

EAST LINDSEY DISTRICT COUNCIL

REGULATION 22 CONSULTATION STATEMENT

MARCH 2017

Supporting Economic Growth for the Future



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East Lindsey Local Plan

Regulation 22 Consultation Statement

1.0 INTRODUCTION

Legal Requirements

- 1.1 The preparation of the Local Plan must reflect the National Planning Policy Framework (NPPF) and comply with The Town and Country Planning (Local Planning) (England) Regulations 2012 (hereafter called The Regulations). Regulation 18 (this was Regulation 25 in the early stages of the Plan's preparation) requires that a local planning authority must – (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan and (b) invite them to make representations about what a local plan should contain. Paragraph (2) of Regulation 18 lists these to be - such of the specific consultation bodies (listed in Part 1 Regulation 2) as the local planning authority consider may have an interest in the subject of the proposed plan; such of the general consultation bodies (also referred to in Part 1 Regulation 2) and such residents and other persons carrying out business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.
- 1.2 Regulation 22 covers the covers the submission of documents and information to the Secretary of State prior to examination. It sets out the documents that must be submitted to the Secretary of State alongside the documents/s for examination. These include, at 22 (c), a statement setting out –
- (i) which bodies and persons the local planning authority invited to make representations under regulation 18;
 - (ii) how those bodies and persons were invited to make representations under regulation 18;
 - (iii) a summary of the main issues raised by the representations made pursuant to regulation 18;
 - (iv) how any representations made pursuant to regulation 18 have been taken into account;
 - (v) if representations were made pursuant to regulation 20 (the submission document), the number of representation made and the main issues raised in those representations; and
 - (vi) if no representations were made in regulation 20, that no such representations were made.
- 1.3 This Consultation Statement fulfils those requirements, setting out the consultation carried out under Regulation 18, along with the representations pursuant to Regulation 20. It accompanies the submission of the East Lindsey Core Strategy and Settlement Proposals, which together form the Local Plan for the District. It sets

out what consultation and public engagement has been carried out up to date, and how this has influenced the content of the Plan so far.

- 1.4 The Local Plan has been under preparation for some time. As a result, the Core Strategy has been through a number of consultation stages, which all constitute consultation under Regulation 18 (previously Regulation 25). Below is a table showing the stages carried out. The evolution of the plan, and the scope and response to these different consultation stages are outlined below. The consultation on the Core Strategy has helped to shape the Settlement Proposals, especially the early rounds of consultation looking at issues and options. However, the Settlement Proposals have not undergone as many rounds of consultation and as such the background is less complex. The document will be divided into a number of sections, firstly setting out the issues and options consultation, followed by the Regulation 18 consultation on the Core Strategy, then the Settlement Proposals and finally the regulation 20 responses.

Documents	Dates
Issues Consultation	March 2006 and (joint with the Community Plan) April 2007
Issues and Options Consultation (and Sustainability Appraisal)	November 2007
Draft Core Strategy (and Sustainability Appraisal)	October 2009
Draft Core Strategy (and Sustainability Appraisal) plus Strategic Housing Land Availability Assessment	October 2012
Topic Paper – The Proposed Housing Target and Preferred Option for Growth	May 2014
Core Strategy and Settlement Proposals (and Sustainability Appraisals)	June 2016
Core Strategy and Settlement Proposals (and Sustainability Appraisals)	November 2016

Consultees

- 1.5 The Council's mailing list continues to evolve throughout the preparation of the plan and beyond. The structure of the mailing list is based, primarily, on the requirements of the 2012 Regulations (and its predecessors). This means that the Council consults the relevant:

- specific consultation bodies – this includes Lincolnshire County Council, Parish Council's, neighbouring Council's (including neighbouring Parish Councils), local service providers, the Environment Agency, Natural England and Historic England;
- general consultation bodies - which cover voluntary bodies or those representing the interests of different ethnic or national or religious groups, disabled people and business interests; and
- residents and other persons carrying out business in the area.

1.6 Statutory and other formal consultees are already set for the Council. The mailing list contains contacts for local groups from early joint consultation work carried out with the consultation on the Council's Community Plan. This list continues to evolve with contacts being added and updated. It contains contacts for national and local organisations and groups; anyone who expresses an interest in the plan, whether formally through consultation or at other times; those requesting that their details be included on the mailing list; and landowners and agents of site promoted through the Strategic Housing Land Availability Assessment (SHLAA). The current specific and general consultation groups consulted are set out in appendix 1 to this report. The list of residents, SHLAA consultees and other consultees has not been published.

2.0 EARLY CONSULTATION

Preliminary Stages

- 2.1 Formal consultation on the Core Strategy began in 2007 with the Issues and Options consultation. This is an important stage in early consultation and especially in fulfilling Regulation 18(1)(b) which requires the LPA to invite representations about what a local plan ought to contain.
- 2.2 The content was, in part, developed from two earlier public consultations. One was carried out on the original Statement of Community Involvement, which also encompassed early consultation on issues; the other was carried out jointly with a review of the Council's Community Plan, to establish what issues matter to residents. The public, planning applicants and agents consulted were consulted and local workshops were held.
- 2.3 As the joint consultation was based on all aspects of community life, and covered a broad range of subjects, some issues were beyond the remit of a spatial plan. However, there were a number that could be used to help frame the local plan issues and options, these were:-

Developing places and spaces : the most important issues were considered to be:

- Retaining and access local shops and services;
- Protecting local character;
- Supply of affordable housing.

Developing the economy : the key issues were:

- Poor transport infrastructure;
- Unemployment/Help for people to move into jobs;
- Low Wages;
- Aging Population

Building Greener Communities : these were:

- Conservation of Wildlife and Habitats;
- Problems associated with Climate Change;
- Limited public access to Greenspace and Woodland

Issues and Options 2007

- 2.4 The formal Issues and Options consultation ran from 7th November – 19th December 2007.

Bodies or Persons invited to make representations

- 2.5 All the appropriate relevant authorities and specific and general consultation bodies, as outlined in Part 1 of the Regulations and set

out in appendix 1 to this report, were consulted. Local groups and individuals, whose details were held on the Council's database, were also consulted, see paragraph 1.6 above. At that time, this list consisted of circa 1500 persons or groups.

How those bodies and people were invited to make representations

- 2.6 All consultees were sent either a letter or an email notifying them that consultation on the Issues and Options was about to take place; the consultation dates; the web link at which the document and response form could be viewed; and a web link for electronic responses. At this stage, the majority of consultees (approx. 71%) were contacted by letter. For the 662 members of the public being consulted by letter, they were also informed where a paper copy of the document could be inspected and that there would shortly be adverts in the local newspapers giving details of local exhibitions.
- 2.7 The document, response form and the interactive electronic response pages were made available on the Consultation pages of the Council's website, with a direct link from the home page. At this stage, the Council was using Limehouse software to produce the document and carry out consultation.
- 2.8 Paper copies of the document, and response forms, were available at the 17 libraries throughout the district (including mobile libraries) and at the Council's five Area Offices and Head Quarters building. 24 Local GP surgeries and 48 Post Offices were sent a poster and leaflets to display in their premises giving people information about the workshops being held in the district and where documents could be seen.
- 2.9 Statutory notices were placed in the local newspapers circulating in the area, these also publicised the exhibitions/ drop in sessions being held locally, these were:

Venue	Date and Times
Horncastle Community Centre	12 th November 2007 3pm – 8pm 12 Attendees
Alford Manor House	20 th November 2007 3pm – 8pm 3 Attendees
Tetney Village Hall	22 nd November 2007 3pm – 8pm 5 Attendees
Mablethorpe Community Centre	23 rd November 2007 3pm – 8pm 7 Attendees
Skegness Embassy Centre	26 th November 2007 3pm – 8pm 5 Attendees
Wragby Resources Centre	6 th December 2007 3pm – 8pm 5 Attendees
Spilsby Franklin Hall	11 th December 2007 3pm – 8pm 16 Attendees
Louth Conoco Room	11 th December 2007 3pm – 8pm

	3 Attendees
Stickney Village Hall	12 th December 2007 1.30 – 6.30pm 7 Attendees
Coningsby Community Hall	14 th December 2007 3pm – 8pm 5 Attendees

The main issues raised and how these have been addressed in the Plan

- 2.10 The Issues and Options document took forward earlier work in developing issues, presenting a number of options for how each of the key issues could be addressed. There were 15 topic areas (issues) presented, with a number of options (between 2 and 7) put forward for each topic.
- 2.11 The responses were reported to Planning Policy Committee on 13th March 2008, 8th May 2008 and 12th June 2008. In most cases, the option or combination of options with the most support were the ones taken forward into the Core Strategy. A combination of options was usually followed in areas where the options were not mutually exclusive. There were some issues which were not dealt with through the document, for topics where there is a statutory duty governing the policy approach, such as the historic environment.

3.0 CORE STRATEGY

Regulation 18 Consultation

- 3.1 The Core Strategy has been through three rounds of consultation : 2009, 2012, June 2016 and November 2016 for the pre-submission consultation.
- 3.2 The early preparation of the Core Strategy was awaiting the outcome of the East Midlands Regional Plan. At the Examination in Public, the Panel (confirmed in the adopted Plan of March 2009) proposed that future housing development in East Lindsey should be comprised only of existing commitments (i.e. Houses under construction, or with planning permission and allocated sites without permission) pending the findings of a Coastal Study to assess the implications of climate change for the coast. With the uncertainty over the Coastal Study, the Council took the decision to prepare an interim Core Strategy (2009), which could not contain new housing growth but which would set a broad strategy moving forward and present policies for other topic areas.
- 3.3 A draft Coastal Study was prepared, although not formally adopted by the participating Authorities. As the Regional Plan moved towards abolition following the publication of the Localism Act, there was no longer the opportunity to review its policies and so it was left to the Local Planning Authorities affected by the Coastal Study to move forward with the findings. Work on the 2009 draft Core Strategy was then carried forward into the 2012 draft Core Strategy, where possible. However, the opportunity was taken to look afresh at the policies in the light of changes in national planning policy and changes to the planning system, as well as seeking to develop the growth aspects of the Plan.

2009 Core Strategy

Bodies or Persons invited to make representations under Regulation 18

- 3.4 The Council continued to add interested parties wishing to be consulted on the plan to its database, along with reflecting changes to statutory and local organisations. All the relevant specific and general consultation bodies, as outlined in Part 1 of the Regulations were consulted (see appendix 1).

How those bodies and people were invited to make representations

- 3.5 All consultees were sent an email or letter informing them of the impending consultation, where the document could be viewed (on line and in person) and the dates of forthcoming exhibitions/drop in sessions across the District. The Over 1200 people or groups were sent

letters regarding the consultation; still the preferred method of consultation for many.

- 3.6 The Council also took the opportunity to carry out joint exhibitions with colleagues from the Environment Agency in coastal locations, in relation to the Shoreline Management Plan, which set the context for planning along the coast. The dates of the two consultation strands were:

Venue	Date and Time
Wragby Resource Centre	27 th October 2009 1pm – 7pm
Louth Town Hall	30 th October 2009 1pm – 7pm
Horncastle Admiral Rodney Best Western Hotel	2 nd November 2009 1pm – 7pm
Spilsby Franklin Hall	3 rd November 2009 1pm – 7pm
Alford Manor House	4 th November 2009 1pm – 7pm
Sibsey Village Hall	5 th November 2009 1pm – 7pm
Tattershall Village Hall	6 th November 2009 1pm – 6.30pm
Joint Consultation with Shoreline Management Plan	
Wainfleet All Saints Coronation Hall	20 th November 2009 1pm – 7pm
Chapel St Leonards Access Centre	23 rd November 2009 1pm – 7pm
Skegness Grosvenor House Hotel	24 th November 2009 1pm – 7pm
Marshchapel Village Hall	27 th November 2009 1pm – 7pm
Sutton on Sea Bacchus Hotel	30 th November 2009 1pm – 7pm

- 3.7 Posters were distributed for display at the 29 GP surgeries and 32 Post Offices across the District. Paper copies of the Core Strategy and Sustainability Appraisal were available for scrutiny at the 17 libraries (including mobile libraries) and 5 East Lindsey Area Offices, plus Headquarters Building. An advertisement was put in local newspapers circulating in the area on 8th October 2009, setting out the start and closing dates for consultation, where the consultation documents could be viewed (both on line or in person) and details of the drop in sessions outlines above. An article was also included in The Messenger, the Council's newsletter which was circulated to every house in the District.

The main issues raised and how these have been addressed in the Plan

- 3.8 The main issues raised focused around the location of growth, tourism, renewable energy and flood risk. A number of changes were made to the plan as a result of the consultation. However, as paragraph 3.10 sets out, there was significant change between the 2009 version of the Plan and its next iteration. These changes came from both decisions as to how the plan was to progress, but also from the changes that were happening to planning at a national level. Therefore, the format of the policies changed, along with a number of amendments to the policies and text as the wider issues created greater change than the amendments brought forward by consultation. Where the changes accorded with new Government guidance, they were taken forward to

the 2012 Plan. The revised policies were reported to Planning Policy Committee over a period between December 2011 and July 2012; and these can be seen on the Council's website.

Moving Forward after the Abolition of the Regional Plans

3.9 In the period from 2010 – 2011, significant changes in the planning system occurred, with the election of a new national government (along with local government elections) and subsequent legislative changes. This created some delay in addressing the consultation responses. The decision of National Government to abandon regional Plans, and the subsequent legal challenges to this, brought about further delay and uncertainty (see paragraph 3.2 and 3.3). With the ongoing uncertainty as to whether or not the Regional Plans were to be removed, the Council had no clear direction as to whether to continue with the no growth Core Strategy (pending the continued review of the Regional Plan) or to move to establish its own housing figures and develop a growth strategy. The decision was finally made, with the resolution of the regional plan issue, to move to a growth plan, and this required a rewriting of the policies; along with changes to reflect the introduction of the NPPF. A workshop was held in September 2010, to which all Parish Council's were invited, which provided a forum for discussion about the growth moving forward.

2012 Core Strategy

Bodies or Persons invited to make representations under Regulation 18

3.10 The Council's database continued to evolve as additional consultees were added to the mailing list when interest was shown, these mainly being individuals and agents. Changes to national and local organisations were also reflected. All relevant specific and general consultation bodies in Part 1 of the Regulations were consulted.

How those bodies and people were invited to make representations

3.11 The 2012 consultation was carried out in tandem with the Council's consultation on its Housing Strategy. As in previous consultations, letters or emails (depending on the preferred method of consultation) were sent to those who registered their interest in being kept informed. The communication informed consultees of the time period for the consultation, where documents can be inspected (both electronically and in person) and notification of the drop in sessions (see below). Adverts were placed in local newspapers on 4th September, containing the same information as was included in the correspondence to people on the mailing list. Letters were also sent to local libraries along with copies of the documents for public inspection. Due to the strategic nature of the document, and low level of attendance at the consultations held in the villages at previous Core Strategy consultations, two events were held at:

Skegness Embassy Theatre Arts Room 22nd November 2012 10am – 5pm;
Louth Town Hall Chamber 23rd November 2012 10am – 7pm

- 3.12 The events also included displays by the Environment Agency on flood risk and Lincolnshire County Council in respect of the Coastal County Park initiative.
- 3.13 Posters advertising the consultation and drop in events were sent to local post offices and doctors surgeries to help promote the consultation; along with leaflets explaining the documents. An item was included in the Council's newsletter, The Messenger, which was delivered to every household in the District.
- 3.14 Subsequently, an additional event was added at the request of elected members in Mablethorpe Library on 14th December 2012 10am – 7pm; this was subject to its own advert in the local newspaper on 5th December 2012.

The main issues raised and how these have been addressed in the Plan

- 3.15 Responses to the consultation were individually fed through the Council's Planning Policy Committee between March and September 2013; these can be seen in full on the Council's website. Responses were grouped where they raised similar issues but, unless they were the same comment, they were reported individually. Comments were presented in a tabulated form, with the respondent's name; whether an objection or support; the reasons for their objection or support; the Council's response and any proposed changes to the policy. A number of changes were made to the policies and these are also presented in the committee papers as tracked changes to the policy.
- 3.16 The most significant areas of objection related to housing and its distribution; coastal flood risk; and renewable energy. The Council could not make changes to satisfy all the respondents on the distribution of growth, as there were many different (and potentially conflicting) outcomes requested and some of the requested changes would have left the Plan being found unsound and out of conformity with national policy. Similarly, with coastal flood risk, the outcome requested by a significant number of objectors would have left the Plan out of conformity. The Council has worked with the Environment Agency to create a policy approach which takes account of national planning policy, whilst allowing settlements in areas the coastal hazard areas to sustain themselves. There were some amendments included to the renewable energy policy supporting text primarily for the sake of clarity. The blanket approach to the Lincolnshire Wolds AONB was removed from the policy as, although a highly protected landscape, this level of veto on a type of development is not supported by the NPPF.

3.17 Following these amendments to the plan, there were some subsequent changes made to the plan as a result of changes to national policy or local circumstances, and these were loaded onto the Emerging Local Plan and Consultations part of the Council's website after they had been considered by Planning Policy Committee.

Strategic Housing Land Availability (SHLAA)

3.18 At the same time as the consultation on the Core Strategy began, a consultation was issued on the Strategic Housing Land Availability Assessment (SHLAA). Although the SHLAA is part of the evidence base for the Local plan, and as a result not a formal part of the consultation under Regulation 18, it has still formed part of the preparation of the Plan and it is through the work on, and consultation on, the SHLAA that many people have been brought into the Local Plan consultation database.

3.19 As the SHLAA consultation did not have a statutory timeframe attached to it, the closing date was set beyond the Core Strategy consultation; running for a total of 17 weeks and closing on 28th February 2013. This allowed extra time for Parish Council's to digest the information provided and to establish if there were additional sites within their Parishes.

3.20 Consultation was largely run in parallel to Core Strategy and Housing Strategy consultation. Separate letters were sent out tailored specifically to the type of recipient. This was especially important for the Parish Council's, as the letters reflected whether a Parish was one identified for growth or not and if it any sites had been put forward within its area. These were sent out between the 29th and 31st October 2012.

3.21 The mailing list that is used for all consultation contains specific pages for SHLAA owners and agents and this was used to help effectively target the letters and emails. The consultation was available to view on the Council's website. A paper version of the SHLAA consultation document, including the maps was made available at the drop in sessions for the Core Strategy. The consultation resulted in 170 responses from 118 respondents.

3.22 The consultation resulted in 170 responses from 118 respondents. Of the 170 responses, 59 were from landowners supporting or objecting to the way their site had been assessed. The responses from non-landowners are predominantly from Parish Councils, residents or agents. Again, the responses provided additional information which underpinned support or objections to sites. The Council added any relevant details to its SHLAA database for consideration in the decision making process.

Topic Paper – The Proposed Housing Target and Preferred Option for Growth – May 2014

- 3.23 Following on from the 2012 Core Strategy consultation, and the decision to pursue a growth Core Strategy, the Council published a topic paper on the proposed housing target and the preferred option for growth. The Council had been ready to progress the plan earlier, but a visit from the Planning Inspectorate advised a reconsideration of the housing figure methodology and this created some delay.
- 3.24 The document was based on the Council's newly formulated housing projections; the outlined the outcome of the previous consultation on the Core Strategy and the selection of the preferred option: option 2 – housing growth in towns and large villages. The consultation was carried out in May 2014.

Bodies or Persons invited to make representations under Regulation 18

- 3.25 The consultation largely took the traditional format, with consultations being sent out to those on the Council's mailing list. These consisted of around 359 emails and 1511 letters; including 160 Parish Councils, 8 libraries and 6 Customer Access Points.

How those bodies and people were invited to make representations

- 3.26 The document was put on the Council's website for viewing, with paper copies at available at libraries and customer access points. As the Topic Paper was only a slim volume, a paper copy was also sent to each Parish Council.
- 3.27 The consultation was advertised in the local paper for 2 weeks and a media release was issued to the local press.

The main issues raised and how these have been addressed in the Plan

- 3.28 There were 176 respondents to the consultation exercise; not all respondents answered both questions (housing target and option). Of those responding on the housing target question, 55% objected to the target and 45% supported it. Of those objections to the target most did not have evidence to support their objection but rather referred to their desire, or not, to see additional development in a particular place or the District as a whole. 15.74% didn't wish to see development; 14.4% wanted development in places that were not to receive growth under the Plan; 12% wanted a higher target; 43.5% wanted a lower target; and 14.4% objected to the target for other reasons – either with no reason or technical matters such as the trajectory or the fluctuating market conditions.
- 3.29 Of those responding to the option question, 67.75% objected to the choice of option 2 and 32.25% expressed support for the option. Of

those objecting to the options, 38.5% wanted options 3 or 4 (a more widely dispersed pattern of growth); 46.5% wanted option 1 (focusing development on the towns – a number of these were in order for their settlement not to receive growth); 9.5% objected as they wanted to see development in the coastal area; and 5.5% were general objections.

- 3.30 These responses were to be progressed through the Council's Planning Policy committee. However, around the time that the consultation responses were being processed, the Government announced that it was to revise its population projections, requiring a reassessment of the Council's own housing target for the district. There was no benefit to carrying the results of this consultation forward as the baseline figures were soon to become out of date.
- 3.31 A meeting was also held, in November 2014, with representatives of the Medium and small villages to discuss the approach of the Core Strategy to their communities.

Core Strategy June 2016

- 3.32 With the new housing target established, the Council proceeded to consultation on the Core Strategy in June 2016. This was carried out in parallel with the Settlement proposals consultation.

Bodies or Persons invited to make representations under Regulation 18

- 3.33 The Council's database continued to evolve as additional consultees were added to, or removed from, the mailing list; these mainly being individuals and agents. Changes to names of national and local organisations were also reflected. All relevant specific and general consultation bodies in Part 1 of the Regulations were consulted, see appendix 1.

How those bodies and people were invited to make representations

- 3.34 Letters or emails were sent to all those on the consultation database. This amounted to almost 250 emails and just over 1500 letters. This included a letter to caravan site owners asking for evidence to support the requests of some owners to extend the season on caravans occupancy into the winter months. A letter was sent to all 30 doctor's surgeries asking for their input in to the plan in the light of comments about difficulties in accessing doctor's surgeries in previous consultations and asking them to display a poster advertising the consultation. A letter, along with copies of all documentation, was sent to the 16 libraries (including mobile libraries) and customer access points across the District. A letter and publicity poster was sent to every Post Office in the District with a request to display the poster. An A4 leaflet was sent to every household in the District, informing residents of the consultation. An advert was placed in a local newspaper for two weeks on 22nd and 29th June 2016.

3.35 All the documentation pertaining to the consultation was placed on the Consultation part of the Council's website, with a direct link from the home page. Due to the volume of material, it was not possible to distribute paper copies, although these could be viewed at libraries and customer access points.

The main issues raised and how these have been addressed in the Plan

3.36 The key issues from the June 2016 consultation were housing numbers and distribution; and the coast. Whilst comments were made on all the policies, the comments on the other policies tended to be requesting minor changes to the policy or supporting text, rather than seeking a change of direction for the policy.

3.37 In respect of housing, the main objections related to fact that housing delivery was stepped with higher delivery towards the end of the plan period. The Council amended this to provide for even delivery over the plan period. The second main objection from developers was around the method used to deal with the undersupply of housing. The Council in the Plan has opted for the Liverpool method that is the undersupply is spread across the Plan period. After some discussion at Planning Policy Committee, members chose to change this to the Sedgefield method and front load the undersupply into the first five year.

3.38 With regard to the distribution of housing growth across the towns and large villages and Members previous concerns about a lack of allocation in the medium villages, the medium inland parish councils were sent an individual letter particularly asking them to look at this issue and inform the Council of their views. Out of 37 medium villages there were 9 responses of those 6 were in support. There was only 1 clear objection, with 1 being unclear and 1 made no comments. No response was received from the other parish councils and this was taken as an indication that there is no objection. Given this, there was a 91% support for the policy from Medium villages. Therefore no change was made to the way housing is distributed.

3.39 In respect of the Coast, there were many objections to this policy, which is not surprising given the radical directional change this policy goes in. The two main lines of objection amongst consultees were the lack of a housing allocation and the caravan occupancy. In respect of housing, most of the objections centred on the fact that the housing was needed and that without it there would be economic consequences and the coast would decline or individual settlements would decline. The evidence is that this is not the case. There are presently 1308 housing commitments on the coast, these commitments are located right across the coastal zone and are presently not being built out quickly. The Council has worked closely with the Environment Agency and the Plan contains a commitment to monitor the plan closely over the first five years to establish what the effects of the new policy

approach are. There are currently no proposals to change the approach.

- 3.40 For caravan occupancy, in very broad terms most of the direction of the objections focused on the fact that the coastal economy would decline and/or not grow if the caravan industry was not permitted to open over either a longer period or Christmas. The objections also stated that jobs could be created and that the policy was preventing development and change. The Council's Economic Action Plan contains a project around examining the caravan occupancy period in more detail, with industry members, the Environment Agency and Lincolnshire County Council. The group will examine whether the risks involved in occupying caravans in areas of coastal flood risk can be mitigated against, not necessarily in terms of design but in terms of process and procedure, to such an extent that those that manage that risk are satisfied. Alongside that work there will be a study examining the economic relationship between the different forms of holiday accommodation along the coast.
- 3.41 The responses were considered by three special meetings of the Council's Planning Policy Committee on 11th, 13th and 14th October 2016; the representations, and the Council's responses to them, are set out on in the agendas on the Council's website.

Core Strategy November 2016

Regulation 20 Consultation

- 3.42 The document the Council intends to submit to the Secretary of State, including changes made from the previous document as a result of Regulation 18 consultation, was put out for the final round of consultation between 30th November 2016 and 25th January 2017, having been approved by an Extraordinary Council on 2nd November 2016. This consultation was carried out in parallel with the Settlement Proposals document. All the other evidence and supporting documents were also subject to consultation, including the Sustainability Appraisal and Habitat Regulations Assessment. In line with legislation, this consultation focused on the soundness and legal compliance of the Plan.

Bodies or Persons invited to make representations under Regulation 20

- 3.43 At this stage in the Plan's preparations, representations are now made under Regulation 20, which covers representation about a local plan which the Local Planning Authority proposes to submit to the Secretary of State.
- 3.44 The Council's database continued to be used as the basis for consultation. The database has evolved with additional consultees being added, and also some being removed as letters and emails are

returned undelivered; this mainly relates to individuals and agents. Few new statutory consultees or local organisations have emerged, although some have changed their details and some have ceased to operate; these changes have also been reflected. At the time of the consultation period, the database contained 1960 entries. All relevant specific and general consultation bodies in Part 1 of the Regulations were consulted, see appendix 1.

How those bodies and people were invited to make representations

- 3.45 The consultation was advertised in a local newspaper on 30th November and 7th December 2016. Letters or emails were sent to all those on the consultation database, this amounted to approximately 1,710 letters and 250 emails. Due to the volume of material, it was not possible to distribute paper copies. However, a letter and copies of consultation documents were sent to 16 libraries (including mobile libraries) and the Council's five customer access points. Documents were also available for inspection at the Council's Manby headquarters building in Planning Reception. A letter and publicity poster was sent to every Post Office in the District with a request to display the poster.
- 3.46 All the documentation pertaining to the consultation was placed on the Consultation part of the Council's website, with a direct link from the home page.

The main issues raised and how these have been addressed in the Plan

- 3.47 For the pre-submission consultation, the Council received responses from 79 individuals or organisations covering 221 responses. Some of the representations quoted multiple policies and these have been included for each of the policies against which they were made, even though the content of the objection was dealt with as one representation. The breakdown of representations is outlined below.
- 3.48 The housing policies generated the most responses with 60 objections and 19 supports across the three policies; a number of representations covered all three policies. These focused largely on the amount and location of development with a number seeking to change the policy to address their aspirations with regards to sites. Some sought more generally to increase or reduce the amount of development for an individual settlement. The next largest cluster of representations is related to the coast. There were 22 objections spread across the five policies, with 3 supporting responses. The plan was not changed to meet the bulk of these objections as they form part of an evidenced strategy for both housing development and for addressing the issue of coastal flood risk. A change to the amount or location of housing growth to address one objector would mean having to change the strategy for the whole District, which would run counter to the evidence base and may, in itself bring about objection from those who support the current strategy in the Plan.

Policy or Section	Number of Representations	
	Objection	Support
Proposals Map	0	0
Introduction/ General Representations	6	1
Vision and Objectives	0	0
SP1 A Sustainable Pattern of Places	10	13
SP2 Sustainable Development	10	2
SP3 Housing Growth and the Location of Inland Growth	29	3
SP4 Housing in Medium and Small Villages	11	1
SP5 Specialist Housing for Older People	2	0
SP6 Neighbourhood Planning	8	1
SP7 Affordable and Low Cost Housing	17	2
SP8 Rural Exceptions	2	0
SP9 Single Plot Exceptions	6	0
SP10 Design	14	2
SP11 Historic Environment	2	0
SP12 Gypsies, Travellers and Showpeople	6	0
SP13 Inland Employment	4	0
SP14 Town/Village Centres and Shopping	2	0
SP15 Widening the Inland Tourism and Leisure Economy	1	0
SP16 Inland Flood Risk	4	2
SP17 Coastal East Lindsey	8	1
SP18 Coastal Housing	4	1
SP19 Holiday Accommodation	6	1
SP20 Visitor Economy	2	0
SP21 Coastal Employment	2	0
SP22 Transport and Accessibility	2	1
SP23 Landscape	1	2
SP24 Biodiversity and Geodiversity	7	0
SP25 Green Infrastructure	0	2
SP26 Open Space, Sport and Recreation	1	0
SP27 Renewable and Low Carbon Energy	1	0
SP28 Infrastructure and Section 106 Obligations	9	1
Annex 1 Affordable Housing and Housing for Vulnerable Groups, Local Connection Criteria - The Coastal Zone	0	0
Annex 2 Sequential and Exceptions Test for Development in the Coastal Zone of East Lindsey	0	0
Annex 3 Indicative Thresholds for Transport Assessments	0	0
Annex 4 Glossary	0	0
Evidence Base	7	1

3.49 The Council has made a number of minor modifications which have addressed some of the typographical changes, factual inaccuracies and requests for small changes to the plan which bring about clarity but do not change the direction or overall strategy of the Plan.

3.50 Under the Council's constitution, these representations have to be presented, for information, to the Council's Planning Policy Committee. This was done at the meeting on 23rd March 2017. The agenda, setting out all the representations, can be seen on Council's website.

4.0 SETTLEMENT PROPOSALS

- 4.1 The first draft of the Settlement Proposals document was published alongside the Core Strategy in June 2016. Prior to drawing together that document, there were two previous consultations which have fed into its preparation; these are outlined below.

Regulation 18 Consultation

Strategic Housing Land Availability Assessment

- 4.2 The issues consultation right at the start of the plan preparation helped to shape the settlement proposals. However, the first consultation that directly helped to shape the Settlement Proposals document was the Strategic Housing Land Availability Assessment. Paragraphs 3.19 – 3.23 above give more information on the SHLAA process

Growth Consultation 2014

Bodies or Persons invited to make representations under Regulation 18

- 4.3 The Council continued to add to its consultation list, throughout the preparation of the Core Strategy documents. This included the details of people who had had involved through the SHLAA. By this stage, the consultation list contained almost 1600 addressees and approx 300 email contacts.

How those bodies and people were invited to make representations

- 4.4 The second consultation, in November 2014, was carried out directly with Parish Councils for the 20 large villages that would be receiving growth through the Plan. This involved sending a letter along with a copy of the map along with the proposed text for each settlement as drafted at that time. The map showed the housing sites that had been promoted through the SHLAA and indicated which were suitable and which were not; and sites proposed for protection under policies in the Core Strategy.

The main issues raised and how these have been addressed in the Plan

- 4.5 Five Parish Councils responded to the consultation. Some of the consultations queried or provided information regarding the points system behind the settlement pattern that led to the village receiving growth. Changes were made to the points, where appropriate.
- 4.6 Most respondents commented on the housing sites. These varied with some of the sites the Council considered suitable being supported

(sometimes with caveats on size or how the site should be developed) and some sites receiving objections. Where the objections, or caveats, are based on planning reasons and can be upheld, they will be considered as part of the site allocations process. There were also comments about the areas put forward as protected open space, which were largely supportive.

Settlement Proposals June 2106

Bodies or Persons invited to make representations under Regulation 18

- 4.7 The consultation was carried out in parallel with the Core Strategy consultation from 27th June to 8th August 2016. The Council's database continued to evolve as additional consultees were added to the mailing list when interest was shown, these mainly being individuals and agents; undelivered responses were removed. Changes to names of national and local organisations were also reflected. All relevant specific and general consultation bodies in Part 1 of the Regulations were consulted, see appendix 1. By June 2016, the consultation list contained the details of almost 1800 individuals or groups.

How those bodies and people were invited to make representations

- 4.8 Letters or emails were sent to all those on the consultation database. This amounted to almost 250 emails and just over 1500 letters. A letter was sent to all 30 doctor's surgeries asking for their input in to the plan in the light of comments about difficulties in accessing doctor's surgeries in previous consultations and asking them to display a poster advertising the consultation. A letter, along with copies of all documentation, was sent to the 16 libraries (including mobile libraries) and customer access points across the District. A letter and publicity poster was sent to every Post Office in the District with a request to display the poster. An A4 leaflet was sent to every household in the District, informing residents of the consultation. An advert was placed in a local newspaper for two weeks on 22nd and 29th June 2016.
- 4.9 All the documentation pertaining to the consultation was placed on the Consultation part of the Council's website, with a direct link from the home page. Due to the volume of material, it was not possible to send out paper copies, although it could be viewed at libraries and customer access points.

The main issues raised and how these have been addressed in the Plan

- 4.10 Unsurprisingly, the majority of responses were site specific setting out reasons why individual sites should or should not be allocated. The largest number of responses, by far, related to the options for Gypsy and Traveller sites. 75% of the combined responses on the Core Strategy and Settlement Proposals related to these sites. The Council had put forward nine sites for consideration from which sites would

have to be selected for inland permanent and coastal transit sites. The majority of the responses were objecting to individual sites.

- 4.11 The objections covered a variety of planning, and non-planning, matters. Of the former, these included issues such as access; landscape impact; accessibility to services and facilities; the need for the sites; the location within a settlement – proximity to other land uses; and loss of employment land. The Council considered all the responses submitted. As this was a consultation on site selection, the options for addressing the main issue is somewhat restricted; this will depend whether or not a site is selected. For those sites not selected, the objections were addressed immediately. For those sites selected there may still be opportunities to address the objections through design and landscaping. One of the sites chosen is on a current industrial estate, however, the length of time the land has been vacant, past take up rates and the need identified through the employment land survey have all been considered in coming to the decision to allocate the site.
- 4.12 The other issue that led to a significant change to the Plan related to housing within the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB). There were objections from Natural England, the Lincolnshire Wolds Countryside Service, one of the Parish Council's and a number of residents to these allocations. There was also representation in respect of one these settlements from Historic England. There are two Large Villages within the AONB. Although their allocations were not significant in number, compared to other large villages, and one of the villages was not allocated its full objectively assessed need (due to lack of availability of suitable sites), respondents felt that the allocations were at odds with their location in a protected landscape. The decision was made not to allocate additional housing in these villages.
- 4.13 The responses to the Settlement Proposals were considered at a special meetings of the Council's Planning Policy Committee on 14th October 2016 (one of three special meetings set up to consider representations); the representations, and the Council's responses to them, are set out on in the agendas on the Council's website.

Regulation 20 Consultation

Settlement Proposals November 2016

- 4.14 Consultation on the Settlement Proposals was carried out in parallel with the Core Strategy Consultation; consequently, the final round of consultation was carried out between 30th November 2016 and 25th January 2017, having been approved by an Extraordinary Council on 2nd November 2016. All the other evidence and supporting documents were also subject to consultation, including the Sustainability Appraisal and Habitat Regulations Assessment. In line with legislation, this consultation focused on the soundness and legal compliance of the

Plan. In line with legislation, this consultation focused on the soundness and legal compliance of the Plan

Bodies or Persons invited to make representations under Regulation 18

4.15 The Council's database continued to be used as the basis for consultation. The database has evolved with additional consultees being added, and also some being removed as letters and emails are returned undelivered or people; this mainly relates to individuals and agents. Few new statutory consultees or local organisations have emerged, although some have changed their details and some have ceased to operate; these changes have also been reflected. At the time of the consultation period, the database contained 1960 entries. All relevant specific and general consultation bodies in Part 1 of the Regulations were consulted, see appendix 1.

How those bodies and people were invited to make representations

4.16 The consultation was advertised in a local newspaper on 30th November and 7th December 2016. Letters or emails were sent to all those on the consultation database, this amounted to approximately 1,710 letters and 250 emails. Due to the volume of material, it was not possible to distribute paper copies. However, a letter and copies of consultation documents were sent to 16 libraries (including mobile libraries) and the Council's five customer access points. Documents were also available for inspection at the Council's Manby headquarters building in Planning Reception. A letter and publicity poster was sent to every Post Office in the District with a request to display the poster.

4.17 All the documentation pertaining to the consultation was placed on the Consultation part of the Council's website, with a direct link from the home page.

The main issues raised and how these have been addressed in the Plan

4.18 Of the 79 respondents to the consultation, 22 groups of individuals commented on the Settlement Proposals document, covering 27 objections and 8 comments of support. Of the 22 objections, 11 related to the non-allocation of sites or the desire for a larger site to be allocated; 2 objected to the allocation of a site or any sites in a community; 7 were from Historic England on the impact on heritage assets; 2 related to omission of sites for biodiversity; 1 was from the Environment Agency regarding one of the settlements in the document; and four miscellaneous objections. The Council made minor modifications to address four of the objections, including those by the Environment Agency and Anglian Water.

4.19 In terms of the other objections, the Council maintained its position as set out in the Settlement Proposals document. Some of these were carried forward from the previous round of consultation and the

Council considered that these had been appropriately dealt with at that time.

- 4.20 The Council has made a number of minor modifications which have addressed some of the typographical changes, factual inaccuracies and requests for small changes to the plan which bring about clarity but do not change the direction or overall strategy of the Plan.
- 4.21 Under the Council's constitution, these representations have to be presented, for information, to the Council's Planning Policy Committee. This was done at the meeting on 23rd March 2017. The agenda, setting out all the representations, can be seen on Council's website.