

North Somercotes Parish Council

East Lindsey Core Strategy and Settlement Proposals Development Plan Document 2016-2031 Inspectors' matters, issues and questions

Hearing Statement

Matter 1: Duty to Cooperate, Local Development Scheme, consultation, Habitats Regulations, accordance with the Act and Regulations and consistency with national policy

Main issue: Are the Plans (CS and Settlement Proposals DPD) legally compliant in these areas?

Questions:

Sustainability appraisal

9. Has an adequate sustainability appraisal been carried out of the plans? [S19(5)] Does this adequately assess the likely environmental, social and economic effects of the plans? In doing so have matters relating to climate change been adequately considered?

The Parish Council maintains that since no objective assessment has been made of this settlement's housing needs or the impact of climate change on the future of this settlement, that the environmental, social or economic effects of the plans on this settlement cannot realistically have been adequately assessed.

There has been no assessment of North Somercotes' requirements to remain sustainable, nor any consideration of its aspirations and ability to attract inward investment and continue to improve its social and economic standing as one of the main sustainable centres of population on the coast with a wide range of facilities and services. A more precise and considered approach should be taken which strikes a proper balance between a level of growth which allows this vibrant community to continue to thrive and grow whilst adapting to the risk of a 'low likelihood', but 'high impact' large disturbance flood event (source: LCC Removing people from Danger – Evacuation Routes in Lincolnshire September 2015).

Climate change

12. Do the plans taken as a whole include policies designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change? [S19(1A)]

Coastal flooding is a significant issue for this community, and the largest natural threat. On the one hand, there is inherent uncertainty in the timescales, water levels and extent, but the overtopping or breaching of the sea defences some 1.5 to 2 miles away from North Somercotes remains a 'low likelihood' but 'high impact' disturbance event that can be planned for and mitigated against. This is particularly the case given the current warning systems and emergency planning, whereby forecasts are available up to 5 days in advance, allowing for a range of preventative responses, including the development and deployment of this community's own Emergency Resilience Team, and planning for targeted or preventative evacuation.

On the other hand, and just as importantly there is a strong social and economic need, as voiced by Colin Davie of Lincolnshire County Council (LCC) at the recent Coastal Flood Forum when explaining LCC's Greater Lincolnshire Strategic Economic Plan (SEP), (which supersedes the Coastal Study), to capitalise on the value of the potential coastal economic activity. The need for a strong economy applies to this coastal community as well as the district as a whole, and LCC state that growing business on the coast is supported by private investors. Those growing businesses will need workers, and those workers will need housing. Not in settlements further away increasing transports costs and road journeys, but in large service villages such as North Somercotes that want to develop and maintain vibrant economies and communities. It is both feasible and desirable to have a growing economy to provide opportunities for people to live and work on the coast,

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keeping people safe, not putting more people at risk, and ensuring the long-term sustainability – flood resilient market homes for workers should be an integral part of that growing economy.

The Parish Council would like to see a positive strategy which details mitigation or adaptation to climate change for coastal communities, rather than a simplistic ‘move inland’ approach that has some notable exceptions for adjacent communities that in effect share identical flood risk characteristics with North Somercotes. The Coastal Study, which has been superseded, in any case established that notwithstanding flood risk, to sustain communities in the coastal zone and enable them to ‘develop and have a viable and prosperous future’; it would be necessary to make provision for additional development including housing to meet changing demand.

*This not only applies to potential new housing development, but to the protection of key infrastructure in times of flood such as electric and water supply. If the risk to the community is so great as to limit development what measures will be taken to ensure that in the event of a significant disturbance event, the existing community can remain viable? In accordance with the NPPF and the White Paper – Fixing our Broken Housing Market (Feb 2017) – **local plan polices should support measures for future resilience of communities and infrastructure to climate change. Local planning authorities need to take a positive approach to addressing climate change impacts on their communities and infrastructure** – locating housing growth in other settlements, or inland, will simply prevent this community’s long-term ability to remain sustainable or continue to improve its economic viability, and in effect increase its vulnerability.*

The Parish Council believes the Coastal Strategy as proposed is therefore at odds with the NPPF, as it represents a negative rather than a positive approach to the challenges the coastal communities face. Measures to support future resilience of communities should include economic resilience as well as the more obvious flood resilience; vulnerability to climate change is not just about flood risk, it should also take into account and mitigate for economic and social vulnerability, ensuring a sustainable and viable community in a flood risk area can maintain and improve its economic prosperity, including new and replacement high quality housing to appropriate standards.

The Parish Council believes it is not unreasonable to expect to see a more integrated and holistic approach to flood risk management as part of climate change. A proactive strategy should take full account of flood risk, coastal change and water supply and demand conditions. It should be based on adapting the environment and structures to cope with the specific risk of flooding in our community, by the use of resistant and resilient design methodologies for the built environment, whether new or existing structures, and further development of the community’s self-help Emergency Resilience team.

Environment Agency (EA) Map 1 and Map 2 Tidal Flood Warning Areas at Appendix 1 - (which correspond to the Environment Agency Red Flood Warnings in January 2017 included with the parish council’s previous response at pages 21-25) illustrate the significant differences between, for example, Mablethorpe and Sutton on Sea Wards and North Somercotes: within the low-lying areas Mablethorpe and Sutton on Sea have around 7000 population at risk, many of these directly behind the sea defences. Very few of the North Somercotes population of around 1800 are in the low-lying areas, most being in the area a risk from the furthest extent 1.5/2 miles away, and the rest being in the same wider area at risk from tidal flooding as Grainthorpe and Marshchapel.

This is logical because as can be seen there is a significant similarity between properties at Marshchapel which are no further from the sea than properties on Conisholme Rd, North Somercotes for example. In fact North Somercotes benefits from the protection of the high ground of the Warren Woods conifer plantation in North Somercotes which in places is over 8m high and provides a substantial impediment to flood water depth and velocity, despite some EA flood zone maps in fact showing it as covered.

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The map in the Settlement Proposals which denotes coastal Lincolnshire also illustrates these same shared characteristics with Grainthorpe and Marshchapel and underlines the inconsistency of treating North Somercotes in a way which is not supported either by an examination of the historic flood risk data or specific future flood risk when compared to other less sustainable communities on the coast which have been treated differently, eg Marshchapel and Grainthorpe, some of which have experienced flooding.

Moreover, at a recent Coastal Floor Forum, a representative from the EA clearly stated that in terms of local resilience North Somercotes didn't need to be included in the Saltfleet to Gibraltar Point resilience project because the coastline here is continuing to accrete and there was no need for any control measures. It is also of note that both the old and new sea defences (which are now approx 1 m higher than the old) at North Somercotes were not overtopped or breached in 2013 or 2017, and on both occasions the local parish Emergency Resilience Team was on hand to monitor the situation, ready to initiate self-help action if required.

Matter 2 - Vision and Objectives for East Lindsey and Sustainable Development (Policy SP2)

Context: The CS sets out the vision for East Lindsey to 2031 and the objectives to achieve that. Policy SP2 sets out the overall approach regarding sustainable development and SP2 2 broadly reiterates the 2nd part of para 14 of the Framework.

Main issue: Are the vision and objectives appropriate and adequately expressed? Is Policy SP2 sound?

Questions:

4. Overall, do the plans do enough to encourage the reuse of previously developed land as required by paragraphs 17 and 111 of the NPPF?

Because there has been no assessment of North Somercotes' actual housing needs and its land availability prior to considering the potential impact of flood risk on that land, potential infill plots in areas at relatively lower risk of flooding (ie danger to some rather than all or most) and a large area of previously used brownfield land in the centre of the settlement (Appendix 2 - disused fuel depot - adjacent to the Somercotes Academy and put forward by the owner for consideration) have not been scoped. Similarly, no consideration has therefore been given to the infrastructure impact or requirements of either extant permissions (which the parish council believes on a revised estimate is now 36 rather than ELDC's figure of 55) or new development. The Parish Council remains very concerned over these matters, especially considering the problems already experienced in this community with unreliable broadband provision and concerns regarding water pressure and sewerage network capacity.

Matter 3: Objectively assessed need for housing (OAN) and the housing requirement (Policy SP3 and section on Housing Growth)

Context

The Plan states that the OAN for the plan period (2016-31) is 7215 homes. A figure of 553 homes has been added to this to deal with 'past under supply' as of 1 February 2016, which 'included a 5% buffer'. This results in a housing target of 7768. Policy SP3 states that sites will be allocated for the phased delivery of these homes as follows:

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2016-21 av 591/year
2021-25 av 481/year
2025-31 av 482/year

The evidence relating to the OAN for housing is set out in several documents:

- Housing Topic Paper – March 2017
- Demographic Forecasts Updating the Evidence – Oct 2016 (EdgeAnalytics) EA2016
- Updating the Demographic Evidence – June 2015 (Edge Analytics)EA2015
- SHMA Update – January 2014 (Opinion Research Services)
- SHMA – Sept 2012 (Opinion Research Services)

Main issues - OAN: Has the HMA been appropriately defined? Does the plan appropriately identify the objectively assessed housing needs for the HMA in accordance with national policy and the planning practice guidance? Is the identified OAN of 7215 homes for 2016-31 (average 481/year) soundly based and supported by robust and credible evidence? Does it correctly take into account household projections, demographic factors, economic factors and market signals? or considering the impact of zero population growth,

Questions:

OAN – General

4. The establishment of the OAN does not appear to be directly based on the standard methodology which is strongly recommended by the PPG (para 5). Are there local circumstances that have led to the approach used?

The Parish Council maintain that they key policy driver should be the economic stability and growth of this community, in full accordance with the LCC Greater Lincolnshire Strategic Economic Plan for growing business on the coast, and that mitigation of flood risk and ensuring resilient communities should then be considered, once the current housing need for this community and the future growth requirement has been objectively assessed.

This is a thriving community which has a long tradition of multiple generations of the same families residing and working locally, and wishing to remain doing so. The premise for zero population growth fails to adequately recognise the needs of this community or its aspirations to be part of a strong and vibrant coastal economy; nor will such a strategy result in an ability to retain or attract economically and physically active young and working age people who it is felt would be more likely to evacuate if the trigger for emergency evacuation was required. Many of our young professional people want to stay in, or return to their community after study, where they can be part of a vibrant cohesive community, for example receiving assistance with future child care from elderly relatives and in turn providing care to those same elderly relatives in later life. Similarly, many older people want to stay in their communities in suitable and good quality housing, or sheltered housing, where they can be supported by strong family networks and long-standing friends.

The concentration on in-migration of an older population will result in a self-fulfilling prophecy – if we are not building flood resilient houses of a suitable size and reasonable cost for economically active working age people, who are required to meet the proposed employment growth of an increasing coastal economy set out in the Greater Lincolnshire SEP, then over time our population will end up further skewed than it is at present towards the older age group; the natural population will decline, and our aging housing stock will be neither resilient nor of high quality. We have already seen in other neighbouring coastal areas the

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deleterious impact of a growing in-migration of older residents, and a decline in younger working age adults with children, on the viability of schools in the area – Mablethorpe and Saltfleet for example.

Furthermore, if a 'one-size-fits-all' zero-population growth is to be the adopted strategy, then Marshchapel would have an allocation of 16 based on 4.9% growth of existing households, not 84; Tetney 35 not 57; and Hogsthorpe would have 20, not 100 as in the plan.

OAN – adjustments for market signals

Note: The PPG (para 19) states that the housing need number (starting point) should be adjusted to reflect appropriate market signals and other indicators of the balance between the demand for, and supply of, dwellings. The market signals are: land prices, house prices, rents, affordability, rate of development and overcrowding.

13. Have the market signals in the PPG been considered and what conclusions have been drawn from them? [Section 6 of the Housing Topic Paper refers to house prices, house sales and housing completions] Is there a worsening trend in any of these indicators and if so, should there be an upward adjustment to the OAN? Does the 481/year figure include any adjustment for this reason?

The Parish Council believe that there is a demonstrable lack of suitable housing in the parish. The median house price for all house types in North Somercotes in August 2016 was £216,760, compared to the ONS Q4 2016 figure of £150,000 for all house types for East Lindsey, and well above the Detached Houses ONS Q4 2016 figure of £180,00 for East Lindsey as a whole.

The overall average price of £191,075 was more expensive than Marshchapel (£148,929) or Saltfleet (£150,621) although of course average prices may only reflect the mix of properties sold, rather than changes in the local market itself, but in the past year 22 properties were sold in North Somercotes, and house prices were 14% up on the previous year, and 12% up on 2013 when they averaged £170,489. (source Rightmove 6-6-17).

Anecdotal evidence also shows that properties in the <£200,000 range in the village are currently coming onto the market and being sold, subject to contract, within a matter of a few weeks, or days in some recent instances (2 bed detached bungalow £158,950 added 31/5/17 sold in under two weeks; 3 bed detached bungalow £199,950 added 22/4/17 sold in two weeks). The lack of availability of suitable housing for economically active members of the population, particularly those with young families that could contribute to the vibrancy of the community, is of significant concern to the parish council who believe it is vital to achieve a balanced population rather than an increasing skew towards the economically inactive members of the population, to ensure both current and future adequate workforce supply.

Conclusion on OAN

15. Should there be a commitment to an early review of the plan within 5 years to re-assess the OAN for housing? If so, should this be expressed in a policy and what should the time period be?

The Parish Council believes that there should be an objective assessment of the need for housing in this community now. In addition, the Environment Agency should be encouraged to try to bring forward the work to process and rerun the modelling data using the new heights and vastly improved sea defences following the 2009 - 2012 works, rather than modelling on the 2006 data, as well as factoring in climate change figures and other relevant data, so that a review which takes this into account could be undertaken at a much earlier stage and before potentially far-reaching decisions are taken. See also response to Matter 5 Question 7.

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

Context:

The district wide housing target is 7768 homes. The plan seeks to restrict housing in the Coastal Zone/area to existing commitments (1308) because this is an area of high coastal flood risk. This leaves a minimum of 6460 to be met inland.

The plan states that the Council has chosen a ‘zero population growth’ scenario for the coast, amounting to 96 homes/year or 735 for the plan period. This assumes no significant growth in the coastal population and a rise in the formation of new households of approximately 4.9%. The figure of 735 is less than the existing commitments total of 1308 as of Feb 2016. [paras 9 and 12, pages 22-23]

Policy SP17 lists the settlements in the coastal area/zone.

Policy SP18 sets out the circumstances where new housing will be accepted in the Coastal Zone. In addition, to sites which already have planning permission this includes: (1) sites with permission where improved layouts, designs or flood mitigation come forward [provided house numbers do not increase], (2) open market housing meeting specified criteria (including brownfield and disused sites, subject to active marketing for other uses and not being viable for other uses), (3) housing for specific identified vulnerable minority groups. This policy will be covered in detail under Matter 15.

The representation from the Environment Agency (23/1/17) states: ‘We strongly support the Council’s approach to direct housing growth to areas at lowest risk of flooding (ie away from the coastal settlements) in order to avoid increasing the population at risk of flooding. We commend the Council for its approach in adhering to national planning policy and directing vulnerable development away from areas of highest flood risk, whilst meeting the needs of the existing community with the provision of 1308 new homes in the form of existing commitments.’

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?

Questions:

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 map is confusing particularly when some of the settlements that are clearly in the same flood risk zone as North Somercotes have then been treated differently in the Plan despite practically identical flood risk parameters, as noted under Matter 1, Question 12 Climate Change above, and illustrated in Appendix 1 – Map 1 for North Somercotes, Grainthorpe and Saltfleet.

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?

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See also answer to Matter 1, Question 12 Climate Change above. The parish council maintains that the Coastal Zone approach is overly simplistic; the outcomes of which cannot be justified for this community of around 1800 residents when using an evidence based approach. It overlooks the wider needs of the community and ignores the crux of the matter, which is the complex and multifaceted social, economic and environmental challenge facing this community, of which the management of, and adaptation to, flood risk and coastal change is just one part. There needs to be a better balance struck between the economic and social factors and a positive and proactive approach to the environmental factors of flood risk and coastal change. It is recognised that this is a very difficult challenge, but it is not one that the parish council feels can just, in effect, be walked away from and left for 5 years, on the off chance that no negative harm to the viability and vibrancy of North Somercotes will result, just because it is too difficult to grasp.

The village has never been flooded; the poor state of the sea defences at Donna Nook in 1953 owing to rabbit infestation allowed some breaching and an ingress of sea water which reached some fields to the right-hand side of Marsh Lane. These are lower than the road, which was not covered, and they had under 2ft approx of water in places up to Meals Farm, but no water reached beyond there. This was partly due to the topography, and factors such as the protection afforded by the higher ground, 5m to 10m, in and around Warren woods (Appendix 3 of the Parish Council's response to ELDC Local Plan Publication 25 January 2017 shows the revised 1953 flood extent map revised in 2012).

During the events of 2013 and 2017, when we had our vastly improved sea defences, no flooding occurred, though some sand bags were required at Donna Nook to prevent overtopping in 2013 owing to the pull-over access over the sea bank being below 4m and which the Parish Council had requested the EA to repair some considerable time prior to the event. This has now been rectified only recently.

As previously noted, (see Appendix 4 of the Parish Council's response to ELDC Local Plan Publication 25 January 2017) those parts of Coastal Lincolnshire in Flood Zone 3 that are most likely to be flooded were identified during the recent event on 13 January 2017, and these correspond to the maps in Appendix 1. They show the situation for the coastal community as a whole, including Grainthorpe and Marshchapel, and this community specifically.

These clearly illustrate that North Somercotes village was unlikely to be affected, and it wasn't; in the same way that Grainthorpe and Marshchapel are shown as unlikely to be affected and were not. However, there seems to be a reluctance to accept this evidence when it is shown to be accurate in predicting the areas unaffected, yet to fully accept it when it is accurate in predicting the areas which were effected, which appears to be somewhat contradictory.

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 parish council has a reasonable expectation that there should have been, and still should be, an examination of the development required to maintain the sustainability of this settlement – which was in fact the policy approach in 2012. This would enable development of housing for its existing population within the confines of this settlement, and flexibility to meet the potential housing requirement of additional workers as part of improving the coastal economy and mitigation of flood risk. The village is well placed to provide this, at the same time supporting its future and continuing role as a large service village, with an improving stock of good quality, flood resilient housing. It would also provide the opportunity to assess and protect existing and new infrastructure to appropriate standards.

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If the starting point for inland settlements is calculated on the number of households as a percentage, why was this not done for coastal settlements, and then consider the mitigation required?

If the approach is to look at the settlement pattern and then assess the needs and relative merits of distributing growth across the settlements, allocating housing in coastal locations that do not have the range of services or facilities and which then need transport to access schools and services in this parish, appears contradictory. Particularly when the risk of flooding is the same, and the capacity of the smaller communities without emergency services or Emergency Resilience teams to cope with a large disturbance event is likely to be less, and one of those settlements does not have the range of services referred to: the village shop closed over a year ago, the outreach post office is sporadic, the village pub has closed and is currently on the market with planning permission for change of use to residential applied for, and it does not have a cemetery – though it does now have a tearoom.

Strategic growth to match the aspirations of this community and the Greater Lincolnshire SEP does not have to mean putting more people at risk, providing those risks are adequately managed. In fact, carefully thought out growth of flood resilient housing development with suitable protection measures can stimulate an increase in flood risk awareness, and an increase in flood sensitive behaviour – this in turn can achieve a decrease in risk to life and property damage costs (Adaptive Planning for Coastal Waterfronts – Peter Christiaan van Veelen - Architecture and the Built Environment 2016). The proposed economic coastal development and associated housing and infrastructure in the SEP could provide an opportunity to create long term resilience to climate change as part of a multi-layer, multi-agency approach, which would benefit this community and the wider coastal area.

The whole community should be considered in an holistic way, not just as ‘coastal flood risk’. New resilient development and infrastructure would improve the community’s ability to withstand a flood risk event. By developing a portfolio of adaptation measures, including self-organised recovery, to reduce local exposure and vulnerability we would increase the number of stakeholders that are aware of and actively address the risks and improve the number of houses which have mitigation measures, so decreasing the numbers at risk.

This represents a positive strategy for increased flood resilience while maintaining and sustaining the community and is entirely consistent with the NPPF:

- para 99: “Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. **When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.**”
- 100. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, **but where development is necessary, making it safe without increasing flood risk elsewhere.**

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?

See also answer to Question 2 above. From the evidence on the maps it can be seen that treating this settlement differently is not justified on the evidence. Whilst the breach locations modelled may be different on another occasion, and the tide and surge characteristics different, what is relevant is the evidence which demonstrates that the risk to this community is not commensurably different to that of the smaller settlements reclassified as inland; moreover this community is larger and better able to cope in terms of its facilities and preparedness, being largely self-sustaining in the unlikely event of being cut off from all three points of exit inland. Furthermore, looking at the Environment Agency Tidal breaching hazard maps for

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2115 in a 1 in 200 (0.5%) Annual Chance Scenario (consequences of a breach not likelihood) these show almost identical Max Depth profiles, so the communities of Grainthorpe and Hogsthorpe for example would also need to evacuate through the yellow (0.25 to 0.50 metres) orange (0.50 to 1 metre) and red (1 to 2 metres) hazard zones.

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?

People wishing to live on the coast as a lifestyle decision will not simply move inland but find other coastal communities, possibly out of the District, particularly if availability of housing is scarce, and/or house prices continue to rise, as evidenced in North Somercotes. Using a blanket approach to 'coastal' housing regardless of where those extant permissions are is rather indiscriminate – it is not reasonable to expect someone that works in North Somercotes to have to find suitable housing in Skegness for example, incurring the costs and carbon footprint of travel. To say that there are sufficient extant permissions on the coast – when these are not in the settlements that want/need them – is akin to saying that if the numbers of extant permissions in Louth were enough for the whole of the Inland areas, then other inland settlements should not receive any allocation. Such a policy does not fairly consider the needs, role or aspirations of the coastal settlements, or this specific settlement.

The parish council can still only reconcile the settlement's extant permissions to c.36, not the 55 as stated; although one developer has now noted that he is considering commencing development in the next 2 years. However, it seems likely that the majority of this will be housing >£250k and therefore will make no, or very little, contribution to the lack of more affordable smaller sized homes for economically active younger members of the population, potentially exacerbating the trend towards an increasingly large cohort of older economically inactive residents.

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

6. The Parish Council believes there is ample reason to show that a more robust and detailed evidence-based assessment is required. Further evidence of the different circumstances and characteristics at North Somercotes, compared to Mablethorpe for example, was noted at the Coastal Flood forum organised and hosted by MP Victoria Atkins on 24 February 2017.

A representative from the Environment Agency (EA) specifically noted, when asked, that the reason why North Somercotes was not included in the project looking at protection of the coastline from Saltfleet to Gibraltar Point is that for the past several decades the shore north of Saltfleet, including North Somercotes, has been accreting – over half a mile of green shore added to that which was already there in just the last 15-20 years – and there was no need for any control measures as it was not an area at risk of erosion. She also stated, very confidently, in answer to another question, that if the proposed 40m breach in the old sea bank at Pye's Hall had been removed, that the new higher and improved sea bank would not have been overtopped based on the 2013 event, even if the breach had been created to allow water through the old sea defence.

It was also noted by the EA at that forum that it would be inconceivable not to continue the present level of coastal protection to 'Hold the Line' beyond the next 30 years given the £3b assets on the flood plain, which she noted included - 24,000 properties, 1700 businesses and 19,000 static caravans, along with 21,000 hectares of productive land. She further stated that it was not just about flood risk management but also about growing the economy, a comment that was echoed and amplified by Cllr Colin Davie who talked about

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the need to keep people safe and at the same time provide opportunities to grow the economy for the long term sustainability of the coast, including the provision of market housing.

Whilst district-wide flood protection measures, rather than individual property level protection measures, are recognised as the most economically beneficial and effective flood risk management strategy for areas where probability is greater than 1 in 250 (North Somercotes level of protection is 1 in 200), it is accepted that the challenge of funding such defences over the long term makes this difficult to achieve (Asselman and Slager (2013) www.bea.gov).

This is all the more reason to develop complementary policies and strategies that could assist with such funding at a local level, for example by collection of a levy from self-builders wishing to build and stay in their communities on the coast (for a minimum of 5 years), and the development of building regulations which set the required building level protection measures, such as all residential used space above flood elevation, and standards for retro-fitting schemes for existing properties.

Security from flooding is a key infrastructure requirement, and with an investment of over £8m of public monies and loss of grade 1 and 2 agricultural land during 2009-2012 to ensure appropriate defences are in place along this coast from Tetney to Saltfleet, this community has a reasonable expectation of deriving some economic and social benefit from that improved infrastructure.

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)?

See also Matter 3 Question 15. Development of the coastal economy should not be delayed by having an untested strategy with potentially unintended negative consequences, that has to wait until the end of five years to see if a mistake has been made – the parish council can see no reason why a more positive holistic approach cannot be taken to suitably mitigated development which would be aimed at maintaining this sustainable community and attracting the necessary workforce to deliver a strong and improving coastal economy.

This community has the capacity and ability to adapt and deal with the slowly changing environmental conditions, and the potential for a large disturbance event. It is well placed to build capacity to recover from an extreme situation and return to equilibrium. The questions that should be asked now, not in five years-time are:

- *How do we continue to maintain and protect our community and develop our coastal economy in the light of the uncertainty of environmental conditions over the next 50/100 years?*
- *What adaptations are needed?*
- *Where and When?*
- *Under what conditions?*
- *What combination of measures will be most effective?*
- *How do we increase awareness and reduce the consequences of a potential event and avoid adverse impacts?*
- *How do we improve the technical and physical adaptability and flexibility of buildings to contribute to flood risk management?*
- *How do we create a more attractive and liveable environment?*
- *How do we fund any up-front costs?*
- *How do we develop and improve the ability of the community to self-organise and self-help?*

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What will ELDC do to recover the situation if it discovers after the post-5 year review that the Coastal Policy has had a detrimental effect on the coastal zone as a whole or on any single settlement? How will this be put right, if indeed it can? This seems to be an unacceptable and unnecessarily high-risk strategy, particularly when a more positive yet cautious approach can easily be taken for the next two to five years, responding to the list above. This would also allow time for the relevant and up to date EA modelling data which takes into account the vastly improved defences, to be available rather than relying on the 2006 modelling data. It can also be seen during this time if the Greater Lincolnshire SEP is delivering on its anticipated investment in the growth of the coastal economy and where this is located.

The parish council believe there should be a focus on improving overall flood resilience of coastal communities, whilst maintaining and improving economic social and environmental sustainability.

In the meantime, the Parish Council aims to have its new formal Emergency Resilience and Response Plan in place by April 2018 and is currently working with colleagues in Lincolnshire County Council as well as other agencies, including the EA, Police and Coastguard, medical staff, local farmers and various village organisations as well as the community as a whole to achieve this.

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 parish council contends that this is reasonable, but in order to demonstrate equity and fairness that the same policy should also apply to others with a local connection or who live and/or work in their communities. As noted under Matter 5, the provision of new flood resilient homes with appropriate mitigation is one way of improving the flood resilience and standard of housing generally, so should not just be available for some and not others, particularly the young economically active population who can fulfil a local connection criteria and who would not qualify for affordable housing.

In essence, why can't those wishing to remain in the village in market housing be afforded the same opportunities and benefit? The parish council already has 9 applicants who fulfil the local connection criteria for its development of 6 houses to rent, and starter homes at similar rents or shared ownership could provide a much needed boost for this demographic.

2. Is it intended that people in vulnerable and minority groups should have to demonstrate a local connection to the area in order to qualify for new housing in the Coastal Zone in the same way as those in need of affordable housing? Will Clause 3 achieve this?

It would be somewhat unreasonable if those with no connection to the community were allowed preference over those in the community who are not allowed market homes and have to leave the area. This does

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nothing for community cohesion or the maintenance of family and friend networks which are important in this community. The flood risk is the same for someone in an affordable house as it is for a market house if built to the same standard, so why would it be acceptable to allow some groups of the population to live in the community and not others? If the risk is such that people can't live in flood resilient market housing and be placed at risk, how would it be right to place others at risk in flood resilient affordable housing – particularly since vulnerable people including those with mental health issues for example may be at higher risk when it comes to understanding those risks and the necessity of prevention or evacuation.

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? And

5. Should clause 2, bullet point 3 also refer to affordable housing?

In accordance with the NPPF policy in para 111 the parish council believes such an approach is justified. Particularly in the case of North Somercotes, which has a large brownfield site that could be used for appropriate starter housing or shared ownership housing for economically active members of the population. This would address the increasingly skewed population of older age group in-migration. Equally, it could be suitable for a sheltered housing and/or care home complex to enable our older residents to remain in the community rather than have to go to Louth as now and lose their community support networks. See Matter 2 response to Question 4 and Appendix 2.

Furthermore, if the identified need is for market housing or other housing such as sheltered accommodation for our existing population as above, why would it be reasonable to have to demonstrate that other uses – which may not be essential or desirable – should be considered first, thus adding a 12 month delay and uncertainty? When young family members are having to move away it does seem inequitable and wrong that there is no provision for their housing needs, and as has been the case numerous times in this community - those from areas such as Skegness or much further away have then been able to move here.

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?

The Parish Council believes this should be related to the site-specific FRA as noted, since it is quite possible that in future suitable housing could be on helical piles or similar, with the ground floor already above the flood elevation requirement to minimise flood damage and maximise recovery time. This would enable 'ground floor' sleeping accommodation to still fulfil the requirement to be above flood risk elevations.

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? And

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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?

While the parish council supports the principle of extended occupancy, based on assessment of the specific risk at specific sites - including any evacuation routes - it would be inherently unreasonable to find a situation in which extended occupancy periods of caravans was permitted yet flood resilient market housing in those same or even adjacent communities was not.

The issues and time involved in Community Emergency and Resilience teams (where they exist) dealing with and ensuring those occupants had sufficient awareness of the risks and evacuation plans and procedures etc would undoubtedly far outweigh the benefit to the community of the additional income, which in any case may not currently be lost to the district if other forms of accommodation are being used during the closed periods.

Concluding Statement

The parish council recognises and acknowledges the tremendous amount of work that has gone into the development of the Local Plan to date.

Unfortunately, on behalf of all those that live and work in this settlement, and those who also use and benefit from its facilities and services, the parish council cannot reconcile and therefore cannot accept, the arbitrary approach and negative impact of the Coastal Policy.

The parish council submits that the fundamental lack of an objective evidence-based assessment of this community's future economic, social and environmental issues and needs, is incompatible with the requirement for a reasonable, justifiable and sound Plan as currently written, as far as this community is concerned.

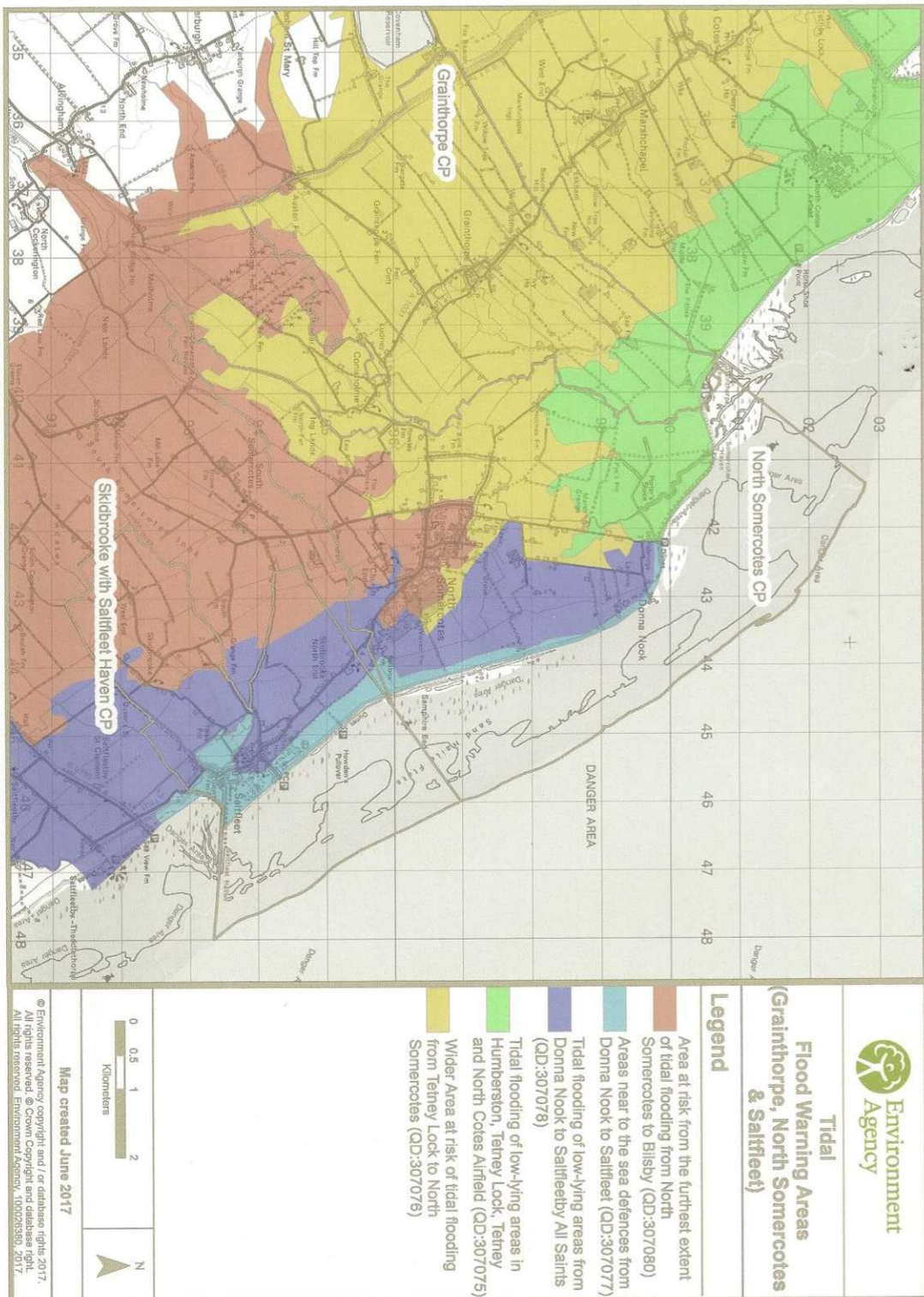
I would like to thank the Inspectors for the opportunity of representing the views of this community in responding to the Draft Local Plan, and trust that the important matters and fundamental principles raised in this hearing statement, and the previous response to the Local Plan, will be given full consideration.



**Mr Stephen Brooks – Chairman
North Somercotes Parish Council**

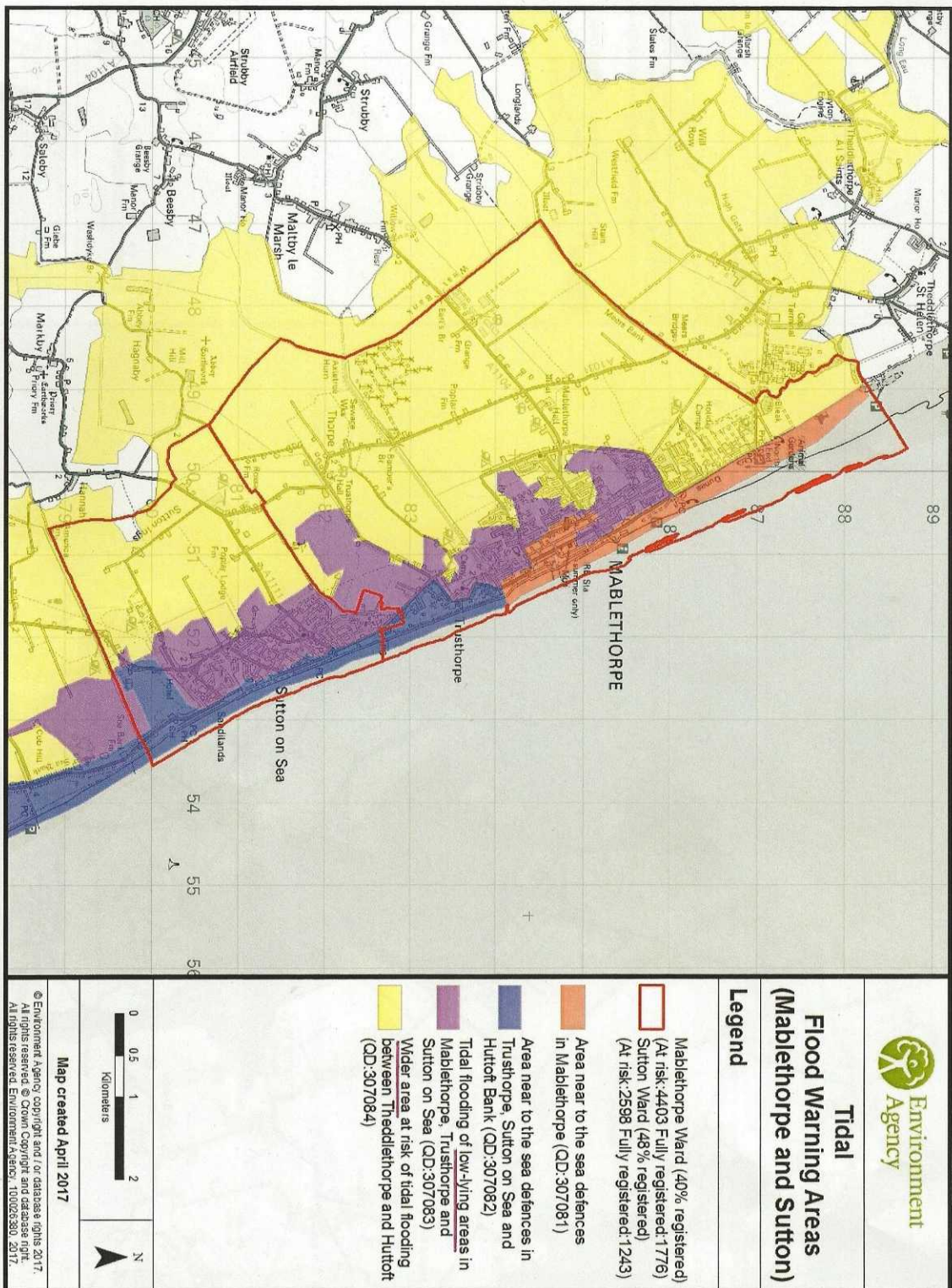
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Appendix 1 – Tidal Flood Warning Areas Map 1 – Grainthorpe, North Somercotes and Saltfleet



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Map 2 – Mablethorpe and Sutton Tidal Warning Areas



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Appendix 2 – North Somercotes Brownfield site – disused fuel depot

