

7 September 2017

Dear Mr Youle and Mrs Phillips

In response to our attendance at Stage 1 Matter 17 of the hearing, Mrs Phillips asked us to undertake some preparatory work for Stage 2 Matters 1 and 2. Below is our update on these issues and our submission to Stage 2 of the hearing.

Please do get in contact if you require any clarification or further detail before the hearing.

Yours sincerely



Fran Smith

Nature Partnership Manager



Background

The GLNP has responded to previous drafts of the ELDC plan with several areas of concern. The majority of these have been resolved; the outstanding concern is the matter of an up to date evidence base for the natural environment.

It was discussed at Stage 1 Matter 17 of the hearing that the plan did not contain an up to date evidence base for the natural environment as a number of Local Sites were omitted. From my recollection Mrs Phillips had three main issues:

- That ELDC gain an up to date evidence base for the plan
- That ELDC keep this evidence base up to date for the duration of the plan
- That site allocations were checked against Local Site locations to determine if an up to date evidence base would have led to differences or concerns in site allocations. The GLNP was asked to check this

The partially resolved issue is:

- That ELDC gain an up to date evidence base for the plan – ELDC chose to gain this through a one year license for mapped Local Site data with the GLNP
- However, despite over 30 days to pay for the provision of this data ELDC have failed to do so. As such if ELDC have not paid for the provision of data by 26 September the GLNP will require ELDC to delete all provided data and remove it from the plan
 - If this occurs ELDC will not have an up to date evidence base for the plan

The outstanding issues are:

- That ELDC keep this evidence base up to date for the duration of the plan
- Several site allocations have potential to impact Local Sites

Stage 2 Matter 1

The GLNP does not believe the Settlement Proposals DPD allocates/designates all of the uses required by the Core Strategy.

Currently there is a considerable difference between the aspirations of policy SP24 and its application within the settlements proposals document. While ELDC have evidence for Local Sites for this year, there appears to be no plan in place to keep this evidence base up to date. As such the plan as a whole can be seen as inconsistent with national policy, in particular paragraphs 117 and 165 of the NPPF and Section 13 of Planning and Compulsory Purchase Act.

The GLNP has contacted ELDC to determine a way forward and offered assistance however we are not aware of any decision being made.

While the GLNP is the sole outsourced provider of this service in Greater Lincolnshire, our concern is for the protection of the natural environment. If ELDC choose another route to gain the baseline environmental data, such as in house expertise, this would also resolve the GLNP's concern.

Stage 2 Matter 2

The GLNP does not believe that the sites proposed to be allocated in the plan have been chosen on the basis of a robust assessment process as the plan was lacking an up to date evidence base for the natural environment until July 2017. As such the plan as a whole can be seen as inconsistent with national policy, in particular paragraphs 117 and 165 of the NPPF and Section 13 of Planning and Compulsory Purchase Act.

The GLNP has three key points to make in relation to this matter:

- The designation of Local Sites
- The need for ELDC to have an up to date evidence base on the natural environment for the duration of the plan
- Several site allocations have potential to impact Local Sites

The designation of Local Sites

ELDC now have the most up to date information on Local Sites that the GLNP is aware of. While it is ELDCs responsibility to formally designate any Local Sites, our understanding is that in working practice any Local Site published in a Local Plan as a Local Site or held by a Local Planning Authority on a Local Sites GIS layer or list forms such a designation in lieu of a formal process.

The need for ELDC to have an up to date evidence base on the natural environment for the duration of the plan

The information GLNP have provided is only relevant for one year, and ELDC have only sought a one year license for the information. There appears to be no plan in place to keep this evidence base up to date. As such the plan as a whole can be seen as inconsistent with national policy, in particular paragraphs 117 and 165 of the NPPF and Section 13 of Planning and Compulsory Purchase Act.

The GLNP has contacted ELDC to determine a way forward and offered assistance however we are not aware of any decision being made.

While the GLNP is the sole outsourced provider of this service in Greater Lincolnshire, our concern is for the protection of the natural environment. If ELDC choose another route to gain the baseline environmental data, such as in house expertise, this would also resolve the GLNP's concern.

Several site allocations that are of concern to Local Sites

The GLNP is concerned about allocations impacting on several Local Sites within the plan. The detail of these is all different and they are described below.

Burgh-le-marsh BLM310

This site is not a designated Local Site, however our response to ELDC's draft plan in August 2016 highlighted that the site meets the criteria for LWS designation as neutral grassland. The allocation coincides with the area of wildlife value.

This is known because of an ecological survey carried out on the site as part of a planning application submitted to ELDC. The ecological surveyors highlighted the value of the site as part of their report that was submitted with the planning application.

While the plan is not yet adopted, the publication version has been through several rounds of consultation and therefore holds some weight. Policy SP24 states that development will only be permitted in exceptional circumstances on “sites that meet the criteria for selection as a Local Site”.

The publication version of the Settlement Proposals document makes no reference to the ecology of the site and it appears as if a robust assessment has not taken place.

Spilsby SPY302

This allocation is adjacent to Six Acre Plantation SNCI, as the GLNP highlighted in our response to ELDC’s draft plan in August 2016.

The publication version of the Settlement Proposals document refers to possible ecological interest in the ponds north of the site (where the SNCI is located) and the need for biodiversity enhancement if the development proceeds. However there is no recognition of the presence of a Local Site and as such a robust assessment does not seem to have taken place.

Mablethorpe

Within Mablethorpe the map is unclear, so at this stage the GLNP is unable to determine if there is a potential impact on Local Sites.

- At Mablethorpe North Dunes cLWS and Sutton on Sea Dunes, Hillside Avenue to Sandhurst Road cLWS there is an unknown designation adjacent to the cLWS. This designation is mustard yellow stripes and does not appear on the key, as such its potential impact on the cLWSs cannot be determined.
- At Mablethorpe North Dunes cLWS an unknown designation coincides with the area of the cLWS. This designation is purple dots and does not appear on the key, as such its potential impact on the cLWS cannot be determined.

Skegness

Within Skegness the map is unclear, so at this stage the GLNP is unable to determine if there is a potential impact on Local Sites.

- There is an unknown designation coinciding with the area of the following Local Sites. This designation is purple dots and does not appear on the key, as such its potential impact on the Local Sites cannot be determined:
 - North Shore Golf course cLWS
 - Sea View Walk, Skegness LWS
 - Lagoon Walk Dunes, Skegness LWS