

NORTH LINCOLNSHIRE COUNCIL

PLANNING COMMITTEE

**THE HOUSING CHALLENGE
THE YORKSHIRE AND HUMBER PLAN – 2009 UPDATE
SPATIAL OPTIONS**

1. OBJECT AND KEY POINTS IN THIS REPORT

- 1.1 To inform Members about the publication and implications of the Yorkshire and Humber Assembly's 'The Housing Challenge – The Yorkshire and Humber Plan – 2009 Update Spatial Options'.
- 1.2 To seek Members approval to respond to the consultation as detailed in Appendix1
- 1.3 The key points of this Report are to seek responses on the following three issues:-
 - 1) How many new homes need to be built in the Region - looking to the longer-term, but also taking proper account of the potential shorter-term impact of the current 'credit crunch'?
 - 2) How well can the current Yorkshire and Humber Plan strategy accommodate the growth we need - and yet also deliver sustainable development?
 - 3) What opportunities (and in which general locations) could best meet longer-term housing needs in different parts of the Region?

2. BACKGROUND INFORMATION

- 2.1 The Yorkshire and Humber Assembly has issued for consultation a paper entitled 'The Housing Challenge – The Yorkshire and Humber Plan – 2009 Update Spatial Options'. This partial review is a requirement of the Secretary of State's approval of the Yorkshire and Humber Plan (the current Regional Spatial Strategy) in May 2008.
- 2.2 Comments on the Spatial Options document have been invited by 30th January 2009. An extension to the 6th February has been agreed with the Assembly to fit in with reporting structures following the Christmas period.

- 2.3 The document is for consultation only - the ideas and options it contains are not proposals, but the responses received will help shape an update to the existing Regional Spatial Strategy (RSS). The next stage - during spring 2009 - will involve the preparation of draft revisions to the RSS's policies for housing and the setting out of draft proposals for where (in the various parts of the region) development should take place in the longer-term. Formal consultation on these draft revisions to the RSS is expected to take place in summer 2009.
- 2.4 On the 30th May 2008, the Assembly published for six weeks a 'Call for Evidence' document that started a debate about whether and how the Yorkshire and Humber Plan might be further improved to better plan for the very long-term development needs of the region, particularly the need for new homes. It asked for general ideas about the approach that might be taken to accommodating future development and it also asked about any specific development proposals that could form part of a way forward. The responses that the Assembly received to that consultation exercise have been taken into consideration in preparing the Spatial Options document.

3. OPTIONS FOR CONSIDERATION

- 3.1 The 'Spatial Options' document moves the debate forward by asking questions about the scale of housing development for which the region should be planning and by setting out some specific options for where (in the long-term) this might be accommodated.
- 3.2 The document asks 31 specific questions and focuses on three important issues:
- 1) How many new homes need to be built in the Region - looking to the longer-term, but also taking proper account of the potential shorter-term impact of the current 'credit crunch'?
 - 2) How well can the current Yorkshire and Humber Plan strategy accommodate the growth we need - and yet also deliver sustainable development?
 - 3) What opportunities (and in which general locations) could best meet longer-term housing needs in different parts of the Region?
- 3.3 The Assembly has offered four options to deal with where additional development might occur:
- Option 1. Maintain the Plan's current core approach. Most additional development to go in towns and cities, with some development to meet local needs in smaller settlements. More urban extensions are likely;

- Option 2. More urban focus: greater concentration in fewer larger towns and cities. More or larger urban extensions likely, encroachment into greenbelts and countryside;
- Option 3. Key settlements in high quality public transport corridors;
- Option 4. Broad 'areas of search' where towns can develop further. This may mean settlements changing their place in the hierarchy.

3.4 For the Humber sub-area the four options for growth which have been identified are:

- Option 1. Urban extensions to Hull, Scunthorpe, and Grimsby with additional development in Beverley, Bridlington and Driffield. Flood risk constraints are acknowledged for Goole, Hull, Grimsby, and Scunthorpe;
- Option 2. Urban expansion to Hull (west side), Beverley (north and south), Driffield (south), Bridlington, Grimsby (south and west), and Scunthorpe (north, east and south);
- Option 3. Growth in the Hull/Beverley/Driffield/Nafferton corridor, growth in the Hull/Ferriby/Brough corridor, and in the Brigg/Barnetby/Haborough area between Grimsby and Scunthorpe. This option also identifies the option of a new settlement (location not suggested);
- Option 4. Growth west of Driffield (Alamein Barracks area).

3.5 The RSS seeks to develop and diversify the Humber sub-area's economy, making the most of multimodal transport links, ports and urban centres. It seeks to protect existing development in flood risk areas, and enhance the considerable nature conservation interest in the sub-area. Additionally, it targets investment in transport, social and environmental infrastructure to support economic growth and regeneration. In looking at the spatial options further, the Assembly will be considering the findings from the evidence base work, the sustainability appraisal and responses to this consultation.

3.6 The consultation paper also looks at the needs of Gypsies and Travellers across the region. It considers the factors affecting potential site locations and the weight to be attached to them, and also asks under what circumstances might all or part of one authority's needs be met by another(s).

3.7 Responses to the relevant questions raised in the consultation document can be found in Appendix 1. Not all of the 31 questions have been answered as many relate to different sub-areas within the region.

4. ANALYSIS OF OPTIONS

- 4.1 It is considered that the current RSS strategy of focusing development on the region's towns and cities is still the correct one, and that if additional housing is needed then that strategy is robust and flexible enough to still deliver it for the most part. In the case of North Lincolnshire the current approach strongly supports the delivery of the urban renaissance programme, which is vital to transforming the area via projects like the Lincolnshire Lakes urban expansion.
- 4.2 If further housing is required in North Lincolnshire it is considered that it should be focussed in Scunthorpe, the most sustainable settlement, and that the Lincolnshire Lakes urban expansion will be well placed to accommodate additional growth.
- 4.3 Options that deviate away from the RSS's current core approach raise considerable concerns due to the potentially detrimental impact on the sustainable growth of Scunthorpe and the delivery of the urban renaissance programme. As such these would not be supported.
- 4.4 There is also concern that work and consultation carried out on the North Lincolnshire Core Strategy would be in danger of not being in general conformity with the RSS if new spatial options are considered.

5. RESOURCE IMPLICATIONS (FINANCIAL, STAFFING, PROPERTY, IT)

- 5.1 Financial – the timely preparation and delivery of the Local Development Framework has implications for the level of Housing & Planning Delivery Grant received by the authority. The RSS review process may have implications in the delivery of the Local Development Frameworks.
- 5.2 Staffing – resources for responding to the RSS review process will be drawn from within the Spatial Planning team, and where appropriate other council services and the Local Strategic Partnership.
- 5.3 Property – there are no property implications.
- 5.4 IT – there are no IT implications.

6. OTHER IMPLICATIONS (STATUTORY, ENVIRONMENTAL, DIVERSITY, SECTION 17 - CRIME AND DISORDER, RISK AND OTHER)

- 6.1 Statutory – the RSS is a material consideration in the preparation of the Local Development Framework and forms part of the statutory development plan system set out in the Planning & Compulsory Purchase Act 2004 and its sub-ordinate secondary legislation.

- 6.2 Environmental – the policy set out in the RSS and subsequent reviews will assist in the delivery of sustainable development.
- 6.3 Diversity – there are no diversity implications
- 6.4 Section 17 – Crime & Disorder – the policy set out in the RSS and subsequent reviews will inform the Local Development Framework that will help to create a built environment which is safe and secure.
- 6.5 Risk – there are no risk implications

7. **OUTCOMES OF CONSULTATION**

- 7.1 All comments received from relevant council officers have been incorporated into Appendix 1

8. **RECOMMENDATIONS**

- 8.1 That the responses detailed in Appendix 1 are submitted to the Yorkshire and Humber Assembly as this Council's formal response to the 'The Housing Challenge – The Yorkshire and Humber Plan – 2009 Update Spatial Options' document.

HEAD OF STRATEGIC REGENERATION, HOUSING AND DEVELOPMENT

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Date: 14th January 2009

Background Papers used in the preparation of this report

The Housing Challenge – The Yorkshire and Humber Plan – 2009 Update, Spatial Options.

RSS update 2009 – Consultation Questions

About you:

Are you responding as an individual, as an organisation, or on behalf of an organisation?

Individual
Organisation
On behalf of another individual / organisation

Name Chris Barwell
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What is your interest (or who you represent's interest) in the strategic proposal for accommodating growth?

Public sector organisation
Member of the public
Land Owner
Developer
Other Please state:

Consultation Questions

QUESTION 1:

What rate of house building should we be planning for in the Region?

Level of Growth			
1	Current RSS	22,260 a year	<input checked="" type="checkbox"/>
2	NHPAU Lower	25,100 a year	<input type="checkbox"/>
3	NHPAU Upper	28,300 a year	<input type="checkbox"/>
4	Trend Based Household Projections	30,000 a year	<input type="checkbox"/>
5	Other	Please specify in your response	<input type="checkbox"/>

Please summarise the reasons for your choice including any comments you may have on the assumptions we have used in introducing the possibility that rates of building may need to increase from 22,260 homes per year. We would welcome any evidence in support of your answer that organisations or individuals may have.

North Lincolnshire's emerging LDF Core Strategy reflects the RSS set levels of development to be delivered in North Lincolnshire over the next 15 to 20 years (2008 to 2026). North Lincolnshire is currently expected to deliver some 13,500 new dwellings in this time at a rate of 750 dwellings per year. This figure is part of the RSS current level of growth listed under (1) in the table above.

Based on recent years of housing development it is clear that North Lincolnshire is able to deliver this number of new dwellings, peaking in one year at over 1,100 dwellings. However, it should be noted that in trying to achieve these levels of housing growth it must be seen as a long term iterative process. It is recognised that achieving the level of housing growth will be dependent on a variety of different factors, for example the state of the national and global economy, availability of funding to deliver infrastructure and priorities of the infrastructure providers and others.

There are currently a number of economic forecasts that mean that outcomes are difficult to quantify or align with predicted future housing growth (whatever methodology is used).

Perhaps we can be more certain in saying that the down turn in the current economy is likely to mean that the first five or six years will not meet the current 750 dwellings per year as set in current RSS. The lower housing completion numbers is evidenced by what has happened in the last 18 months in North Lincolnshire. In 2007/2008 North Lincolnshire had 480 housing completions and for the first 8 months of 2008/2009 there have only been 179 housing completions.

The question of should the RSS require anymore housing to be spatially distributed in the Region than is currently in RSS will depend on when the economy is predicted to pick up. Before the economic downturn North Lincolnshire has performed exceptionally well in terms of new housing completions, significantly much higher than North East Lincolnshire and Hull within the Humber sub region. In fact the population has increased in North Lincolnshire but decreased in North East Lincolnshire and Hull. So North Lincolnshire is proving to be an attractive place for people to live. There is therefore every reason to think that housing completions will continue to grow and return to the pre 2006 level once the economic up turn arrives.

In light of this, consideration should be given to what housing could be physically built in terms of all available resources if and when the economy improves – will it be possible for the housing industry to catch up to existing predicted RSS annual house completion levels after say 2012/2013? For example we should be looking at actual resource capacity within the house building industry - an economic up turn will mean a significant demand in available construction workers in the UK – will the up turn be a south to north geographical movement and if so will the majority of the UK house builders and construction workforce firstly home in on the south and south east UK - will there be a shortage of construction workers? Despite the current national housing requirement this is just one example that should be examined before contemplating higher levels of housing growth listed in 2) to 5) in the above table. Given the same market conditions of pre 2006/2007 it is clear that given actual housing completion performance and population increase in North Lincolnshire, the area could accommodate increased housing growth.

QUESTION 2

If the Region were to introduce a step-up of housing from 22,260 dwellings per year to Levels 2, 3, 4 or 5 (Question 1) how soon do you think this could take place and please provide reasons?

Some of the answer to this question is contained in the answer to question 1. If the economic downturn is not to pick up for 4 to 5 years and the level of housing completions are to be below the current RSS housing growth levels the RSS will have to play “catch up” before saying it can add more? How this can be achieved is difficult to predict. But since we are in a position of looking in an initial 5 year period of a reduction in housing completions because of the state of the UK and Global economy, it seems sensible for the RSS to have a precautionary approach (steady as we go approach because of enormous economic uncertainty) to housing growth and maybe have 5 yearly phased intervals with the first phase using current RSS rates and then reviewed to determine the next 5 years. If after this the economy stabilises perhaps then we can build in more specific long term planning of housing growth. The answer to question 1 gives a local view of the question of housing growth in North Lincolnshire.

Even though there are concerns about the current economic downturn we believe that North Lincolnshire is in a better position than other authorities, because of its recent ability to meet the adopted RSS housing delivery figures, to be able to step up its housing delivery in future years.

There is strong evidence to suggest that North Lincolnshire could quite quickly accommodate a greater level of growth. There is major interest from housebuilders to start to prepare planning applications for all of the urban extension of Lincolnshire Lakes that can accommodate 10,000+ dwellings.

QUESTION 3

In looking at where new homes needed in the Region could be located, should we continue to use the existing RSS distribution (as set out in Section 5 above)? If yes, please summarise your reasons below and go to Section 6 below.

Despite the economic volatility and uncertainty of the economy at present, the answer is yes. The RSS has only recently been found to be sound and approved. The RSS needs much

more time to see how it performs before judgement can be made on its effectiveness. Context to this answer is given to answers to questions 1) and 2). Any additional housing should be located in accordance with current RSS ratios. In the answers to questions 1) and 2) given the market conditions pre-credit crunch, North Lincolnshire has been very effective in attracting people in to its area, supplying housing and increasing its population year on year. We are equally positive that, “come the up turn” in the economy the same theme will continue. Therefore adding to the existing RSS – housing strategy – will give North Lincolnshire sufficient flexibility to accommodate additional housing. North Lincolnshire Council would not wish for a radical change of course in RSS.

A shift away from the current RSS approach for new housing would not assist in the aim of the Regional Economic Strategy for creating stronger Cities, Towns and Rural Communities. The Yorkshire Forward Renaissance Programme approach is about delivering sustainable communities and about making places and neighbourhoods that have a good quality of life. This can be based on the assets and traditions that are already in place in these towns and cities. A shift away from this approach would significantly undermine this strategy and could result in significant negative effects for the existing cities and towns of the region. Furthermore it would significantly impact on the ability of LPAs to meet the government’s brownfield targets and result in major investment requirements for infrastructure to deliver housing growth in these locations.

The North Lincolnshire LDF Core Strategy is based upon the approach of the existing RSS. Currently, we are working towards the publication stage and consequent submission to the Secretary of State, therefore, as with other authorities it is not considered appropriate to change direction in terms of the strategy. This would result in much of existing work being meaningless and would mean a major delay in getting a Core Strategy on the books, which is not in line with the government’s desire to have a speedy planning system.

The proposals to review the location of housing in the current RSS review is very unhelpful and has created significant amounts of uncertainty for developers and is impacting upon investment decisions. Proposals for different locations undermines this requirement and development of our region’s towns and cities in the current strategy, particularly in the current climate where there is no marked demand for additional locations.

In North Lincolnshire, the major urban extension of Lincolnshire Lakes is capable of accommodating a far higher number of houses to meet any increase figure.

QUESTION 4

If no, tell us how much emphasis you think should be placed on the following factors in shaping where new homes are located (as set out in Section 3). Please rate each factor on a scale of 1-5 (where 1 is the least important and 5 is the most important).

	Score
Matching housing growth with forecast economic change	
Addressing affordability	
Meeting new household growth trends	
Reflecting market demand	
Other (please specify)	
Don't know	<input type="checkbox"/>

N/A

QUESTION 5

Do you consider that the Plan’s Core Approach (Spatial Option 1) can accommodate current levels of housing growth to 2026? If yes, please state why and provide any evidence that you have to support this view.

N/A

If no, please answer question 7

QUESTION 6

If you consider that the Plan’s Core Approach cannot accommodate current levels of house building within the Region, please tell us which Spatial Option(s) you think should be used to deliver the current RSS housing requirements of 22,260 homes per year to 2026? Please provide reasons for your answer?

See answer to question 3.

QUESTION 7

Do you think the Plan's Core Approach could accommodate higher levels of house building through to 2026?

- If yes, which level(s) of growth could be accommodated (refer to question 1)?
- If no, please tell us which Spatial Option(s) you think should be used in order to deliver higher levels of house building.

Please see the answers to questions 1), 2) and 3) to add context to this answer. You will recall that in these answers because of the economic downturn and volatility in the financial markets it is almost impossible to give judgement on what the correct levels should be for North Lincolnshire and the Region as a whole. A summary follows.

The current RSS needs time to perform to find out whether it is effective or not in providing higher levels of housing provision. North Lincolnshire Council's Core Strategy is based upon the approach of the existing RSS. Currently, North Lincolnshire is working towards the publication stage and consequent submission to the Secretary of State, therefore, as with other authorities it is not considered appropriate to change direction in terms of the strategy. This would result in much of existing work being meaningless and would mean a major delay in getting a Core Strategy on the books, which is not in line with the government's desire to have a speedy planning system.

In addition to North Lincolnshire Council's Core Strategy many renaissance and regeneration projects that include housing are being supported and funded by Yorkshire Forward and others to the tune of millions of pounds – these projects and schemes are being progressed at a steady rate on the back of the current RSS. It is understood that this is the case in many other LA areas within the Region. In conclusion it will be extremely difficult, if not impossible, to change course significantly in LDF terms. It may well be possible for housing levels to increase beyond current RSS requirements but in calculating how the economy may perform in the future we must remember that there are significant challenges, particularly in relation to the environment (climate change, flood risk, drainage, ground water protection, nature conservation) and agricultural land quality (related to likely increased agricultural needs). The majority of new housing in North Lincolnshire is currently planned as urban extension on greenfield land with a low percentage planned on brownfield land (only a low percentage is available). However, given the same market conditions of pre 2006/2007 it is clear that given actual housing completion performance and population increase in North Lincolnshire, the area could accommodate increased housing growth.

Any additional housing should be located in accordance with current RSS ratios. In the answers to questions 1) and 2) given the market conditions pre-credit crunch, North Lincolnshire has been very effective in attracting people in to its area, supplying housing and increasing its population year on year. We are equally positive that, "come the up turn" in the economy the same theme will continue. Therefore adding to the existing RSS – housing strategy – will give North Lincolnshire sufficient flexibility to accommodate additional housing. North Lincolnshire Council would not wish for a radical change of course in RSS.

QUESTIONS 8-10 - Leeds City Region Sub-Area

We asked you above in Questions 5 to 7 whether you thought the Region as a whole could accommodate a range of house building rates. Now we want you to tell us if the approach to this particular sub-area needs refining and how it might accommodate housing growth, by answering the following questions.

8. To what extent can the current strategy deliver current house building rates in this sub-area?

N/A

9. To what extent can the current strategy deliver higher house building rates in this sub-area?

N/A

10. Which Spatial Options or combination of Spatial Options do you think provide sufficient guidance for Local Authorities to determine broad locations for where further house building should be located?

N/A

QUESTIONS 11-13 - South Yorkshire Sub-Area

We asked you above in Questions 5 to 7 whether you thought the Region as a whole could accommodate a range of house building rates. Now we want you to tell us if the approach to this particular sub-area needs refining and how it might accommodate housing growth, by answering the following questions.

11. To what extent can the current strategy deliver current house building rates in this sub-area?

N/A

12. To what extent can the current strategy deliver higher house building rates in this sub-area?

N/A

13. Which Spatial Options or combination of Spatial Options do you think provide sufficient guidance for Local Authorities to determine broad locations for where further house building should be located?

N/A

QUESTIONS 14-16 - Humber Estuary Sub-Area

We asked you above in Questions 5 to 7 whether you thought the Region as a whole could accommodate a range of house building rates. Now we want you to tell us if the approach to this particular sub-area needs refining and how it might accommodate housing growth, by answering the following questions.

14. To what extent can the current strategy deliver current house building rates in this sub-area?

It is considered that current strategy has been successful in delivering the current house building rates set out in the RSS for the Humber sub-area. For example, in North Lincolnshire over the past 5 years the housing market has delivered and exceeded the RSS housing requirement for the authority, for example in 2006, 1,060 homes were built within the area, at least 75% of these dwellings were delivered within Scunthorpe and the Market Towns. The latest housing position statement identifies that all Scunthorpe's housing allocations have been developed apart from one site. This demonstrates that North Lincolnshire can deliver the current growth in the RSS and the market has the capacity to deliver more than this. This has been further evidenced by the Draft Strategic Housing Land Availability Assessment, which has indicated the possibility to accommodate higher figures if required. Furthermore the council's strategy could better the higher numbers set out in the revised RSS.

15. To what extent can the current strategy deliver higher house building rates in this sub-area?

As mentioned previously, North Lincolnshire is already delivering more than the existing housing delivery rate as specified in the RSS. Using the housing trajectory and considering housing land supply and development trends North Lincolnshire Council are confident that the RSS housing requirements can be comfortably met. It is expected that this trend will be continued over the coming years, especially as the economic development opportunities in the area are realised. Therefore, it can reasonably be expected that the current strategy will be able to deliver higher housing building rates.

Scunthorpe is located close to the regions largest employment allocation and two regional airports. The South Humber Bank has seen significant development and investment with £1.5bn expected to be invested over the next 5 years. Scunthorpe is ideally located to be a major town to serve the Humber's Gateway to Europe.

16. Which Spatial Options or combination of Spatial Options do you think provide sufficient guidance for Local Authorities to determine broad locations for where further house building should be located?

It is considered that Spatial Option 1: Maintain the Core Approach is the most suitable to determine the broad locations for future housing development in the Humber sub-area. In general it represents the most sustainable option and is the one which ensures that the regeneration of the sub-region's key urban areas.

In respect of North Lincolnshire, option 1 would continue to support the longer term renaissance and regeneration of Scunthorpe to enhance its standing as a sub-regional town. It also represents the most sustainable option for future growth as there are existing facilities and services to support it, all of which can be easily accessed by existing and improved public transport networks. Furthermore, this option has the greatest potential to deliver on the government agenda of 'Sustainable Communities' and the development of brownfield land.

The Regional Economic Strategy (RES) contains an objective of 'Stronger Cities, Towns and Rural Communities' which highlights the success of the region depending on creating and maintaining prosperous and attractive cities, towns and rural communities. The RES states that "Our region's success depends on prosperous and attractive cities, towns and rural communities. Our cities, in particular, have a major role to play in driving competitiveness...The region needs cities and towns, places that have distinctive feels, a sense of buzz and that people love to live in". From a North Lincolnshire perspective only option 1 can meet this objective. Maintaining the Core Approach will be the most effective option in delivering the Government's sustainable communities agenda. Option 2 cannot be supported as the locations promoted for development in Scunthorpe have significant local constraints such as major infrastructure requirements, proximity to Scunthorpe Steelworks and major industrial installations and Air Quality Management Areas (AQMA) that make their development difficult to realise. Furthermore option 3 would actually reduce the capacity of the existing of towns and cities of the sub-region to undertake regeneration as it would misappropriate the investment and housing delivery to other locations and significant infrastructure investment would be required.

As part of Yorkshire Forward's Renaissance Towns and Cities programme, Scunthorpe has developed a long term vision for its physical and economic transformation. This vision consists of a series of interlinked, landmark projects, one of which is the Lincolnshire Lakes project.

The Lincolnshire Lakes involves creating a sustainable urban extension along the western boundary of the Scunthorpe urban area, providing high quality, well designed new homes as well as major opportunities for a new business park together with tourism, leisure, recreation and sport facilities all set within an unique lakeside environment, would positively transform the western approach to Scunthorpe and create a valuable opportunity for biodiversity and a new place for living, working and leisure. The Lakes will provide the opportunity for Scunthorpe to have a high quality sustainable urban fringe environment.

It is anticipated that this area would provide 3,000 new homes in phase 1, with a further 3,000 in phase 2 and 5,000 in phase 3. It will also incorporate 250,000ft² of business floorspace in phase 1, with a further 500,000ft² in phase 2 and 250,000ft² in phase 3. The development will span a significant period, at the minimum a length of 20 years.

As part of the Lincolnshire Lakes feasibility work, the council has commissioned Halcrow to undertake a sequential and exceptions testing to show that development in this location would be feasible and be in line with Planning Policy Statement (PPS) 25. This is included as part of the council's response.

The other options (options 2 & 3) are not considered to be feasible for North Lincolnshire. Option 2 would focus development to the north, east and south of Scunthorpe. Firstly, development in these locations would not support the longer term regeneration plans for the town and more or less result in the creation of new settlements, and secondly, there are number of local considerations which need to be taken into account in respect of each of them.

North of Scunthorpe - the location proposed for residential development is adjacent to major industrial development and is very divorced from the main body of the town. This raises issues about how easily any urban extension in this area could be integrated into the wider urban area. It also raises issues about whether placing residential development so close to a busy industrial area would deliver the quality environment which would attract developers and potential residents to the area.

East of Scunthorpe - this location means developing to the east of Scunthorpe steelworks. Again this residential area would be divorced from the town and would be situated next to a large operational steel making plant which again raises the question of deliverability. Furthermore this area of North Lincolnshire is the subject of an Area Quality Management Area (AQMA) and as such consideration should be given.

South of Scunthorpe - the location proposed has a number of key difficulties which would require to be overcome before it can be developed. The first of these relates to accessibility. Despite being adjacent to the M180 motorway, there is no possibility of direct access. This has been confirmed by the Highways Agency during consultation on the emerging Local Development Framework. Accordingly, development in the general location would result in traffic having to use existing roads and creating additional congestion within the urban area. The other major issue in this area relates to drainage infrastructure which is not considered suitable to support large scale development.

Option 3 would involve the development of either a new settlement or the expansion of existing villages. This approach raises significant concerns, in particular in respect of the long term regeneration of the Scunthorpe Urban area. It is the council's position that this should not be put at risk.

It is considered that this approach would not be sustainable and would not be able to deliver the required level of housing growth as it would be constrained by the need to ensure essential services and infrastructure are in place to support it.

For example, Brigg, whilst being an important service centre in North Lincolnshire, can only accommodate limited growth, as there are a number of constraints including drainage and infrastructure.

The council is concerned that some of the other options clearly show a lack of understanding about the local area. The suggested options appear to be based on crude partial environmental constraints mapping and take no account of better environmental issues, infrastructure or common sense.

Some of the proposed options would have a damaging impact upon existing urban areas and market towns. These proposals are currently impacting upon investor confidence and the council wish their deletion as quickly as possible.

QUESTIONS 17-19 - York Sub-Area

We asked you above in Questions 5 to 7 whether you thought the Region as a whole could accommodate a range of house building rates. Now we want you to tell us if the approach to this particular sub-area needs refining and how it might accommodate housing growth, by answering the following questions.

17. To what extent can the current strategy deliver current house building rates in this sub-area?

N/A

18. To what extent can the current strategy deliver higher house building rates in this sub-area?

N/A

19. Which Spatial Options or combination of Spatial Options do you think provide sufficient guidance for Local Authorities to determine broad locations for where further house building should be located?

N/A

QUESTIONS 20 – 22 - Vale and Tees Links Sub-Area

We asked you above in Questions 5 to 7 whether you thought the Region as a whole could accommodate a range of house building rates. Now we want you to tell us if the approach to this particular sub-area needs refining and how it might accommodate housing growth, by answering the following questions.

20. To what extent can the current strategy deliver current house building rates in this sub-area?

N/A

21. To what extent can the current strategy deliver higher house building rates in this sub-area?

N/A

22. Which Spatial Options or combination of Spatial Options do you think provide sufficient guidance for Local Authorities to determine broad locations for where further house building should be located?

N/A

QUESTIONS 23-25 - Coast Sub-Area

We asked you above in Questions 5 to 7 whether you thought the Region as a whole could accommodate a range of house building rates. Now we want you to tell us if the approach to this particular sub-area needs refining and how it might accommodate housing growth, by answering the following questions.

23. To what extent can the current strategy deliver current house building rates in this sub-area?

N/A

24. To what extent can the current strategy deliver higher house building rates in this sub-area?

N/A

25. Which Spatial Options or combination of Spatial Options do you think provide sufficient guidance for Local Authorities to determine broad locations for where further house building should be located?

N/A

QUESTION 26 - Remoter Rural Sub-Area

26. Are there any Spatial Options which we should consider for this sub-area?

N/A

QUESTION 27

In thinking about additional accommodation (pitches) how much emphasis would you put on each of the following approaches. Please rate each on a scale of 1-5 with 1 being the least important and 5 being the most important factor in shaping distribution of additional pitches.

	Score
'Meeting need where it arises'	3
A more even spread (with or without specifying that every authority should make some provision)	3
Access to services such as schools and health facilities	5
Avoiding environmental constraints e.g. areas of flood risk or nature conservation sites.	4

Reasoning

Access to services such as schools and health facilities: -

It is important that the Gypsy and Traveller community has access to services such as schools and health facilities. Recent research has indicated that the Gypsy and Traveller community finds it hard to access the same services as the settled community and suffer much more due to the lack of these services. With this in mind it is important that when thinking about additional accommodation emphasis should be placed on choosing locations where access to these services is greatest and can be better addressed by the local authority. The closer these sites are to more sustainable locations the greater opportunity there is for integration. By local authority's providing authorised sites for the Gypsy and Traveller community, instead of allowing unauthorised sites and encampments, there is a greater chance for access to schools and health services as the local authority is in a better position to plan for this eventuality, as the site has been established and mechanisms have been put in place to allow access.

Meeting need where it arises: -

Due to the historical inequalities in pitch provision, Gypsies and Travellers have constrained choices as to where and how they would choose to live if they had real choice. Choices for the non-travelling community are generally much wider, as there is no social housing available for Gypsies and Travellers in every authority in the country. There are no local authority sites in 138 of the 353 local authorities in England, and only in 71 authorities is there more than one site. Some authorities have no authorised private sites. Over time, this has inevitably meant that Gypsies and Travellers have generally moved to areas they see as offering the best life chances; for example, an authority which provides a site; an authority which is perceived as having more private authorised sites than others; or an authority that is attractive in some other way (slower enforcement, transport links, friends and family resident etc).

Therefore there is a tendency, where the need for additional accommodation is assessed, for the assessment to further compound these inequalities in site provision. For example, authorities which already provide Gypsy and Traveller accommodation (publicly or privately) are assessed as having greater need for additional pitch provision than authorities with little or no pitch provision. It is therefore important to try and provide the established Gypsy and Traveller community with the provision identified in the needs assessments.

Avoiding environmental constraints: -

The national approach to constraints for Gypsy and Traveller provision has changed profoundly in recent years with the on set of climate change. Circular 1/2006 emphasises the importance of flood risk but PPS25 goes much further specifically precluding new pitches from those areas at high risk – flood zone 3 and applying a sequential and exceptions test to those in flood zone 2. This however causes problems in allocating sites as this is a much stricter interpretation of PPS25 than to other development.

QUESTION 28

Are there particular instances where need for additional provision arises in one local authority, but where all, or part, of that need should be met in neighbouring local authority areas? If yes, please specify the areas concerned and say why this is the case

In North Lincolnshire the issue of demand for sites from outside the authority area is of particular relevance. In North Lincolnshire there is an unauthorised development at an area called Westrum Lane, which is located on the border between North Lincolnshire and West Lindsey. It is very close to the town of Brigg, which is in North Lincolnshire. The site can only be accessed by travelling through Brigg itself.

As the site falls under the jurisdiction of West Lindsey District Council there are issues for both local authorities as the Gypsies and Travellers are using the services in Brigg (schools, shops, health etc), which is in North Lincolnshire however they are travelling back across the border.

Although the site is technically in West Lindsey district, which is in the East Midlands Region, it would perhaps seem appropriate for North Lincolnshire Council to work in partnership in addressing this demand particularly as some/most of the households have located there from the authorised site in Brigg (Mill Lane). (This site has temporary planning permission with time limits). Thus from a North Lincolnshire perspective additional provision is more than just a cross authority issue it is a cross regional issue.

There is a need for additional provision in Brigg as the North Lincolnshire and North East Lincolnshire Gypsy and Traveller Accommodation Assessment (GTAA) identified a high need and we are currently looking for sites in Brigg. However as there is a temporary site on the border in West Lindsey part of this need is currently being met.

QUESTION 29

Some parts of the wider Travelling community have established patterns of travel for work and social/cultural reasons for which the accommodation on the more permanent sites may not be appropriate.

- Should transit be identified separately from residential provision or is mixed provision on the same site desirable
- What level of provision is needed for transit purposes (please include evidence to support your answer)
- What form should transit provision take
- What should be the main reasons for the distribution transit accommodation

The evidence gathered in the North Lincolnshire and North East Lincolnshire GTAA identifies that the provision of an inappropriate form of transit accommodation may fail to reduce unauthorised encampments. i.e. a mixture of residential and transit provision may not work in all cases because of possible community tension between 'settled' and 'highly mobile' Gypsies and Travellers, having varying reasons for travelling.

Therefore based on this information we suggest that transit provision is identified separately from residential provision.

The 'CLG Designing Gypsy and Traveller Sites Good Practice Guide' has guidance for permanent sites and transit sites, which indicates that in most situations sites should be kept separate. It states that 'views are mixed on the extent to which transit pitches can be successfully provided on permanent sites'.

Level of provision for transit purposes

The North and North East Lincolnshire GTAA March 2008 identify the need for 10 extra transit pitches between 2007 and 2012. As it currently stands there is a deficiency of this type of provision in both authority areas.

What form should transit provision take

There needs to be a variety in transit provision in order to cater for the variety of needs. This might range from formal transit pitches, through less-equipped stopping places used on a regular basis to temporary sites with temporary facilities available during an event or for part of the year.

North Lincolnshire GTAA highlighted that the preferred type of transit provision was: -

Designated stopping places	38%
Transit pitch on a residential private site	24%
Private transit site	14%
Council transit site	12%
Other	7%
Transit pitch on a council site	5%

Distribution of transit provision: -

It might be appropriate for the RSS to broadly identify a number of transit pitches where a need is clearly established. A sub-regional approach might be appropriate where there is evidence. Proximity to major routes will be an important locational criterion for such an approach. As Gypsies and Travellers will stay for a short period on transit sites, it is important that there is somewhere for them to move to.

The final decision on the distribution of transit sites should be a matter for the local authorities to decide based on their findings in their GTAA. Where they provide no relevant information or where there is no GTAA at present, Caravan Count information could be used.

A final source of information is first-hand local knowledge of the region. Such knowledge might highlight locations where unauthorised encampments are common and problematic, or major regular cultural events (fairs, missions) likely to attract Gypsies and Travellers to the region for a short period.

QUESTION 30

What date should Policy H6 go up to? On what basis should longer-term estimates be made? (please include evidence to support your answer)

We suggest Policy H6 should go up to 2016 as this is what our GTAA made estimates up to. Therefore this is the only information we can base our projections on. The situation needs to be monitored regularly (e.g. every 5 years). The current shortage of sites and pitches for Gypsies and Travellers means it is difficult to predict trends in living arrangements. The current shortage of sites and pitches for Gypsies and Travellers means that it is difficult to predict trends in living arrangements once GTAAs across the country have been implemented in the form of nationally increased site/pitch provision. There is no means of knowing how Gypsies and Travellers will decide to live in the next decade. There may be an increase in smaller households, moves into bricks and mortar housing may be more common or household formation may happen at a later age.

QUESTION 31

What process should be introduced to ensure that estimates and associated planning documents/policies are updated?

Where there is clear and immediate need for instance evidenced through the presence of significant numbers of authorised encampments or development the most up to date pitch requirements identified in needs assessments should take precedence.

The level of accommodation provision should remain under constant monitoring/review. Once local authorities have completed their GTAA the information contained in them should be fed through to the Region so that estimates can be made 'more' accurate and planning documents/policies can include the up to date information from the GTAA.

QUESTION 32

Are there any other issues that you wish to raise about the Spatial Options document?

N/A