic Policy 16 supports development which contributes to a year-round visitor economy and . The benefits of green and blue infrastructure in terms of active travel, recreation and relaxation are explicitly referenced within Draft Section 7.2, and Draft Strategic Policy 16 acknowledges the value of the Natural Environment to the tourism offer, promoting rural 'green tourism' facilities and supporting rural diversification where appropriate. The Cleethorpes Habitat Management Plan has been developed to manage increasing recreational pressures and access to sensitive areas. Draft Strategic Policy 11 states that the council will have regard to enhancing biodiversity and geodiversity when considering development proposals. Further, Draft Strategic Policy 13 advocates that good design should have regard to the need to protect natural assets with regard to the LNRS. Throughout the plan, the protection of the environment and landscape is explicitly referenced.

Housing

Housing Requirement

Comments revealed significant differences of opinion regarding the scale of housing growth required within North East Lincolnshire. Across both consultations, many respondents questioned whether the proposed housing requirement is justified in light of population projections, an ageing demographic profile, housing vacancy levels and the availability of existing housing stock. Several respondents considered that the proposed housing figures are too high and would result in unnecessary development, particularly on greenfield sites, whilst others argued that higher levels of housing delivery are necessary to support economic growth, inward investment and labour market requirements. Some respondents considered the proposed figures to be broadly appropriate. Comments repeatedly highlighted the need for housing growth to be supported by robust evidence, including an up-to-date HEDNA, housing trajectory and consistency between housing and employment growth assumptions. Respondents also

requested greater transparency regarding the assumptions underpinning housing land supply calculations, including sites under construction, windfall allowances, lapse rates and demolition assumptions. Concerns were raised regarding discrepancies between evidence documents and the relationship between housing and employment requirements. A recurring theme throughout both consultations was the need to deliver the right housing mix, including affordable housing, smaller homes, family housing and accommodation capable of meeting the needs of higher-skilled workers attracted to the area. Respondents also highlighted concerns regarding the stepped housing requirement, arguing it could delay delivery, reduce affordable housing provision and exacerbate existing shortages. Conversely, others supported the higher housing requirement, including the proposed 622 dwellings per annum figure, and considered it should be treated as a minimum requirement. Several respondents advocated a stronger brownfield-first approach, greater reuse of empty homes, regeneration of urban areas including Grimsby and East Marsh, and the allocation of a broader range of deliverable sites, particularly small and medium-sized sites capable of contributing to delivery in the early years of the Plan.

How We've Responded

Comments raised several issues around the housing requirement. The figure presented in the Plan is calculated using the standard method set out by the Government in line with their drive to build 1.5 million homes. This is a minimum figure and sets the amount of land allocations for housing. Smaller sites have been included within the allocations but generally, these sites usually come forwards as windfall applications. The 2025 (amended 2026) HEDNA assesses the housing need and the job growth in the area and finds correlation. The existing plan uses a stepped trajectory; however, the current plan uses a flat trajectory. A visual is included within the policies to show the trajectory.

Whilst the use of brownfield sites is the optimum position, to meet the requirements, some greenfield sites have been included due largely to insufficient brownfield land being put forward to meet the housing targets. The effects this may have will need to be assessed through individual applications. The suite of housing policies aims to deliver a range of housing to meet all needs including affordable, various size and tenure and specialist need homes.

The reuse of empty homes has been raised. The policy encourages the empty homes being brought back into use; however, the planning system does provide any mechanism to directly required this and it will need to be part of a wider Council initiative to make better use of existing housing stock.

Additional information on the calculations around housing are set out in the supporting housing topic paper.

Housing Allocations

Housing allocations generated the highest level of consultation response across both consultation stages. A recurring theme throughout the comments was concern regarding flood risk, drainage capacity, infrastructure provision, loss of greenfield land, impacts on biodiversity and wildlife, loss of agricultural land, pressure on schools and healthcare services, increased traffic congestion, impacts on village character and identities, erosion of separation between settlements, development within Green Wedges and the availability of public transport. Particular attention focused on HOU342 (Grimsby West/Freshney Valley). Respondents raised extensive objections relating to flood risk, the site's role in natural drainage and flood storage, impacts on chalk streams, blow wells, wildlife habitats, biodiversity corridors, agricultural land and recreational open space. Concerns were also raised regarding coalescence between Grimsby, Laceby, Healing, Great Coates and Aylesby; increased traffic congestion; pressure on schools, healthcare services, drainage and utilities; impacts on public transport; loss of settlement identity; affordable housing provision; and the justification for the scale of development proposed. Many respondents advocated a stronger focus on brownfield regeneration before releasing strategic greenfield sites. Additional comments emphasised the need to prioritise the reuse of vacant properties, regeneration of town centres and redevelopment of underutilised urban land before allocating further greenfield sites.

Outside Grimsby West, numerous representations raised site-specific concerns. Common issues included flood risk at HOU017, HOU021, HOU068A/B, HOU100A/B, HOU118, HOU310, HOU354A, HOU360, HOU361A/B, HOU367, HOU369, HOU373, HOU378, HOU379 and HOU380. Green Wedge and settlement separation concerns were frequently raised regarding HOU074A-C, HOU086, HOU087, HOU096, HOU135, HOU204, HOU217, HOU218, HOU274, HOU281, HOU290, HOU296, HOU309, HOU362, HOU365, HOU366, HOU368A-C, HOU371 and HOU287A. Significant concerns were raised regarding the cumulative impact of development within Waltham, including HOU135, HOU274, HOU291, HOU362, HOU366 and HOU368A-C, where respondents argued that allocations would lead to overdevelopment, increased congestion, strain on infrastructure and reductions in strategic gaps with neighbouring settlements. Concerns were repeatedly raised regarding the capacity of infrastructure in Laceby, particularly in relation to HOU068B, HOU129, HOU310, HOU342, HOU351 and HOU351A, including sewerage, drainage, school capacity and highway issues. Objections relating to residential amenity, accessibility and sustainability were raised by Humberston Parish Council regarding HOU082, HOU084A, HOU097, HOU139 and HOU365, whilst additional concerns regarding traffic, drainage and service capacity were raised in relation to Humberston allocations more generally. Comments also highlighted specific environmental and heritage considerations, including Great Crested Newts at HOU068B, archaeological interest at HOU367, heritage impacts

associated with HOU272A and HOU388, and the need to protect the Cottagers Plot Conservation Area in relation to Grimsby West. Concerns were also raised regarding housing yield assumptions and delivery rates, particularly at HOU110, HOU129, HOU005, HOU074B, HOU342 and HOU394. Despite the widespread objections, some respondents supported a number of allocations, including HOU068B, HOU286A, HOU340, HOU342, HOU365 and HOU372, whilst others promoted additional sites including HOU010B, HOU087, HOU096, HOU105A, HOU286A, HOU365, HOU371 and HOU372. Recurring themes throughout the consultation included the need for improved bus services and public transport provision to support allocations, particularly those identified by Public Transport NELC, alongside concerns regarding housing delivery assumptions, viability evidence, infrastructure capacity and the robustness of the evidence base underpinning site selection.

How We've Responded

It is noted that flood risk is a consideration across a number of the allocated sites. An independent assessment of flood risk across these sites has been carried out and will need to be taken into account when sites come forward for development. Drainage issues were also raised. This has been taken into account and drainage solutions will need to be considered on each site.

A Housing Site Selection document has been completed which outlines all of the relevant constraints across all of the housing allocations. This includes (but is not limited to) flood risk, infrastructure, drainage, environmental factors. This highlights the individual considerations that will need to be taken when a site is submitted for planning permission (plus any others that may arise through the process) up front and measures the impact the cumulative impact of all of these constraints site by site. It justifies the position taken across all matters.

Strategic Allocations

Comments were generally supportive of the principle of strategic allocations but identified a number of areas requiring further consideration. Respondents requested greater emphasis on infrastructure provision, flood risk, environmental protection, heritage impacts, energy efficiency, low carbon homes and community consultation. Several comments argued that strategic allocations should not result in settlement coalescence and that separation between villages should be maintained. Concerns were raised that a heavy reliance on strategic allocations could reduce emphasis on smaller, more deliverable sites capable of contributing towards housing supply in the shorter term. Related concerns were raised regarding delivery risk and resilience with respondents highlighting the potential consequences of delays to major strategic sites and advocating a more diversified portfolio of sites capable of contribution towards

delivery throughout the Plan period. Respondents requested stronger consideration of biodiversity connectivity, geodiversity, Local Wildlife Sites and ecological networks. Sport England highlighted the need to ensure sports and recreational facilities keep pace with housing growth and sought references to Active Design principles. Some respondents considered that strategic urban extensions should remain separate and individually assessed within policy wording, rather than grouped together. Comments also raised concerns regarding developer contribution requirements and the cumulative infrastructure requirements associated with large-scale strategic sites.

How We've Responded

Strategic allocations have been given specific requirements around infrastructure requirements. This is set out in the policy. The three strategic sites are spread out across the Borough, with a new one proposed to the northwest at Immingham, located close to the transport corridors and Employment sites.

All additional considerations are set out in the Housing Site Selection document.

Affordable Housing

Comments were mixed regarding the proposed affordable housing approach. A recurring theme throughout both consultations was concern that affordable housing provision is not meeting local needs and that greater emphasis should be placed on delivering social rented housing, genuinely affordable homes and a wider mix of tenure options. Respondents highlighted the need for affordable housing provision across the Borough, including within Grimsby and Cleethorpes, and emphasised the importance of ensuring housing remains accessible to lower-income households, young people, key workers and those employed in emerging sectors. Several respondents highlighted the importance of affordable housing for key workers, including healthcare staff, and the relationship between housing affordability, recruitment and workforce retention. Several respondents sought greater clarity regarding affordable housing requirements across housing market value zones and highlighted concerns that postcode boundaries and value area methodology may not accurately reflect local market conditions. There were differing views regarding off-site contributions, with some respondents opposing commuted sums and others suggesting that commuted contributions may provide greater opportunities for affordable housing delivery in high-value areas. Significant concerns were raised regarding the viability evidence underpinning the policy, particularly in relation to strategic urban extensions and the cumulative impacts of multiple policy requirements. Several respondents requested updated viability evidence and questioned whether policy costs, infrastructure contributions and affordable housing requirements had been appropriately balanced.

How We've Responded

The HEDNA looks at the need for Affordable Housing in the Borough. The Policy also considers issues such as viability when putting together the final requirement. The tenure of the AH is somewhat informed by the HENDNA but also from direction from specialist housing officers within NEL who provide advice based on local evidence for requirements.

The viability of the policy has been assessed through the independent viability assessment commissioned by the Council. It has found the approach using the value areas to be sound in its reasoning. This has resulted in the % split and % requirements being set out clearly in the Policy.

Rural Housing

Comments were generally supportive but mixed regarding the approach to rural housing. Respondents emphasised the importance of providing housing opportunities for younger people within rural communities and ensuring villages remain sustainable places to live. Broader comments elsewhere in the consultation responses also supported the principle of allowing some additional growth within rural settlements where it can support local services and communities without undermining settlement character.

How We've Responded

Rural housing is a fine balance between meeting need and protecting the area character. The Plan does this by applying specific requirements to this housing type as set out in the policy. This allows detailed scrutiny of proposals in open countryside locations.

Housing Mix

Comments were generally supportive of securing an appropriate mix of housing but highlighted a need for greater justification regarding housing requirements, tenure split, specialist accommodation and the distribution of different housing types across the Borough. Respondents stressed that housing provision should respond to local evidence, including needs identified through the HEDNA. Several representations highlighted shortages of smaller homes, starter homes and affordable accommodation, whilst others emphasised the continuing need for family housing, including three and four-bedroom properties. A recurring theme was the need to provide more specialist accommodation for older people, people with disabilities, those with learning difficulties, dementia, mental health support needs and supported living requirements.

Respondents suggested housing mix, density and older persons housing should be addressed through separate policies. There were also requests for broader definitions of accessibility which encompass physical, sensory and cognitive accessibility. Some respondents advocated allowing the market a greater role in determining housing mix whilst others argued the Local Plan should provide a stronger policy steer to ensure identified needs are met

How We've Responded

The policy supports mixed communities looking to meet the needs of all of the Borough's residents including affordable housing, specialist requirement housing and mixed tenure delivery. Various special requirements are mentioned in the policy, including for younger people and those with mental and physical impairments. This is supported by the HEDNA.

Self-Build

Comments were generally supportive of self-build and custom housebuilding provision. Some respondents requested stronger evidence to justify the proposed requirement for 1% of homes on strategic sites to be delivered as self-build or custom-build plots. Conversely, others argued that the percentage should be increased and that specific site allocations should be identified to meet demand for self-build housing and increase housing choice across the Borough.

How We've Responded

A topic paper is issued which explains and evidences the Council's approach to self-build requirements.

Gypsies and Travellers

Comments on this policy were generally supportive during the 2024 consultation. However, during the Preferred Options consultation a number of respondents objected to the policy approach and to the principle of identifying land to meet Gypsy and Traveller accommodation needs. No significant site-specific or policy drafting issues were raised beyond these objections.

How We've Responded

The Council has commissioned a Gypsies and Travellers needs assessment which provides evidence to support the Council's approach. The results have been used to update the Local Plan policy on this. No land is specifically identified due to the very low

levels of need and some pitches being available. It is expected that the need could be accommodated through organic growth via small windfall sites over the Plan period.

Town Centres, Social and Cultural Places

Retail Hierarchy

Comments were generally supportive of the Retail Hierarchy approach but identified a number of opportunities to strengthen the strategy for town, district and local centres. Respondents emphasised the need for a more cohesive approach to regeneration, particularly within Grimsby Town Centre, to increase footfall, attract visitors and encourage investment. Several representations highlighted the importance of the visual quality of centres, including improved shop front design, landscaping, maintenance and public realm improvements. Accessibility was identified as a key priority, with respondents stressing the need to ensure centres are inclusive and usable for all sections of the community. Comments also highlighted the importance of security and tackling anti-social behaviour as part of efforts to maintain vibrant and attractive centres, including concerns regarding anti-social behaviour within Cleethorpes. A recurring theme was the need to bring vacant premises back into productive use and establish a clear strategy for the reuse of empty units. Respondents also advocated encouraging residential development within and around town centre locations to increase natural footfall, support local businesses and improve vitality throughout the day and evening. During the Preferred Options consultation, a respondent requested that the two proposed local centres associated with the Grimsby West development are included within the Retail Hierarchy to provide long-term protection and support for their future retail function. Additional comments sought a review of the retail hierarchy classification and centre boundaries including proposals to redesignate the Cleethorpes Road and Grimsby Road centres as a single district centre in recognition of their scale, function, catchment and regeneration potential. Respondents also sought clearer definitions of local and district centres and greater flexibility to support diversification and investment within designated centres. Overall, comments sought a more integrated approach linking retail, regeneration, accessibility, public realm improvements, housing delivery and community safety.

How We've Responded

It is noted that a masterplan of Grimsby Town Centre could have benefits. At this time, the Masterplan for Grimsby is being reviewed and updated, although this is a wider Council project outside of the Planning service. The policy encourages enhancement of all town, district and local centres. This includes uses that bring people to the centre and proposals which enhance shop frontages, enhanced landscaping and public realm

works. The Local Plan does not directly secure funding and improvements but supports any that do come forward. It also supports and encourages development with accessible and inclusive elements.

The Plan embeds secured by design principles which can aid with improved security more generally.

The policy more widely supports the reuse of vacant units for compatible town centre uses. It also encourages residential development closer to the town centre. It is noted that comments suggested including the local centres within the Grimsby West development within the allocations. This can't be the case as the plans for the development are not approved.

The retail hierarchy and centre boundaries have been reviewed through the Local Plan review process and are presented as such within the policy and supporting policy maps.

Town Centre Uses

Comments were broadly supportive of the policy approach relating to town centre uses. Several respondents considered that the Plan should provide clearer explanations of technical planning terminology, including references to use classes, to make the document more accessible to residents and businesses. Representations supported the continued diversification of town centre uses and reinforced earlier suggestions that residential development should be encouraged within town centre locations to support regeneration and increase footfall. Respondents also advocated environmental improvements, including measures to improve the appearance and condition of the River Freshney corridor, recognising its importance to the town centre environment and visitor experience. Historic England requested that policy wording explicitly confirms that the installation of solid shutters would not be supported within conservation areas and other sensitive historic environments. During the Preferred Options consultation, concerns were raised regarding the lack of functioning libraries within Grimsby and the importance of maintaining accessible cultural and community facilities within town centre locations. Overall, respondents supported the objective of creating more active, attractive and diverse town centres but sought clearer guidance regarding heritage considerations, residential uses and the role of supporting community facilities

How We've Responded

It is noted that planning technology is used throughout the plan. We are looking to create a glossary that will sit outside of the local plan which will aid in understanding. Use classes are fully explained within the relevant planning legislation. Full detail has not been included in the plan.

It is noted that town centres are changing. The plan responds to this by allowing a range of uses beyond retail. Housing development is allocated within the wider town centre area.

Historic England specifically requests the resistance of shutters within the conservation area or other historically sensitive environments. This is directly reflected within the policy.

Community facilities are encouraged within the town centre where appropriate. The social and cultural places policy supports these kinds of uses.

Heritage considerations are embedded within the policy, and this is further supported by the Conserving and enhancing the historic environment policy.

Social and Cultural Places

Comments were generally supportive of the Social and Cultural Places policy and recognised the importance of cultural, community and heritage assets in supporting town centre vitality and community wellbeing. Respondents suggested that the policy should adopt a more proactive and aspirational tone, clearly identifying the projects, initiatives and opportunities intended to support cultural growth across the Borough. Several comments noted that the Plan could do more to generate enthusiasm and confidence regarding the future cultural offer, with respondents seeking greater clarity regarding funding opportunities, governance arrangements and delivery mechanisms. A recurring theme was the need to safeguard existing valued cultural, social and community facilities and strengthen policy protection against their unnecessary loss. Respondents also highlighted the opportunity to bring existing Council-owned assets back into productive use, including libraries and other community buildings, either through direct local authority intervention or through community-led initiatives. During the Preferred Options consultation, additional comments highlighted the importance of investing in North East Lincolnshire's Heritage and Archive Collections, together with the preparation of a coordinated strategy to celebrate, promote and integrate local heritage assets within the wider cultural offer of Grimsby, Cleethorpes and surrounding settlements. Overall, respondents supported a more proactive approach to cultural development, heritage promotion, community asset management and town centre regeneration, whilst seeking greater clarity regarding how these aspirations will be delivered in practice.

How We've Responded

The policy supports social and cultural places both existing and new. It is noted that comments asked for projects to be clearly outlined. This is done within the policy wording. The Local Plan does not directly create funding opportunities, nor can it

influence the reuse of Council buildings for social uses but generally supports projects which are in keeping with the suite of plans.

Comments were raised around heritage assets which are again supported throughout the Local Plan.

Minerals and Waste

Safeguarding Minerals

Comments were generally supportive of the approach to safeguarding mineral resources and associated infrastructure. There were no significant objections to the principle of safeguarding minerals from sterilisation by non-mineral development. Respondents broadly supported the continuation of policies aimed at protecting existing mineral resources and infrastructure required for extraction, processing and transport. Whilst consultation responses during the Preferred Options stage were generally described as partially supportive, no significant new issues or concerns were identified beyond those raised previously.

How We've Responded

This policy has remained largely unchanged. It continues to protect mineral sites.

Future Minerals

Comments were generally supportive of the proposed policy approach relating to future mineral extraction. Respondents sought clarification regarding whether any additional mineral extraction sites are proposed through the new Local Plan and how future extraction needs will be addressed over the plan period. There was interest in ensuring that future mineral requirements are supported by an up-to-date and robust evidence base. Whilst responses during the Preferred Options consultation were partially supportive, no substantial objections to the principle of future mineral extraction were recorded. Overall, respondents sought greater clarity regarding future mineral provision, site requirements and the long-term strategy for maintaining an adequate supply of minerals.

How We've Responded

No additional mineral sites are being put forward through the review. The plan relies on the Northern Lincolnshire Minerals Assessment (including Local Aggregates Assessment) which is up to date. The policy remains largely unchanged.

Mineral Restoration and Aftercare

Comments were generally supportive of the proposed approach to minerals restoration and aftercare. Respondents recognised the importance of restoring extraction sites to beneficial after-uses and ensuring that restoration proposals deliver environmental improvements where possible. The Greater Lincolnshire Nature Partnership (GLNP) specifically supported the retention of the policy due to its biodiversity objectives and the opportunity it provides to enhance habitats and ecological value following mineral extraction. Responses received during the Preferred Options consultation continued to show broad support for the policy approach, with no significant additional concerns identified.

How We've Responded

The policy remains largely unchanged.

Future Waste Facilities

Comments were generally supportive of the policy approach relating to future waste management facilities, although a number of issues were raised regarding evidence, waste management practices and environmental considerations. Several respondents questioned whether the Waste Needs Assessment (2015) remains an appropriate evidence base and suggested that a more up-to-date assessment is required to reflect current and future waste management requirements. Additional comments suggested that future WNA should explicitly consider wastewater transport and treatment infrastructure, sewage sludge management and the waste implications of major industrial development to help ensure sufficient capacity can be planned and delivered. Some comments related to the operation of household waste services, including suggestions that household waste collections should take place more frequently. Respondents also highlighted concerns regarding fly tipping and considered that further measures should be explored to discourage illegal waste disposal. There were requests for greater support for waste-to-energy solutions where materials cannot be recycled and for the Plan to better recognise the role of energy recovery within the waste hierarchy. The Greater Lincolnshire Nature Partnership requested that policy wording be strengthened to place greater emphasis on nature conservation and environmental enhancement, including the addition of the words "and enhancement" within policy wording and stronger recognition of biodiversity considerations when assessing future waste development proposals. Responses during the Preferred Options consultation were broadly partially supportive, with no significant new issues identified.

How We've Responded

The policy remains largely unchanged. An updated Waste Needs Assessment has been commissioned and completed and forms part of the evidence base. This evidence includes wastewater treatment.

The Local Plan cannot directly address fly tipping or adjust the household collection timetable. The policy defers to the Waste Management Strategy which incorporates the waste hierarchy and the types of waste facilities which are supported. The natural environment policies would ensure that biodiversity and ecology considerations are made for waste applications.

Safeguarding Waste Facilities

Comments were generally supportive of safeguarding existing waste management facilities and associated infrastructure. Respondents recognised the importance of protecting established waste facilities from inappropriate development that could prejudice their continued operation. Several comments promoted greater use of waste-to-energy technologies where recycling or reuse is not possible and highlighted the role such facilities can play in managing residual waste streams. Respondents also suggested amendments to policy wording relating to radioactive waste to provide greater clarity. During the Preferred Options consultation, comments were partially supportive of the policy approach and no major new issues or objections were identified. Overall, consultation responses supported the ongoing safeguarding of waste infrastructure whilst highlighting opportunities to strengthen policy wording relating to energy recovery, environmental enhancement and operational clarity

How We've Responded

The policy remains largely unchanged. An updated Waste Needs Assessment has been commissioned and completed and forms part of the evidence base. This evidence includes wastewater treatment.

The Local Plan cannot directly address fly tipping or adjust the household collection timetable. The policy defers to the Waste Management Strategy which incorporates the waste hierarchy and the types of waste facilities which are supported. The natural environment policies would ensure that biodiversity and ecology considerations are made for waste application

Introduction and Other Supporting Text

Vision

Comments were generally supportive of the overall Spatial Vision and its recognition of the Borough's environmental assets, particularly the role that green spaces play in defining the character and identity of North East Lincolnshire. Respondents recognised the importance of protecting and enhancing the natural environment but suggested that the Vision should place greater emphasis on communities and people, alongside environmental objectives. Several respondents also supported an economic growth-lead Vision and sought stronger recognition of the role that housing delivery, population growth and workforce retention plan in supporting future economic growth and investment within the Borough. A recurring theme was that the Vision should more clearly recognise the importance of infrastructure delivery, including transport links, road networks, utilities and community facilities, and how these will support future growth. Respondents also requested stronger references to climate change mitigation and adaptation, together with greater recognition of heritage assets, local distinctiveness and the Borough's special character. Comments suggested that the Vision should better demonstrate the relationship between growth, infrastructure, environmental protection and heritage conservation. During the Preferred Options consultation, respondents continued to support the overall direction of the Vision and Objectives but emphasised the need for development to be supported by the right infrastructure in the right locations. Some comments also reflected wider concerns raised elsewhere in the consultation regarding the Plan's reliance on a limited number of large strategic housing sites and advocated a broader distribution of growth, including additional medium-sized sites within Tier 1 and Tier 2 settlements.

How We've Responded

The Vision broadly lines up with that of the Council overall. Community plays a role within the vision laid out in the Plan.

Specific topics such as housing are covered in the relevant sections of this plan.

Introduction

Comments were generally supportive of the Introduction and supporting contextual information. However, respondents suggested a number of amendments and additions to strengthen the supporting text. Concerns were raised regarding the usability of the consultation portal, with some respondents commenting that it was not particularly user friendly. Respondents suggested that greater prominence should be given to the emerging Local Nature Recovery Strategy (LNRS) and that references to biodiversity

should be updated to reflect the implementation of mandatory Biodiversity Net Gain (BNG) legislation. Comments also suggested that a clearer explanation should be provided regarding future open space requirements and how these needs have informed the Plan's approach. A specific comment requested that the supporting text should explain why certain evidence documents, including Conservation Area Appraisals relating to The Humberston Fitties, are considered out of date. Overall, respondents sought stronger links between the Plan, supporting evidence and emerging environmental initiatives.

How We've Responded

The consultation portal is a 3rd party embedded software system for creating Local Plans. Whilst it is not possible to directly alter it, work is ongoing to improve it where possible. The LNRS has now been released and features in section 7 relating to the Natural Environment. BNG is referenced in the Plan but guidance states that the 10% is a mandatory national requirement with no deviation from this up or down.

The Open Space policy has had a major rewrite as Draft Policy 5 and makes it clear where, when and how much provision should be made.

Strategic Objectives

Comments regarding the Strategic Objectives were mixed, with respondents generally supporting the broad aims of the Plan whilst suggesting amendments to improve clarity, specificity and deliverability. Some respondents considered that several objectives were insufficiently specific and did not clearly explain how outcomes would be achieved. Others questioned whether some objectives were realistic given current economic conditions. A recurring theme was the need for stronger links between climate change, housing growth, transport provision and infrastructure delivery, with respondents stating that these issues should be treated as interrelated rather than separate objectives. Several comments requested greater emphasis on transport infrastructure, including specific reference to rail travel, sustainable transport and connectivity. Respondents also sought stronger recognition of heritage assets and their settings, protection of green infrastructure and healthy spaces, and encouragement of appropriate brownfield redevelopment opportunities. Additional comments suggested that the objectives should include a commitment to minimise the long-term impacts of minerals and waste development. Throughout both consultation stages, respondents emphasised the need for development to be supported by appropriate infrastructure and for growth to be planned in a coordinated manner. During the preferred options consultation, several respondents requested that the Marmot Place principles be embedded within the Strategic Objectives to strengthen the Plan's focus on health, wellbeing, reducing inequalities and supporting healthier communities. Overall,

respondents supported the ambition of the Strategic Objectives but sought clearer links between growth, infrastructure, transport, climate change, health, heritage and environmental protection.

How We've Responded

These have remained largely unchanged, reflecting the fact this is a review and the overall vision and objectives of the Plan and the Council's Plan are also still similar. However some of the wording has been clarified and improved to allow tighter monitoring of whether objectives are being achieved.