

Date: 16<sup>th</sup> March 2017

Consultee ID: 757549

Matter 1a

## **NORTH EAST LINCOLNSHIRE LOCAL PLAN EXAMINATION**

### **MATTER 1A: OVERALL BASIS FOR THE PLAN – PROCEDURAL MATTERS**

#### **Issue 1.1: Whether the North East Lincolnshire Pre-Submission Draft Local Plan has been prepared in accordance with the relevant legal and procedural requirements**

1. The following hearing statement is made for and on behalf of the Home Builders Federation. This statement responds to selected questions set out within Matter 1a of the Inspector's *Matters, Issues and Questions*.
2. The Inspector's Issues and Questions are included in bold for ease of reference. The following responses should be read in conjunction with our comments upon the Pre-submission version of the Local Plan, dated 12<sup>th</sup> April 2016 and the Pre-submission Further Changes, dated 28<sup>th</sup> October 2017. The HBF has also expressed a desire to attend the examination hearing sessions.

#### ***A: Procedural requirements:***

3. The HBF has no comments.

***B: Duty to co-operate: The duty requires local planning authorities to engage constructively, actively and on an ongoing basis as well as to have regard to the activities of other bodies. Table 3.1 of the PSDLP notes there are 'strong interactions between the economic and residential functions of adjacent authorities', indicating the importance of active, constructive and continuing engagement with these Authorities. Whilst CD23 summarises the outcome of partner engagement on strategic priorities, few supporting details are provided and no specific examples are given. The following questions are intended to allow the Council to provide further information as to how and when any engagement took place and the matters addressed.***

***Q1.4: What are the strategic, cross-boundary issues of relevance to the Plan?  
Did some issues require a greater level of engagement than others?***

4. The primary concern of the HBF is that of housing need and delivery. In this regard, whilst it is clear a degree of engagement has taken place, it is unclear what the outcomes of this engagement are. The importance of identified actions resulting from fulfilment of the duty is clearly articulated within the National Planning Practice Guidance (PPG). The PPG states '*it is unlikely that this (the duty) can be satisfied by consultation alone*' and that '*inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others*'.

***Q 1.5 What examples would the Council point to in order to illustrate the extent and frequency of engagement as to the strategy and contents of the Plan, which have taken place with neighbouring authorities and other bodies or organisations over the course of the Plan's preparation.***

5. The HBF consider this a matter for the Council to address

***1.6 The 'evidence of engagement' refers to meetings and correspondence. Were meetings arranged specifically to discuss this Plan as it evolved? If so, at what intervals? With which bodies or organisations? What effect did such engagement have on the development of the Plan?***

6. The HBF consider this a matter for the Council to address.

***Q1.7: Although the Housing Requirement Technical Paper refers to active consultation and the sharing of data with the three adjoining Authorities, no specific examples are given (HSG 07, 3.3). How were the views of neighbouring authorities ascertained as to the proposed definition of the Housing Market Area (HMA) and the Objective Assessment of Housing Need (OAHN)? What were the views of other Authorities within the Humber sub-region as to the OAHN set out in the Pre-Submission Draft Plan?***

7. Within our comments upon the Pre-submission version of the plan (paragraphs 8 to 12) the HBF raised this lack of detail as an issue. Whilst it is understood that the Council intends to meet the OAHN of North East Lincolnshire within the plan area it is not clear whether they will need to assist in meeting the housing needs of neighbouring districts. This is particularly important given the strong interlinkages with neighbouring districts.

***Q1.8: What is the housing supply position within neighbouring authorities? Might this have any implications for the supply of housing in North East***

***Lincolnshire? Does the growth-based strategy of this Plan have any implications for neighbouring authorities?***

8. The HBF refers to our comments upon the Pre-submission version of the plan.

***Q1.9 to Q1.13***

9. The HBF has no further comments.

***C. Habitats Regulation Assessment (HRA)***

10. The HBF has no further comments.

***D. Sustainability Appraisal (SA)***

11. The HBF has no further comments.

Yours sincerely,

*MJ Good*

**Matthew Good**  
**Planning Manager – Local Plans**

Email: [matthew.good@hbf.co.uk](mailto:matthew.good@hbf.co.uk)

Tel: 07972774229