

Summary where consultees have raised concerns and response

The Statutory Consultee responses are included in the general summaries and responses. However this document looks at some of the key specific issues/concerns raised by some of them and how they have been dealt with as part of the production of the reviewed Local Plan		
consultee	key planning issues covered by the Local Plan raised during Regulation 18 consultation	response
Network Rail	Requested additional protection for railway crossings	an additional clause has been added to Draft Policy 9 to specifically reference rail crossings
Environment Agency	Advised that more information would be required to show that the proposed development sites would be safe from flooding. More info to show that the sequential test would be passed	An Update to the Strategic Flood Risk Assessment has been commissioned. This provides an assessment of all current sources of flooding. It also includes high-level site-specific Flood Risk Assessments for sites identified as being at risk of flooding. It provides additional information explaining why the allocations have been proposed in order to support the growth and regeneration of Grimsby and Cleethorpes. Information has also been included to explain the cost/benefits of protecting NEL from flooding into the future. The Memorandum of Understanding with the Environment Agency and advice on the sequential and exception tests is being updated, which supports the development of sites in higher risk areas where they lie within the most deprived Wards. Work continues with the Environment Agency to refine and finalise the approach
Ministry of Defence	Requested protection for MOD assets	additional clause added in to policy Draft Policy 5 to take into account MOD safeguarding areas
North Lincs Council	Queries raised over the high levels of employment land proposed to be allocated (circa 600 hectares) and over the potential for impacts on the strategic road network	A detailed assessment of each employment site has been undertaken, including contact with owners/promoters to better understand the intentions, likely area to be developed, and potential job creation. This resulted in a reduction from over 600 hectares to just under 400 hectares with various sites being shown to have the potential for very low job densities. In terms of the strategic road network, discussions have been held with both National Highways and internal Local Highways Authority to demonstrate that impact can be managed through policies and via project-level Transport Assessments
Humber and North Yorks Integrated Care Board	wish to ensure flexibility in the provision of accommodation. Identifies significant underprovision in relation to Extra Care and Sheltered Accommodation. Provisions for older people is also not keeping pace with the ageing population. Reference made to need for young people and for accessibility to be more wide ranging in terms of those with sensory and perception deficits	The LP policies provide sufficient support and flexibility to ensure that discussions can be held at application stage to enable the right types of accommodation to be provided, either as a mix of larger schemes or as standalone development. Draft Policy 18 includes reference to accommodation for older people, other people of all ages, supported living, extra care, and requires a certain amount 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
NHS - property	Mentions that policy 4 does not include an explicit reference to health infrastructure. Recommends additional clarification in relation to the disposal of NHS assets no longer needed. Makes reference to securing contributions. Suggests the addition of a comprehensive policy on healthy places. Suggestion made to include reference to affordable housing for NHS workers	Draft Policy 22 now has an addition in the supporting text to confirm it does not apply to healthcare facilities. In relation to the additional policy - Draft Policy 3 relates to Health and Wellbeing and in addition the elements/themes suggested are covered throughout the plan already. Draft Policy 4 now includes specific reference to health infrastructure, and includes clarification that the evidence required relates to the NHS declaring the infrastructure surplus or part of an estates strategy or service transformation plan. However historically contributions have not been sought due to the adequacy of existing provision. In relation to NHS workers, the LP doesn't usually specify particular types of worker, due to the fact there are many types of worker that could benefit from affordable housing. The policies instead remain flexible to cover all eventualities.
Anglian Water	AW notes the proposed economic growth however it has its own regulatory requirement to reduce volume of non-domestic potable water by 9%, which doesn't allow for growth, therefore AW is unable to comment on the ability of infrastructure. AW also notes that for domestic, headroom is available at all Water Recycling Centres apart from Laceby (other than for currently planned development)	AW notes that it has worked with NELC effectively over the years. It also notes that it has plans to upgrade 80 Water Recycling Centres across the region. AW will look at phasing of investment to support the NELC housing target across the Plan period. NELC have produced a Water Cycle Study (WCS) to assess capacity and infrastructure to support the Local Plan and future development proposals. Laceby WRC does not have headroom and therefore future undeveloped allocations have been pushed to the end of the Plan period to allow this to come forwards. Other WCS do have headroom capacity but AW will need to provide funding in future AMP funding plans to ensure this is retained. The WCS advocates reducing to 110 l/p/s, which has been incorporated into Draft Policy 1.

National Grid Electricity Transmission	Draws attention to 2 Employment allocations where their assets will need to be considered during development. References HOU342 (Grimsby West) in relation to nearby assets - advises they are working on this with the applicant for the current application to ensure access remains and to ensure that the highway link is in an appropriate location. Also references DCO applications	Draft Policy 4 seeks to ensure that suitable infrastructure is in place for development and to safeguard existing Infrastructure. It doesn't include a comprehensive list of all infrastructure. In relation to HOU342 NGET is working with the applicant as part of the live application on matters affecting its assets. DCO applications are dealt with by the Planning Inspectorate. NGET considers suitable design of detailed schemes can mitigate impact on assets in relation to the Employment allocations
Historic England	Concern raised over various sites in the initial Reg 18 Issues and Options consultation in terms of the possible impact on heritage assets. Subsequent concern raised over a small amount of the preferred option sites	The initial set of sites was refined with various sites discounted, which resulted in only a small number with potential impact. A Historic Impact Assessment covers the sites in the Plan
NELC Health	Empty and housing will be dependent on infrastructure. Specifically active travel provision, type of tenure, level of urban sprawl, greenspace/nature provision, healthy living. Requests provision for securing future contributions is made. Health Impact Assessments (HIA's) still need to be included	Draft Policy 4 does now include reference to healthcare provision to allow flexibility if requested - however historically contributions have not been sought in relation to this and the reviewed Local Plan Housing numbers of 11,472 is only approx 1700 higher than the 9,742 in the currently adopted Local Plan that has already been tested, but over an extended period to 2043. Section 7 of the Draft Plan provides a suite of 6 policies looking at health and wellbeing and the natural environment, including its benefits to sport and recreation and management of hot food takeaway location to assist in reducing childhood obesity levels. The need for HIA (or rapid HIA if appropriate) is contained in Draft Policy 3.
National Highways	NH undertook a separate high-level analysis of proposed site allocations.	National Highways assessed each site and the potential for impact on the Strategic Road Network. Engagement with the LHA included analysis of each site undertaken and potential future interventions/improvements identified to allow a project-level assessment for future planning applications. Draft Policy 9 requires Transport Statements and Transport Assessments where needed, taking into account cumulative impacts
House Builders Federation	Advice Plan period covers 15 years but could be extended. Notes concentration of housing where there are existing service and facilities as a logical approach, however advises must be able to meet needs across the Borough - including larger and smaller sites. References Green Wedges and need to not exclude dev	Plan period covers 18 years. 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 a number of smaller sites are included in the allocations. Green Wedges (renamed Strategic Wedges) are designed to promote functional green corridors from the urban area to the countryside and to retain the individuality of settlements - they only represent small areas of the Borough with other areas open. Boundaries can be reviewed however sufficient sites have been identified without undermining those wedges
NELC Trees	No concerns raised but suggest an integrated approach to landscaping, SuDS, street lighting and visibility splays	The majority of these elements are covered in Draft Policy 11 and within the principles of good design.
NELC Air Quality	Confirms there are no Air Quality Management Areas (AQMA) in force in the Borough. Advice reduction in emissions should be a consideration	Additional data and a topic paper into the impact on Talyors Avenue produced, but also covering the expected significant increase in the use of electric vehicles in the near-term and corresponding reduction in harmful emissions as a result
NELC PROW	Concern over the lack of emphasis on protecting public rights of way and references the up-to-date Improvement Plan	Draft Policy 16 protects rights of way for strategic sites with Draft Policy 9 also including a clause to protect public rights of way. The Plan now drawing on the evidence from the 2021-2031 Improvement Plan
Historic England	Initially raised concern over various possible allocations in relation to Heritage Impact. Identifies the need for Historic Impact Assessment. Preferred Options response narrowed the concern down to two sites	Various sites were discounted to arrive at the Preferred Options, which included removal of the majority where there were potential for significant heritage impacts with the latest comments only relevant to 1 remaining site. A full plan Historic Impact Assessment has been produced that will address any residual concerns. HIA will also have to be produced at applications stage where appropriate
Natural England	Response notes that Natural England were unable to provide a detailed assessment of the HRA or individual allocations due to their resource constraints. However, question the evidence behind the Zone of Influence used (ZOI) and capacity of the South Humber Gateway. Request the Green Infrastructure Framework is referenced. Advises that key subject areas including Biodiversity/Geodiversity, Landscape, Green Infrastructure and space, Health and Wellbeing, Climate Change, Coastal Change are covered in policies. Welcome the BNG policy	A Technical Paper on the Cleethorpes Habitat Mitigation Plan (CHMP) has been produced outlining the approach including updates to the ZOI. The CHMP is also currently being reviewed separately. The South Humber Gateway mitigation scheme is designed to mitigate impact from development within its area where the Employment allocations lie. The contribution to the scheme has been updated to ensure it remains in line with the costs of provision. Green Infrastructure Framework is now referenced in the supporting text to Draft Policy 5 and a Green and Blue Infrastructure Assessment has been carried out along with an Open Space Assessment. The suite of Policies in Section 7 cover the natural environment, and are underpinned by assessments/studies completed into Open Space, Green Blue Infrastructure, Flood risk (including climate change) and Landscape Character. In the final Submission Draft of the Plan, the BNG policy has been removed with this covered in Draft Policy
Sport England	concern over lack of evidence base for sport facilities. Question whether Health Impact Assessment should be included for all for all major not just those over 150 dwellings. Request a negatively worded policy relating to green space and recreation. concern that design policy does not include active lifestyle	A full assessment of indoor and outdoor facilities and strategy is being produced by the Council as a wider piece of evidence to support NELC activities. The policies are flexible enough to allow this to be taken into account once it is completed. A rapid HIA is now required for 10 to 149 dwellings in Draft Policy 3. Negatively worded policies are not generally supported by the NPPF in that plans should be positively written. Draft Strategic Policy 11 includes "active habits and behaviour"

Parish Councils	key planning issues covered by the Local Plan raised during Regulation 18 consultation	response
Laceby PC	Raises issues over drainage capacity and water overall. Concern over housing types/mix. Concern over inability of road network to handle additional traffic. Concern over increase in traffic fumes. Concern over allocations and the Grimsby West allocation (HOU342). Request Laceby is moved to a 'Rural Village'.	a Water Cycle Study has been completed, which confirms there are disposal capacity issues at the facility serving Laceby. The LP trajectory shows one site with an application being considered, one under construction and one site without permission. The first site will require these issues to be assessed and overcome as part of the application being considered, the second site under construction will already have these considered. The latter has been pushed to the end of the plan period to allow for improvements/upgrades to be made to the facility. HOU310 was discounted/removed from the Preferred Options. Laceby has various services and facilities and is therefore considered to be a sustainable location for some new development. HOU342 is a strategic site bringing about various benefits in terms of the economies of scale, with further assessment below. The policies have been revised in line with an updated Housing and Economic Needs Assessment to ensure housing mix and tenure reflect current needs. Local Plan policies include the requirement for Sustainable Drainage Systems to manage surface water discharge rates. Draft Policy 9 requires cumulative transport impacts to be assessed and Transport Statements/Assessments where appropriate. The take-up of electric vehicles is increasing at a rapid rate, significantly reducing emissions
Waltham PC	Suggests broadening of S106 infrastructure contributions. Supports green wedges. Disproportionate amount of development in the 'Southern Arc'. Upgrades to 'Cheapside' required. Question the number of houses allocated for HOU110 and HOU129. Concern over mapping and limited visual representation of the area	S106 contributions can only be used to offset the impacts of the proposed developments. The Draft Policy 7 makes provision for a variety of types of contribution, including for 'services and community facilities' and more specifically 'nature-based solutions'. Green wedges have been relabelled as Strategic Wedges in the Draft Plan, with one aim being to continue to exist to try and preserve the identity of individual communities. Draft Policy 9 requires cumulative transport impacts to be assessed and Transport Statements/Assessments where appropriate. The Western and Southern Arc is to receive approximately 25% of the overall housing allocations, reflecting it containing 5 of the larger settlements separate to the Grimsby/Cleethorpes Urban area (Waltham would receive 20% of the Arc Housing and 4.5% of the total housing across the Borough, reflecting its range of services and facilities). HOU110 and HOU129 benefit for a combined approval (granted 2023) for 154 in total. This is now reflected in the Draft Plan. The reviewed Plan will include inset maps for key settlements and the immediately surrounding area and in addition, we are working providing a digital, interactive map on the Council's website
Barnoldby PC	Note that no proposals for housing in Barnoldby le Beck, however concern raised generally over the amount of development in the Southern Arc, particularly Waltham, and the increase in pressure on local amenities and traffic through Barnoldby. Concern over growth ambitions for employment and level of job creation	Draft Policy 9 will require cumulative transport impacts to be assessed, with Transport Statements and Assessments required where needed. These should look at the impact on wider road networks as a result of increased traffic generation. The Housing and Economic Needs Assessment is used to look at the likely job requirements and creation. Significant areas (approx 400 hectares of land) are proposed to be allocated. There has already been significant investment in port facilities. A detailed assessment of likely future employment sites and potential job creation has been carried out involving contact with businesses and landowners to understand future development plans. The Council has recently dealt with a screening opinion for a regional poultry firm seeking to develop a site with a potential for 1400 jobs being created. The Council's regeneration team work with a various businesses/organisations seeking to develop within the Borough.
Holton le Clay PC	question the amount of jobs to be provided. Concern over whether could lead to excessive overdevelopment of housing in NEL. Questioned whether Tetney and Holton le clay would be in the hierarchy. Suggest that new dev should be concentrated around the A180. Question whether the wording of the Green Wedge policy is sufficient and if it could be extended. Will archaeology be safeguarded. Concern over HOU104	The draft Plan proposes around 400 hectares of employment land with the Housing and Economic Development Needs Assessment (HEDNA) and other evidence showing this aligns with proposed housing growth and job need. Tetney and HLC would not be shown as they do not fall within NEL. The majority of new employment and the new strategic site are located close to the A180 with HOU342 also being closely linked to it. Green wedge policy has been rewritten as draft Strategic Policy 6. A balance has to be struck to ensure the purpose of this does not stray into 'green belt' territory, which has a significantly higher bar and test for designation. Archaeology is now covered in draft Policy 8. HOU104 already benefits from permission.
Immingham PC Bradley PC	object to golf club land being proposed for allocation. Request a line regarding the Immingham Master Plan object to HOU364 being proposed for allocation	The proposed allocation on the golf course has been discounted and removed. The Masterplan will need to be more advanced in order for it to be included in the Local Plan. This proposed allocation has been discounted and removed from the draft Plan
Habrough PC	Concern over the threshold for a Health Impact Assessment (HIA) being 150 dwellings. Concern over the vacant pitches	draft Policy 3 requires a comprehensive HIA for proposals over 150 dwellings but still requires a rapid HIA for major applications up to that amount (so for 10 - 149 dwellings). The GTAA has been completed including on the ground assessments and surveys to ensure findings are robust

Healing PC	Mentions about stations and rail infrastructure. Concern over HIA limit of 150 dwellings. Concern over scale of HOU342. Concern over HOU361A. More affordable homes required	rail and rail infrastructure are in draft Policy 9 with crossings also protected. Rapid HIA is needed for 10-149 dwellings. HOU342 is an existing allocation with a live application being considered. HOU361A has been discounted and removed. Affordable home provision is in line with the HEDNA.
Stallingborough PC	Concern over HOU316B and HOU316A and lack of service and facilities to support new growth. Concern over rail transport	rail connections and rail infrastructure are in draft Policy 9 with crossings also protected. HOU361A and B have been discounted and removed with only HOU316 remaining, which is under construction already.

The inclusion of HOU342 as a proposed allocation

Grimsby West is an existing allocated site within the current Local Plan. It currently has a live planning application being considered. It is located with easy access to the A180 and Humber Bank employment sites and includes provision of a link road north-south that would assist the wider flow of traffic north-south across the Borough. Strategic sites offer benefits from the economies of scale in terms of viability and the ability to provide their own internal infrastructure, services and facilities. If the same amount of housing came through piecemeal on much smaller sites, these could be located sporadically throughout the Borough and be too small to provide these onsite and with lower viability to contribute to off-site facilities. This would then place additional pressure on existing local infrastructure, services and facilities. The site has the potential to provide signifcant amount of affordable homes, which may not be achievable on smaller sites where viability is more challenging. Without the site, the Plan will be over 3000 houses undertarget and would not be found sound at examination

The Green Wedges identified in the current Local Plan have been carried forward as Strategic Wedges with the boundaries updated where necessary. The reviewed Local Plan also contains policies to protect and enhance green and blue infrastructure, open space and the landscape in general. They are supported by updated studies and assessments, including Open Space, Green/Blue Infrastructure Study, and a Landscape Character Assessment. All of these seek to ensure that visual impact and impact on the landscape are properly considered. the Green Wedge SW4 runs through the Grimsby West site. These will all need to be taken into account in any proposal to develop the Grimsby West site