

CORE STRATEGY

TOPIC PAPER

THE COAST

Updated and Revised March 2017



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COASTAL EAST LINDSEY

1.0 INTRODUCTION

- 1.1 Chapter 10 – Coastal East Lindsey is the discrete policy within the Core Strategy that deals with the coastal area in the District as defined by the Environment Agencies Coastal Flood Hazard Maps.
- 1.2 The Policy has been developed and written with the co-operation of the Environment Agency and they have confirmed that they are satisfied with it.
- 1.3 Since at least 2007 when PPG17 – Flood Risk was brought in by the then Government, the Council has been acutely aware that the most important and difficult issue for the District is to find a policy solution to flood risk, in particular coastal flood risk. This was brought to the fore during the examination of now revoked East Midlands Regional Plan in 2009. This issue pervades the policy making considerations of the Council; not just in planning but in the business of the Council itself, and was sharpened by the events of December 2013 and January 2017. In December 2013, during an overnight tidal surge coastal East Lindsey came very close to experiencing a serious flood event and major damage was caused to some of the defences. The District had a flood event near miss in January 2017. This issue does not only touch the lives of those already living and working in the coast it also has the potential to seriously affect those who may wish in the future to come and live in the coast. The Council has chosen to face this issue head on and the Local Plan has set out the policy direction for the Coastal Zone clearly giving significant weight to flood risk.
- 1.4 Consultation on the Coastal Policy over the formation period of the Local Plan has raised many objections. This is not surprising to the Council given the significant change of direction this policy takes the District in. With the assistance of the Environment Agency, the Council has shaped the policy from the available evidence; where possible the policy has been changed and adapted to meet the concerns of consultees but always with the view that the risk to residents from coastal flooding is given significant weight. Thus far there is no over-riding evidence which clearly outweighs that risk and moves the Council in a different policy direction.
- 1.5 Coastal flood risk for East Lindsey is wider than the Planning System and the planning system cannot resolve all the issues the coast has. It can however strongly support the economy, infrastructure,

support new community services and facilities and the creation of new and improved flood defences. It can support those groups already resident in the coast in terms of housing need and try and ensure that the amount of people put at risk does not significantly increase.

- 1.6 However, flood risk issues are not just about planning. The cost of flood defences along East Lindsey`s coast is a significant matter of concern and at the time of writing this paper that future cost and how funds are to be raised has not been resolved. This has implications for the physical structure of much of the coast. The beaches, particularly at Mablethorpe are mostly artificial and the risks associated to the economic prosperity of the coast if the funding is not resolved can only be described as significant.
- 1.7 There is also the issue of the cost/benefit ratio built into national flood funding. Houses built after January 2012 do not go toward the national grant in aid for flood defences, so the more houses you built equals the same or less grant from the Government. Flood insurance is still difficult for some householders, despite the Governments new deal with the industry. Properties built after 2009 do not qualify for the deal. Finally, and most importantly of all, there is the consideration of emergency planning, evacuation and the safety of those residents living on the Coast and visiting the Coast.
- 1.8 The Council does not have all the answers about the Coastal Zone, nor can it determine in the long term what affect its policies will have on the area. Therefore it has determined to strongly support economic growth on the Coast but housing growth should be constrained, so that the population does not strategically contribute to the Districts overall growth. This is in conformity with national planning policy in that local plans should apply a sequential risk based approach to the location of growth. The Council will closely monitor the coast over the 5 year review period of the Local Plan to determine whether the coastal policy is having a negative effect on social, economic or environmental factors. All these factors are set out in the Council`s monitoring regime for the Local Plan.

2.0 BACKGROUND TO THE COASTAL POLICY

2.1 The background to the formation of a separate Coastal Policy in the Core Strategy is complex and goes back to 2009, with the production of the East Midlands Regional Plan. Below is a short review of events.

- The East Midlands Regional Plan was Examined in May 2009 – The Inspector of the Plan ordered an immediate partial review of the document; the review was required to take into account the flood risk issues along the Lincolnshire Coast, including finding a solution to the issue of future housing in the coastal flood plain for three authorities, Boston Borough, South Holland and East Lindsey. He also, as an interim measure capped housing growth at existing commitments.
- To find a solution to the flood risk issue, the three councils in partnership with Lincolnshire County Council, East Midlands Development Agency, East Midlands Regional Council and the Environment Agency set up a study group to work on the production of a document to inform future planning policy. This document was called the Coastal Study and was completed in early May 2010, with a view that the finished product would be used to inform the policies in the partial review of the Regional Plan.
- The policy that was emerging from the Coastal Study at that time would have capped housing within the coastal area. Major development would only have been permitted on an exceptional basis and be confined to business and employment uses only. The occupancy period with regard new and extension to caravan sites was to be restricted to between 1st May and 30th September; new and replacement buildings for community use would have been permitted; new buildings and infrastructure needed for emergencies would have been permitted.
- However, in May 2010, there was a General Election and a change of Government, shortly after; the Secretary of State declared that the Regional Plan was to be revoked. Work on the Partial Review of the Plan stopped.
- The Coastal Study became instead the key piece of evidence in policy making for development on the Lincolnshire coast with regard to the Council`s evolving Local Development Framework, now the Local Plan; particularly the Coastal Flood Hazard Mapping that had been produced as part of the evidence for the Study and is still a key piece of evidence.

- 2.2 With regard to the Coastal Flood Hazard Maps. They were created using hydrodynamic 2D computer based modelling which was developed to simulate the impact of an extreme tidal storm event in the North Sea on the coastal areas of Lincolnshire. The models give a realistic understanding of how tidal flood waters could behave in relation to defences and the land behind defences. These maps provide more information than the previously used Flood Zone maps which only show the defended floodplain.
- 2.3 The modelling includes flooding due to overtopping and breaching of the flood defences. The probability of an event is difficult to determine, although overtopping will promote breaching. The modelling therefore only assesses the consequence of breaches and no assessment of the probability of a breach occurring has been included. When Boston flooded in 2013, it was found that the maps were accurate and did determine where the water went in the town.
- 2.4 Two return periods were modelled 1 in 200 and 1 in 1000 year events. This was taken for present day (2006 baseline) and 2115 (year to which the Defra sea level allowances relate). The modelling for 2115 is based on a sea level rise of 113 cm. The maps show hazards ranked by colour. The classification table is set out below.

Flood Hazard Classification table

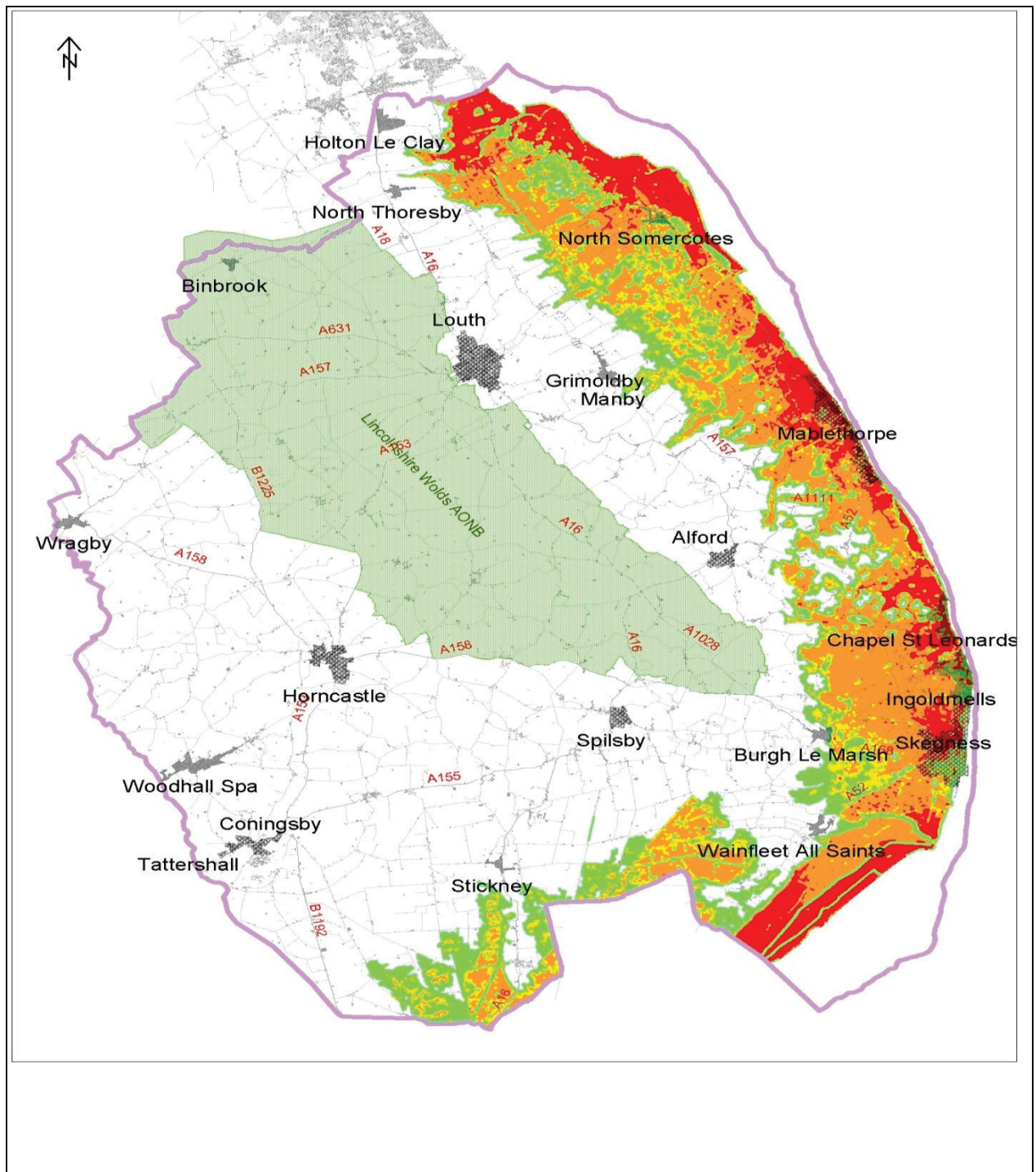
Degree of coastal flood hazard	Hazard Rating	Colour on mapping	Description of flood water	Description of hazard
None	Little or no hazard	White	Outside of flood extent produced by model	Little or no hazard (from coastal flooding)
Low	Low Hazard	Green	Shallow flowing or deep standing water	Caution, low risk to people
Moderate	Danger to some	Yellow	Fast flowing or deep standing water	Risk to the vulnerable, such as children, the elderly and the infirm
Significant	Danger for most	Orange	Fast flowing and deep water with some debris	Risk to most, including the general public
Extreme	Danger for all	Red	Fast flowing deep water with significant debris	Extreme hazard, danger to all, including the emergency services

Source: Defra and Environment Agency, 2008

- 2.5 The Council throughout the process of the formation of the Coastal Study supported the broad principles it set out in that a solution needed to be found for the future of its coast without strategically increasing the population and placing more residents at risk from flooding.

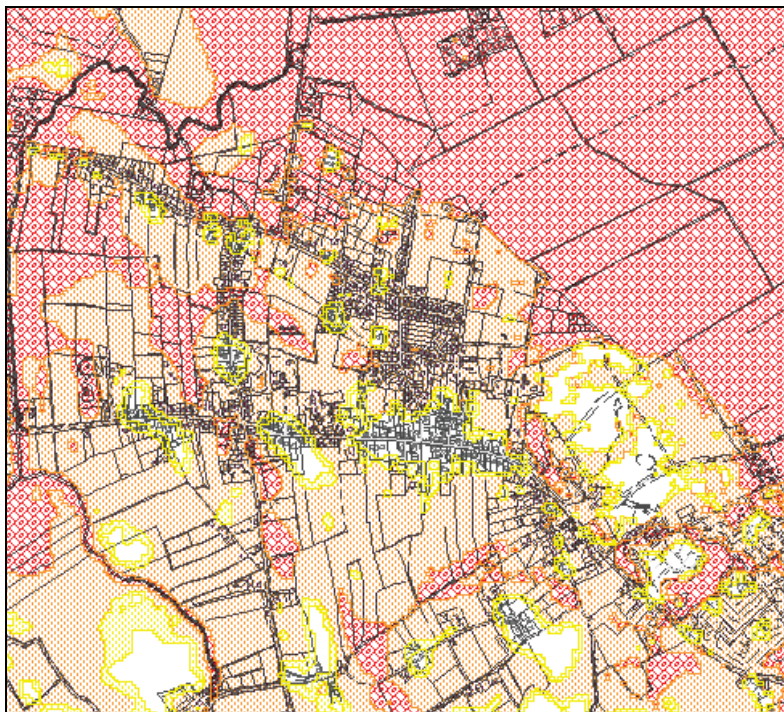
2.6 Set out below is a map of East Lindsey showing the Coastal Zone.

Combined Flood Hazard Map of East Lindsey Areas at risk of flooding from breach of sea defences, due to an event with a 0.5% chance of occurring in any one year 1 in 200-year event in 2115

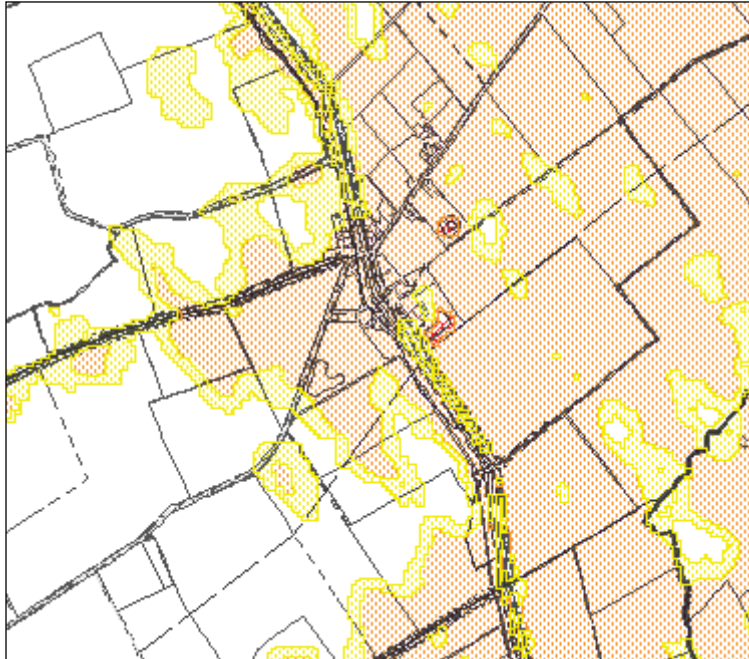


3.0 WHICH SETTLEMENTS ARE IN THE COASTAL ZONE?

- 3.1 For the purposes of the Coastal Policy in the Local Plan, the Council had to determine which settlements should be “in” the Coastal Zone and which “outside”. Those in the Zone would not receive a housing allocation in the Local Plan whilst those outside would. The Coastal Flood Hazard maps as can be seen above are not neatly drawn around settlements or through them, but weave across the coastal area of the District. It was therefore determined that those settlements that were fully washed over by the zones including red (danger for all) and orange (danger for some) would be classed as “in” and those on the western edge which may have some areas of settlement in the hazard zones but were near or adjacent to the low hazard area or no flood risk area would be “out”.
- 3.2 It was considered that the residents of those settlements which were in the Coastal Zone were more at risk from flooding because they would have to travel through the zone to evacuate from a flood event.
- 3.3 An example of a settlement (North Somercotes) in the Coastal Flood Hazard Zone is shown below, to evacuate out of the settlement residents would have to travel through red and orange zones;



3.4 Below is an example of a settlement on the edge of the Coastal Flood Hazard Zone (Grainthorpe)



Below is a list of those settlements along the Coast which are classed for policy purposes in the Local Plan as in the Coastal Zone.

Addlethorpe
Anderby
Chapel St. Leonards
Croft
Ingoldmells
Mablethorpe
New Leake
North Cotes
North Somercotes
Saltfleetby All Saints
Saltfleetby St. Clements
Saltfleetby St. Peter
Skegness
Skidbrooke + Saltfleet Haven
South Somercotes
Sutton on Sea
Theddlethorpe All Saints
Theddlethorpe St. Helen

4.0 HOUSING TARGET - COASTAL EAST LINDSEY

- 4.1 The Lincolnshire Coastal Study established the principle that future growth in the coastal area should not contribute to meeting the strategic needs of the region, and that any new housing development should be of a level and type designed to keep the population in this area broadly stable.
- 4.2 The National Planning Policy Framework (NPPF) is clear that local authorities should find a way to deal with flood risk and that they should co operate with partners under the duty to co operate in working on the issue.
- 4.3 Paragraphs 99 and 100 of the NPPF state that Local Plans should take into account climate change over the longer term, new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. Inappropriate development in areas of flood risk should be avoided by directing it away from the areas of highest risk but where necessary making it safe without increasing risk elsewhere. Local Plans should apply a sequential, risk-based approach to the location to development.
- 4.4 By applying this risk-based sequential approach to flood risk across East Lindsey with regard to Coastal Flood Risk, it is clear that the District has settlements outside of the Coastal Flood Hazard area which are sustainable and can accommodate growth. This in effect works in the same way as if the Council were unable to accommodate its own growth and were asking an adjacent authority to take that growth. In this case the District can accommodate its own growth and we can do it outside areas of high flood risk. There is no need to allocate housing in an area of high flood risk when you can do it in a safer, sustainable place. Whilst some of the settlements "in" the Coastal Zone have areas of yellow (danger for most) and green (caution – low risk) flood risk. The residents would have to go through red (danger for all) and orange (danger for most) zones to evacuate (some for a substantial distance) and therefore the risk remains high for these places.
- 4.5 Therefore, the Council determined on that basis that housing allocations for the Local Plan should only be made in those settlements deemed outside the Coastal Flood Hazard Zone, in other words; Inland East Lindsey.

- 4.6 The Coastal Study principle however stated that housing on the coast should not be to meet the strategic needs of the region. The East Midlands Regional Plan has been revoked but given the sequential approach to development set out in the NPPF, the principle remains that housing in the high flood risk should not be to meet the strategic needs of the District when this can be done in safer, sustainable settlements inland. Therefore the question is what are the housing needs of the coast?
- 4.7 The demographics of the District including the coast is set out in detail in the Housing Topic Paper. That Topic Paper discusses the process the Council went through to ascertain an appropriate housing growth scenario for the Coastal Zone. (See Housing Topic Paper)
- 4.8 The only scenario which in reality does not strategically grow the population but does allow for new household formation from the existing population is the zero population scenario. The migration led PG10 year and completion rate scenarios are "business as usual" and therefore do not achieve the strategic objectives of the Councils proposed Coastal Policy of not strategically increasing the population and putting more residents at risk. The zero dwelling growth scenario shows a decline in the population and this is not what the Council is trying to achieve in maintaining the population and keeping it stable.
- 4.9 With regard to the Zero Population scenario this provides a dwelling growth of 49 homes per year or 735 dwellings across the plan period.
- 4.10 As at the 28th February 2016 there were already 1308 housing commitments in the coast, a technical over-supply based against the target scenario of 735 of approximately 573 dwellings. This will mean for this plan period up to 2031 rates of development will only be lowered in the coast by just over 30% compared to previous build rates. This will provide a buffer of 44%. This should provide an adequate buffer during the first five years of the Plan for this area of the District.
- 4.11 Additional work carried out on the 2014 population projections using the same scenario shows a decline in this need to 630 homes over the plan period. This means that the buffer has gone up to 52%. The policy however is to remain at 735 homes.

Set out below is a table of the existing commitments in the Coastal Zone as at February 2016;

Addlethorpe	0
Anderby	2
Chapel St. Leonards	152
Croft	15
Ingoldmells	176
Mablethorpe	128
New Leake	0
North Cotes	0
North Somercotes	55
Saltfleetby All Saints	7
Saltfleetby St. Clements	0
Saltfleetby St. Peter	1
Skegness	608
Skidbrooke + Saltfleet Haven	3
South Somercotes	0
Sutton On Sea	155
Theddlethorpe All Saints	0
Theddlethorpe St. Helen	6
Trusthorpe	0
TOTAL	1308

5.0 WHY A SEPARATE COASTAL POLICY?

5.1 The coastal area of East Lindsey is considered to be so important in terms of its size, economic impact, make up of its population and the issues around flood risk that it warrants a policy in the Core Strategy in its own right. The majority of matters relating to the coast therefore sit in one policy in the Core Strategy. This hopefully fulfils one of the key concerns raised by those living and working in the coast, that policy should be clear and in one place.

5.2 The Policy is broken down into sector sections to make it easier for the reader, these are as follows and are discussed in more detail below;

- ***Strategic Policy 17 (SP17) – Coastal East Lindsey***

- ***Strategic Policy 18 (SP18) - Coastal Housing***

- ***Strategic Policy 19 (SP19) - Holiday Accommodation***

- ***Strategic Policy 20 (SP20) – Visitor Economy***

- ***Strategic Policy 21 (SP21) – Coastal Employment***

5.3 A key driver for East Lindsey is the maintenance of economic growth of the coastal part of the District. With its vibrant tourism industry, which is one of the main employers in this part of the District, it is essential that the coast be seen as being “open for business”. The Council has taken on board the key principles from the Coastal Study but has adapted them through consultation and examination of the evidence to ensure they fulfil the future needs of the coastal area and the District.

5.4 The creation of a separate policy in the Local Plan for the coast has helped the Council as an organisation identify and focus on this area more precisely. The Council now has two Member Portfolio Holders for economic development, one of which covers the Coast. It also has created and is working on a rolling 5 year Economic Action Plan, much of which covers projects in the coast and projects which will assist in informing the 5 year review of the Local Plan. A copy of the East Lindsey Economic Action Plan November 2016 is available as part of the Council`s evidence base to the Local Plan.

6.0 STRATEGIC POLICY 17 (SP17) – COASTAL EAST LINDSEY

- 6.1 This is the general section of the policy. It sets out which settlements are considered in the Coastal Zone.
- 6.2 This section of the Policy also sets out how the Council will view the Sequential and Exception tests with regard to development in the Coastal Zone. All relevant development in areas of flood risk has to show how it has passed the Sequential and Exception tests.
- 6.3 With regard to the Sequential Test this steers development to areas of lowest risk. One of the aims of the Coastal Policy is to make it clear to those wishing to develop what will and will not be supported by the Council. Part of this work is to make the process of submitting and understanding planning easier. To aid in this, Annex 2 of the Local Plan sets out how relevant development meets the Sequential test in the Coastal Zone, this then precludes this exercise from the application process. For development deemed to have passed the Sequential Test, it must then demonstrate how it passes the Exception Test, this is also set out in Annex 2 of the Local Plan.
- 6.4 For the Exception test, the very term exception means that it is beyond that would normally be allowed. It is important that development not listed in Annex 2 does demonstrate that it provides wider sustainability benefits. For this type of development and to assist those wishing to develop the Council will test development against its Sustainability Objectives set out in the Annex. Whilst the Council strongly supports economic growth on the coast, all relevant development should score positively and demonstrate that it provides wider environmental, social and economic benefits to the wider community. This format for the Plan has been agreed with the Environment Agency and they supported the Council with the wording of the Annex. The reality is that most development passes the Sequential and Exception Test and is supported by the Coastal Policy; some as set out below passes but with policy caveats attached to it but this is part of the mitigating against the risk from flooding.
- 6.5 It is important to note that site-specific flood risk assessments will still be required to establish the potential risk of flooding from coast, river and other sources and establish the most appropriate means of mitigation, and meet the requirements of the Flood and Water Management Act.

7.0 STRATEGIC POLICY 18 (SP18) - COASTAL HOUSING

- 7.1 This part of the policy covers housing in the Coastal Zone.
- 7.2 Set out above in Section 4 is the rationale and need for housing in the Coastal Zone and how this will be met at least in the first five years of the Plan through existing commitments.
- 7.3 However, the Council understands that land changes hands, landowners may wish to alter plans already approved and these housing commitments may change through the plan period. The Council felt that it was important that the Coastal Policy was flexible enough to accommodate this. The Council would not wish to constrain the opportunity for improvement on sites, such as new layouts or design and improved flood mitigation.
- 7.4 **Affordable Housing** - The Economic Viability Assessment shows that viability is an issue in the coast and to reflect this evidence the Affordable Housing Policy in the Core Strategy sets at nil the affordable housing contribution for the Coastal Zone.

However, the Council still needs to try and ensure that housing for specified vulnerable or minority groups is catered for, and particularly for affordable housing. Coastal East Lindsey is the area where the Housing Register is highest.

- 7.5 Therefore, in the Coastal Policy, affordable housing is not constrained, nor does it have any kind of target attached to it. Affordable housing is going to be in a "policy off" situation.
- 7.6 On the surface this would indicate that no affordable housing will be built in the Coastal Zone in the plan period. If there is no allocations and windfall open market housing fails the sequential test and therefore will not be supported, then how is affordable housing going to be brought forward? Out of the existing commitments on the coast 434 are set out as affordable housing, this is 33% of the 1308 housing commitments. Developers have been seeing this as an alternative way of developing sites and though the numbers are not significant, it does show that given a positive policy toward development, even in a difficult viability situation it still can come forward. This will continue to be monitored during the 5 year review period of the Local Plan.
- 7.7 The Council has to ensure that affordable housing if it does come forward is only allocated to those residents already living in the Coastal Zone. Drawing residents in from safer areas might provide

them with a new home but it would be counter intuitive because they would effectively move out of a safe area and into a high flood risk area. The Local Plan therefore has a local connection occupancy criteria which sets out who is eligible to occupy an affordable home and only draws people from the Coastal Zone and not the whole District.

7.8 Housing on Brownfield Land - The Council understands that sites which have served a useful purpose can become run down, empty and cause blight to a neighbourhood. Flood risk could prevent those sites from being developed for a useful purpose. Whilst the Council would always encourage and support the reuse of land in the Coast for employment, leisure or tourism uses and if in an appropriate location, retail, it also does understand that despite landowner's best efforts this is not always possible. The Council will therefore support open market housing on such sites in the towns, large and medium villages of the Coastal Zone. There will be caveats to this use of land to ensure that open market housing is not the "go to" before other matters have been considered and these are set out in the policy.

7.9 Objections – During the consultation process of the Local Plan there were many objections around the housing sections of the Coastal Policy. These focused on the fact that the housing was needed and that without it there would be economic consequences and the coast would decline or individual settlements would decline. Arising from this the Council brought forward the brownfield reuse of land part of the policy which does provide for some open market housing as set out above and ensures that sites do not blight communities; there is also the Single Plot Exceptions Policy, Affordable Housing and Older Persons Housing, all of which would be supported.

7.10 Examining the objections more closely, it is clear that at the present time the concerns of those objecting cannot be substantiated by the evidence. There is no evidence of a need for additional housing at this time beyond that which will be provided by existing commitments. The housing to be provided should be provided for local people, not in the sense we talk about local needs when we discuss affordable housing but in the sense for residents who are already living in the coast and forming new households. New households are formed through a number of mechanisms, children leaving home, people coming together to live, people parting company and living separately. As set out above there are presently 1308 housing commitments on the coast, these commitments and they are located right across the Coastal Zone.

- 7.11 From the work done by demographic consultants Edge Analytics; housing to provide for the needs for the existing population, as discussed above, means that the Council should be allocating 735 houses across the plan period, this actually leaves a technical over supply of 573 homes, this should provide an adequate buffer during the first five years of the Plan for this area of the District. One of the consultees during the summer 2016 consultation provided a piece of evidence which supports the continuing in migration of older persons demographic of the District as a whole. They stated that they carry out 120 private property surveys a year in the coast and 90% of them are for people outside Lincolnshire who wish to come and retire. Extrapolating this figure out to the 1308 existing commitments means that technically only 130 of them could be taken up by local residents. Even though it's only a small sample, it would indicate that retirees are still wanting to come to the coast and this is perpetuating the older demographic of this area.
- 7.12 Building houses in an area of high flood risk for those coming in from outside who are more likely to be older and therefore more vulnerable to the dangers from flood risk cannot be considered to be appropriate in terms of evacuation and risk. In the light of the Sequential Test, East Lindsey has other safer, sustainable settlements to allocate the housing that would have gone in the coast and this is an available option for the in migrants.
- 7.13 Evidence from Edge Analytics states that the Coastal Area has experienced a decline in population growth since 2008 it would appear as if existing household formation is still trending downwards. The population of the coastal zone like the rest of the District is driven by the in migration of mainly older persons. Younger people move out to go off to higher education and do not appear to come back, this is could be because the number of higher skilled, higher paid jobs are not available to them; this has formed over a long period of time an imbalance in the population which appears to be exacerbated in the coastal zone.
- 7.14 The in migration of older persons is continuing but the formation of new households from the resident population is declining. The Council can only theorise on the effect this is having on the housing market on the Coast; but it would appear from looking at the evidence that the new build market is not that robust with slow build out of the existing planning permissions. However, the second hand housing market is still operating effectively. This is because, the Council believes, the second hand housing market is able to offer a wide range of bungalows at various prices for the incoming migrant older population whilst the new build market builds two storey properties because of flood risk and is only able to draw, in

the main from the formation of new households within the existing resident population. This demand is small over the 15 year plan period (630 as set out above), too small to sustain a robust new build market. The second hand housing market is also fuelled by a high churn in the older population in that mortality rates in this population are high, given the age of the occupants of the majority of these properties, leaving many empty homes for sale and therefore a wide second hand market. The predominance of bungalows as a form of development has been driven in the past by high rates of in migration and the majority of planning permissions for housing on the coast were for this type of development, when flood risk was not such a major issue in terms of national planning policy.

- 7.15 It is considered important that there is enough housing for the existing resident population which given the oversupply in the existing commitments this should allow; this includes those already living in the coast and working in the tourism industry. Overall there is no evidence of need for key worker housing (housing for doctors, nurses, social workers, fire and ambulance staff, etc.) and the Council has to date not had any enquiries about this type of housing nor has anyone responded to the consultation on the Local Plan providing evidence of a shortage nor an inability to access the open market from these sectors of workers. There is no evidence of a rise in the Housing Register which has dropped significantly since 2012 and property prices in the Coastal Zone are not rising any faster than the rest of the District, which is very slowly. Also the existing commitments are not being built out at an accelerated rate. Therefore the usual market signals of a squeeze on the housing market are not present at the moment in the Coastal Zone.
- 7.16 Will settlements decline as a result of the Coastal Policy? This is very unlikely for the reasons set out in the Housing Topic Paper and the Sustainable Communities Topic Paper. (Please see these papers). Housing growth does not equal protection of services and facilities.
- 7.17 The other main objection from consultees was the existing commitments would not provide housing and that the Council should make developers build out. Unfortunately, the Council cannot force developers to either start on site or build out sites quickly. There are sites which have started but have then stopped again for various reasons; there were only two developers that the Council spoke to that said that they had no intention of completing, 4 that cited financial concerns and waiting for the market to improve; with the majority stating that they would build out.

- 7.18 However, in response to consultee concerns the Council has set up a project in the East Lindsey Economic Action Plan which will work toward examining underlying factors around existing housing in more detail in the Coastal Zone. It will also examine whether there can be any legislative changes around commitments in areas of high flood risk that either rescind planning permissions or apply possible penalties to those that gain permission and then do not develop.
- 7.19 The Council did consider whether to allocate additional housing against the failure to deliver the existing commitments but given the notional over supply of the commitments as set out above, against the chosen housing scenario, it was felt to be unnecessary at this time. Also there was the possibility of having an allocation and then the commitments come forward and housing could end up not being constrained and by default the Council would end up in a "business as usual" situation.
- 7.20 The other matter the Council had to consider is the deliverability of any additional housing allocations in the Coast. Given the situation as outlined in 7.14 above, and the fact that there is an oversupply of housing in the Coastal Zone in the form of existing commitments it is very unlikely that additional allocations would come forward in a timely manner, potentially leaving a District wide undersupply of housing.
- 7.21 These are all factors which will be monitored during the 5 year review of the Local Plan. The work of the Housing Reference Group will feed into and inform any proposed policy changes.

8.0 STRATEGIC POLICY 19 (SP19) - HOLIDAY ACCOMMODATION

- 8.1 This section of the policy covers all aspects of holiday accommodation. It sets out what the Council will support and where and also what the Council will not support. It is considered important to try and be clear on this aspect because holiday accommodation forms one of the major land uses in the Coastal Zone and is the one of main employers and clarity provides for a more positive robust economic atmosphere for users to operate in.
- 8.2 **Serviced Holiday Accommodation** – the policy supports bed and breakfast and hotels and sets out where they should be. There are defined serviced holiday accommodation areas set out in the Settlement Proposals Document and the Council will only support the loss of a development in these areas after defined criteria are met. It is important to set criteria for these losses because of the importance of trying to maintain some kind of balance to the holiday accommodation on the coast. The caravan industry

dominates, but if tourism is to flourish and grow there does need to be choice in the market for visitors.

- 8.3 **Protected Zone between Chapel St Leonards and Ingoldmells** – This zone is set out in the policy. It is the last piece of open green space between the two settlements, separating them and forming the spatial gap which sets them apart as individuals; much of the local area is now dominated by caravans and this gap forms a visual break as well as providing open green landscaping and assists in forming a rural feel to this part of the coast before moving rapidly to the more built up, caravan dominated fringes and heart of both settlements.
- 8.4 Moving along the A52, the openness of the land is very apparent to the east because it is so flat and stretches out to the horizon giving a wide rural view. There is a clear distinction between Chapel St Leonards and Ingoldmells which further caravan development in this green space will close permanently and lead to further visual dominance by caravans of the area.
- 8.5 **Caravans** – Given the dominance of this industry along the Coast, there were many objections around the caravan occupancy period in the Coastal Policy. In very broad terms most of the direction of the objections focused on the fact that the coastal economy would decline and/or not grow if the caravan industry was not permitted to open over either a longer period or Christmas. The objections also stated that jobs could be created and that the policy was preventing development and change.
- 8.6 The concept of a caravan occupancy period has been under discussion for a long period of time. There are positive and negative considerations about the caravan sites in the coast. The East Lindsey coast has one of the largest concentration of caravans in Europe with approximately 27,000 of them in the Coastal Zone. This industry has changed the landscape of many parts of the coast and is one of the dominant employment uses of land.
- 8.7 The Council commissioned a study in 2012 by Sheffield Hallam University to look at how many people actually had a caravan on the coast as their main residence and the result of that was approximately 6,000. In the summer months the population of the coast rises as the caravan sites fill up and the District has in effect the equivalent of another town in the Coast. This rise in population places pressure on existing services such as health and drainage infrastructure but does benefit the District in terms of income generation.

- 8.8 The Coastal Study with regard new and extension to caravan sites was going to restrict the occupancy of caravans to between 1st May and 30th September. The Council always believed that this was too restrictive because it did not take in Easter, which is an essential part of the tourism season. By working with the Environment Agency and looking at the peak periods for high tides and storm events, the Council determined that the occupancy period could run from **15th March to 31st October**. This would cover Easter for the next 100 years and take in the October school half term holiday. The technical paper covering the tide data is available in the Council`s evidence base for the Local Plan.
- 8.9 However during the consultation on the Core Strategy in 2012, it was noted by consultees that the half term did not always finish on the 31st October, when that date was not a Sunday but ran on to the following Sunday. Following this and trying to incorporate consultee concerns, once again working with the Environment Agency the Council amended the policy to include the occupancy period to the 31st October or the following Sunday, if the 31st does not fall on a Sunday.
- 8.10 In the consultation in July/August 2016 objections were again raised as set out above at 8.5. Some of the evidence presented by consultees actually supported the fact that the coast appears to be economically growing, overall the tourism economy of the District is trending upwards. The Council is aware that areas in the coast suffer from high deprivation and the coast has declined in this regard since 2010. However the country has suffered from one of the most sudden and severe economic downturns, which affected the whole of the District including housing building, in migration and employment. The full impact of the 2008 recession did not reach East Lindsey until the end of 2009 and given that levels of housing building have still not returned to pre-recession levels it is difficult to relate continuing deprivation directly to planning policy and any restriction on caravan occupancy. In fact all the evidence from the 2015 STEAM report points to a rise in economic growth along the coast particularly in tourism. In 2015 visitor numbers in East Lindsey were up to 4.53m from 4.27m in 2014 and the economic value of tourism increased from £555m in 2014 to £584m in 2015. Employment also increased in tourism from 7631 in 2009 to 8344 in 2015.
- 8.11 Looking again at national planning policy, Local plans should take into account climate change over the longer term, new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. Inappropriate development in areas of flood risk should be avoided by directing it away from the

areas of highest risk but where necessary making it safe without increasing risk elsewhere. Local Plans should apply a sequential, risk-based approach to the location to development. Caravans are classed as highly vulnerable development and in order to still support and allow caravan sites in areas of flood risk one of the main mitigation measures is to ensure that they are only occupied during periods of evidenced lower risk; this is the period March to October. The Council has evidence that this is the most dangerous period with regard to flood risk.

- 8.12 The danger from flooding is real, present and could happen during any year. On the 5th December 2013, a deepening pressure system combined with high astronomical tides and strong to gale force 'north westerly' winds to generate a coastal surge along the whole of the east coast of England, the largest surge since the 'great storm' of 1953. There were 18-20 km of flood defences overtopped, causing four breach locations. There was a large area of scour (e.g. Mablethorpe) and 4 breach locations at Boston Haven, Gibraltar Point (Bull Dog Bank), Tetney Marsh and Friskney, inundating an estimated 1,700 hectares of agricultural land. A number of buildings, including significant sites, were damaged, such as the historic St Botolph's Church ('Boston Stump') and Gibraltar Point Visitor Centre, which is in East Lindsey. An estimated £8.1m worth of damage caused to infrastructure in the county. A total of 6072 residential properties were damaged, the majority in Boston. In the conclusion of the Local Resilience Forums Response Recovery Paper they state;

"Overall this was a good, forecast-led, response and recovery effort. But, we were lucky. The wind direction was predominantly 'off-shore' and less strong than in 1953, so there were less damaging wave conditions. We also did not experience the heavy rain to exacerbate conditions as has happened during subsequent storms to hit the south west of England throughout December and into early February 2014. Due to these factors, and investments in defences, this was not an event on the scale of 1953 but nonetheless, a valuable and timely reminder for contingency planners and responders."

- 8.13 A further major event occurred in January 2017, this was a near miss. The prediction for this event was worse than in 2013 but the weather conditions altered and it was avoided. The window for this change was just 2 hours. Whilst those that own or run caravan sites would ascertain that their residents could evacuate within a relatively short period; the Council and Emergency Planning Services could not enforce this evacuation and this does not take into account those that did not come in a car but arrived in the

Coast by train. There is no planning condition, licencing arrangement or S106 agreement that can be put in place which could be enforced within the time period of a flood event and need to evacuate. Therefore, whilst some residents of caravan sites could self-evacuate it would leave too many question marks over the situation around what would happen if the residents refused, site owners did not co-operate or could not make their residents leave and what would happen to those that did not have vehicles. There is also no cap on the numbers that could potentially be in the coast in the winter months, nor how that would operate if those numbers increased. Emergency Planning has to plan for a worst case scenario and this scenario could, if the occupancy period was not in place, theoretically be all the caravan sites full over Christmas when a major event occurred.

- 8.14 The 2015 District wide STEAM report states that during these winter months there are still available approximately 26, 236 beds of non-serviced holiday accommodation with a further 6,000 beds of serviced holiday accommodation across the District. Overall the number of non-serviced accommodation beds has increased since 2009 by 23,000, with a 90% share of the market. There is also evidence to show that there a rise in the take up of serviced accommodation over the winter months and this correlates to the period when caravan sites which sit in the non- serviced accommodation category close. This would indicate that there is an economic relationship between the two types of accommodation and allowing a longer period of occupancy for caravans without further study and consideration could find the Council`s policy harming the serviced accommodation sector for the benefit of the non-serviced accommodation sector.
- 8.15 Looking at the 2013 – 2015 STEAM report for Skegness and Ingoldmells for serviced accommodation visitor days were up by 13.2%, numbers up by 9.2% and FTE`s of direct employment increased by 4.1%. For non-serviced accommodation visitor days were up 8.5%, numbers up by 4.5% and direct FTE employees up by 7.0%. All this leads to the conclusion that restricting the occupancy of caravan sites as set out in the Local Plan is not having any impact on the economic prosperity of the coast.
- 8.16 As a compromise an addition to the policy was negotiated with the Environment Agency to add a section to include some limited areas in the Coastal Zone that are not currently shown to be impacted by flood water in the current day breach scenario. In these areas there may be an opportunity to allow holiday sites to be safely occupied throughout the year for a limited period of 20 years. This would need to be secured via planning condition to allow an opportunity to

reassess the impacts of climate change in 20 years' time. At that time the knowledge and understanding of how climate change is progressing will be better understood and the Council will also be able to use the latest available information to provide robust evidence. The Strategic Flood Risk Assessment includes the maps of these areas.

- 8.17 Overall, the Council has worked with the Environment Agency to try and shape a policy that allows for the continuing development of caravans, a highly vulnerable form of development, in the Coastal Zone but which also mitigates against the risk from flooding.
- 8.18 In the Councils Economic Action Plan there is a project around examining the caravan occupancy period in more detail, with industry members, the Environment Agency. Emergency Planning and Lincolnshire County Council. The consultation in July/August 2016 helped form the basic brief for the project. In essence the project is looking whether the risks involved in occupying caravans in areas of coastal flood risk can be mitigated against, not necessarily in terms of design but in terms of process and procedure, to such an extent that those that manage that risk are satisfied. Alongside that work there will need to be a study carried out examining the economic relationship between the different forms of holiday accommodation along the coast.
- 8.19 The Work of the project will feed into and inform any proposed policy changes.

9.0 STRATEGIC POLICY 20 (SP20) – VISITOR ECONOMY

- 9.1 This section of the Policy covers the important Skegness, Mablethorpe and Sutton on Sea Foreshore areas. These are heart of the coast in that they attract thousands of tourists every year and form the backdrop to events both in the summer and winter.
- 9.2 This section also covers the Coastal Country Park and Wild Coast of East Lindsey. This is a contrast to the busy "bucket and spade" atmosphere of the main settlements. However, both of these are of equal importance because they diversify the tourism offer and choice to the tourism market.

10.0 STRATEGIC POLICY 21 (SP21) – COASTAL EMPLOYMENT

- 10.1 This final section of the policy offers support to rural employment. It is important to remember that the coast does not just cover the area along the seashore but moves inland to the coastal agricultural area of the District which lies to the east of the main shore. The support offered here for development is the same as the inland

rural areas. Main employment in Skegness and Mablethorpe is covered in the Inland Employment policy.

11.0 EVACUATION AND EMERGENCY PLANNING

11.1 This section of this paper focuses on evacuation and emergency planning. It is hoped that a major flood event does not occur in East Lindsey but the relevant authorities have to be prepared and the impacts of an event need to be understood as they form part of the decision making process when forming policies for development.

11.2 The Lincolnshire Resilience Forum (LRF) is a partnership required under the Civil Contingencies Act, 2004, between the emergency services, local authorities, health service partners, the environment agency, other national bodies (such as Maritime & Coastguard Agency, and the voluntary sector. It does not have a separate legal personality and does not have powers to direct its members, but is concerned with overall direction and policies of emergency planning and preparation in Lincolnshire. The Forum also forms the basis of the strategic multi-agency group that leads the overall response to any major emergency. The Forum meets regularly, and is normally chaired by Lincolnshire Police. Lincolnshire Resilience Forum agreed a 'shared ambition' for Lincolnshire's coastline in 2010;

"We want our coastline to be a safe, attractive and prosperous place for residents, business and visitors. We are all working together to protect and benefit Lincolnshire's coastline. The coast is better protected now than at any time. However, everyone needs to know that there is always the possibility of flooding, and climate change will make this more likely."

11.3 In respect of proposals to extend the occupancy season for caravan sites along the coast, the LRF has agreed the following statement designed to inform discussions / consideration by planners of the public safety issues of an extended season and the cumulative impact on evacuation operations;

"The Lincolnshire Resilience Forum has long-standing concerns over safely moving the existing population during a wide-area and prolonged coastal surge event. If caravan sites were allowed to be occupied all year round, this would significantly increase the number of properties to be evacuated and people requiring assistance from responders, adding to this concern. This would be particularly problematical during the Xmas and New Year holiday seasons when risks are highest and less resources may be available to us"

11.4 Preventative evacuation before the onset of coastal flooding has the potential to save lives but it can be costly in time, money and credibility. Success will depend on the combination of 'available time' and 'required time', with the effectiveness of measures such

as communication, traffic management and decision-making being critical.

- 11.5 National and local evacuation planning assumptions indicate that 10% of the population 'at risk' may refuse to evacuate (and may require rescue at a later stage), and up to 15% may require physical assistance from authorities to leave their homes and/or for transport and temporary shelter. This may equate to as many as 15,000 persons in Lincolnshire during a 'most likely' scenario of multiple breaches during a 1:200 year event. Providing this evacuation assistance and support will overwhelm local resources. We have to remember that in a flood event it will not be just East Lindsey that is affected as demonstrated in the December 2013 event.
- 11.6 Every effort would therefore be required to encourage the remaining 85% of 'at risk' population to 'self-evacuate', using their own transport and finding their own alternative shelter or accommodation with friends or relatives. Anywhere between 9129 and 80,500 properties may be affected by coastal flooding as a result of overtopping of the defences, or multiple breaches. Caravan sites may be particularly vulnerable to the impacts of water depth and velocity.
- 11.7 The LRF Response document in reaction to the December 2013 event stated that "Though potential tidal surges can be forecast up to five days in advance, the accuracy of forecasts and impacts up to 36-12 hours before high tide can be relatively low. The threat of coastal flooding typically will also have levels of uncertainty in:
- Forecasts of expected water levels, timelines, overtopping or defence breaches, and flood extent;
 - Effectiveness of measures such as communication, traffic management and decision-making.
- 11.8 Overall, whilst the Council do not want to labour over the point of the dangers of flood risk and Lincolnshire is well prepared and well trained for a major event, the risk remains and this risk increases during the months October to March when evacuation could be taking place during the hours of darkness in the coldest period of the year.

12.0 CONCLUSION

- 12.1 Overall the Council has tried to respond to consultation concerns around the Coastal Policy. The Coastal Policy has been many years in development and work has been extensively undertaken with the

Environment Agency to ensure that the policy is robust and meets their expectations around flood risk.

- 12.2 The Council believes that taking a sequential approach to housing development on the coast is in conformity with national planning policy and that directing housing development to safer, sustainable settlements outside flood risk is the appropriate way to mitigate against the risk.
- 12.3 The Council at the present time does not believe its policy is having a detrimental effect on the coastal area either in regards to housing need or on the economy. However, this is a new, different direction for policy and it is important that the matter is formally reviewed. This review is built into the Local Plan and set at 5 years. The Council has already started that review process and clearly set out what it is going to do, who with and when by.