**Examination of the East Lindsey Core Strategy and the East Lindsey Settlement Proposals Development Plan Document**

**Inspector’s Matters, Issues and Questions (MIQs)**

**Stage 2 – Settlement Proposals DPD**

**Matter 1 – Structure of the Plan**

**Issue: With its proposed content and structure, will the plan be effective in delivering the development required by the Core Strategy?**

1. Other than for housing, does the Settlement Proposals DPD allocate/designate all of the uses required by the Core Strategy? Are all the allocations/designations expressed on the Policies Map? The Council should prepare a table to summarise the uses required by the Core Strategy and where these are allocated/designated in the Settlement Proposals DPD. This includes (but might not be limited to):
* Gypsy & Traveller accommodation (20 stopping/transit pitches; 13 permanent pitches; and 2 show and circus people plots).
* Employment floorspace (in the 7 towns, Core Strategy page 61).
* Convenience and comparison retail floorspace (at least in Louth, Horncastle and Alford).
* In the case of protected green space, is it clear to which spaces Policy SP25 of the Core Strategy applies?

*Set out below is a table of the designations and where they sit within the Plan geographically*

|  |  |
| --- | --- |
| *Housing Allocations*  | *Shown in Settlement Proposals DPD*  |
| *Conservation Areas*  | *Shown where they coincide with a map contained within the Settlement Proposals DPD.* |
| *Ancient Monuments* | *Shown in Settlement Proposals DPD.* |
| *Gypsy and Traveller accommodation* | *Where allocated these have been shown in the Settlement Proposals DPD.* |
| *Employment floorspace* | *Shown in Settlement Proposals DPD.*  |
| *Retail floorspace* | *This was discussed during Stage one of the Inquiry.*  |
| *Town Centre Boundaries* | *Shown in Settlement Proposals DPD* |
| *Primary Shopping Frontages* | *Shown in Settlement Proposals DPD* |
| *Serviced Holiday Accommodation Area* | *Shown in Settlement Proposals DPD along with on Policies Map One.* |
| *Coastal Amusement Areas* | *Shown in Settlement Proposals DPD* |
| *Foreshore* | *Shown in Settlement Proposals DPD along with on Policies Map One.* |
| *Coastal Country Park* | *Shown in Settlement Proposals DPD along with on Policies Map One.* |
| *Protected Open Space, Addlethorpe* | *Shown in Settlement Proposals DPD along with on Policies Map One.* |
| *Coastal Zone/Hazzard Map areas* | *Shown on Policies Map Two.*  |
| *Existing Housing Commitments along the Coast* | *Shown in Settlement Proposals DPD.* |
| *Sports and Recreation Facilities* | *Shown in Settlement Proposals DPD along with on Policies Map One.* |
| *Local Nature Reserves* | *Shown in Settlement Proposals DPD along with on Policies Map One.* |
| *Local Wildlife Sites* | *Shown in Settlement Proposals DPD along with on Policies Map One.* |
| *Lincolnshire Wolds AONB* | *Shown in Settlement Proposals DPD along with on Policies Maps One and Two.* |
| *Sites of Special Scientific Interest* | *Shown in Settlement Proposals DPD along with on Policies Maps One.* |
| *Sites of Nature Conservation Importance* | *Shown in Settlement Proposals DPD along with on Policies Maps One.* |
| *Protected Open Space* | *Shown in Settlement Proposals DPD along with on Policies Maps One.* |

*The Council feel that the sites protected under policy SP25 - green infrastructure are clearly represented within the settlement proposals DPD with a clear notation within the key also.*

1. The DPD provides specific details of each of the housing sites proposed to be allocated, but no such detail is provided for any other type of allocation e.g. employment, Gypsy & Traveller; retail. Why is this? Should similar referencing and details be provided for these other types of allocation?

*The table details for the housing allocations arose from the details in the SHLAA and how the council maps the details on its mapping system. The fact that as the Council went through its consultation stages this detail appeared to help consultees with their comments and also to diminish the number of objectors. This added weight to the idea of continuing with the detail into the finished version of the Plan. It did not appear to be the same with the other types of allocations so the detail was not felt to be required.*

1. What is the status and purpose of the text in the analysis tables for each settlement? Is the text intended to be prescriptive, or is it for guidance? Should this be clarified by providing distinct “policies” and “supporting text/reasoned justification”? (Note that some of the text needs redrafting for clarity e.g. infrastructure section of analysis table for SIB303 in Sibsey). What is the purpose of the tables for the settlements in which no allocations are proposed e.g. Binbrook, Huttoft, Partney, Tetford, and some of the coastal settlements? If the tables are necessary for these settlements, why are they not also necessary for the medium and small villages?

*The tables associated with each settlement are guidance. The old Adopted 1995 Local Plan had a description of each relevant settlement and the Council believes that for those wishing to develop, it sets the scene, lays out a broad description of the character, where the settlement is, pointers to infrastructure and generally provides commentary on the settlement. Not everyone who develops in the District is from East Lindsey and it allows those from outside to get some idea what each settlement is like in general terms.*

*The tables for each individual site is also guidance, it also sets the scene, flags up any potential constraints that developers should be aware of and provides an overview of each site. The Council can see that this might not be clear in the Plan and therefore would propose a main modification to paragraph 2.5 on page 11 which would amend the last sentence so that it would read as follows;*

*This will provide guidance to those wishing to develop these sites and provide a starting point for any negotiations. Matters which the Council wishes to see positively addressed on individual sites are set out in the Policy SP DPD1.*

*Binbrook, Huttoft, Partney, Tetford are still large villages and therefore could be subject to windfall growth during the plan period, therefore it was felt that they should be treated the same as the other settlements and also have an associated map which would show the same as the other settlements albeit without any housing allocations, they also have their character set out in the tables associated with the maps so the scene is still set for those settlements.*

*With regard to the coast the towns and large villages are still towns and large villages in the Settlement Pattern and therefore they needed to be treated the same way as the rest of the towns and large villages in regard to setting out their general description and overview of those settlements and providing a map in relation to how the polices relate to each settlement, they also show the existing housing commitments, which form part of the delivery of housing as set out in the Core Strategy.*

*The Council believes that by setting out the Settlement Proposals in the way that it is, it has helped to minimise the number of objections because each site has an explanation and consultees can see that consideration has been given to the various matters that go into determining if a site is suitable. This has made it a more open and transparent process and the Council believes minimised objections.*

*The Council did not include the medium and small villages because housing was constrained in these settlements to brownfield land as windfall developments, and rural exception sites, they do not have any designated employment land either. Even with the amended Policy SP4, having maps or settlement text for these settlements would not add to the Plan nor provide any more clarity for decision makers and developers.*

*Each site table will require amending as per the Council`s trajectory ED32 in that a more clearer picture should be set out as to when the Council believes the sites can be delivered and in which phase of the plan period.*

*During the discussion on Stage 1 of the Local Plan the Council was asked to give consideration to ensuring that there was clear policies in the Settlement Proposals DPD and setting out which sites are allocated. The Council would agree that it is not clear in the document in a “set out” policy and given the comments above about the tables for each site and is there is any policy consideration in regard to them, the Council would propose that the two tables in the plan be adapted to include more detail of the site allocations and to set out if there are any clear policy requirements for any of the sites. Therefore the Council propose the following main modification;*

*After paragraph 2.7 on page 11 a policy set out in bold italics which would read*

***Policy SP DPD1***

***1. The overall District wide housing requirement is 7819 homes for the plan period.***

 ***The requirement will be.***

* ***On the coast approximately 1262 homes which covers the area of the Coastal Flood Hazard maps these are existing commitments. Housing on the coast will be constrained to these existing commitments with the exceptions set out in Strategic Policy SP18 (SP18) Coastal East Lindsey***
* ***Inland a minimum of 6557 homes.***
* ***The requirement will be delivered as set out in the following table;***

|  |  |
| --- | --- |
| ***HOUSING TARGET 2017 - 2031*** | ***7819*** |
|  |  |
| ***Commitments inland*** | ***3118*** |
| ***Commitments coastal*** | ***1262*** |
| ***Inland allocations as set out in Clause 2*** | ***4170*** |
|  |  |
| ***Total – This includes a 9% buffer against the housing target;***  | ***8550*** |
|  |  |
| ***Other sources of housing that could come forward*** ***during the plan period – these have not been included in the housing requirement above.***  |  |
| ***Possible homes from brownfield sites in the coastal zone*** | ***448*** |
| ***Possible homes from brownfield sites in the medium and*** ***small inland villages*** | ***225*** |
| ***Total*** | ***693*** |

***2. The 4170 homes which represent the inland housing allocation will be delivered as set out in the following table;***

|  |  |  |
| --- | --- | --- |
| ***SETTLEMENT*** | ***ALLOCATION*** | ***SITES***  |
| ***ALFORD -***  | ***161*** | ***Alford Town Council are preparing a Neighbourhood Plan and this will set out how the 161 homes and other spatial requirements are to be delivered in Alford over the plan period.*** |
| ***BINBROOK*** | ***0*** |  |
| ***BURGH LE MARSH*** | ***200*** | ***BLM305 –Land at Hall Lane******BLM310 – Land on the North of Wildshed Lane******BLM313 – Land on the south of Wildshed Lane******BLM318 – Land on the south of Station Road******BLM320 – Land on the south of Orby Road*** |
| ***CONINGSBY/TATTERSHALL*** | ***417*** | ***C&T305 – Land off Park Lane******C&T306 – Land to the south of Leagate Road******C&T311 – Land to the south of Leagate Road******C&T313 – Land on Leagate Farm, Leagate Road******C&T311 – The site should provide an adequate green buffer to the adjoining industrial estate in order to mitigate against any impact on residential amenity.*** |
| ***FRISKNEY*** | ***59*** | ***FRIS306 – Land to the south of Low Road******FRIS316 – Land at Low Road/The Avenue******FRIS317 – Land off The Avenue******FRIS321 – Land at Burgh Road******FRIS317 – Development must demonstrate through a sensitive layout and high quality design that it does not affect the setting of the listed buildings to the west of the site and the Schedule Ancient Monuments, in order to preserve their settings.*** |
| ***GRAINTHORPE*** | ***18*** | ***GRA209 – Poors End******GRA211 – Land to the north of Staples Garth*** |
| ***HOGSTHORPE*** | ***98*** | ***HOG306 – Land at West End******HOG309 – Land off Thames Street*** |
| ***HOLTON LE CLAY*** | ***326*** | ***HLC206 – Land off Louth Road******HLC302 – Land off Church Road******HLC303 – Land east of Louth Road*** |
| ***HORNCASTLE*** | ***0*** |  |
| ***HUTTOFT*** | ***0*** |  |
| ***LEGBOURNE*** | ***23*** | ***LEG303 – Land off Househams Lane******LEG307 – Land off Station Road*** |
| ***LOUTH*** | ***1204*** | ***LO096 – Land between 7 and 9a Kidgate******LO155 – Land to the north of houses on Eastfield Road******LO301 – Land to the east of the A16******LO302 – Land off Grimsby Road******LO305 – Land off Brackenborough Road******LO311 – Land to the rear of Chestnut Drive******LO312 – Wallis House, Birch Road******LO313 – Land to the north of Legbourne Road******LO325 – Land off Shearwater Close******LO326 – Land off Eastfield Road******LO329 – Land off Legbourne Road******LO341 – Land off Bluestone Rise*** |
| ***MANBY/GRIMOLDBY*** | ***77*** | ***MAN316 – Land to the rear of the former health centre on the B1200******MAN314 – Land to the east of Carlton Road*** |
| ***MAREHAM LE FEN*** | ***113*** | ***MLF021 – South of Main Street******MLF303 – Land to the rear of the garage, Main Street******MLF305 – Moat Farmyard, Watery Lane******MLF328 – Land on the south of Main Street******MLF303 – Access should be through MLF021 (South of Main Street) with pedestrian access only off Chapel Lane and demonstrate how surface water can be drained from both sites.*** |
| ***MARSHCHAPEL*** | ***84*** | ***MAR217 – Land off Mill Lane******MAR226 – Land adjacent to Sea Dykes Way******MAR300 – Land to the rear of Sea Dykes Way******MAR304 – Land to the rear of Sea Dykes Way******Development on the above sites should only take place on the low flood risk areas of the site.***  |
| ***NORTH THORESBY*** | ***165*** | ***NTH307 – Land off High Street******NTH308 – Land off the A16******NTH313 – Land off the High Street******NTH308 – A well landscaped buffer should be provided alongside the A16 to minimise noise impact from the road and to provide a landscaped screen to the development.******NTH308 – The roof tiles of any development should blend in with surrounding development to mitigate against any impact on the historic Wolds/Marsh setting when looking down from higher elevations.*** |
| ***PARTNEY*** | ***0*** |  |
| ***SIBSEY*** | ***239*** | ***SIB303 – Land to the rear of Sibsey House on the east of the A16******SIB304 – Land to the rear of Tregarthen House, west of the A16******SIB406 – Land to the rear of Page Close*** |
| ***SPILSBY*** | ***425*** | ***SPY310 – Land between the B1195 and Ashby Road (eastern side of Spilsby)******SPY302 – Land off Ashby Road******SPY310 – A doctor’s surgery will be provided as part of the first phase of the development. To ensure provision for this immediate identified need in the town of Spilsby.*** |
| ***STICKNEY*** | ***24*** | ***STK306 – Land to the west of the A16******STK319 – land adjacent to the depot, Main Road******STK319 – An adequate green buffer should be provided along the boundary with the adjacent depot.*** |
| ***TETFORD*** | ***0*** |  |
| ***TETNEY*** | ***57*** | ***TNY308 – Land west of Hoop End******TNY311 – Land west of Humberston Road******TNY320 – Land rear of North Holme*** |
| ***WAINFLEET*** | ***96*** | ***WAI305 – Land off Mat Pitts Lane******WAI308B – Land off Barton Road******WAI308 – Land off Barton Road******WAI401 – Land off Mats Pitts Lane******WAI407 – Land off Mats Pitts Lane*** |
| ***WOODHALL SPA*** | ***352*** | ***WSP304 – Land adjacent to St Hughes School******WSP314 – Land off Green Lane******WSP315 – Garage on Witham Road******WSP314 – A suitably wide green corridor should be provided adjacent to Green Lane suitable for landscaping, walking and cycling, to ensure that Green Lane remains a rural corridor connecting Woodhall Spa to the open countryside.******WSP314 – A detailed odour assessment should be provided to demonstrate no adverse impact on future residents.*** |
| ***WRAGBY*** | ***32*** | ***WRA024 – Land at Thornfield and the rear of Louth Road*** |

***3. The Council will ~~allocate sites for~~ ensure the phased delivery of the ~~7768~~ 7819 homes as follows;***

|  |  |  |  |
| --- | --- | --- | --- |
| *2017/18* | *490* | *2026/27* | *481* |
| *2018/19* | *749* | *2027/28* | *481* |
| *2019/20* | *749* | *2028/29* | *481* |
| *2020/21* | *749* | *2029/30* | *481* |
| *2021/22* | *749* | *2030/31* | *481* |
| *2022/23* | *485* |
| *2023/24* | *481* |
| *2024/25* | *481* |
| *2025/26* | *481* |

1. ***The Council will allocate land for employment as set out in Policy SP13 of the Core Strategy and set out the land that is existing employment land both of which should be protected for predominately uses B1, B2 and B8, excepting those criteria set out in Policy SP13.***
2. ***The Council will allocate land for Gypsies, Travellers and Showpeople as set out in Policy SP12 of the Core Strategy.***

*Given the above comments on the matter of ensuring that the allocations are clearly set out, this would also apply to the Coastal commitments. The Council are therefore proposing the following modification at page 163 at 3.2*

*Delete the first sentence at 3.2 and replace it with the following;*

***Policy SP DPD2***

***In the Coastal Zone, housing growth will be provided by 1262 existing commitments. The Coastal Zone is the area covered by the Environment Agency`s Coastal Flood Hazard Map. The map is shown on page 80 of the Core Strategy. The zone covers the red (danger for all), orange (danger for most), yellow (danger for some) and green (low hazard – caution).***

***The 1262 existing commitments in the Coastal Zone are set out below****;*

|  |  |
| --- | --- |
| Addlethorpe | 0 |
| Anderby | 2 |
| Chapel St. Leonards | 148 |
| Croft | 17 |
| Ingoldmells | 171 |
| Mablethorpe  | 128 |
| New Leake | 0 |
| North Cotes | 0 |
| North Somercotes | 56 |
| Saltfleetby All Saints | 4 |
| Saltfleetby St. Clements | 0 |
| Saltfleetby St. Peter | 1 |
| Skegness  | 563 |
| Skidbrooke + Saltfleet Haven | 10 |
| South Somercotes | 0 |
| Sutton On Sea  | 155 |
| Theddlethorpe All Saints | 0 |
| Theddlethorpe St. Helen | 7 |
| Trusthorpe | 0 |

*For completeness and to show the total commitments, the Council is also proposing to include maps for Anderby, Croft, Saltfleetby All Saints, Saltfleetby St Peter and Theddlethorpe St Helen. This then clearly sets out the existing commitments in the Coastal Zone.*

1. Paragraph 2.9 of the document explains why no housing allocations are proposed in Binbrook and Tetford (AONB), but not why none are proposed in Horncastle, Huttoft and Partney. Is the approach in these latter towns justified and, for clarity and completeness, should the paragraph be amended to explain it?

*The Council believes that the approach is justified. In the Core Strategy in the chapter on housing growth at paragraph 14, page 23, the Council sets out that because population growth is predicated on the in migration of mainly older persons it is not possible to predict where they are going to want to live, so the starting point is the most sustainable settlements, with a calculation based on the total number of households. This assumes that that assessed need is proportional to the number of houses. It also means that in some settlements that need is already being met by existing commitments and they therefore do not require housing allocations in the Plan.*

*The Council determined not to make any allocations in Horncastle because there were already in February 2016, 697 commitments and the total need was 683, those commitments have risen even further with the total at February 2017 standing at 849. It was therefore felt that there was already sufficient housing to supply the need over the plan period.*

*With regard to Huttoft, planning permission was granted on the proposed sites just before February 2016 and they therefore became existing commitments with no need to place them in the plan.*

*With regard to Partney, whilst Partney is a large village in the Settlement Pattern it is relatively small with its facilities spread out, neither the shop nor the petrol filling station are located in the core of the village, being just off the by-pass. There are also constraints to development to the north and west from flood risk meaning growth would be even further from facilities. Given that the overall allocation was only going to be 7 dwellings and taking the above into account, it was felt that an allocation in this plan period was not necessary, given that the Council could find enough land in other sustainable settlements.*

*For completeness, an additional paragraph could be inserted after 2.9 which could read as follows;*

***With regard to Horncastle, no housing allocations have been proposed because the number of existing housing commitments exceeded that needed over the plan period. Huttoft has no housing allocation because the sites proposed were granted planning permission prior to the submission of the Plan and Partney has no housing allocation because though it is a large village, it is relatively small in size with its services and facilities spread out beyond the core of the village.***

1. Are proposed modifications ADM41 and 42 additional/minor amendments or are they necessary to make the plan sound?

*The front cover of the Plan will be amended to reflect the stage the plan is at so ADM41 is not a modification that is really required in hindsight.*

*With regard to ADM42, this is an additional modification which updates the consultation on the Plan for everyone to be see and for the Council to be open and transparent.*

*Maps*

*(Where necessary, please refer to the responses to the Stage 1 Core Strategy questions concerning the Policies Map under Matter 1).*

1. Does the Key to the Settlements Maps issued on 15 June 2017 represent the most up to date version? Is this Key needed to ensure that the plan policies are accurately illustrated geographically? If so, the change should be made upon the adoption of the plan, but Inspectors cannot recommend Main Modifications to the Policies Map. (Note proposed amendment ADM46).

*The Key supplied on the 15th of June represents the most up to date version of the Key to the settlements proposals document and is required to ensure the plan policies are accurately illustrated geographically.*

1. With particular regard to the following matters, do the Settlement Maps and the revised Key provided on 15 June provide a clear and comprehensive geographical illustration of the policies in the plan?
* What policy does the purple striped area towards the south of the map for Coningsby/Tattershall illustrate? Is this policy shown on the Key? Is the map otherwise accurate (ADM49)?

*The striped area shown on the map shows Tattershall Castle an Ancient Monument, policy SP11 is shown on the key, the map is felt to be accurate.*

* What policy does the black striped area on the map for Friskney illustrate? Is this shown on the key?

*The striped area on the Friskney map represents a moated site which is covered by Policy SP11 which is illustrated on the key.*

* What policy do the purple/maroon lines on the maps for Coningsby/Tattershall; Woodhall Spa; North Somercotes; and Saltfleet illustrate? Are these Local Wildlife Sites? If so, is the colour on the key correct?

*The lines illustrate the Local Wildlife Sites which are covered by Policy SP24. The colour used is correct on the key as supplied on the 15th of June 2017.*

* In several cases, including in Hogsthorpe; Holton Le Clay; Mareham Le Fen; North Thoresby; and Spilsby, there is no clear distinction between the boundaries of the various allocated housing sites. Should this be rectified to clarify the illustration of these policies?

*The Council in this instance believes the sites are clearly delineated with each site having a boundary and unique identification number.*

* In Horncastle, if the town centre boundary is represented by a solid red line as shown on the key of 15 June, what policy does the broken red line on this map represent? Should this be on the Key?

*The red broken line is the former town centre boundary line, this should have been removed from the map and was simply an oversite of the Council. The solid red line represents the town centre boundary and is represented on the Key correctly. A revised map has been provided for clarity.*

* Is the map for Huttoft sufficiently clear? What policies do the annotations on the map represent?

*Huttoft falls within the Coastal Country Park in its entirety and unfortunately the colour used to represent this masks the detail underneath it, including protected open spaces and sport and recreation facilities. The council have attached a revised map which allows for the underlying features to be more clearly seen. The policies map and key will also need to be amended accordingly.*

* On the maps for Louth, should the size of the reference numbers for the housing allocations be increased for clarity? Why are some of the sites shown as sports and recreation facilities (blue) on page 76 then shown as protected open spaces (green) on page 77? Are proposed amendments ADM56 and 57 intended to address some of these issues? Which map is correct?

*The Council agree that due to the scale of the maps it would be useful to increase the size of the reference number on the allocated sites to add clarity. The map shown on page 77 correctly represents the designations for sport and recreation and open spaces however the town centre boundary was incorrect. The map on page 78 was intended to supersede that on page 77 under ADM57 however due to the mapping system used the map on page 78 has erroneously shown the sports and recreation facilities (blue) as simply open space (green). Both maps are to be removed from the final document and replaced with the revised map attached. A revised town centre map has also been included.*

* Is it necessary to alter the map for Mareham Le Fen (ADM61) to make the plan sound?

*As protection of sports facilities is covered by policy SP26 it is felt necessary for soundness that the map for Mareham le Fen be amended to show graphically the sports facility.*