

Briefing

Examination of the East Lindsey Core Strategy and the East Lindsey Settlement Proposals DPD: Inspectors' Matters, Issues and Questions – Stage 1 Core Strategy (May 2017)

June 2017

1. This Hearing Statement has been prepared on behalf of St Andrews Healthcare in respect of their land interests to the south of Tothby Lane, Alford (“the site”).
2. The site is approximately 9.8 hectares in area and is located on the western edge of Alford. The centre of Alford is located 0.8km to the east of the site and it is bound by residential properties on its eastern and southern boundary; whilst a dismantled railway and Tothby Lane bound the site on its western and northern boundaries respectively.
3. The site is available and represents a suitable and achievable opportunity to deliver up to 200 dwellings over the plan period.
4. The site has previously been promoted through the Local Plan by Turley during the public consultation on the Core Strategy Pre-Submission Draft in January 2017 and the Draft Core Strategy in June 2016.

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

Question 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?

5. It is considered that the Coastal Zone is clearly shown on the submission policies map given that it is distinctively hatched in blue.
6. The plan also clearly sets out which Towns (i.e. Skegness, Sutton on Sea and Mablethorpe) and Large Villages (i.e. Marshchapel, Grainthorpe, North Somercotes, Chapel St Leonards, Hogsthorpe and Ingoldmells) are in the coastal zone within the East Lindsey District boundary.
7. However, the plan does not clearly illustrate the other settlements within the Coastal Zone, which include Addlethorpe, Anderby, Croft, New Leake, North Cotes, Saltfleetby All Saints, Saltfleetby St Clements, Saltfleetby St Peter, Skidbrook cum Saltfleet, South Somercotes, Theddlethorpe All Saints, Theddlethorpe St Helen and Trusthorpe, as listed in Strategic Policy 17 'Coastal East Lindsey.

Question 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?

8. A review of the Environment Agency's Flood Map for Planning confirms that the extent of the Coastal Zone is justified.
9. The probability of river and sea flooding in this area is high (i.e. Flood Zone 3) which is defined by 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.

Question 3: Is the restriction of new housing in the Coastal Zone to existing commitments (apart from the exception 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)?

10. The restriction of new housing in the Coastal Zone to existing commitments including in the Towns of Skegness and Mablethorpe/Sutton/Trusthorpe is a justified response to coast flood risk.
11. It is the most appropriate strategy given that it is consistent with paragraph 99 of the NPPF, which states that Local Plans should take account of climate change over the longer term including factors such as flood risk and coastal change; and new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

Question 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?

12. Table B of the Core Strategy shows a minimum allocation of housing across the 'inland' Towns and Large Villages, which includes minimum allocations for 18 homes at Grainthorpe, 100 homes at Hogsthorpe and 84 homes at Marshchapel.
13. It is evident that there is no clear justification contained within the Core Strategy on why there are housing allocations in the aforementioned Large Villages, despite their location within (or partially within) the coastal zone, as shown on the Key Diagram (page 5).
14. We reiterate that the most appropriate strategy is directing housing allocations towards the inland areas rather than the coastal zone, which aligns with paragraph 99 of the NPPF, which outlines that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
15. It is considered that the housing allocations in Grainthorpe, Hogsthorpe and Marschapel is unjustified and is inconsistent with the NPPF; and the housing allocations to these settlements should be redistributed to inland Towns, such as Alford.

Question 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 expectations, be capable of being met in the inland area? Could this policy affect the levels of in-migration to East Lindsey?

16. Strategic Policy 3 sets out the overall District wide housing target as 7,768 homes for the plan period. The housing target for the coastal area is approximately 1,308 homes and is a minimum of 6,460 homes in the inland area. This can be presented as being 16.8% of the total overall District wide housing target being apportioned to the coastal area with the remaining 83.2% apportioned to the inland area.
17. The overall split is justified insofar that the 1,308 homes allocated to the coastal area are already housing commitments as of February 2016 given that these sites already have the benefit of planning permission. If these permissions are not implemented within the expiration of the permission, it is considered that these sites should be considered undeliverable, in line with footnote 11 to paragraph 47 of the NPPF, given that land within the coastal area is not a suitable location for development owing to the high risk of river and coastal flooding.
18. It is considered that any need arising in relation to the coastal area, which is not met by existing commitments and various policy expectations will be capable of being met in the inland area as the spatial strategy is based on the provision of a minimum rather than a maximum housing target, allowing sufficient headroom for redistribution towards inland Towns, such as Alford.

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

19.

No comment.

Question 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)?

20. Yes, the plan should include a policy which sets out 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).
21. It is considered that this provision is wholly compliant with paragraph 153 of the NPPF, which states the Local Plans can be reviewed in whole or in part to respond flexibly to changing circumstances.
22. For instance, the Council has a historical record of failing to demonstrate a five year housing land supply of deliverable housing sites and therefore the land allocations contained within the Local Plan should be regularly reviewed to avoid the long term protection of sites allocated for housing, where there is no reasonable prospect of a site being used for that purpose.
23. Therefore, for the purpose of clarity and robustness, it is recommended that the policy should clearly set out what stage will be reached by specific date within either policies related to the housing requirement or within the monitoring section of the Core Strategy.

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