

## Comments on the Main Modification to the Local Plan

By **Lincs Design Consultancy**

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### HOUSING GROWTH AND THE LOCATION OF INLAND GROWTH – (SP3)

MM4 / page 21 – SP3 / Paragraph 2

The amendment states that: -

*This area is covered by the Environment Agency's Coastal Flood Hazard Map and is called the Coastal Zone. The map is shown on the policy map on page 6 and on page 90 of the plan and the zone covers the red (danger for all), orange (danger for most), yellow (danger for some) and green (low hazard – caution).*

There are areas along the coast which are shown within Flood Zones 2 & 3 but at the same time are white on the Hazard Map. Are these areas not considered to be within the Coastal Zone and as such suitable for dwellings; subject to meeting other policies in the Plan?

MM4 / page 28 – SP3 / Paragraph 30

Is there any information to show how the Council will monitor the supply of Windfall housing?

MM4 / page 29 – SP3 / Clause 1

Same comment as above (page 21 – SP3).

The amendments are contradictory. Is the Coastal Zone defined by the Hazard Maps or is it the list of settlements?

Also, there are settlements within the Hazard Mapping area which are not on the list; for example, Friskney. Does this mean new dwellings are acceptable as Friskney is not on the list or is it still effectively banned due to being in the Hazard Zone?

MM4 / page 30 – SP3 / Clause 5

Is it necessary to require a footpath? And is this a roadside path or public footpath?

It could be that a footpath may be provided as part of a development and this in turn could improve accessibility for existing nearby dwellings.

A suggestion is to require either an existing footpath or a feasible route for a footpath link/extension to an existing pedestrian route.

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## **HOUSING IN INLAND MEDIUM AND SMALL VILLAGES – (SP4)**

MM5 / page 31 – SP4 / New paragraph after 2

Is there any definition of ‘important views’?

MM5 / page 32 – SP4 / Clause 1

Given the welcomed change to allow dwellings in the medium and small villages, is it really necessary to require redevelopment sites to be marketed? Particularly as many of these sites will be more appropriate to develop ahead of the windfall sites?

Is there any definition for ‘disused’?

Does this mean an active commercial or agricultural site does not have to be marketed?

MM5 / page 32 – SP4 / Bullet point 3 of Clause 1

Are there character assessments to cover these buildings? Who defines if a building contributes to the character of the area?

MM5 / page 32 – SP4 / New Clause 2 – new addition to the policy

It is wrong to restrict frontage development to 2 dwellings. A maximum number should not be set. The decision on the number of frontage dwellings should be based on other policies; such as character, amenity.

Gardens should not be excluded. If a restriction is required, it would be more appropriate to have a clause similar to SP3; restricting the use of gardens on the edge of the settlement with countryside character.

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## **AFFORDABLE HOUSING – (SP8)**

MM8 / page 38 – SP7 / Clause 2

Who are the ‘accredited bodies’?

MM9 / page 39 – SP8 / Paragraph 3

There is no definition of ‘rural workers’.

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## **INLAND EMPLOYMENT, CENTRES AND SHOPPING – (SP13)**

MM14 / page 63 – SP13 / New clauses after Clause 1 – 1i and 1ii

Why is Louth Industrial Estate allowed to have leisure, business/office and retail use (subject to certain criteria) but none of the other industrial estates are?

Given the effective ban on housing on the coast is this another penalty for these areas and other block to investment?

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## **WIDENING THE INLAND TOURISM AND LEISURE ECONOMY – (SP15)**

MM16 / page 75 – SP15 / Clause 3

Does this mean that a site slightly beyond a settlement but connected to it by a public footpath is acceptable?

The amendment only allows existing sites to extend if they are in close proximity to a town, large or medium village. This effectively existing sites in the countryside from expanding and is too restrictive. Policies in the old Local Plan enabled existing rural sites to extend if there were wider benefits; such as improved landscaping. There have been a significant number of approvals for such sites and most if not all have been implemented. For example, Halfway House (between Skegness and Burgh le Marsh), Willow Lake (outside Croft), Hill View Park (outside Hogsthorpe) and Woodthorpe Hall. This policy and its amendments penalise existing holiday sites for being in the countryside and will prevent them from adapting and expanding; which could affect the viability of the business, the local economy and jobs. This goes against the NPPF which aims to support a prosperous rural economy.

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## **INLAND FLOOD RISK – (SP16)**

MM17 / page 78 – SP16 / Clause 2

If the criteria are complied with is it automatic that the proposal passes the sequential test?

General point - There seems to be little in the way of discussion on the sequential and exceptions tests within the Plan.

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## **COASTAL EAST LINDSEY – (SP17-21)**

MM19 / page 90 – SP19 / Paragraph 10

It is wrong to remove this paragraph. Allowing longer seasons for sites not within the present day risk areas will have a significant positive effect on the economy and will help those who rely on seasonal employment.

MM19 / page 91 – SP19 / Clause 8

As above.

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## **OPEN SPACE, SPORT AND RECREATION – (SP26)**

MM25 / page 110 & 111 – SP26 / Paragraph 8

If the facilities required by the lower table exist within the distances set out in the upper table, does this mean the development does not need to provide them? Please clarify.

The scale of development in the lower table is too wide for the first group. Providing a LAP, LEAP and MUGA within a development of 10 dwellings is excessive and given the cost of a MUGA is likely to make a development unviable. There may be other issues which would prevent the incorporation of a MUGA such as amenity and character. It is suggested that an additional scale is added. Perhaps excluding a MUGA from developments between 10-50 dwellings; but maintaining this requirement for developments of 51-200.

Will there be clear definitions for the LAP, LEAP, NEAP and MUGA? For example, will the MUGA have floodlighting?

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#### **S106 OBLIGATIONS – (SP28)**

MM27 / page 121 – SP28 / New Paragraph after 9

Who defines the level of contribution and will the projects be defined?

Will there be a CIL?

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#### **STRATEGIC POLICY – (SP29)**

MM28 / page 122 – SP28 / New Policy after Policy 28

How will the Council carry out this monitoring?