

LOCAL PLAN CONSULTATION RESPONSE FORM

Please note your comments are not confidential. Please keep your comments as brief as possible and focused on the point you are trying to make. The text boxes can be expanded. If you have alternative wording for policies please do not hesitate to make suggestions, if you have evidence to support your comments and wish to submit it please contact a member of the Policy Team to discuss the best way to do this. Please submit your comments on a Word document not a PDF.

Please note the Council cannot accept or publish comments that are personal in nature or injurious to individuals or groups of people.

NAME	SKEGNESS TOWN COUNCIL	For office use
ADDRESS	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 150px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 80px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 60px; height: 15px;"></div>	
GENERAL COMMENTS ON THE CORE STRATEGY	<ul style="list-style-type: none"> • The Plan does not seem to be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements to meet locally evidenced need. There are inconsistencies in the approach and some parts of the strategy, plan and policies appear to be counter intuitive. • The plan does not seem to provide a convincing strategic and appropriate way forward that has been considered against alternative approaches and that is supported by good quality evidence. • The plan will not be effective because the evidence it is based on is already substantially out of date in some key areas. • The plan quotes National Planning Policy in respect of Town Centre vitality but does not provide a suitable framework to actually deliver this. 	

Chapter 1		
Chapter 2	See Coastal East Lindsey Section as comments apply here also. The prevention of housing growth 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.	
Chapter 2A	See Coastal East Lindsey Section as comments apply here also. 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.	
Chapter 3	This will be picked up within the NDP for Skegness	

<p>Chapter 4</p>	<p>The proposed 20 pitch site is inadequate to enable Police to take enforcement action against large groups parking in areas that are not allowed as it will not provide an adequate area to move them to.</p> <p>The proposals to site this on an industrial site is not acceptable. As well as the potential health and safety issues for those who would be using the site (including children), no other residential or semi residential site would be allowed here and such a mix of residential and non-residential will be a departure from existing policy.</p> <p>There are already indications that if the site is located on the industrial site this will harm existing and future economic investments and this will consequentially impact job prospects.</p>	
<p>Chapter 5</p>	<p>See Coastal East Lindsey Section as comments apply here also. Other issues will be picked up with the NDP</p>	
<p>Chapter 6</p>	<p>See Coastal East Lindsey Section as comments apply here also. Retail evidence is significantly out of date for Skegness.</p> <p>Skegness is described in the local plan as a primary retail site. However, there has been a significant impact of 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.</p> <p>For the largest settlement in East Lindsey this is unacceptable. National Planning Policy has a strong focus on protecting the vitality and viability of town centres, but these are just words unless there are strategic and innovative policies to support this aim. The policies as set out seem to be aimed at maintaining the status quo rather than tackling the issues and supporting Skegness to grow its economy.</p>	

Chapter 7	See Coastal East Lindsey Section as comments apply here also. Evidence is 6-7 years old outside the time suggested when a plan would require significant revision (i.e. 5 years). This section is very weak and does not meet the ambitions of the strategy.	
Chapter 8	N/A	
Chapter 9	<p>Evidence Base</p> <p>There is concern that the evidence base for some aspects of the proposed local plan is out of date. The East Lindsey Retail & Leisure study dates from 2008 which is pre the explosion in on-line retail which has completely changed the pattern of retail commerce and impacted the requirements of retail within Skegness.</p> <p>The economic baseline is 6 years old.</p> <p>The hidden communities project is 5 years old, but caravan parks siting residential style vans have significantly increased during this period.</p> <p>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.</p> <p>Strategic Thinking</p> <p>The plan lacks coherent strategic thinking for the Coastal area and in particular Skegness, which is the Districts main area of population. In areas, the approach and policies seem to be contradictory in aim and ambition.</p> <p>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 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.</p>	

The plan acknowledges the need for "affordable" housing in the area and is willing to allow development in this respect. But this position completely ignores the market situation whereby "affordable housing" is only built by private developers where it can be funded through the sale of "market value" houses. This essentially means that new affordable houses would need to come from the public or housing association sectors which with current financial constraints is unlikely. This also affords no growth to enable the benefit of the prosperity ambition, enabling those who can move on from lower cost housing to free these up for others.

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.

The plan vaguely refers to the employment and leisure opportunities and that ELDC support the principle of this, but surely the Local Plan should be setting the level of ambition at this early stage by identifying policies in support of the site?

Policies (SP13):

E. The Local Plan should set out that existing permissions for phases on larger developments that have not been started, may be withdrawn if these are not being used to meet local demands.


F. Could the updated Brownfield Site register being included as an Appendix?

L. "...advertised at the prevailing market value.."

W. This should include permanent living for a substantial period of the season (e.g. where the caravan is clearly being used as an alternative to permanent accommodation rather than as a holiday let or as a weekend retreat.

<p>Chapter 10</p>	<p>Evidence Base</p> <p>There is concern that the evidence base for some aspects of the proposed local plan is lacking. 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 most recent car park survey appears to be 2011 and does not take into account changes including the removal of Pier Field, the changes to parking restrictions on the parades and the introduction of height barriers.</p> <p>The LCC Local Transport Plan is notably weak in addressing problems in the East Lindsey Area in general and Skegness and the Coast specifically. There is little consideration of managing holiday traffic with the traffic surveys being carried out on a weekday in October. The Local Plan encourages economic growth but does not show how increases in economic activity will be managed from a transport perspective.</p> <p>Strategic Thinking</p> <p>The Local Plan sets aims for the coast to develop and grow and encourages Skegness to be an all year round holiday resort. The plan does not demonstrate real aspiration or ambition for the future to reduce deprivation and increase good opportunities for the working age residents of Skegness, or to full fill their potential and it does not go far enough to improve the experience of visitors to our town and the coastal economy. Transport links are essential whether it is to complete a college education, access healthcare or visit all areas in Lincolnshire and beyond.</p> <p>Skegness has a resident population of approximately 22,000 people which increases significantly during the holiday season. If this increase is to be maintained all year round, the plan needs to support improved road and public transport infrastructure to ensure easy access for business, tourists and residents.</p> <p>The Local Plans main priority is in support of good foot and cycle routes, using call connect and the plan wants to reduce traffic congestion with the Western relief road. But these alone do not sufficiently support the strategic aspirations of the Local Plan.</p> <p>Policies (SP14)</p> <ol style="list-style-type: none"> 1. Define the "key facilities" 3. This would surely need to be shown to link to existing footpaths and cycleways and part of a strategic approach? 4. Specific mention also for Blind users having regard to national best practice in respect of road and pathway surfaces. 	

	<p>5. This sounds as if it is anticipated that car parks may be sold off for development. Simply having a robust survey is not sufficient, showing that there is a) alternative parking arrangements and b) this will not compromise future development must be a pre-requisite.</p> <p>Where are the policies to encourage the delivery of an improved transport infrastructure?</p>	
Chapter 11	No comments at this stage will pick up with NDP	
Chapter 12	No comments at this stage will pick up with NDP	
Chapter 13	No comments at this stage will pick up with NDP	
Chapter 14		

Settlement Proposals SITE NUMBER 	Please clearly state which site you are referring to, please keep your comments focused on material planning considerations and/or policy considerations, a list of what is material to planning can be found on the Councils website at www.e-lindsey.gov.uk/localplan. If you are the owner or represent the owner of a site please ensure you state this and when the site is expected to come forward for development.	

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GENERAL COMMENTS ON THE EVIDENCE BASE	Comments have mainly been included in the sections above. However, overall the evidence base is out of date and in some cases a decade old. Therefore the evidence is not reflecting many changes with a result that the proposals are immediately out of date.
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