

East Lindsey Core Strategy 2016 – 2031 Examination

Lincolnshire County Council Hearing Statement

9 August 2017

Matter 15: Coastal East Lindsey (Policies SP18-21)

Main issue: Assuming that the general policy of restraint on market housing in the Coastal Zone is justified, are the exceptions proposed in Policy SP18 for market housing on brownfield sites, housing for minority groups and affordable housing then justified? Is Policy SP18 clear and effective?

Questions

SP18: Coastal Housing

1. Does the need for people in vulnerable or minority groups, or people requiring affordable housing to remain in their communities justify the approach taken? Have these matters been appropriately balanced in preparing the Core Strategy?

The coastal area has been identified as having the highest need for affordable housing (SP18 para. 5) and it is desirable in principle to maintain family links and community cohesion. However, this must be balanced against protecting people from the threat of flooding. SP 18 (3), which supports affordable housing anywhere in the Coastal Zone, is at odds with the overall cautionary approach which caps housing across the entire Zone in response to coastal flood risk. The policy should be made more consistent with SP 18 (2) which supports open market housing on brownfields sites. In addition, the focus on vulnerable groups would place individuals at risk during a flood event. SP 18 (3) should promote shared ownership and low cost starter homes in line with evolving Government policy.

4. What is the justification for supporting open market housing on brownfield and disused/empty sites etc (subject to criteria) as an exception to the overall policy of restraint?

Justification for this exception is provided in SP 18 para. 4 (p.85). This is a reasonable attempt to allow the regeneration of brownfield and disused sites, providing opportunities for investment to improve the overall quality of the housing stock. This will provide a boost to the local economy, especially if new housing targets the need to accommodate workers who support the tourism industry.

6. In Clause 4, should ground floor sleeping accommodation always be prohibited, or should this be determined on a case by case basis by reference to site-specific Flood Risk Assessments?

As a matter of caution and consistency, no ground floor habitable rooms (including sleeping accommodation) should be allowed. In design terms this will effectively rule out bungalows and encourage the building of town houses with garages and kitchens at ground floor level. Adopting a case by case approach will result in excessive deliberation over what constitutes a justifiable exception and what type of evidence is required.

Main issue: Will Policies SP19, SP20 and SP21 achieve the aims set out on page 81 of the Core Strategy to give the Coast a strong, diverse, growing economy and business sector; and to enable all year round tourism?

Questions

SP19: Holiday Accommodation

8. Is the proposed restricted occupancy period for the relevant development of between 15 March and 31 October justified by a robust analysis of flood risk vs. the economic objective to extend the length of the holiday season? Has adequate account been taken of the protection offered by flood defences, early warning systems and evacuation plans? Will it be difficult for newer businesses subject to the condition to compete with older ones without it? Is the occupancy limit consistent with national policy which indicates that holiday caravans for year round use are capable of passing the Exception Test?

It does not take account of the potential to promote a different kind of tourism offer beyond the caravan-based stay. The analysis as presented does not appear robust, nor is it clear on what basis the choice of site for potential extension has been made. There is little explicit attention to flood protection other than the general level of protection offered by the frontline defences. 'Early warning' and evacuation plans are the responsibility of, respectively, the EA and the Lincolnshire Resilience Forum. Reference to these provisions should be made in the Local Plan, though it is not the role of the Local Plan to create these provisions. It may be questionable whether the extension period as set out is wholly consistent with national policy, given the levels of risk that can be expected in December & early January.

9. Is Clause 8, which would permit year round occupancy of holiday accommodation in certain areas for a specified period of 20 years, justified? Is it sufficiently flexible to respond to changing circumstances at the end of that period? Is it otherwise effective in informing potential developers about where its provisions apply and should the plan identify the designated areas?

SP19 refers (para. 10, p. 90) to the Council's SFRA (CD54) for information on designated areas. There is inadequate signposting to the relevant maps (4 – 7 inclusive) and the information provided does not articulate clearly which parts of the mapped area are suitable for 12 month holiday occupation. It is assumed that these areas (blue or white or both?) are suitable but in some cases these comprise small "islands" surrounded by red (unsuitable) through which a safe evacuation route would be problematic. The use of a 20 year condition is at odds with a common understanding of the word "temporary". There is no explanation based on available evidence to justify a 20 year period compared to any other. Given the amount of time allowed to lapse there would be little realistic prospect of reversion to the original use or restricted occupation.

10. Should new hotels and bed and breakfast accommodation constructed under Clause 1 be subject to the same restriction in respect of no ground floor sleeping as similar accommodation provided as a result of a change of use under Clause 3? If not, why, and is it justified to apply it to changes of use?

Yes, the restriction is appropriate. This is not considered unduly restrictive given that the typical layout of such tourist accommodation comprises ground floor uses such as kitchens, dining rooms and lounge areas.