

East Lindsey Core Strategy 2016 – 2031 Examination

Lincolnshire County Council Hearing Statement

8 August 2017

Matter 5 – The overall distribution of development, between the Coastal Zone/area and Inland, in particular for housing (Policies SP3 and SP17)

Main issue: Is the division of the District into discrete Coastal and Inland Zones justified? Is the overall policy of restraining housing development in the coastal zone justified by coastal flood risk?

Q.1 Is the Coastal Zone clearly shown on the submission policies map? Does the Plan clearly set out which Towns, Large Villages and other settlements are in the coastal zone.

The Coastal Zone is shown clearly on the Key Diagram/Proposals Map on p. 5 of the Core Strategy. All settlements located within the Zone are listed in Policy SP17.

Q.2 Is the extent of the Coastal Zone justified and how was it established? What is the probability of river and sea flooding in this area? How many people live in this area? Have there been any incidents of tidal flooding?

Since the principal justification for establishing a coastal zone is based on the risk of (primarily) coastal inundation, we would expect the coastal zone to correspond to 'flood zone 3' as presented on the publically accessible Environment Agency flood risk map for planning. It is worth noting that the Lincolnshire Coastal Study (2010) defined the 'coastal zone' as the whole of Boston and South Holland, as well as the lowland part of East Lindsey. This may have influenced the use of the term in the Local Plan.

Probability is defined according to flood zone. Flood Zone 3(a) is defined as "Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding". Approximately 250,000 people live in the defined area. The principal historic incident of coastal flooding occurred in 1953, although a higher surge tide in December 2013 severely tested the flood defences and was prevented from having a significant impact by the lack of an onshore prevailing wind. There was, nevertheless, coastal flooding to north and south of East Lindsey on the Humber and in Boston caused by the height of the tidal surge

Q.3 Is the restriction of new housing in the Coastal Zone to existing commitments (apart from the exceptions set out in Policy SP18), including in

the Towns of Skegness and Mablethorpe/Sutton/Trusthorpe, a justified response to coastal flood risk? If not, should an alternative approach have been followed based on an assessment of flood risk and development needs in individual settlements (for example, such as North Somercotes)?

The general restriction is based on a partial implementation of conclusions drawn in 2010 from the Lincolnshire Coastal Study, which was undertaken as a result of planning inspector recommendations arising from the then Regional Spatial Strategy. LCC considers the restriction insufficiently flexible to take account of policy developments since that time, and potentially restrictive of appropriately mitigated development in response to commercial and economic requirements. At the same time, LCC recognises the need to set policy within the framework of the NPPF, along with the flexibilities that are available within the NPPF. A wholly localised approach based on individual settlements would be unlikely to achieve the levels and co-ordination of development necessary to support the growth of the area as a whole, and would not necessarily be sufficient to account for the strategic scale of coastal flood risk and the larger scale management measures necessary to mitigate it

On balance, LCC is supportive of East Lindsey's approach to managing housing growth and development. In particular, it appreciates the challenge of responding to the serious threat of coastal flood risk. LCC supports the implementation of existing planning permissions in Coastal East Lindsey (significant at 1308 dwellings) plus brownfield market housing in the coastal strip to maintain the level of population.

Q.4 There appear to be housing allocations in some Large Villages which may fall within (or partially within) the coastal zone shown on the Key Diagram (page 5) [eg Grainthorpe, Hogsthorpe and Marshchapel]. What is the justification for this?

No comment.

Q.5 Is the overall split in housing numbers between the inland and coastal areas justified? Will any need arising in relation to the coastal area, which is not met by existing commitments and the various policy exceptions, be capable of being met in the inland area? Could this policy affect levels of in-migration to East Lindsey?

The overall split is considered justified based on balancing existing commitments in the inland and coastal area with the potential for sustainable growth in the inland towns and large villages. It is difficult to predict if a displaced coastal need can be met inland if required. This will require more information on the differences in demand between the two housing market areas e.g. is an inland settlement a suitable substitute for a coastal town for prospective in-migrants or does the coast appeal to a particular demographic such as retirees and tourist workers? Would the latter locate to another coastal area or is East Lindsey's relatively low cost housing a strong enough compensating factor?

Q.6 In setting overall policies of restraint in the Coastal Zone, has adequate account been taken of the protection offered by coastal sea defences?

The NPPF sets out a sequential test for all proposed development in areas at risk of flooding, coastal, fluvial and otherwise. Environment Agency flood risk mapping tends not to take account of flood defences, because it focuses on residual risk in the event of defences failing. However, there is also the potential to take appropriate mitigation, including the nature of proposed development, into account. It is this second point that needs further consideration, particularly in view of broader strategic aims for coastal economic growth as set out in the LEP's Strategic Economic Plan, Coastal Vision and Water Management Plan.

Q.7. The supporting text states that the Council will carry out a plan review in 5 years (page 28), a full review of its housing policy within 5 years (page 29) and a full review of the coastal policy at the end of the first five years (page 84). Given the approach taken in the coastal area, should the plan include a policy which sets out this intent? Should the policy set out what stage will be reached by a specific date (eg a target date submission for examination within # years of adoption)?

Lincolnshire County Council (LCC) supports an immediate start on a plan review following adoption and a policy should be included in the plan to deliver on this intention. A target submission date for examination within 3 years of adoption would be realistic. This will allow the East Lindsey Local Plan to be brought fully up date to reflect significant proposed changes to the planning system as detailed in proposed revisions to NPPF and the Housing White Paper. It will also allow a re-assessment of the growth and infrastructure needs of the district in line with the Greater Lincolnshire Local Economic Plan. LCC is willing to play a constructive role in identifying these needs in partnership with East Lindsey.