



SKEGNESS TOWN COUNCIL



Town Clerk: S Larner

Mr J Youle and Mrs L Phillips (Local Plan Inspectors)
C/O Local Plan Programme Officer,
East Lindsey District Council
Tedder Hall
Manby,
Louth
LN11 8UP

31st January 2018

Dear Mr Youle and Mrs Phillips,

Re Local Plan Inspection

Skegness Town Council are currently undertaking a Neighbourhood Development Plan (NDP). The Council are extremely keen to express the importance that this will have to the area and believe that local opinions and locally determined needs must be fully taken account of. The Council is aware of a recent High Court judgement which support the idea of Local Communities having their say on growth.

The local NDP has just completed its first stage of local public consultation and the next stage will start to procure specific technical information and begin the process of developing policies for further consultation.

I have attached the Council response to the Local Plan Consultation but have summarised the main points below. Can you please confirm that these points have and will be fully taken into consideration through the examination of the Plan?

Can you also please confirm that the East Lindsey Local Plan will not seek to prevent new development, that is sustainable and supported by the local community, from coming forward?

Summarised Local Plan Consultation Points

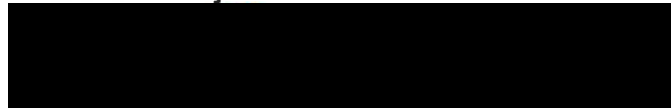
- The prevention of housing growth within the Town works against the policy of economic development and growth. Alternative sites may be available within the ELDC area, but these are not connected to the coast by adequate and suitable public transport provision.
- The plan does not enable Housing Land Allocation to be managed through the NDP in Skegness, which is currently the primary residential area in East Lindsey.
- Economic growth and job creation is a key issue to tackle deprivation, which the plan seeks to address and support. However, there is no planned growth for

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housing other than the permissions that have already been granted. The plan refers to a “technical over supply” due to permissions already granted. But this places the responsibility and decision making for housing growth and development into a very small number of developers whose main focus may not align with the needs of the town. If the town is to be vibrant and prosperous, then either there will need to be an increase in supply of the correct type of homes or significant improvement to public transport links to other residential areas where growth is permitted.

- Skegness is described as a primary retail site. However, there has been a significant impact from on-line retail and this needs to be tackled if Skegness is to be secure in its retail offering. The Local Plan offers nothing in this regard and relies on an evidence base that is 8 years old (i.e. pre-significant on-line retail offerings and loss of major retailers). The Local Plan is simply not robust enough and lacks any ambition or strategic thinking.
- There is concern that the evidence base for some aspects of the proposed local plan is out of date. There is a lack of any transport or movement of people surveys showing how retail, leisure and residential areas connect currently and how this will be developed to improve viability and economic prosperity in the future.
- The plan on the one hand appears to support additional or extended caravan parks but on the other hand does not wish to encourage more people using these as their main home. The only policy set to influence this is to restrict the occupation times from March to October. This presents many contradictory elements which are not fully explored or considered: -
 - They can still be occupied as a “main residence” for 7.5 months per year with the associated strain placed on local services. Those in permanent or semi-permanent residence will have a lower daily spend than those holidaying, but will also be much less likely to contribute to local infrastructure costs than those in permanent dwellings.
 - ELDC’s economic development policy is to extend the season – this policy seems to be encouraging holiday accommodation which is incapable of supporting this policy
 - No account has been taken of the levels of demand for new caravan spaces and what a sustainable number for the future is. Without this evidence base there is a risk that new demand is simply coming from existing parks which will leave these semi-occupied and eventually lead to their decline

Yours sincerely



Steve Lerner
Town Clerk