



East Lindsey
DISTRICT COUNCIL

TABLE OF REPRESENTATIONS AND COUNCIL RESPONSES

MARCH 2017

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CHAPTER 2 – A SUSTAINABLE PATTERN OF PLACES, GROWTH AND HOUSING

Name of responder	Policy No	Page No,	Para No	Settlement Proposals	Map or Site No	Settlement Proposals page No	Page No, Para No	Q3 Response	Q4 Change Sort	Councils Response
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GENERAL RESPONSE										
Crowder W & Sons Ltd						Chapt er 2	Table B	<p>Land East of Lincoln Road, Horncastle</p> <p>Further to the above consultation, please find below representations on behalf of <u>W.Crowder and Sons Ltd</u>, owners of the above land.</p> <p>My client wishes to record his strong objection to the Draft Plan(s) comprising part of this latest consultation stage.</p> <p>For a Development Plan to ultimately be regarded as 'sound', it needs to (amongst other things) Be <u>positively prepared</u>, justified and effective.</p> <p>My client considers it fails on both counts – most particularly with</p>	<p>My client's objections to the latest proposed consultation draft can be remedied by:</p> <ul style="list-style-type: none"> the identification of land east of Lincoln Road, Horncastle as a long-term housing/mixed-use allocation (including extra-care facility and a site for the new primary school) to cement the 	<p>As at the end of January 2017, Horncastle already had 849 housing commitments, the allocation on a pro rata basis would only have been around 670, so the town is well over that. The Plan makes it clear why the Council allocates on a pro rata basis, this is because housing demand in the District and population growth is predicated on the in migration of older persons and it is impossible to predict where they are going to want to live. The Council therefore in the Local Plan is trying to direct housing growth to the most sustainable, safe from flood risk settlements and these are the inland towns and main villages, offering a choice of housing sites across these settlements. The issue with disproportionately placing growth in just one main place like Horncastle, is that the growth is unlikely to be delivered, because not all the in migrants who come into the District want to live in Horncastle, they want to live everywhere, particularly in the smaller settlements. The end result will be pressure to approve housing outside of any large allocation in one place on windfall sites elsewhere and the allocated sites will be left undeveloped or only developing out slowly; alternatively, the Council will very quickly fall out of having a five year supply and then a free for all will occur outside of the allocated sites.</p>

<p>reference to the Council's approach to future housing (and associated infrastructure) delivery at Horncastle.</p> <p>As identified in the draft Core Strategy\ Horncastle is one of the District's 'Principal Towns' (and <u>most</u> sustainable settlements). The majority of the District is essentially rural with relatively poor connectivity to major conurbations.</p> <p>A large part of the District (including some of those principal towns) lies within areas acknowledged to be at risk of coastal flooding or land designated as AONB 2 .</p> <p>It is therefore with some surprise to note that the Council proposes (in both its <i>draft</i> Core Strategy and Settlement Proposals DPDs) <u>zero</u> housing allocations in one of the few sustainable locations it has and where development would not be susceptible to coastal flooding.</p> <p>It was within the above context that my client's site (land east of Lincoln Road, Horncastle) was identified in the SHLAA as a site potentially suitable for housing³.</p> <p>Shortly following the publication of this early document, my client engaged with both those preparing the Horncastle Neighbourhood Plan and the Council to discuss the delivery of this site, in whole or in part, as part of the Council's early/emerging Forward Planning work.</p> <p>My client had indicated that he was a willing landowner and was prepared to invest significantly in promoting his site through the Local Plan Review process as and when this progressed.</p>	<p>principle and phasing of the development up to and beyond the current Plan period, thereby providing the mechanism to secure much needed highway/infrastructure improvements so important to the sustainable growth and future of Horncastle moving forward.</p> <p>As part of the above, my client's application identifies a logical first phase of development which is capable of providing much needed housing and affordable housing within the first few years.</p> <p>My client's highway consultants have, using the latest modelling information, concluded that this first phase of 120 dwellings can be accommodated</p>	<p>Because the Council has a clearly articulated 5 year review in the Local Plan the amount of housing for Horncastle will be part of that review and if it is found to be necessary then allocations of further land will be considered at that time.</p> <p>Horncastle is a town and therefore considered to be a sustainable settlement. This means that sites such as the one that the consultee is discussing can come forward if landowners wish to submit an application and believe they can deliver the site, there is nothing in the plan that prevents this and it is therefore not necessary to show broad locations of growth in Horncastle. There is no need for broad locations for growth because the Council has set out that growth will be supported in the inland towns and large villages. With regard to Horncastle any developer will have to evidence that they can feed into the water system adequately and overcome the County Councils highway considerations.</p> <p>The site the consultee is referring to has had a planning application submitted to the Council for determination for 18 months and has yet to resolve issues including highway issues and the wider impact on the highway network in Horncastle. Unless these are resolved then the application will be moved forward for a refusal of permission. Therefore at this stage the site is not deliverable because there is no certainty around the resolution of these issues.</p>
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				<p>Of course, progress on the Review of the existing Local Plan has been extremely slow.</p> <p>In the meantime, the Council has failed miserably in demonstrating and delivering an adequate supply of housing land in accordance with its annual housing land requirements.</p> <p>Owing to the above and as a consequence of national planning advice (most notably paragraphs 49 and 14 of the NPPF), the Council has received many speculative applications for housing outside of the Local Plan process within the context of applying the presumption in favour of sustainable development.</p> <p>Horncastle has of course seen its fair share of such planning applications.</p> <p>Concerned that there was a real danger that such planning applications might use up housing numbers for the town before the Council even progressed towards a draft new Local Plan, my client also then engaged directly with the Council to establish its views as to the acceptability of housing (and other development) on the land by way of a formal pre-application enquiry.</p> <p>The Council's response (copy enclosed) to the same was a <i>favourable</i> one in principle and very helpfully set out in detail the extent of supporting documentation etc. that would be required to accompany the future planning application.</p> <p>As a consequence of this advice, my client invested significantly in the preparation of an outline planning application for a mixed-use development comprising housing, the relocation of my client's existing garden centre, ancillary retail units</p>
				<p>within the existing highway infrastructure without severe impact. Accordingly, whilst it is acknowledged that the delivery of additional housing beyond this level will be dependent on more significant highway improvement works, there is no reason why the first phase could not be developed in the short-term such that the Council could be confident of its delivery within the early stage of the Plan period (i.e. prior to their five-year review) as required to satisfy the various tests of 'soundness'.</p>

	<p>and an extra-care facility 4 — all set within a high quality landscape and all underpinned by a sustainable urban drainage system which was a key driver in the design/layout of the overall masterplan.</p> <p>The application (which is still under consideration by the Council) was registered as valid⁵ and widely publicized/consulted.</p> <p>There was significant objection from those existing residents closest to the application site (as is to be expected) which ultimately manifested itself into a statutory objection from the Town Council.</p> <p>The principal cause of objection was twofold: flood risk and highways.</p> <p>In terms of flood risk, local residents confirmed their properties had suffered regularly/recently from flooding, both as a consequence of surface water runoff and an inadequate local foul drainage system.</p> <p>My client was aware of such issues at the outset and a <u>key</u> driver of the sustainable urban drainage system was to ensure, through design, that not only would the proposed development not give rise to flooding elsewhere, but would also (by limiting the rate of surface water run-off generated by the development to the existing greenfield rate — but on a controlled/managed basis) resolve/reduce the likelihood of those adjoining properties suffering from further flooding occurrences.</p> <p>The above was to be secured by committing to the proposed sustainable urban drainage system (which the Lead Local Flood</p>

	<p>Authority (LLFA) were encouraged and seemed inclined to adopt as a further innovative element of the overall proposal) and by off-site contributions generated by the development as a whole towards the upgrading of the local foul water infrastructure.</p> <p>Accordingly, rather than making a bad situation worse, the proposal offered a real (and rare) opportunity to resolve existing deficiencies without pressure on the public purse – in a climate where, despite the serious nature of the problems, this area was never going to be high enough up on the priority list to expect there to be funds available to provide a solution without further planning intervention.</p>		<p>The other principal issue related to the increase in <u>traffic</u> through <u>adjoining residential areas</u> as a consequence of the layout plan showing vehicular connectivity directly onto Elmhurst Road – this having been set as a specific requirement of the Highway Authority at the outset.</p> <p>The Illustrative Masterplan (layout) had been designed purposefully to discourage through traffic, thereby limiting the number of additional vehicular traffic onto Elmhurst Road. My client had made it clear to local residents that he was happy to ensure that all vehicular traffic exited onto Lincoln Road if necessary, thereby removing this element of local residents' concerns entirely.</p>		<p>During the progress of the application, the extra-care facility was welcomed as a means of addressing the shortfall of dedicated housing to meet the town's (and</p>

	indeed the District's ageing population.	
	The Education Authority also expressed a willingness to work alongside my client (the applicant) to incorporate a site for a new primary school owing to the lack of available land around existing school sites to facilitate the additional school classrooms identified as being required alongside housing development already granted ⁶ .	
	As mentioned previously, Horncastle has seen its fair share of housing sites granted over the past few years owing to the Council's significant housing (and affordable housing) deficit.	
	Some of those have been granted at the local level by the Council; others at appeal.	
	One notable development is that secured by Glad man Developments for circa 300 dwellings ⁷ which was allowed at appeal owing to its contribution towards the Council's five-year housing land supply.	
	Owing to the Council's resistance of the proposal at the local level, Glad man's development was allowed at appeal ⁸ <u>without</u> making any contribution towards additional school places, or highway/junction improvements.	
	This development (and others approved – collectively referred in the draft document as 'existing commitments') all place a burden on Horncastle's infrastructure, yet contribute little towards improving existing or facilitating future additional capacity.	
	It is noted with interest in the draft consultation document that a new	

	<p>school site is required and is to be safeguarded on land owned by the Local Authority – but not intended to be allocated/delivered until the new Local Plan is reviewed again in five years’ time⁹.</p>	
	<p>The Highway Authority objected to my client’s application on the basis that the scheme would have a severe impact on an existing junction in the middle of the Town despite having allowed the aforementioned consented schemes and, from more recent discussions, still being prepared to allow <i>smaller</i> schemes through (despite the fact that the cumulative impact of those smaller schemes would result in the same impacts on these junction(s) than say a single larger development but without the consequential highway improvement works/contributions capable of being secured by the latter.</p>	
	<p>Indeed, it would appear that the Highway Authority are content, for ease, to resist new development in Horncastle owing to the limited scope for mitigation of the existing junction(s) without a much wider-reaching, more expensive solution-approach to (restricting) future housing delivery in one of its principal sustainable settlements.</p>	
	<p>The Council’s more general policies on improving design {SP10}, safeguarding the historic environment {SP11} securing high quality landscape {SP23 – 25}, addressing climate change, seeking sustainable development, safeguarding against flood risk, resolving existing flood problems {SP16} and improving the cleanliness and quality of surface water entering</p>	

			<p>the system are all acknowledged and supported.</p> <p>Significantly, my client's proposal on land east of Lincoln Road complies with all of these objectives and more.</p> <p>And yet, despite the very significant benefits and opportunities arising from these proposals (which no other consented scheme in Horncastle can possibly deliver) and the Council's favourable response on the pre-application enquiry regarding the principle of the development, the Council in its draft DPDs seems content, for ease, to <i>turn its back</i> on meeting some of the more difficult problems Horncastle faces now and in the future- and instead <i>pass the buck</i> onto others as part of an early five-year review¹⁰</p> <p>It is for these very reasons that the Council's approach to the delivery of housing and other development in Horncastle is <i>not</i> considered to be justified or effective and that the Plan in its present form cannot be regarded as having been <i>prepared positively</i>.</p> <p>In its present <i>form</i>, my client considers the draft Core Strategy and Settlement Proposals DPDs fail to meet the tests of '<i>soundness</i>' as required for the Plan to ultimately be adopted.</p> <p>More particularly, it the Council's approach fails to make provision for a level of future housing (and affordable housing) capable of contributing towards and delivering much needed improvements to existing infrastructure deficiencies – those which existing commitments exacerbate without redress.</p>

Crowder W & Sons Ltd	SP1, SP2, SP3	Table A	<p>It is clear that important highway improvement/junction works can be secured to improve the existing situation – but again this is not likely to be forthcoming off the back of existing commitments which offer little by way of contributions (either as a consequence of those contributions not having been secured, or those sites not being of sufficient size to make such a contribution on viability grounds).</p> <p>My client acknowledges the difficulties some of these issues will present to the Council. However, planning is not meant to be easy and he expects the Council to have tried much harder to forward plan to arrive at a longer-term solution.</p>	<p>The Council acknowledges in the draft consultation document that the take-up of land has been slow and this has affected housing delivery.</p> <p>It implies that sustainable urban extensions have been discounted on the basis that the District has traditionally not been served by larger housing developers and that to entertain such an approach might prejudice smaller local housebuilders etc. 11</p> <p>This is not accepted. Sustainable urban extensions/larger housing allocations are almost always developed in phases by a number of different housebuilders. It is almost never the case that a single developer would develop an entire sustainable urban extension/larger housing allocation -and there is therefore no reason why such an approach would prejudice/penalise the District Council's traditional housebuilders in this way as suggested in the draft Core Strategy.</p>	<p>However, given that the Council has persistently under-delivered in this respect, my client considers that a 20% buffer should more appropriately have been applied in line with national planning guidance¹⁴ and that this would consequently increase the housing target commensurately.</p>	
O					<p>The reason at the present time for a 5 % buffer in the housing supply calculations is set out in the Housing Topic Paper. The Council has to calculate how much undersupply, if any, to add onto the housing target. The way the Council has done this is set out in the Housing Topic Paper in Section two. The Council also has to make a judgement about whether the buffer applied to the undersupply would be 5 or 20%. The Council has determined that it should be 5% because under delivery of housing in the District is coming in general from a lack of demand. The Council contacts all those persons/developers/builders who are granted planning permission across the District to ask them when they are going to deliver their sites. There are many reasons for sites not coming forward the main ones are waiting for the market to improve and sites up for sale with planning permission waiting to be sold.</p> <p>The Council had its own Housing Capital Programme (HCP) up to the end of 2015 and though there are a few sites still to be built out it is now coming to an end. This programme added to the completions over a number of years and has helped to keep the housing market in East Lindsey partly on track. In 2014/2015 the HCP contributed 50% to the District's housing completion rate. The Council believes that it has through intervention tried to support the housing market in the district and the lack of demand is outside of the control of the Council, this coupled with the slow economic recovery rate in the District should lead to the conclusion that a 5% buffer should be applied to the 5 year</p>	

<p>supply calculation and therefore the 553 homes shown as the undersupply is correct and the Council has not persistently under delivered on its housing, it is not failing to grant permissions for housing across the District, as at the 31st January there were 5005 housing commitments.</p> <p>The Council does not believe it should increase its buffer to 20% in its 5 year housing supply calculation. Looking at the five year supply after a year from the start date of the Local Plan, the supply, with the Local Plan allocations stands at 9.45 years. This is sufficient housing to more than deliver the growth of the District in the first five years of the plan period. Given that there is a review at five years, at that time if necessary more housing can be allocated and the supply or undersupply situation can be reviewed.</p>							
<p>In effectively <i>making do</i> at this stage (presumably in order to try and get an up-to-date Local Plan in place as quickly as possible), the Council is still persisting with a two-tier Plan (rather than a <u>single new</u> Local Plan as is now encouraged) and an early five-year review (to address anything which this Plan fails to deliver) notwithstanding its 2031end date.</p>	<p>My client considers that the future of Horncastle deserves more thought – and a long-term vision which may/will inevitably transcend beyond the currently proposed Plan period. In this connection, my client notes that the Spilsby site (SPY310) is acknowledged to commence within the Plan period but its full delivery is not projected until the end of or beyond the new Plan period¹² and remains of the view that the Council should have considered the provision/delivery of the land east of Lincoln Road, Horncastle on a similarly long-term basis.</p>			<p>Such long-term strategic planning depends on a creative and sufficiently forward thinking Local Plan process and my client considers the current draft consultation document to be significantly lacking in this regard- again failing in its requirement to have been positively prepared.</p>	<p>In conclusion, an approach to the delivery of housing (and other development) in one of the most sustainable towns in the District (and one of the few which is not at risk of coastal flooding) which proposes zero housing allocations for the remainder of the Plan period, despite Strategic Policy SP3, <u>cannot</u> be supported at this stage.</p>		

The Council appears to seek to hedge its bets with regard to the failure of its proposed new Plan by making provision for windfall sites in or adjoining the settlement boundary and earmarking an early five-year review.

My client would much prefer the Council to give more thought to the future housing, affordable housing and future infrastructure requirements of one of its most sustainable settlements as part of *this* current draft, providing the mechanism and motivation for continued investment by the private sector to help achieve these overarching objectives.

The Council's lack of direct engagement with my client (given the positive pre-application advice at the outset and the comprehensive application currently before the Council), also raises questions over procedural compliance and whether the Plan has been positively prepared.

I trust the above is helpful in progressing the *draft* Local Plan and look forward to being notified of the Examination details (as I will wish to attend to make further representations on the above points orally at the relevant session(s)) and each and any subsequent consultation stages leading up to adoption.

My client also disputes the Council's future annual housing requirements as he considers the historic shortfall has been underplayed.

The draft Core Strategy¹³ identifies the housing target of 7768 homes incorporates the historic shortfall when the 5% buffer has been applied.

Broadgate Homes represented by Hulme Planning Consultancy Ltd	Louth Town Council	SP1/SP3	General		<p>However, given that the Council has persistently under-delivered in this respect, my client considers that a 20% buffer should more appropriately have been applied in line with national planning guidance¹⁴ and that this would consequently increase the housing target commensurately.</p> <p>The allocation of my client's land east of Lincoln Road, Horncastle would clearly assist in addressing some of this historic shortfall whilst securing many other of the Core Strategy's (and Neighbourhood Plan's) visions and objectives – including the District's issues identified in the Core Strategy as needing to be addressed over the next 15 years¹⁵</p>		
Louth Town Council	SP1/SP3	General			<p>The strategic priorities identified in the development strategy that seeks to distribute housing development to the towns and large villages, i.e. Strategy Policy 1 (SP1) A Sustainable Pattern of Places, is supported.</p>		<p>The Council notes the consultees support.</p>
Louth Town Council	SP1/SP3	General		<p>Louth Town Council is very concerned that despite providing many comments to the local plan consultation, no acknowledgement, feedback or changes to the plan have been accommodated (other than the provision for Gypsy I traveller sites) .</p> <p>Whilst the arguments cannot be presented in the manner required the council would challenge the plan going forward on a number of points:</p> <p>Unequal distribution of allocated building land concentrating on the inland towns within the district. This is as a result of the severe</p>	<p>Louth is one of the two largest towns within the District and has a wide range of services and facilities and therefore on a pro rata basis has the highest housing allocation. Through economies of scale this will assist in the provision of services and facilities in the future and help Louth to become more sustainable than it already is.</p> <p>The statutory consultees covering infrastructure have been consulted through the production of the Local Plan and have raised no objections to the continued growth of the town.</p>		

	<p>restriction on coastal allowances and within villages.</p> <ul style="list-style-type: none"> • Louth is expected to absorb 26% of the district housing allocation over the next 15 years. This will place additional pressures on Louth not experienced by other towns. • Using the current occupancy levels stated the population of Louth will exceed 19,000 within the lifetime of the plan and potentially become the largest town in the district. <p>49% of the potential 5,134 properties put forward in Louth are within areas that have poor road infrastructure, local surface water flooding problems or water supply shortages to resolve and little in the way of local retail units, amenities and community networks.</p> <p>The proposed increase in 1,277 homes could result in over 2,000 additional cars circulating around me through the town on poor infrastructure. The location of the new developments will create local congestion for which there are no ready solutions.</p> <p>The Local Plan encourages a piecemeal approach to water supply which will cause continual disruption to the road network in Louth to create the necessary supplies as and when required.</p> <ul style="list-style-type: none"> • Lincolnshire Health and Care STP has not yet been completed. • 5106 obligations to create sustainable development with distinctive character. 	

	<p>The Council's original OAHN was set out in a number of reports including the Housing Topic Paper dated February 2016 and the Updating the Demographic Evidence Report by Edge Analytics dated June 2015. Since the draft Local Plan consultation ended in August 2016 the Council has undertaken a re-assessment of its OAHN to account of the most up to date data available including the 2014 SNHP as set out in East Lindsey Demographic Forecasts Updating the Evidence Report dated October 2016 by Edge Analytics and the Housing Topic Paper dated November 2016. The Council concludes that no meaningful change has arisen from the publication of the 2014 SNPP and SNHP. The OAHN remains 481 dwellings per annum based on official projections plus local sensitivity testing adjustments for 10 year migration trends and Household Formation Rates (HFR) together with a vacancy <i>I</i> second homes conversion rate of 6.5%. This equals an OAHN figure of 7,215 dwellings for the period 2016 – 2031 to which is added 553 dwellings of housing under supply for the period 2011 – 2016 resulting in a housing requirement of 7,768 dwellings (517 dwellings per annum) as set out in Policy SP3.</p> <p>It is noted that the Council's updated evidence provides no further information or analysis of market signals in particular if worsening trends indicate the need to increase OAHN above demographic led projections.</p> <p>There also appears to be a mismatch between economic growth and housing provision. The Council's Economic Baseline is +240 jobs per annum but all demographic led scenarios are below this figure. The latest evidence shows that the Council's preferred scenario will only</p>	<p>housing delivery and fulfil the national objective of trying to significantly boost housing supply.</p> <p>It is difficult to see how the Council could using evidence come up with a higher figure for its baseline housing target. The housing market in the District is improving albeit very slowly. Section 6 of the Housing Topic Paper discusses the housing market and whilst the section is not entitled "Market Signals" it does look at some of these factors such as house prices, which are rising but only very slowly. Overall, the Council would conclude that its baseline Housing Target is the correct one for the District at the present time, though this will be reviewed again in the 5 year review of the Local Plan.</p> <p>Section 3 of the Housing Topic Paper sets out the economic impact of housing growth. The Baseline document highlights that, if current economic activity rates stay the same, the percentage of the economically active workforce who work in East Lindsey will need to increase from 66% to 81% to sustain the local jobs market. To some extent, it is anticipated that this gap will be reduced by older people remaining in the workplace for longer, the increase in retirement age and benefit reform. However, even taking this into account, there is still likely to be a gap between the stock of jobs in East Lindsey and the number of economically active residents that are available to fill them in the future.</p> <p>This leaves the District with a dilemma because theoretically increasing housing could just increase the number of older persons moving into the District, thus exacerbating the situation with a top heavy population of older persons and still not enough residents to fill jobs. It would appear as if the commuting ratio for the District has gone down from 1.16 in 2001 to 1.09 in 2015 meaning less people are commuting out of the District, the unemployment rate has also fallen from a high of 7.5% in 2011 to 4.8% in 2015 and jobs have increased with an upturn in the economy particularly around the tourism industry. The East Lindsey Economic Baseline study proposed two scenarios for the District, one of an economy which is not fluctuating and remains in a low wage, low skill equilibrium, this is the present day scenario, though there are signs that economic growth does appear to be starting to positively grow in the District it is slow and tends to be still in the low wage sectors such as tourism. The other scenario was one of large scale intervention into the economy is set out below;</p> <ul style="list-style-type: none"> • Improvements in public health and a pool of higher skilled jobs enable the economy to retain enough of its workforce to fill all the additional jobs needed. 	
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HBF	SP3/S P18	O				<p>The NPPF states a preference for a 15 year time horizon for DPDs (para 156). However if the Core Strategy and the Settlement Proposals Plan are not formally adopted until the beginning of 2018 as set out in the latest Local Development Scheme dated March 2016 then less than the preferred plan period of 15 years would remain.</p> <p>It is noted that the Council refers to a full review of policies Policy SP3 – Housing Growth & the Location of Inland Growth and Policy SP18 – Coastal Housing within 5 years. However this proposal is not set out in the wording of either policy. It is suggested that the Council's intention to review these policies within 5 years is widened to encompass the whole Local Plan thereby facilitating the amalgamation of two separate DPDs into one single document and the extension of the plan period beyond 2031. Such a policy commitment to a proposed Local Plan review within 5 years would assist in resolving the lack of consistency between the Council's DPDs and national policy.</p>	<p>In a number of places in the Local Plan it states that the Plan will be reviewed in 5 years and why, the Council do not consider the need to keep repeating this.</p>	<p>demand. The situation will be carefully reviewed in the 5 year review of the Local Plan.</p>
Burgh le Marsh Town Council	Chapt er 3	O	Burgh le Marsh	22		<p>This section of the Local Plan is challenged on <u>testsof soundness</u> in respect of the criteria for being "positively prepared" and consistent with achieving sustainable development.</p> <p>We acknowledge that Burgh le Marsh largely boasts the facilities and characteristic noted in the Development Plan including location on the public transport network, and a good number of shops and amenities</p>	<p>The Council is unclear on what grounds the consultee is objecting to the Local Plan. They appear to accept that Burgh Le Marsh is a large village and want to be assured that infrastructure will be supported through S106 contributions on development. This is something that already happens and has happened and therefore it is not clear what the consultee wishes the Local Plan to say in any amendment.</p>	<p>The Council is unclear on what grounds the consultee is objecting to the Local Plan. They appear to accept that Burgh Le Marsh is a large village and want to be assured that infrastructure will be supported through S106 contributions on development. This is something that already happens and has happened and therefore it is not clear what the consultee wishes the Local Plan to say in any amendment.</p>

			<p>key sustainability aim of the NPPF and the necessity of transporting children to schools outside their local community is therefore contrary to both the spirit and letter of national planning policy. Recently, an application for a Gypsy/Traveller site (EDLC application S/023/01319/16) within the town drew comments from the Lincolnshire County Council Strategic Development Officer Mr S. Challis in respect of the pressure on the local school; he specifically noted, 'this development would result in a direct impact on local schools. In this case just the primary schools at Burgh le Marsh are projected, notwithstanding the proposed development, to be full in the future to the permanent capacity of the school.' In his remarks Mr Challis went on to note the school is anticipated to have no surplus permanent places by 2019 and to call for a capital contribution to help fund additional provision.</p> <p><u>Drainage&FoulWaterSystems.</u> Events of flooding in severe weather continues to plague residential and commercial properties in the town due to aging and overburdened systems, despite assurances from the water board without the benefit of substantiating evidence. In the interest of sustainability and prudence, future development that will pressurise these systems should require contributions to enable development without detriment.</p> <p>In summary, we accept that as inland settlement some measure of development will necessarily be allocated to Burgh le Marsh and assert the persistence of real pressures on our local infrastructure and services. Therefore, in the interest of sustainable development which serves the social and economic needs of the Burgh community in furtherance of its general well-being, we feel any</p>

Historic England		p19 (9)	O	<p>approved development should be accompanied by planning conditions for Section 106 contributions towards redress and mitigation of these infrastructure pressures.</p> <p>Chapter 2 - A Sustainable Pattern of Places, Growth and Housing</p> <p>Should the suggestions about the Settlement Proposals Document be taken on board and implemented, and since there are no site specific site allocation policies, it is recommended that the Settlement Proposals Document is referenced within the 'Evidence' list for this chapter.</p> <p>This would provide opportunity for additional text to be included within this Chapter to highlight the assessment work within the Settlement Proposals Document which could assist with informing site allocation proposals as they come forward since the Plan sets out a more generic approach to sites in its' policies. It is considered this option would assist with the Plan demonstrating a positive approach to the historic environment as required by the NPPF.</p>	<p>It is recommended that additional text be included at the end of Paragraph 9 which currently sets out what other factors can affect decisions and shape the strategy for the location of growth.</p> <p>Additional wording, after the existing list, could read as follows:</p> <p><i>'The Settlement Proposals Document includes general assessments of these factors in relation to housing allocation sites (as per Table B Paragraph 21) and, whilst not conclusive, indicates what measures may be required at individual sites to address these issues. The District Council will expect developers to consider this information and encourages early engagement on</i></p>	<p>It is unclear what the consultee means and what purpose their suggestion would serve.</p>
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<p>represent ed by Andrew Rollinson</p>	<p>Chapt e 2</p>	<p>O</p>	<p>p13 (2.9)</p>	<p>Objection is made to the lack of any housing allocation in Binbrook. BIN306 has previously considered to be available, deliverable and suitable; it is strongly contended that this remains the case and that this site should be brought forward in the Local Plan as a housing allocation.</p> <p>The justification for the lack of housing allocation provided in paragraph 2.9 makes only the most cursory assumption about the 'level of impact' with no balanced reference to the sustainability of the settlement nor the need to significantly boost the supply of new housing and to focus new housing in rural areas on those settlements with a good range of services and facilities.</p> <p>Please see our comments about Chapter 3 for our detailed response about the failure to allocate site BIN306.</p>	<p>development proposals'. We would be pleased to discuss any suitable alternative should you consider this an appropriate way forward on this point.</p>	<p>The Council removed the allocations for Binbrook from the Local Plan after an objection was raised by Natural England during the consultation June 2016. This was because the settlement lies within the Lincolnshire Wolds AONB and therefore there should be as assessment of alternative locations for growth outside of the nationally designated area. In the same way as flood risk has been judged quite clearly East Lindsey has other suitable sustainable locations to put growth that would not have a wider impact on the AONB. Binbrook remains a large village and choosing not to make an allocation does not change its status in the Local Plan. This does not mean there is a blanket ban on housing in Binbrook it would be for individual site owners coming forward to evidence that they have passed the tests set out in National Policy to make them acceptable for delivery in a nationally designated area.</p>
<p>SP1,S P2, SP3, SP4</p>	<p>O</p>	<p>The consequence is an</p>	<p>East Lindsey District Councils' Core Strategy An Unsound and Non-compliant Housing Target The housing target contained within East Lindsey District Council's Core Strategy is unsound, being premised on outdated & false information, and parts of the methodology used to determine it are in direct contradiction to Planning Law & Guidance. The consequence is an</p>	<p>In reality the situation is very straight forward. If we follow the evidence produced for East Lindsey District Council by consultants Edge Analytics, at considerable cost to the</p>	<p>The Council believes its housing figure to be correct and does not wish to support a lower figure as set out by the consultee. The consultee does not agree with the Council that there was an undersupply of housing but the Council calculations show that there was and this has been fed into the housing target in the Local Plan. The Council contacts all those with planning permission to ask them when they are going to bring their site forward, the information is then fed into the 5 year supply. The Council cannot be more accurate in this process.</p>	

		<p>inflation of housing need by some 30%.</p> <p>East Lindsey District Council (ELDC) has chosen to ignore the most up to date evidence available to it, when calculating its housing target for the Local Plan period of 15 years, without an adequate reason for doing so. It has dismissed:</p> <ul style="list-style-type: none"> the ONS subnational population estimates (2014), the latest set of Household Projections (2014) from the Department for Communities and Local Government and the findings of its own 2014 Strategic Housing Market Assessment update (SHMA). <p>An in depth examination of the flaws in ELDC's methodology, demonstrated in the "Housing Topic Paper" of November 2016, which forms the evidence base for this, will highlight why it is essentially unsound.</p> <p>The belief that the trend in inward migration to the district is driven by the buoyancy of otherwise of the UK economy.</p> <p>The reason the Local Authority has chosen to incorporate the CLG 2008 based household projections into its calculations, whilst ignoring the latest set of figures (2014), is the belief that prior to 2008 inward migration to East Lindsey was running at a much higher level, and that the cause of this was the buoyancy of the British economy. The implication being that once the UK economy returns to higher levels of growth, inward migration will again begin to rise, and any housing projection will need to reflect this possibility.</p>	<p>council taxpayers of the District, which is grounded on the most up to date ONS subnational population estimates (2014) together with the latest set of Household Projections (2014) from the Department For Communities and Local Government, all of which include economic trend considerations, the real housing need is estimated to require 425 new dwellings per year (using the migration based scenario ELDC have chosen).</p> <p>Over the 15 year period of the Core Strategy this amounts to a district wide total of 6,375 homes to be built. Subtracting the 1308 planning permission commitments that currently exist on the coast, what's</p>	<p>The Council has chosen to take an average between the 2008 and 2012 projections because it wants to be sure that there is flexibility in the housing target to deliver sufficient housing levels, which it may do so.</p> <p>It is best practise to include the undersupply in a housing target and this the Council has done.</p> <p>The Local Plan has a 7.3% buffer because it is once again good practise to allow some over allocation in case sites do not come forward. It is almost impossible to allocate the exact amount of housing, this means cutting sites up on the maps, which the Council believes is not good practise because invariably the whole site comes forward so it should be shown as such on the proposals maps in a transparent way.</p>
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	<p>This is perhaps the most fundamental of the flawed assumptions behind the calculation of the housing target, and the evidence that gives the lie to this suggestion is to be found in ONS data that actually appears in the Edge Analytics analysis, prepared for ELDC.</p> <p>Because the net effect of the birth and death rates in the district is always negative on population growth, the only driver of population increase is migration. Prior to 2001 inward migration was high. Thus all population estimates produced before the Census figures of 2011 were published, anticipated a continuation of this pattern. It simply did not happen and that is why any population and household projections prior to 2011 have proved to be significantly exaggerated.</p> <p>As can be seen from the graphs and tables below the demographic evidence that East Lindsey District Council has in its possession suggests that,</p> <ol style="list-style-type: none"> 1. There is no discernible connection between population growth in East Lindsey and the health of the UK Economy. 2. The clear trend for inward migration to East Lindsey from 2001 to 2007, when the UK economy was very buoyant, was one of reduction. Indeed from 2004 to 2006 in- migration fell by over 40%. <p>Moreover, all CLG Household Projections are premised on economic data. The 2012 figures will have factored in the era of growth from 2001-2007, and the 2014 statistics will have factored in the growth since 2012 as well.</p>									

<p>This area of the country does not follow national trends. East Lindsey, in particular, has an economy of its own, which, self-evidently, is driven by factors mostly connected with its proximity to major road and rail links and economic hubs. Thus the general rule that as the UK economy picks up so will in-migration, which may hold water for many parts of the country, simply does not apply to East Lindsey.</p> <p>It is no good looking at house sales or house completion statistics in isolation in order to inform the need for future housing. These can be up or down for all sorts of reasons unconnected with the state of the local economy and indeed population growth. The evidence is clear. The Office for National Statistics and the Department for Communities & Local Government fully expect inward migration to remain at its current lower level. <u>The belief that there has historically been an undersupply of housing in the district</u></p> <p>This entirely inaccurate claim is based on calculations using the completely out of date regional housing target set way back in 2006. Planning Guidance states – “<i>It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.</i>”</p> <p>In fact the only way to look at historical housing supply is to look at the actual figures. On this subject Planning guidance says – “<i>The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.</i>” According to the Local</p>	<p>the 15 year Plan period (15 a year). However, this is a purely aspirational policy statement. No strategy to implement this policy is offered and no budgetary consideration given to this task</p> <ul style="list-style-type: none"> • East Lindsey has seen an over-supply of housing in the previous 14 years. Planning guidance says that this can be taken into account in calculating a housing target. It has not been. • ELDC is planning to allow a further 218 homes to be built on the coast over and above the proposed cap, provided they meet certain build criteria, and in addition 202 homes in the medium and smaller inland villages on brownfield land over and above the inland target figure. 	

	<p>Authority's own statistics and those of the Census 2011, the number of homes built in East Lindsey from 2001- 2015 was around 7,000. In that 14 year period the population grew by around 7,300 (Census 2001 & 2011 figures taken together with the ONS 2014 Sub National Population Projections). This represents an amazing house building achievement that most Planning Authorities would be extremely envious of. Far from an undersupply of housing, the evidence is clear that there has been a quite definite over-supply. This may well be one of the contributory factors to the flat-lining of house prices since 2008 in East Lindsey, and the lack of demand that developers have informed ELDC about.</p> <p>The belief that there is a currently a shortfall in the five year housing supply for the district</p> <p>ELDC's "Housing Topic Paper" indicates that there are 4085 unrealised planning permissions in the district. The National Planning Policy Framework (NPPF) states the following:</p> <p><i>"Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans."</i></p> <p>ELDC claims in its Core Strategy that the district can only supply the equivalent of 3.85 years rather than 5 years of housing as required. Putting aside the completely unsound method of calculating this figure (referencing the 2006</p>	<p>They are also planning for an expectation of building 1165 new homes on "windfall" sites outside of the target amount. In other words there is an expectation that 1935 new homes will be built surplus to the housing target.</p> <ul style="list-style-type: none"> • East Lindsey's population only rises through inward migration since the death rate consistently outstrips the birth rate. The way the Inland target is reached involves the entirely spurious assumption that any potential migrant to the coast will choose to live inland should they not find an available property due to the coastal development cap. It is well understood that people who might seek to move to the East Lindsey coast are highly likely to move to a coastal location 	

	<p>Regional target) and the fact that it is based on a housing target that has been inflated beyond the objective, up to date evidence, there are, in addition, serious doubts about the robustness of ELDC's assessment of the 5 year deliverability of housing sites:</p> <ul style="list-style-type: none"> • ELDC offer no detailed evidence on how they came to judgements about the deliverability of individual sites. This contradicts planning guidance which states <i>"Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out."</i> The Core Strategy simply states that the Local Authority has made these judgements, and where there are comments about sites in the supporting evidence they are patchy and inconclusive on many occasions. In other words the evidence base is flimsy at best. • The figures for 5 year deliverability exclude any consideration of Alford's allocated sites. Alford is one of the five towns in the area which together will take the bulk of the development. • Discrepancies in the figures have already come to light. On one site that is put down as undeliverable within 5 years, building work has already started! On another site, out of five homes that are recorded as started at the time of the assessment, it is concluded that only 3 will be completed within 5 years! This simply is not feasible. The discrepancies uncovered thus far could be anomalies, but it is highly likely that they point to a lack of soundness in the process of deliverability assessment, so basic deliverability assessment, so basic are they. There appears to have 	
	<p>elsewhere, rather than deny their aspiration to live on the coast by taking up a property inland.</p> <ul style="list-style-type: none"> • ELDC regards their target as a minimum figure. <p>The exaggeration of need is not minor – the housing target has been inflated by 30%, over and above the objective, up to date evidence!</p> <p>A Local Plan has to be achievable and realistic. The entirely unrealistic housing target is in danger of undermining the whole Core Strategy and will ensure that</p> <ul style="list-style-type: none"> • housing supply objectives will continually be missed later in the plan, • A n d house prices in the district will continue to flat-line, due to the glut of properties. 	

	<p>been an assumption of sites not been able to deliver unless there is proof otherwise, rather than the emphasis that the NPPF and its guidance puts on the matter. There it clearly indicates that planning permission sites should be assumed to be deliverable unless there is evidence of constraints that suggest otherwise.</p> <ul style="list-style-type: none"> • The five year housing supply required under the NPPF and even ELDC's proposed inflated housing target would amount to 2,918 dwellings (including the 5% buffer from later in the plan period). It is inconceivable that out of 4085 existing planning commitments, not to mention all of the allocated sites, less than 2918 of these will come to fruition within 5 years. Site owners and developers do not generally apply for planning permission (something that only lasts for a period of three years) on the basis that they do not intend to go ahead in the foreseeable future. • 5 year housing supply for the real, unexaggerated target figure (see below) would be 2232 (which includes a 5% buffer brought forward from later in the plan). ELDC's own depressed figure of 2519 homes that can be delivered within 5 years, is comfortably beyond that number. <p><u>Reference is made to out of date and discredited evidence</u></p> <p>The district housing target figure has been calculated with reference to the CLG 2008 based household projections. Instead of taking the latest set of such figures, as national planning guidance states, ELDC has chosen to inflate the projected need by averaging out the figures between the 2008 and the 2012 household estimates. This is based on the entirely false</p>
<p>ELDC readily admits that developers have informed them that East Lindsey is experiencing low demand. The inflation of the real need for new homes by 30% is a clear indication that they have not listened. ELDC's methodology for calculating this is both unsound and in places fails to comply with National Planning Law and its guidance. It should be revised downwards to offer a more achievable aspiration and a more realistic reflection of need.</p>	

	<p>assumption that inward migration to the district will return to pre-2001 levels, as reflected in the 2008 projections. We have seen that this is simply not going to happen. The 2008 figures are predicated on a population figure of 140,800 in 2008. This is over 4,000 more than the 2011 Census figure and remains 2,328 more than is the current estimate according to the ONS 2014 Sub National Population Projections published in May 2016. In other words so inflated was this projection that it postulated a population figure that has still not been reached 8 years later!</p> <p>The East Lindsey situation is part of a broader picture surrounding the 2008 Household Projections and is the reason that they have been archived and are now not generally available unless requested. They are widely regarded as having been discredited. Even Local Authorities whose population projections were not so seriously exaggerated by the 2008 Household Projections have concluded that these statistical estimates inflate need beyond what is reasonable. Nottingham's Housing Market Area (a conglomeration of Nottingham's local authorities) successfully had their Local Plan approved by the Planning Inspectorate several years ago. In that plan they argued that the 2008 Household Projections over-egged need and the Planning Inspector agreed with their analysis.</p> <p>Of course the Edge Analytics PG 10 yr. scenario, which is the measure that clearly should drive East Lindsey's target, already takes into account the economic trends of a buoyant UK economy (during the period 2001-2007), as do the</p>	

<p>2014 (the latest) household projections. Why is there any need to doubt or add to these findings?</p> <p><u>A misinterpretation of national policy has been employed</u></p> <p>Having inflated need by using out of date, discredited evidence, ELDC's Housing Topic Paper takes another incomprehensible and unjustifiable step to exaggerate the figures further. It claims that:</p> <p>3.5 <i>"The calculations show that the District had a 3.85 year supply of housing meaning that the undersupply would be 5.00 years less 3.85 = 1.15 years of housing undersupply. This equals 553 additional homes which will need to be allocated in the Local Plan and added onto the housing target.</i></p> <p><i>Therefore the housing target for the whole District is 7215 + 553 homes = 7768 or approximately 517 homes per year."</i></p>	
	<p>Firstly, since ELDC's housing supply assessment has been based on the 2006 Regional Target and house building that has taken place since then, this statement erroneously conflates previous housing supply with a 5 year supply of housing as part of a Local Plan. Secondly, National Planning Law and guidance categorically does not, in any shape or form, state that the inability to show a 5 year housing supply means that the supposed discrepancy should be added to the overall target figure. Housing supply should have no bearing on the target at all. The target remains unchanged, it is simply a case of having to find additional sites etc. It is completely illogical to argue that we need to</p>

	<p>build x number of homes but because we can't see how we are going to do that, we need to build more!! Housing supply within the plan period and the housing target are not linked. This calculation results from a misrepresentation of National Planning Law. Besides we have already seen that a shortfall in terms of a 5 year housing supply looks entirely unlikely.</p>	<p><u>The belief that a percentage buffer needs to be added to the housing target to offer market choice and take account of the possibility that allocated sites may not come forward</u></p>	<p>Mysteriously ELDC make a further addition to the housing target of 7.3% for the following reason (from the Housing Topic Paper):</p>	<p>7.17 "The usual approach with regard to housing allocations is to provide a buffer or fall back in the allocations to ensure that if sites do not come forward then others can take up the housing need easily, it also offers choice in the market. Given that the Local Plan is going to be reviewed in 5 years, and at that time additional sites can be allocated if the need and evidence arises, the allocated buffer provision in the plan will be approximately 7.3%."</p>	<p>If the housing target, as indicated by the most recent ONS and CLG statistics, had been unadulterated, then this might appear a reasonable approach. However, those indicators have already been added to in the following way in ELDC's calculations:</p>			

		<ul style="list-style-type: none"> • The use of the 2008 household projections to apparently take account of a sudden upsurge in inward migration • An addition of 517 homes to address a fictitious under supply of housing • An addition of 1935 homes to be allowed outside of the basic housing target, which includes windfall sites, extra housing on the Coast and in medium and small villages not included in the housing target distribution. • 225 vacant homes to be brought back into use. <p>There simply can be no justifiable reason for making an arbitrary addition of 7.3% over and above these considerations.</p> <p>ELDC's methodology wants to argue that the matter of market choice in housing needs to be addressed. It suggests that the demand for affordable homes within its target will make this difficult to achieve. However, its own research clearly indicates the opposite. The 2014 Strategic Housing Market Assessment update (SHMA), despite</p>	
		<ul style="list-style-type: none"> • employing the ONS subnational population estimates from 2010, which greatly exaggerate the population projections • having most of its research based on data prior to the publication of the 2011 Census figures • and being based on the out of date 2008 and 2011 CLG Headship rates, comes to the firm conclusion that there is only a small requirement for market housing. Thus the need for 2825 affordable homes to be provided from the housing target 	

		<p>(representing only 34% of the inflated target, or 44% of the "real" target) would still leave a substantial leeway for market housing choice beyond, within the overall housing offer. It is interesting that ELDC's SHMA concluded that 43% of the objectively assessed housing need should be additional affordable housing. The "real" target see below appears to fit this conclusion very well, whereas the inflated one does not.</p> <p>Conclusion In reality the situation is very straight forward. If we follow the evidence produced for East Lindsey District Council by consultants Edge Analytics, at considerable cost to the council taxpayers of the District, which is grounded on the most up to date ONS subnational population estimates (2014) together with the latest set of Household Projections (2014) from the <i>Department For Communities and Local Government</i>, all of which include economic trend considerations, the real housing need is estimated to require 425 new dwellings per year (using the migration based scenario ELDC have chosen).</p> <p>Over the 15 year period of the Core Strategy this amounts to a district wide total of 6,375 homes to be built. Subtracting the 1308 planning permission commitments that currently exist on the coast, what's left is a total of 5067 new homes. This, thus, becomes the target figure for the inland towns and larger villages. For those who would say that this does not allow sufficient flexibility should the population unexpectedly begin to rise beyond expectation nor give adequate market choice, the following will clearly show that there is more than enough flexibility and choice already:</p>	

		<ul style="list-style-type: none"> • The local authority estimates that there are over 2500 vacant properties within the district. Planning guidance indicates that this can be taken into account in calculating a housing target. It has not been. The Local Authority has a stated aim of bringing a total of 225 such properties back into use over the 15 year Plan period (15 a year). However, this is a purely aspirational policy statement. No strategy to implement this policy is offered and no budgetary consideration given to this task. • East Lindsey has seen an over-supply of housing in the previous 14 years. Planning guidance says that this can be taken into account in calculating a housing target. It has not been. • ELDC is planning to allow a further 218 homes to be built on the coast over and above the proposed cap, provided they meet certain build criteria, and in addition 202 homes in the medium and smaller inland villages on brownfield land over and above the inland target figure. They are also planning for an expectation of building 1165 new homes on "windfall" sites outside of the target amount. In other words there is an expectation that 1935 new homes will be built surplus to the housing target. • E a s t Lindsey's population only rises through inward migration since the death rate consistently outstrips the birth rate. The way the Inland target is reached involves the entirely spurious assumption that any potential migrant to the coast will choose to live inland should they not find an available property due to the coastal development cap. It is well understood that people who might seek to move to the East Lindsey coast are highly likely to move to a 	

Wragby Parish Council	General on Chapter 2	O		<p>coastal location elsewhere, rather than deny their aspiration to live on the coast by taking up a property inland.</p> <p>ELDC regards their target as a minimum figure.</p> <p>The exaggeration of need is not minor – the housing target has been inflated by 30%, over and above the objective, up to date evidence!</p> <p>A Local Plan has to be achievable and realistic. The entirely unrealistic housing target is in danger of undermining the whole Core Strategy and will ensure that</p> <ul style="list-style-type: none"> • housing supply objectives will continually be missed later in the plan, • And house prices in the district will continue to flat-line, due to the glut of properties. <p>ELDC readily admits that developers have informed them that East Lindsey is experiencing low demand. The inflation of the real need for new homes by 30% is a clear indication that they have not listened. ELDC's methodology for calculating this is both unsound and in places fails to comply with National Planning Law and its guidance. It should be revised downwards to offer a more achievable aspiration and a more realistic reflection of need.</p>			<p>The Consultee has not made it clear why they believe Wragby is seeing the beginning of planning blight. The village is a vibrant settlement with services and facilities to sustain its residents and a busy centre. It is unclear how Lincoln and what happens on the perimeter is affecting Wragby, apart from the fact that people may want to purchase houses in Lincoln, though there is no evidence that the housing market in Wragby is affecting Lincoln and no objections to the Local Plan were made on this matter by the Central Lincolnshire</p>
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Lindum Homes	Chapt er 2	(1 to 37)	O	Horncastle HOR314	<p>There are few employment opportunities in the village which means that those residents who work need to travel – in the main to the City – making new houses in or near the city much more attractive a proposition to purchasers.</p> <p>Planning Permission has been granted on four sites in the village in recent years yet only work is underway on only one – it is understood that that the three other sites are for sale.</p> <p>On one site, in particular, ownership has changed hands on, at least, two occasions leading to the possible conclusion that developers are not willing to take too many financial risks in Wragby – other sites further down the A158 (eg., in Horncastle) are also up for sale (with planning permission).</p>	<p>Site HOR314 should either be allocated or shown as a 'broad location for growth'.</p>	<p>Local Plan Team. It is unclear what the consultee is proposing in respect of changes to the Local Plan.</p>
				<p>1. We welcome and support the designation of Horncastle as a Town and suitable location for new development.</p> <p>2. Horncastle is a most suitable and sustainable location that can accommodate a significant level of growth, which is demonstrated by recent decisions by the Local Planning Authority to grant planning permission for a substantial number of new homes. Each of these planning applications have shown that the local infrastructure is capable of accommodating new development through further investment secured by developer contributions.</p> <p>3. We object however to the failure to allocate parcels of land for future residential development in Horncastle, with particular regard to Site HOR314. This is due, according to the plan, to the level of existing commitments in the</p>	<p>1. The Council notes the support for Horncastle as a town in the Local Plan.</p> <p>2. The Council agrees with the consultee that Horncastle is a sustainable place within the District.</p> <p>3. And 4. The Council disagrees with the consultee that other settlements have been placed with a significant burden because Horncastle has no housing allocation, they have not. As at the end of January 2017, Horncastle already had 849 housing commitments, the allocation on a pro rata basis would only have been around 670, so the town is well over that. The Plan makes it clear why the Council allocates on a pro rata basis, this is because housing demand in the District and population growth is predicated on the migration of older persons and it is impossible to predict where they are going to want to live. The Council therefore in the Local Plan is trying to direct housing growth to the most sustainable, safe from flood risk settlements and these are the inland towns and main villages, offering a choice of housing sites across these settlements. The issue with disproportionately placing growth in just one main place like Horncastle, is that the growth is unlikely to be delivered, because not all the in migrants who come into the District want to live in Horncastle, they want to live everywhere, particularly in the smaller settlements. The end result will be pressure to approve housing outside of any large allocation in one place</p>		

<p>on windfall sites elsewhere and the allocated sites will be left undeveloped or only developing out slowly; alternatively, the Council will very quickly fall out of having a five year supply and then a free for all will occur outside of the allocated sites. Because the Council has a clearly articulated 5 year review in the Local Plan the amount of housing for Horncastle will be part of that review and if it is found to be necessary then further allocations will be considered at that time.</p>	<p>5, 6, 7, 8, 9, 10 – Horncastle is a town and therefore considered to be a sustainable settlement. This means that sites such as the one that the consultee is discussing can come forward if landowners wish to submit an application, there is nothing in the plan that prevents this and it is therefore not necessary to show broad locations of growth. Broad locations are the inland towns and large villages already. With regard to Horncastle any developer will have to evidence that they can feed into the water system adequately and overcome County Councils highway considerations. Alternatively they can wait the relatively short period of time and become involved through consultation in the 5 year review of the Local Plan.</p>						
<p>Town. This approach has, however, placed a significantly higher burden on the other inland towns and villages to accommodate the residual growth. As a result, it is contended that this has resulted in many unsustainable allocations which have minimal chance of coming forward. To illustrate this point, it is noted that Louth has an extremely high allocation of 1204, in addition to the level of housing which will also come forward already permitted. As well as this, in comparison to their size, Sibsey (234) and Holten Le Clay (326) also have an extremely high number of allocations. Although it is acknowledged that Louth is the largest town in the district, this is nearly double the amount of development already committed in Horncastle. Development at such a level in one place has never been achieved before in one location over the plan period in East Lindsey. It is contended that such unrealistic development targets are directly as a result of the unreasonable constraining of development in Horncastle, and this should be revisited to allow additional allocations, reducing the burden on more unsuitable locations.</p>							
<p>5. It is also noted that, in addition to minimum housing target, an additional 7.3% buffer has been included in the proposed allocated sites – yet still no additional development has been proposed for Horncastle. The Core Strategy should not deal with the buffer in this way, as this is too restrictive.</p>							
<p>6. Instead, it should allocate 'broad locations for growth' in a variety of areas, with a flexible target to allow an element of market choice on where development should be brought forward. To provide</p>							

<p>additional allocations, in areas and too levels which are unlikely to be brought forward, leaves the Council at significant risk of under-delivery.</p>	<p>7. Part of site HOR314 – land to the south of Banovallum Gardens already has planning permission for 90 dwellings which was granted in late 2016, on the land to the north of the Thunker Drain, secured by Lindum Homes. The approved development sits contiguous with the existing residential development to the north, and therefore assimilates effectively with the existing urban grain. The remaining land within HOR314 sits to the south of Thunker Drain, and is bounded to the south by the land north of Mareham Road, which also has an extant planning permission for residential development.</p>	<p>8. The remainder of HOR314 would sit in between two sites which therefore already have planning permission and are likely to be brought forward in the next five years. It is therefore illogical, and contrary to the good and proper planning of the town, not to allocate the remainder of Site HOR314 and complete development between Mareham Road and Spilsby Road.</p>	<p>9. In addition and as acknowledged within the Strategic Housing Land Availability Assessment (SHLAA) 2016, this could potentially allow the provision of a road from Mareham Road to Spilsby Road. The SHLAA states that this "would move traffic around the town without having to go through the town centre, this would ease traffic flow issues." Such strategic benefits for</p>	

							<p>the Town, however, cannot be delivered without the completion of development within HOR314.</p> <p>10. If development comes forward to the north of HOR314 and to the south of the remaining unallocated parts of the site, the remaining area of HOR314 would have the infrastructure capability to be developed quickly, and in the short term. It should therefore form an allocation, or at very least an area allocated a 'broad location for growth'. If this opportunity is not taken, it would be contrary to the good and proper planning of the town and district, potentially placing further burden on areas less suitable and capable for development.</p>		
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POLICY SP1 – A SUSTAINABLE PATTERN OF PLACES

Name of Responder	Policy No	Page No,	Page No,	Settlement Proposals Map or Site No	Settlement Proposals page No	Page No, Para No	Q3 Response	Q4 Change Sort	Councils Response
KCS Developments represented by Barton Willmore	SP1		S				<p>Our Client continues to support the proposed settlement hierarchy outlined within the Policy as Louth is correctly identified as a 'Town', the most sustainable form of settlements.</p> <p>Strategic Policy 1 (SP1) wrongly identifies Tetford as a "Large Village" and as a sustainable location for development in accordance with other policies of the plan. Paragraph 5 sets out the typical facilities that a large village should provide.</p> <p>In this context Tetford does NOT have the following facilities - a convenience store (it has no food shop), a range of premises for business use, a commuter bus service, or access to the strategic road network. The village does NOT have a range of community facilities.</p> <p>In detail, the facilities matrix in the supporting documents to the plan allocates Tetford with 48 points, with the threshold between medium and large villages as 46 points. There is only one functioning public house, which removes 4 points. The pre-school facility closed through lack of users which removes 4 points. There is no "other shop" as it closed more than a year ago. The only potential retail outlet is a part time jewellery</p>		The Council notes the support of the consultee
	SP1		O				<p>The consultee is discussing Tetford in the context of Policy SP1. Tetford is classed as a large village in the Settlement Pattern and has a number of services and facilities to sustain its residents, these are primary school, large employer, two public houses, pre-school facility, has mains drainage, public playing field, children's play area, two other shops, a church, community hall, a doctors and a sports facility. It scores 48 points and is within the cut off for a large village in the Settlement Pattern which is 46 points. However, since the points were last assessed, it is noted that the local pub has opened a small food shop selling basic items, which is becoming a more prevalent way of delivering services in villages in East Lindsey; this would add another 4 points taking the total to 52. The two other shops are the tea rooms at the fishing lakes and the Lucia Angelis Shop at Aura Soma which sells its products, cosmetics and jewellery. The respondent dismisses the retail outlet at the Aura Soma business on the grounds that it is not a viable village service. However, the points are awarded based on the fact that there are retail premises in the village, not on the degree of popularity they have within the community. Retail premises change hands and can provide any type of retail offer. If the premises are lost it is hard to find alternative premises in a community for new businesses to start up, unless they open in a pub or village hall, so local retail premises are important, regardless of the good they sell. The second pub has been in a state of flux for some time. The Council does not remove points when a facility closes until it is sure that facility is</p>		

basis for preparation (or lack of it), given the growing uncertainty of extreme weather events.

The Lincolnshire Coastal Study shows substantial areas of land within the Plan area that should not be developed, yet many communities within these flood risk zones are promoted for new housing and commercial development in the Plan Area. We understand the difficulty the local authorities have in meeting their growth needs but implore them to reconsider the location of new housing away from the forecast flood risk areas.

No one is a winner if communities flood. It destroys farmland productivity, infrastructure, renders homes unfit for occupation, displaces communities and destroys lives and livelihoods.

Site specific flood attenuation may save the new homes from the worst of a severe weather event, but the displaced flood waters may well affect older less well protected property, surrounding infrastructure, power supplies and the ability of the occupiers to go about their day to day business. It is perverse to propose a greater level of resilience to flooding for new properties than for the wider communities to which they are attached.

The insurance industry is naturally concerned about the growing risk of flood claims and has brokered the 'Flood Re' deal with the Government to limit the extent of their liability.

This came into force on 1st April 2016, and a large swathe of existing residential and commercial property as well as any new housing built after 1st April 2009 will be excluded from protection. The immediate impact may not be great, dependent on

				<p>location and historical flood data, but if flood risk increases through the lifetime of the Plan as forecast, then the new homes in flood risk areas may find themselves without affordable buildings or contents insurance. This is likely to have a depressing effect on property prices and seriously affect the viability of sites built in East Lindsey towards the end of the Plan period or indeed the willingness of developers to even consider building at all. If insurance becomes hard to find lenders will balk at lending and normal market activity will grind to a halt.</p> <p>Pragmatically there is no point in allocating land for development within the Plan for East Lindsey if there is no prospect of it being developed by a rational developer or occupied by a rational householder during the Plan period.</p> <p>Rented housing is also excluded from the Re-provisions leaving landlords in a quandary about protecting their investment portfolios and tenants without affordable contents insurance.</p>			
					<p>Comments under Q3 apply.</p>	<p>Orby is a small village in the Local Plan Settlement Pattern. It has very few services or facilities to service its residents for their day to day needs and therefore there is a high use of the car for day to day living. Having taxi services, call connect and school transport does not score any points in the Settlement Pattern as this still does not provide services for day to day living. Orby does not have a food shop, doctors, shopper's bus service nor a commuter bus service. Therefore this is not a settlement which the Council considers suitable for the allocation of its strategic housing need.</p>	
<p>Small villages – Orby now relegated. Object. Orby should be re-instated to 'medium village' as sustainable as mentioned under comments SP8 creating employment opportunities and serviced adequately with Public House, Village hall, Church. Call connect bus service, taxi services, school transport and cycling routes. Local (village) shops not viable so people moving Comments under Q3 apply about for shopping and other facilities.</p> <p>We support the identification of Skegness as a Town in Policy SP1 – A Sustainable Pattern of Places.</p> <p>We support the approach set out in paragraph 12 of Page 19 that the "pattern provides a starting point"</p>							

Gin Property Ltd represented by Robert Doughty Consultants Ltd	SP1				<p>The identification of Alford as a 'Town' in an inland area is consistent with paragraph 99 of the NPPF which sets out that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change such as coastal flood risk.</p> <p>It is noted that Alford is at risk of fluvial flooding to the north and east of the settlement boundary. Therefore, emphasis should be placed on a direction of growth to the west of Alford. This direction of growth would ensure that Alford is a sustainable location of housing that offers a range of community facilities with good access to jobs away from areas of high flood risk.</p>		
	SP1				<p>We support the identification of Spilsby as a Town in Policy SP1 – A Sustainable Pattern of Places. Although Spilsby may be considered small in the national context the town plays a valuable role in supporting the population of a much wider hinterland. Concentration of development in Spilsby can be a spur for economic development across large parts of East Lindsey</p> <p>We support the approach set out in paragraph 12 of Page 19 that the "pattern provides a starting point" to the consideration of development proposals. The purpose of a policy of this nature is to quantify the existing roles of settlement and not to determine the future role.</p>		The Council notes the support for policy SP1.
represented by WYG Planning	SP1	O		<p>Site context The site in question is a rectangular parcel of land that lies to the south</p>	This view is shared by an Inspector in a recent appeal		The consultee is referring in this representation to the village of Goulceby and its place within the Settlement Hierarchy. Goulceby is classed as a small village and as such has a limited range of services and facilities, all it has is a shop

				<p>of Ford Way, on the edge of the village of Goulceby. The developable area fronting onto Ford Way measures approximately 0.28ha in size. The northern part of the site presents an opportunity for infill development and has the capability to accommodate up to three detached dwellings. As infill development, the site would form part of the existing built form of the village.</p> <p>The land is currently an agricultural field, which is ready for immediate development. The site falls between two substantial residential properties, with further homes to the north and open countryside to the south. There is a mature tree hedgerow along the north and western boundary and this Feature could be maintained and enhanced as part of the development of the site, further adding to the key characteristics of the area. The decision to promote only the northern part of the site was taken due to the fact it comprises a logical infill parcel of land between existing residential properties. The site benefits from an existing vehicular access which is taken north off Ford Way, located in the north-east corner of the site.</p> <p>As identified within the previous Draft Local Plan, Goulceby is considered a 'smaller villages' within Policy SP1 where only limited and restricted housing development is proposed as "there is large number of smaller villages of differing sizes, which have a limited range of services or facilities." We object to this approach and attention is drawn to saved Policy A3 of the 1999 Local Plan, whereby Goulceby is identified as a 'medium village'. The policy states that 'development will be permitted provided its location, character, function, scale, design and</p>
<p>decision involving an outline planning application for the erection of two houses on Shop Lane in Goulceby (APP/D2510/A/12/2186640). The Inspector concluded that Goulceby is part of a "group of smaller settlements in which development in one village may support services in a village nearby. The scheme would be likely to bring more people to Goulceby, and those extra people would be likely to engage in some activities that would enhance or maintain the vitality of the rural communities that includes Goulceby, as do current residents of Goulceby. There is no need for there to be any particular level of service provision in Goulceby for</p>	<p>which lies in the public house, a commuter but service and a church, it is not on the strategic road network. The Council in its Sustainable Communities Topic Paper sets out the background to the Settlement Pattern and its evidence base.</p> <p>The plan, and the choices upon which it is based, must be in conformity with the National Planning Policy Framework (NPPF). With the NPPF clearly stating that sustainable development should be the "golden thread" running through plan making, this would inevitably move the Council toward a more sustainable solution to its housing distribution which enables a larger percentage of the population to access community facilities, employment and other services. Paragraph 55 of the NPPF does state that "housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in villages nearby." However, there needs to be a mutually supportive element to the relationship rather than putting additional growth in locations where residents will have to look elsewhere for the majority of their services. The Core Strategy does contain policies that allow a small amount of development in the medium and small villages, in particular circumstances. However, these are not locations that it feels the Council should be directing strategic growth.</p> <p>The NPPF also advocates the promotion of healthy communities in that there should be an integrated approach when considering the location of housing, economic uses and community services and facilities. In the District younger residents are moving out either to go to higher education or to work and those moving in are of the older larger birth cohorts 50+. There is also evidence that residents who are 75+ are moving out of the District. One conclusion for the young and over 75s moving out is that in the smaller villages there is not the service provision to support their needs and they are seeking them elsewhere.</p> <p>In the Sustainable Communities Topic Paper at section 3 the Council explores the link between the retention of services and facilities. The consultee states that limited small-scale residential development would support services in villages. There is no evidence to support this and clearly the retention or loss of facilities has other factors at play then housing development. The last Local Plan (1995, amended in 1999) allocated housing growth across many of the smaller settlements with a view to protecting and enhancing services and facilities. This approach did not succeed with a large loss of these during the 20 year + life of the Plan. The Council therefore would not support the changes to the Settlement Pattern as proposed by the consultee in that it would promote unsustainable development in settlements with little</p>			

				<p><i>operation are all consistent with the role, status and character of the settlement.</i> There is no contention that the residential development of this site would meet the specified criteria as the site would not be isolated from the main body of the settlement. A residential development in this location would not protrude any further south than the existing dwellings and would result in a continuous form of development along Ford Way.</p> <p>The downgrade in status from the Policy A3 of the saved Local Plan to Strategic Policy 1 (SP1) disregards the fact the village has expanded, albeit marginally, during the current adopted plan period. Furthermore, the residential development of the site would support services in other nearby settlements, namely Scamblesby, Louth and Horncastle. Policy SP1 acknowledges the fact that the "Districts settlements do not exist in isolation" and "form part of a wider pattern that stretches across Lincolnshire."</p> <p>The function of Goulceby forms part of a wider role of connected villages and towns which together, provide residents with the everyday services they require. The resident of Goulceby use the reopened Three Horseshoes public house and have access to facilities and services in nearby village. For example, Scamblesby Primary School is located 4km east and the provision of another primary school and shops can be found at Donnington on Bain, 5km north. In this regard, it is recognised that there are limited services and facilities within Goulceby. However, Paragraph 55 of the NPPF encourages authorities to promote sustainable development in rural areas, stating that housing should be located where it will</p>												
																<p>or no services to support the resident population who would have to travel mostly by car to other higher order settlements for their day to day needs and this would be out of conformity with national planning policy.</p>

								<p>enhance maintain the vitality of rural communities.</p> <p>The small-scale residential development of this site in Goulceby would support services in villages nearby, in the way encouraged by Paragraph 55 of the NPPF, as explained above. It is appreciated that the majority of development goes to larger settlements in sustainability terms, as confirmed within Policy SP2. However, in our view smaller settlements require some degree of growth, particularly housing, to bring more people to these areas to enhance and maintain the vitality and viability of rural communities.</p> <p>As a consequence of limited facilities directly within Goulceby, it can be assumed that the private vehicle would likely be the dominant mode of transport to travel to nearby villages. Paragraph 34 of the NPPF states the principle of locating development so that the need to travel is minimised and the use of sustainable modes of transport is, therefore, maximised; and this is not in dispute. This principle does, however, apply to developments that would generate significant traffic movements and it is not considered that modest housing allocation of this size would generate such movements.</p> <p>This view is shared by an Inspector in a recent appeal decision involving an outline planning application for the erection of two houses on Shop Lane in Goulceby (APP/D2510/A/12/2186640). The Inspector concluded that Goulceby is part of a "group of smaller settlements in which development in one village may support services in a village nearby.. The scheme would be likely to bring more people</p>

POLICY SP2 – SUSTAINABLE DEVELOPMENT

Name of responder	Policy No	Page No, Para No	Settlement Proposals	Map or Site No	Settlement Proposals	Page No	Page No, Para No	Q3 Response	Q4 Change Sort	Councils Response
KCS Developments represented by Barton Willmore	SP2	S						Our Client supports the provision of Policy SP2 which introduces a 'presumption in favour of sustainable development', in line with the National Planning Policy Framework (NPPF).		The Council notes the support for the Policy
[REDACTED]	SP2	O						The policy is incompatible with the Vision and Objectives for East Lindsey and other policies including SP1A and SP14. There is insufficient flexibility for appropriate new housing growth in the category of "Medium Villages" which are recognised as having key facilities and services, job opportunities and community facilities.	<i>Policy SP2 should be revised to allow small scale housing proposals which are commensurate with the character of the settlement, housing needs of the locality and in support of important services and facilities. Such schemes, which may come forward through a neighbourhood plan or other community-led strategy should provide for an increase in high quality new homes. Medium</i>	The Council in its Sustainable Communities Topic Paper sets out the background to the Settlement Pattern and its evidence base. The plan, and the choices upon which it is based, must be in conformity with the National Planning Policy Framework (NPPF). With the NPPF clearly stating that sustainable development should be the "golden thread" running through plan making, this would inevitably move the Council toward a more sustainable solution to its housing distribution which enables a larger percentage of the population to access community facilities, employment and other services. Paragraph 55 of the NPPF does state that "housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in villages nearby." However, there needs to be a mutually supportive element to the relationship rather than putting additional growth in locations where residents will have to look elsewhere for the majority of their services. The Core Strategy does contain policies that allow a small amount of development in the medium and small villages, in particular circumstances. However, these are not locations that it feels the Council should be directing strategic growth.

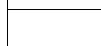
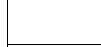
<p>My complaint is that there is insufficient flexibility for appropriate new housing growth in the category of "Medium Villages" which are recognised as having key facilities and services, job opportunities and community facilities.</p>	<p>housing needs of the locality and in support of important services and facilities. Such schemes, which may come forward through a neighbourhood plan or other community-led strategy should provide for an increase in high quality new homes. Medium Villages should be playing a greater and more flexible role in the provision of housing. The recommended revised policy approach will ensure that the EL Core Strategy is then compatible with national policy which under the National Planning Policy Framework says "</p> <p>.... Local planning authorities should be responsive to local circumstances and needs and should, in particular consider whether allowing some market housing would</p>	<p>community facilities, employment and other services. Paragraph 55 of the NPPF does state that "housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in villages nearby." However, there needs to be a mutually supportive element to the relationship rather than putting additional growth in locations where residents will have to look elsewhere for the majority of their services. The Core Strategy does contain policies that allow a small amount of development in the medium and small villages, in particular circumstances. However, these are not locations that it feels the Council should be directing strategic growth.</p> <p>The NPPF also advocates the promotion of healthy communities in that there should be an integrated approach when considering the location of housing, economic uses and community services and facilities. In the District younger residents are moving out either to go to higher education or to work and those moving in are of the older larger birth cohorts 50+. There is also evidence that residents who are 75+ are moving out of the District. One conclusion for the young and over 75s moving out is that in the smaller villages there is not the service provision to support their needs and they are seeking them elsewhere.</p> <p>The consultee states that residential development would support significant additional affordable housing to come forward in medium villages. There is no evidence to support this and the majority of sites that have come forward in the smaller settlements in the past tend to be smaller and more bespoke and therefore very little affordable housing could come forward. The Plan has a rural exceptions policy for affordable housing in rural settlements.</p> <p>In the Sustainable Communities Topic Paper at section 3 the Council explores the link between the retention of services and facilities. The consultee states that limited small-scale residential development would support services in villages. There is no evidence to support this and clearly the retention or loss of facilities has other factors at play then housing development. The last Local Plan (1995, amended in 1999) allocated housing growth across many of the smaller settlements with a view to protecting and enhancing services and facilities. This approach did not succeed with a large loss of these during the 20 year + life of the Plan. The Council therefore would not support the changes to the Settlement Pattern as proposed by the consultee in that it would promote unsustainable development in settlements with little or no services to support the resident population who would have to travel mostly by car to other higher order</p>	
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	<p>Given the comments above with regards to the overall allocations and the dispersion of growth in the district and the extent to which sustainable policies are already in place and the extent to which WRA304 had previously been identified by the Planning Authority as suitable land, it seems unsound not to include WRA304 in this new plan. As even to do so only places Wragby at providing some 2% of the total allocation in the plan period, which only in itself seems unjustified and unsound.</p> <p>Appendix 1: Site Assessment Forms</p> <p>It is not understood why the designation of WRA024 for inclusion in the Local Plan as potential housing has been made when WRA304 has not, there is an inconsistency in the site Assessment for these two-sites. The circumstances and evaluation of each entry are almost identical in every way, all impacts are low, access constraints are almost identical and size and nature of the potential for housing are the same.</p> <p>The commentary for including the WRA 024 could apply equally to WRA304 on an almost identical basis EG:</p> <p>Settlement Proposals Wragby, WRA024</p> <p><u>Suitability of the Site in broad planning terms: Yes the site is suitable. The site is not in flood risk. The site is a house and garden with grassed land at the rear, boundaries are weak at the rear with garden landscaping around the house; development would not impact on the wider landscape because the site is presently</u></p>	

Gin Property Ltd represented by Robert Doughty Consultants Ltd	SP3	0		<p>screened from the road by the existing house and garden landscaping. The site would form a natural extension to the built environment and lies within the main body of the village. There would be no impact on the historic environment, it would not affect the setting of Old Grammar School House, the building is orientated to the south, with the site to the north there will be no impact. The land has no historic connection/significance to the school. The site is close to services and facilities with a footpath along Louth Road, the vehicle access already exists and it is proposed to demolish the existing property which has no significant historical value, this will allow better access into the rear.</p> <p><u>Deliverability of the Site:</u> The owner of the site has confirmed that the site is available for development.</p> <p><u>Declaration of Availability</u></p> <p>As the owner of WRA304 I would like to have it on record that I have confirmed that the site is available for development.</p>	<p>1. We support the general approach of focussing growth in towns and large villages in the inland area. The policy however, does not acknowledge the potential impact of administrative boundaries of town and parish councils. The policy should clarify that the settlement boundaries do not coincide with Administrative boundaries and that the growth of one settlement may actually be in a neighbouring parish. Developments that could be perceived to be part of Spilsby, for instance, could actually fall in the</p>	<p>1. Acknowledgement that named settlements may include land of more than one parish. As such sustainable growth of one settlement may appropriately be located in a neighbouring parish, regardless of</p>		<p>1. The Council does not believe it makes any difference to planning decisions if growth occurs over or outside a parish boundary which is different to that of the named settlement. In the consultation process for development management both parish councils would be consulted as a matter of due process. Therefore it would be unnecessary to make an amendment to the wording of the explanatory text of policy SP3.</p> <p>2. The wording of paragraph 12 concerning the fact that the inland housing figure is a minimum is already repeated in the policy itself at point 1. Therefore there is no need for any further change to the policy.</p> <p>3. The Council notes the support for the production of monitoring reports.</p>
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<p>parishes of Halton Hologate or Hundleby.</p> <p>2. We generally support the level of growth promoted for the District across the plan period. The figure, however, should not be considered to be a ceiling, and the plan should be worded accordingly. We note that the second bullet point of para 12 highlights the view that the inland housing target is a minimum, and this wording should be repeated in the policy itself.</p> <p>3. We support the intention to produce monitoring reports every six months.</p> <p>4. We object to the use of the term "windfall" without an appropriate definition. The implication of the supporting text in advance of the policy implies that windfall are small sites, but the table in paragraph 2 on page 35 indicates that 30% of the affordable housing provision will come from windfall sites, although Policy SP7 states that only sites of 15 dwellings or more will trigger a contribution towards affordable housing provision.</p> <p>5. The approach to defining growth targets for the towns in large villages in paragraph 14, by setting growth targets proportionally to the size of the settlement does not appear to be justified, especially in light of the exceptions made for certain settlements due to Flood Risk (e.g. Alford) or the location in Wolds AONB (e.g. Binbrook).</p>	<p>the apparent status of the settlement that may be the focus for this second parish.</p> <p>2 Include the word "minimum" in Policy SP3 when referring to the growth targets for inland East Lindsey.</p> <p>3 Provide a definition of "windfall" housing to ensure clarity and consistency of use of the term in relation to setting growth targets, and assessing contribution of Windfall to both overall housing growth and the provision of affordable housing.</p> <p>4 Justification to be provided for the setting of targets for each settlement.</p>	<p>4. The Council agrees with the consultee around the fact that there is no clarification on what a windfall site is in paragraph 32 and it is proposed in the minor modifications schedule for the Core Strategy that an additional sentence be added to the paragraph which states "A windfall site is any site that comes forward that is not allocated in the Settlement Proposals Document."</p> <p>5. The consultee asks for a justification for the setting of targets in each settlement. The allocation for each settlement is not a target and nowhere in the Plan does it state it is and that is not how the Council views it. Paragraphs 14, 15 and 16 of SP1 explains how the Council reaches its starting point allocation for each settlement and why, this way of distributing growth fits in with the demographic information on the District. Population growth in the District is predicated on the migration of mainly older persons as set out in the Update of Demographic Evidence by Edge Analytics 2015 and 2016, unlike natural growth or growth from for example, a resident student population where it is clear where the peaks of growth are going to occur; in the main in migrants live where they want to live and can buy a house. Therefore the Council would look to support housing growth across the inland towns and large villages. There are exceptions to that because of flood risk, the location of a settlement in the AONB or in the case of Horncastle the large number of existing commitments. However, in the case of Alford, this is not due to flood risk, as stated in the representation, but rather because Alford is preparing a neighbourhood plan and will be allocating its own sites. It does not mean that housing applications cannot come forward in those settlements, they remain towns and large villages and are thus considered to be sustainable locations, providing they meet the policies in the Plan and are in conformity with the NPPF. They will be treated as windfall sites as set out in point 5 of the main policy SP1. In order to ensure that there is clarification on this subject the Council is proposing a minor modification at paragraph 21 with the insertion of additional wording in the sentence so it reads "Table B below shows the minimum allocation of housing across the inland towns and large villages as set out in the Settlement Proposals Document. These figures are not targets and should not be read as such."</p>	<p>The National Planning Policy Framework at paragraphs 99 and 100 states 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.</p>
<p>Manorcrest Homes represented by Globe Consultants Ltd</p>	<p>SP2</p>	<p>(1-11)</p>	<p>0</p>

		<p>accepting that there should be some limitations in development in the coastal zone on flood risk grounds, it would appear to be unwise to restrict investment in the most populous town in the district in the manner envisaged.</p> <p>Skegness is the largest settlement in the district by some margin. It grew significantly following the arrival of the railway in 1875 and prospered for most of the intervening period. A thriving Edwardian holiday resort has left a legacy that is acknowledged by the Lonely Planet Great Britain Guide, which records Skegness as “everything you could want from a seaside resort”, and the highest recommended place to retire to in surveys considering the best 60 places to retire.</p> <p>Its credentials are amply described in the Plan on page 371, which, in specifically dealing with Skegness settlement proposals, refers to a wide range of services being available, large stores, schools and health facilities. It has a range of employment sectors and rail links to other main settlements.</p> <p>A strategy that seeks growth and prosperity throughout the district whilst also sending a message of <i>giving up</i> on growth within the district’s primary settlement (in terms of population) appears contrary to a sensible strategy. Acknowledging managed growth and harnessing investment for the benefit of the whole community, as well as ensuring development is robust to flood risk, would be more consistent with the strategy of directing development to the most sustainable locations – the towns.</p> <p>It is acknowledged that the NPPF classes housing as a vulnerable use</p>	<p>Local Plans should apply a sequential, risk-based approach to the location to development.</p> <p>The Council has no evidence to justify why it should ignore the sequential test for the District. The District has sustainable settlements outside of the dangers of flood risk in which to place strategic housing growth.</p> <p>There were as at February 2016 1308 housing commitments on the coast, with another 31 being granted permission up to January 2017. These commitments are located right across the coastal zone but are presently not being built out quickly. From the work done by Edge Analytics, housing to provide for the needs for the existing population (zero population growth scenario) means that the Council should be allocating 735 houses across the plan period, with commitments this actually leaves a technical over supply of 573 home. This should provide an adequate buffer during the first five years of the Plan for this area of the District. Additional work carried out on the 2014 population projections using the same scenario shows a decline in the need to 630 homes over the plan period. The policy however is to remain at 735 homes.</p> <p>One of the consultees in the June 2016 consultation stated that they carry out 120 private property surveys a year and 90% of them are for people outside Lincolnshire who wish to come and retire. Extrapolating this figure out to the 1308 existing commitments in the Local Plan means that technically only 130 of them will be taken up by local residents. The Council do not consider it appropriate to build houses in the Coastal Zone for what would be a growing population of in migrants into this area who are in the main older and therefore more vulnerable to the dangers of flood risk. It is considered important that there is enough housing for the existing resident population which the existing commitments should allow, this includes those already living in the coast and working in the tourism industry. There will be support for housing development on brownfield land subject to criteria, the single plot exceptions policy and support for affordable housing and Specialised Housing For Older Persons subject to a local connection criteria. Also support will be given for housing for specialised vulnerable groups such as disabled local people.</p> <p>The Council has established monitoring for the coastal zone and set up two working groups to take on work during the 5 year review of the Plan looking at two key subjects, housing and caravan occupancy. These groups will work with the Council and other key partners toward obtaining evidence and creating policies that all partners including the Environment Agency and the Emergency Planning Services can sign up to and bring forward at the 5 year review point of the Plan.</p>
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						<p>and funds have been directed to encouraging house building. The significant economic value of housing is supported by UK Constructors Group research that shows that every £1.00 spent on housing and construction generates £2.84 of value to the economy as a whole. Importantly in terms of economic impact the same research also shows that for every £1 spent in building £0.92 stays within the UK.</p> <p>The NPPF stresses the importance of delivering sustainable development which include the three interconnected threads of economic, social and environmental considerations. Not acknowledging this, strategically, will lead to the development of Skegness coming to a cliff edge and halting</p>							
Chestnut Homes	SP2	S				<p>The policy forms a logical basis to guide growth in settlements with existing infrastructure and services in place and we support the categorising of the settlements which have been placed after a district-wide assessment</p> <p>The policy is supported for its compliance with the National Planning Policy Framework.</p>							<p>The Council notes the support for the site.</p>
  represented by Brown and Co – Property and Business Consultants LLP	SP2	O	p20	Coningsby		<p>For reasons we will explain later, we feel that the decision not to include our client's site C&T302 does not adequately take into consideration the benefits of allocating this site. The advantages far outweigh the adverse impacts. The only issue which seems to be of contention of this is the fact that this site sits within a Zone 2 and 3 flood risk area. For reasons which we will expand upon later, we would make the following observations:</p> <p>There are other areas where land has been allocated for development in flood risk areas.</p>			<p>Allocate Site C&T302 in addition to or in preference to other less sustainable locations.</p>	<p>The National Planning Policy Framework at paragraphs 99 and 100 states 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.</p> <p>The Council has no evidence to justify why it should ignore the sequential test for the District. The District has sustainable settlements outside of the dangers of flood risk in which to place strategic housing growth and in those settlements if they have flood risk there are areas which do not. These areas are the safe areas for development and</p>			

POLICY SP3 – HOUSING GROWTH AND THE LOCATION OF INLAND GROWTH

Name of responder	Policy No	Page , para No	Settlement Proposals Map or Site No	Settlement Proposals Page No	Page No, Para No	Q3 Response	Q4 Change Sort	Councils Response
KCS Developments represented by Barton Willmore	SP3	Para 22				<p>Our Client continues to welcome the Council's approach to the distribution of housing, with the majority of the Council's requirement being focused towards the inland part of the District rather than the Coastal Flood Hazard area. Our Client previously objected to the proposal to spread the historical undersupply over the plan period rather than the first 5 years of the plan, in addition to proposing a phased step up in deliver of housing over the plan period. It is noted that the Council have addressed these concerns in the Publication Version and this is welcomed. Notwithstanding this, our Client reserves the right to make further comments on these matters and the housing target at the hearing sessions. However, our Client continues to object to part 3 of the Policy which requires "development sites over 30 should demonstrate phasing of development in line with infrastructure requirements' There is no justification for this requirement within the policy or the supporting text and it should be removed as it does not comply with the tests of soundness outlined in paragraph 182 of the NPPF as it is not justified, effective, positively planned or in</p>		<p>The Council notes the support for the distribution of housing. With regard to the requirement to demonstrate phasing of developments on sites over 30 units. The consultee states there is no explanatory text but there is in Policy SP3 at paragraph 22 where it states that sites over 30 need to demonstrate how they are going to phase development in line with infrastructure. The approach to phasing development was supported in the Councils Stage 2 Water Cycle Study on page 102 where it states "...take into account sewerage infrastructure constraints in phasing development in partnership with Anglian Water" who have supported this part of the Plan along with the Environment Agency. The Council does not consider that this requirement is onerous nor will it prevent development coming forward, if it is not going to be phased then a developer just needs to state that on their planning application or state that infrastructure is already in place. The threshold is low because in East Lindsey smaller sites are the norm and these smaller sites can also have an impact on infrastructure. The Council believes this approach will assist with the positive planning of infrastructure.</p>

Lindium Homes	SP3				<p>accordance with national policy. We are unaware of any other local planning authority who have imposed the phasing of developments with such a low threshold and we see no benefit to this requirement. Indeed, it is anticipated that housebuilders would not phase a development of this size and would build it out in a single phase. The policy is therefore unsound as currently drafted and our Client objects to the inclusion of part 3 of Policy SP3 as the tests set out in paragraph 182 of the NPPF have not been satisfied.</p>	<p>We welcome and support the designation of Horncastle as a Town and suitable location for new development.</p> <p>Horncastle is a most suitable and sustainable location that can accommodate a significant level of growth, which is demonstrated by recent decisions by the Local Planning Authority to grant planning permission for a substantial number of new homes. Each of these planning applications have shown that the local infrastructure is capable of accommodating new development through further investment secured by developer contributions.</p> <p>We object however to the failure to allocate parcels of land for future residential development in Horncastle, with particular regard to Site HOR314. This is due, according to the plan, to the level of existing commitments in the Town. This approach has, however, placed a significantly higher burden on the other inland towns and villages to accommodate the residual growth. As a result, it is contended that this has resulted in many unsustainable allocations which have minimal chance of coming forward.</p>	<p>Site HOR314 should either be allocated or shown as a 'broad location for growth'.</p>	<p>The Council has not shown all the housing commitments in the Local Plan because there are too many of them and the maps would become unreadable. There is no need to show them, if planning permission as already been granted then development can go ahead, the Council publishes a list of all housing sites with permission on its website on its position statement.</p> <p>The Council agrees with the consultee that Horncastle is a sustainable place within the District.</p> <p>The Council disagrees with the consultee that other settlements have been placed with a significant burden because Horncastle has no housing allocation, they have not. As at the end of January 2017, Horncastle already had 849 housing commitments, the allocation on a pro rata basis would only have been around 670, so the town is well over that. The Plan makes it clear why the Council allocates on a pro rata basis, this is because housing demand in the District and population growth is predicated on the in migration of older persons and it is impossible to predict where they are going to want to live. The Council therefore in the Local Plan is trying to direct housing growth to the most sustainable, safe from flood risk settlements and these are the inland towns and main villages, offering a choice of housing sites across these settlements. The issue with disproportionately placing growth in just one main place like Horncastle, is that the growth is unlikely to be delivered, because not all the in migrants who come into the District want to live in Horncastle, they want to live everywhere, particularly in the smaller settlements. The end result will be pressure to approve housing outside of any large allocation in one place on windfall sites elsewhere and the allocated sites will be left undeveloped or only developing out slowly; alternatively, the Council will very quickly fall out of having a five year supply and then a free for all will occur outside of the allocated sites. Because the Council has a clearly articulated 5 year review in the Local Plan the amount of housing for Horncastle will be part of that review and if it is</p>
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					<p>To illustrate this point, it is noted that Louth has an extremely high allocation of 1204, in addition to the level of housing which will also come forward already permitted. As well as this, in comparison to their size, Sibsey (234) and Holten Le Clay (326) also have an extremely high number of allocations. Although it is acknowledged that Louth is the largest town in the district, this is nearly double the amount of development already committed in Horncastle.</p> <p>Development at such a level in one place has never been achieved before in one location over the plan period in East Lindsey. It is contended that such unrealistic development targets are directly as a result of the unreasonable constraining of development in Horncastle, and this should be revisited to allow additional allocations, reducing the burden on more unsuitable locations.</p> <p>It is also noted that, in addition to minimum housing target, an additional 7.3% buffer has been included in the proposed allocated sites - yet still no additional development has been proposed for Horncastle. The Core Strategy should not deal with the buffer in this way, as this is too restrictive. Instead, it should allocate 'broad locations for growth' in a variety of areas, with a flexible target to allow an element of market choice on where development should be brought forward. To provide additional allocations, in areas and too levels which are unlikely to be brought forward, leaves the Council at significant risk of under-delivery.</p> <p>Part of site HOR314 - land to the south of Banovallum Gardens</p>		<p>found to be necessary then further allocations will be considered at that time.</p> <p>Horncastle is a town and therefore considered to be a sustainable settlement. This means that sites such as the one that the consultee is discussing can come forward if landowners wish to submit an application, there is nothing in the plan that prevents this and it is therefore not necessary to show broad locations of growth. Broad locations are the inland towns and large villages already. With regard to Horncastle any developer will have to evidence that they can feed into the water system adequately and overcome County Councils highway considerations. Alternatively they can wait the relatively short period of time and become involved through consultation in the 5 year review of the Local Plan</p>
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							<p>already has planning permission for 90 dwellings which was granted in late 2016, on the land to the north of the Thunker Drain, secured by Lindum Homes. The approved development sits contiguous with the existing residential development to the north, and therefore assimilates effectively with the existing urban grain. The remaining land within HOR314 sits to the south of Thunker Drain, and is bounded to the south by the land north of Mareham Road, which also has an extant planning permission for residential development.</p> <p>The remainder of HOR314 would sit in between two sites which therefore already have planning permission and are likely to be brought forward in the next five years. It is therefore illogical, and contrary to the good and proper planning of the town, not to allocate the remainder of Site HOR314 and complete development between Mareham Road and Spilsby Road.</p> <p>In addition and as acknowledged within the Strategic Housing Land Availability Assessment (SHLAA) 2016, this could potentially allow the provision of a road from Mareham Road to Spilsby Road. The SHLAA states that this "would move traffic around the town without having to go through the town centre, this would ease traffic flow issues." Such strategic benefits for the Town, however, cannot be delivered without the completion of development within HOR314.</p> <p>If development comes forward to the north of HOR314 and to the south of the remaining unallocated parts of</p>		
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Hey AM	SP3	O	<p>the site, the remaining area of HOR314 would have the infrastructure capability to be developed quickly, and in the short term. It should therefore form an allocation, or at very least and area allocated a 'broad location for growth'. If this opportunity is not taken, it would be contrary to the good and proper planning of the town and district, potentially placing further burden on areas less suitable and capable for development.</p> <p>Policies SP3 and SP4 limit the allocation of new housing to Towns and Large Villages only. Of 104 named settlements within the District, some 73 are deemed to be Medium or Small Villages and as such are to have no new housing proposed. Meaning that over 70% of settlements are to be allocated no new development and are to be limited to conversion of redundant buildings only for additional housing etc.</p> <p>This omission is in conflict with the provisions of the National Planning Policy Framework - specifically Para 14 thereof where Plan-Making is enjoined to seek positive opportunities to meet development needs. Policies SP3 and SP4 are negative in content.</p> <p>Para 17 requires that support be given to thriving rural communities. Proposing no new development is not offering support to thriving communities, rather it is seeking to have them wither and (probably) fail. Para 55 requires that housing should be located where it will enhance or maintain the vitality of rural communities.</p> <p>Refusing to allow limited new housing does not enhance or maintain vitality. Vitality does not require large numbers of new houses, but it does require some. The contrast is made</p>		
			<p>The Council in its Sustainable Communities Topic Paper sets out the background to the Settlement Pattern and its evidence base.</p> <p>The plan, and the choices upon which it is based, must be in conformity with the National Planning Policy Framework (NPPF). With the NPPF clearly stating that sustainable development should be the "golden thread" running through plan making, this would inevitably move the Council toward a more sustainable solution to its housing distribution which enables a larger percentage of the population to access community facilities, employment and other services. Paragraph 55 of the NPPF does state that "housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in villages nearby." However, there needs to be a mutually supportive element to the relationship rather than putting additional growth in locations where residents will have to look elsewhere for the majority of their services. The Core Strategy does contain policies that allow a small amount of development in the medium and small villages, in particular circumstances. However, these are not locations that it feels the Council should be directing strategic growth.</p> <p>The NPPF also advocates the promotion of healthy communities in that there should be an integrated approach when considering the location of housing, economic uses and community services and facilities. In the District younger residents are moving out either to go to higher education or to work and those moving in are of the older larger birth cohorts 50+. There is also evidence that residents who are 75+ are moving out of the District. One conclusion for the young and over 75s moving out is that in the smaller villages there is not the service provision to support their needs and they are seeking them elsewhere.</p> <p>In the Sustainable Communities Topic Paper at section 3 the Council explores the link between the retention of services and facilities. The consultee states that limited small-scale residential</p>		

West WA Ltd represented by Tom Wilkinson	SP3	(2 to 37)			<p>highest flood risk whilst meeting the needs of the existing community with the provision of 1308 new homes in the form of the existing commitments. This approach is clearly evidence based, demonstrating the plan is positively prepared, justified and consistent with National Policy.</p> <p>Likewise, the Water Cycle Study 2016 has been used to highlight those inland settlements where developers will need to engage with Anglian Water Services to ensure water infrastructure improvements, where necessary, can be delivered in a timely manner to avoid environmental impact and facilitate growth. This approach is strengthened further with reference to development sites over 30 being required to demonstrate phasing of development in line with Infrastructure requirements, which we support.</p>	<p>Site HOR314 should be allocated and site HOR330 should be shown as a 'broad location for growth'.</p>	<p>1. The Council notes the support for Horncastle as a town in the Local Plan.</p> <p>2. The Council agrees with the consultee that Horncastle is a sustainable place within the District.</p> <p>3. And 4. The Council disagrees with the consultee that other settlements have been placed with a significant burden because Horncastle has no housing allocation, they have not. As at the end of January 2017, Horncastle already had 849 housing commitments, the allocation on a pro rata basis would only have been around 670, so the town is well over that. The Plan makes it clear why the Council allocates on a pro rata basis, this is because housing demand in the District and population growth is predicated on the in migration of older persons and it is impossible to predict where they are going to want to live. The Council therefore in the Local Plan is trying to direct housing growth to the most sustainable, safe from flood risk settlements and these are the inland towns and main villages, offering a choice of housing sites across these settlements. The issue with disproportionately placing growth in just one main place like Horncastle, is that the growth is unlikely to be delivered, because not all the in migrants who come into the District want to live in</p>
	O			<p>1. We welcome and support the designation of Horncastle as a Town and suitable location for new development.</p> <p>2. Horncastle is a most suitable and sustainable location, that can accommodate a significant level of growth, which is demonstrated by recent decisions by the Local Planning Authority to grant planning permission for a substantial number of new homes. Each of these planning applications have shown that the local infrastructure is capable of accommodating new development through further investment secured by developer contributions.</p> <p>3. We object however to the failure to allocate parcels of land for future</p>			

				<p>residential development in Horncastle, with particular regard to Sites HOR314 and HOR330. This is due, according to the plan, to the level of existing commitments in the Town. This approach has, however, placed a significantly higher burden on the other inland towns and villages to accommodate the residual growth. As a result, it is contended that this has resulted in many unsustainable allocations which have minimal chance of coming forward. To illustrate this point, it is noted that Louth has an extremely high allocation of 1204, in addition to the level of housing which will also come forward already permitted. As well as this, in comparison to their size, Sibsey (234) and Holton Le Clay (326) also have extremely high allocations. Although it is acknowledged that Louth is the largest town in the district, this allocation is nearly double the amount of development already committed in Horncastle. Development at such a level in one place has never been achieved before in East Lindsey over the plan period. It is contended that such unrealistic development targets are a direct result of the unreasonable constraining of development in Horncastle, and this should be revisited to allow additional allocations, reducing the burden on more unsuitable locations.</p> <p>4. It is also noted that, in addition to minimum housing target, an additional 7.3%o buffer has been included in the proposed allocated sites – yet still no additional development has been proposed for Horncastle. The Core Strategy should not deal with the buffer in this way, as this is</p>		<p>Horncastle, they want to live everywhere, particularly in the smaller settlements. The end result will be pressure to approve housing outside of any large allocation in one place on windfall sites and the allocated sites will be left undeveloped or only developing out slowly; alternatively, the Council will very quickly fall out of having a five year supply and then a free for all will occur outside of the allocated sites. Because the Council has a clearly articulated 5 year review in the Local Plan the amount of housing for Horncastle will be part of that review and if it is found to be necessary then further allocations will be considered at that time.</p> <p>5, 6, 7, 8, 9 – Horncastle is a town and therefore considered to be a sustainable settlement. This means that sites such as the one that the consultee is discussing can come forward if landowners wish to submit an application, there is nothing in the plan that prevents this and it is therefore not necessary to show broad locations of growth. Broad locations are the inland towns and large villages already. With regard to Horncastle any developer will have to evidence that they can feed into the water system adequately and overcome County Councils highway considerations. Alternatively they can wait the relatively short period of time and become involved through consultation in the 5 year review of the Local Plan.</p>
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								<p>too restrictive. Instead, it should allocate 'broad locations for growth' in a variety of areas, with a flexible target to allow an element of market choice on where development should be brought forward. To provide additional allocations, in areas and at levels which are unlikely to be brought forward, leaves the Council at significant risk of under- delivery.</p> <p>5. Part of site HOR314 – land to the south of Banovallum Gardens and north of the Thunker Drain already has planning permission for 90 dwellings which was granted in late 2016, secured by Lindum Homes. The approved development sits contiguous with the existing residential development to the north, and therefore assimilates effectively with the existing urban environment. The remaining land within HOR314 sits to the south of Thunker Drain, and is bounded to the south by the land north of Mareham Road, which also has an existing planning permission for residential development.</p> <p>6. The remainder of HOR314 therefore sits between two sites which already have planning permission and are likely to be brought forward in the next five years. It is therefore illogical, and contrary to the good and proper planning of the town, not to allocate the remainder of Site HOR314 and complete development between Mareham Road and Spilsby Road.</p> <p>7. In addition and as acknowledged within the Strategic Housing Land Availability Assessment (SHLAA) 2016, this could potentially allow the provision of a road from Mareham</p>		
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<p>represent ed by Robert Doughty Consultants Ltd</p>	<p>SP3</p>	<p>12,14</p>	<p>0</p>	<p>Road to Spiisbury Road. The SHLAA states that this "would mo. e traffic around the town without having to go through the town centre, this would ease traffic flow issues." Such strategic benefits for the Town, however, cannot be delivered without the completion of development within HOR314.</p> <p>8. If development comes forward to the north of HOR314 and to the south of the remaining unallocated parts of the site, the remaining area of HOR314 would have the infrastructure necessary to be developed in the short term. It should therefore form an allocation, or at very least an area allocated as a 'broad location for growth'. If this opportunity is not taken, it would be contrary to the good and proper planning of the town and district, potentially placing further burden on areas less suitable and capable for development.</p> <p>9. My clients also own the site known as HOR330 which through its allocation, would provide the Council with further opportunities for road infrastructure improvements to benefit this part of Horncastle, the centre of Horncastle and address the road infrastructure problems relating to the Council's proposal for a further 5 hectares of employment allocation adjacent to Boston Road Industrial Estate.</p> <p>We support the general approach of focussing growth in towns and large villages in the inland area. The policy however, does not acknowledge the potential impact of administrative boundaries of town and parish councils. The policy should clarify that the settlement boundaries do not coincide with</p>	<p>1. Acknowledgment that named settlements may include land of more than one parish. As such sustainable growth of one settlement may appropriately be</p>	<p>The Council does not believe it makes any difference to planning decisions if growth occurs over or outside a parish boundary which is different to that of the named settlement. In the consultation process for development management both parish councils would be consulted as a matter of due process. Therefore it would be unnecessary to make an amendment to the wording of the explanatory text of policy SP3.</p>
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Lincolnshire County Council Environment	SP3	(14,19,20,21,31)	O		<p>Administrative boundaries and that the growth of one settlement may actually be in a neighbouring parish.</p> <p>We generally support the level of growth promoted for the District across the plan period. The figure, however, should not be considered to be a ceiling, and the plan should be worded accordingly. We note that the second bullet point of para 12 highlights the view that the inland housing target is a minimum, and this wording should be repeated in the policy itself. We support the intention to produce monitoring reports every six months.</p> <p>We object to the use of the term "windfall" without an appropriate definition.</p> <p>The implication of the supporting text in advance of the policy implies that windfall are small sites, but the table in paragraph 2 on page 35 indicates that 30% of the affordable housing provision will come from windfall sites, although Policy SP7 states that only sites of 15 dwellings or more will trigger a contribution towards affordable housing provision.</p> <p>The approach to defining growth targets for the towns in large villages in paragraph 14, by setting growth targets proportionally to the size of the settlement does not appear to be justified, especially in light of the exceptions made for certain settlements due to Flood Risk (e.g. Alford) or the location in Wolds AONB (e.g. Binbrook)</p>	<p>located in a neighbouring parish, regardless of the apparent status of the settlement that may be the focus for this second parish.</p> <p>2. included the word "minimum" in Policy SP3 when referring to the growth overall targets for inland East Lindsey.</p> <p>3 Provide a definition of "windfall" housing to ensure clarity and consistency</p> <p>Of use of the term in relation to setting growth targets, and assessing contribution of Windfall to both overall housing growth and the provision of affordable housing.</p> <p>4 Justification to be provided for the setting of targets for each settlement.</p>	<p>The wording of paragraph 12 concerning the fact that the inland housing figure is a minimum is already repeated in the policy itself at point 1. Therefore there is no need for any further change to the policy.</p> <p>The Council notes the support for the production of monitoring reports.</p> <p>The Council agrees with the consultee around the fact that there is no clarification on what a windfall site is in paragraph 32 and it is proposed in the minor modifications schedule for the Core Strategy that an additional sentence be added to the paragraph which states "A windfall site is any site that comes forward that is not allocated in the Settlement Proposals Document."</p> <p>The consultee asks for a justification for the setting of targets in each settlement. The allocation for each settlement is not a target and nowhere in the Plan does it state it is and that is not how the Council views it. Paragraphs 14, 15 and 16 of SP1 explains how the Council reaches its starting point allocation for each settlement and why, this way of distributing growth fits in with the demographic information on the District. Population growth in the District is predicated on the migration of mainly older persons as set out in the Update of Demographic Evidence by Edge Analytics 2015 and 2016, unlike natural growth or growth from for example, a resident student population where it is clear where the peaks of growth are going to occur; in the main migrants live where they want to live and can buy a house. Therefore the Council would look to support housing growth across the inland towns and large villages. There are exceptions to that because of flood risk, the location of a settlement in the AONB or in the case of Horncastle the large number of existing commitments. However, in the case of Alford, this is not due to flood risk, as stated in the representation, but rather because Alford is preparing a neighbourhood plan and will be allocating its own sites. It does not mean that housing applications cannot come forward in those settlements, they remain towns and large villages and are thus considered to be sustainable locations, providing they meet the policies in the Plan and are in conformity with the NPPF. They will be treated as windfall sites as set out in point 5 of the main policy SP1. In order to ensure that there is clarification on this subject the Council is proposing a minor modification at paragraph 21 with the insertion of additional wording in the sentence so it reads "Table B below shows the minimum allocation of housing across the inland towns and large villages as set out in the Settlement Proposals Document. These figures are not targets and should not be read as such."</p> <p>Lincolnshire County Council have an agenda whereby they wish to promote the growth of housing in Horncastle in order to fund through developer contributions a bypass round the town. This bypass is to enable better access to the coast. As at January</p>
					<p>Lincolnshire County Council (LCC) believes that the overall</p>		

ental Services		<p>proposed pro-rata distribution of housing growth in individual settlements. This is inaccurate since settlements such as Horncastle receive no housing allocations in Table B (para. 21). Horncastle should be promoted as a centre for growth in order to meet future housing need, infrastructure and the wider ambitions for coastal and tourist-related economic growth included in the Greater Lincolnshire Local Enterprise Partnership's Strategic Economic Plan (see Visitor Economy, page 34 in SEP 2014 – 2030: Refresh Spring 2016 https://www.greaterlincolshirelep.co.uk/priorities-and-plans/strategies-and-plans/).</p> <p>Para. 19: this proposed trajectory is not consistent with the proposed phasing of sites included in the Settlement Proposals Document (Publication Version: February 2016 – 2031) since every allocated site is expected to be delivered in the "first five years of the plan" apart from the following sites:</p> <p>C&T 311, HOG 306, HLC 206, MAN 316, MAR 217, STK 306, WAI 305, WAI 407, WSP 304 and WRA 024. It is not clear which sites are expected to be delivered in 2021 – 2025 and 2025 – 2031.</p> <p>Paras. 20 and 31: The reference to the 7.3% buffer is included at para. 31</p> <p>NOT para. 26. More clarity is required on how this figure was calculated.</p> <p>Policy SP3: there would appear to be an error of arithmetic in the calculation of the inland housing target (6460). Allocations (3901) + Commitments (2777) = 6678.</p>	<p>growth ambition of the plan is inadequate to support the future development needs of various inland settlements in East Lindsey, and in particular the town of Horncastle. In order to achieve this and not disturb the proposed distribution of housing growth up to 2031, it is proposed that the plan period be extended by 5 years until 2036 and that the inland housing target be increased to accommodate additional growth on suitable sites for delivery in 2031 - 2036.</p> <p>The overall district-wide housing target should be increased from 7768 to 10,358 (i.e. 2590) based on the following calculation:</p> $7768 \div 15 = 518 \times 5 = 2590$ <p>Proposed change to SP 3:</p>	<p>2017, Horncastle already had 849 housing commitments, there allocation on a pro rata basis would only have been around 670, so the town is over that already.</p> <p>The Plan makes it clear why the Council allocates on a pro rata basis.; this is because housing demand in the District and population growth is predicated on the migration of older persons and it is impossible to predict where they are going to want to live. The Council, through therefore in this the Local Plan, is trying seeking to direct housing growth to the most sustainable settlements, which are safe from flood risk, settlements and these are the inland towns and main villages. There is a problem with disproportionately placing growth in just one main place like Horncastle. The growth will not be delivered because not all the in migrants want to live in Horncastle, and they want to live everywhere in settlements across the District, particularly in the smaller settlements. The end result will be pressure to approve housing outside of any such a single large allocation in one place on windfall sites, allocated sites being left undeveloped. Alternatively, the Council will very quickly fall out of having a five year supply and then a free for all will occur outside of the allocated sites.</p> <p>The other reason for not significantly growing Horncastle any more than existing commitments is that the demands on water infrastructure requires significant investigation and will most likely require upgrades. There is also a need for a new primary school. Setting aside all of the above, this matter was only raised in May 2016 and no work has been done on clearly defining why the road infrastructure or a bypass is needed, no feasibility study has been carried out, no options appraisal undertaken, no route consultation carried out , and there is no funding strategy or discussion. There has been no consultation on growing Horncastle over and above what is already proposed. The County Council have not produced a County wide strategy for this work, assessing whether this is the right place to remit funding when there are other settlements in the County which need major road improvements., Boston is an example of this, the Borough Council have been demonstrating lobbying for a bypass for approximately 30 years, and it is unclear why Horncastle would have priority? This matter is also not in the County Transport Plan. The County have not set out how they believe extra housing could pay for a bypass, and how that could be linked legally to developer contributions, and how that would then affect other infrastructure requirements in the town.</p> <p>The County Council have put forward a proposal to increase the length of the Plan period but the Council strongly disagrees with this and will not support this proposal. The NPPF, at paragraph 157, states that local authorities should plan over a 15 year time period and the Council in this case strongly supports this. The County Council have put forward additional sites with no</p>
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<p>consultation carried out on these proposals, increasing the target without consultation and with no considered assessment for the long term impacts. The Council, at the five year review of the Local Plan, needs to have the capacity and ability to have monitored the Coastal Housing Policy and if it appears to be failing then it may be that the housing numbers that the County are trying to propose for allocation now might have to be considered for allocation to the Coast. It would be short sighted of the Council to tie this potential housing allocation up at this stage without a comprehensive package on monitoring, discussion and consultation around the coast. Whilst the Council supports the concept of a bypass for Horncastle, the Council strongly disagrees with the County Council on their its approach and in the previous round of consultation June 2016 both Leaders of the Councils agreed a form of wording for the Plan which sets out how this issue is to be addressed in the five year review of the Plan. That wording is at paragraph 13, within Policy SP22. The Council is concerned that the County Council appear to have gone back on this agreement.</p> <p>All the site owners and developers have stipulated that the sites are going to be delivered in the first five years of the Plan. The Council cannot gain say them and at the present time has to take it as read that they are telling the facts as they see them. It is therefore difficult to set out which sites are going to come forward in which phase. However, over the next 12 months all the relevant site owners/developers will gradually be contacted as part of the 5 year supply work and will be asked to clearly state once again when they are planning to deliver their sites. The position statement which is published on the Councils website will then start to reflect this work.</p> <p>The Council believes that the 7.3% buffer and how it is calculated is clear. It is the difference between the overall target of 7768 and the 8336 how much that has been allocated, 8336 as set out in Table B in paragraph 20 and paragraph 31. In order to clarify this matter the Council is proposing a minor modification for paragraph 31 with an additional sentence at the end which reads "The buffer is the difference between the target and the amount of housing actually allocated in the Settlement Proposals Document"</p> <p>The arithmetic that is stated by the County Council as not incorrect, it is correct. There just appears, on the part of the County Council, to be a lack of clarity in the wording which has led to them not understanding the figures. In order to resolve this the Council is proposing a minor modification by altering the original last sentence of paragraph 31 to read "Policy SP3 therefore sets out a minimum inland housing target of 6460 but the Settlement Proposals Document has an additional allocated buffer provision for housing which is approximately 7.3% or 568 homes."</p>	<p>1. Increase inland target from 6460 to 9050.</p> <p>2. Replace with the following:</p> <p>"The Council will allocate sites for the phased delivery of the 9050 homes as follows:</p> <p>2016 – 2021 – an average of 591 homes per annum</p> <p>2021 – 2025 – an average of 481 homes per annum</p> <p>2025 – 2031 – an average of 482 homes per annum</p> <p>2031 – 2036 – an average of 518 homes per annum (new text)"</p> <p>Proposed change to Table B (para. 21)</p> <p>Include additional allocated housing sites (referenced) which have been assessed as suitable in the SHLAA in order to increase the housing target figures for</p>	

	<p>the following settlements by:</p> <p>Friskney</p> <p>63 (FRIS 301) Holton Le Clay 356 (HLC 301 and 304) Louth 62 (LO 044, 154 and 344) Manby/Grimoldby 91 (MAN 330 and 332) Partney 52 (PAR 302 and 303) Sibsey 101 (SIB 302)</p> <p>Spilsby 150 (SPY 310 delivered @ 30 p.a over 2031 – 2036)</p> <p>Stickney109 (STK 304, 312, 314 and 315) Tetney191 (TNY 313 and 316) Woodhall Spa 18 (WSP 310) Wragby</p> <p>230 (WRA 301, 304, 306, and 313) Horncastle</p> <p>1248 (HOR 050, 063, 301, 302, 308, 312, 314, 315, 320, 324, 327, 330 and 333) Additional Total</p> <p>2671 available to meet needed 2590</p> <p>LCC sees Horncastle as an important gateway to the Wolds and the coastal resorts further afield. Its</p>					
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<p>the growth of one settlement may actually be in a neighbouring parish.</p> <p>2. We generally support the level of growth promoted for the District across the plan period. The figure, however, should not be considered to be a ceiling, and the plan should be worded accordingly. We note the second bullet point of para 12 highlights the view that the inland housing target is a minimum, and this wording should be repeated in the policy itself.</p> <p>3. We support the intention to produce monitoring reports every six months.</p> <p>4. We object to the use of the term "windfall" without an appropriate definition. The implication of the supporting text in advance of the policy implies windfall are small sites, but the table in paragraph 2 on page 35 indicates that 30% of the affordable housing provision will come from windfall sites, although Policy SP7 states that only sites of 15 dwellings or more will trigger a contribution towards affordable housing provision.</p> <p>5. The approach to defining growth targets for the towns in large villages in paragraph 14, by setting growth targets proportionally to the size of the settlement, does not appear to be justified, especially in light of the exceptions made for certain settlements due to Flood Risk (e.g. Alford) or the location in Wolds AONB (e.g. Binbrook)</p>	<p>settlement may appropriately be located in a neighbouring parish, regardless of the apparent status of the settlement that may be the focus for this second parish.</p> <p>2 Included the word "minimum" in Policy SP3 when referring to the growth overall targets for inland East Lindsey.</p> <p>3 Provide a definition of "windfall" housing to ensure clarity and consistency Of use of the term in relation to setting growth targets, and assessing contribution of Windfall to both overall housing growth and the provision of affordable housing.</p> <p>4 Justification to be provided for the setting of targets for each settlement.</p>	<p>2. The wording of paragraph 12 concerning the fact that the inland housing figure is a minimum is already repeated in the policy itself at point 1. Therefore there is no need for any further change to the policy.</p> <p>3. The Council notes the support for the production of monitoring reports.</p> <p>4. The Council agrees with the consultee around the fact that there is no clarification on what a windfall site is in paragraph 32 and it is proposed in the minor modifications schedule for the Core Strategy that an additional sentence be added to the paragraph which states "A windfall site is any site that comes forward that is not allocated in the Settlement Proposals Document."</p> <p>5. The consultee asks for a justification for the setting of targets in each settlement. The allocation for each settlement is not a target and nowhere in the Plan does it state it is and that is not how the Council views it. Paragraphs 14, 15 and 16 of SP1 explains how the Council reaches its starting point allocation for each settlement and why, this way of distributing growth fits in with the demographic information on the District. Population growth in the District is predicated on the migration of mainly older persons as set out in the Update of Demographic Evidence by Edge Analytics 2015 and 2016, unlike natural growth or growth from for example, a resident student population where it is clear where the peaks of growth are going to occur; in the main in migrants live where they want to live and can buy a house. Therefore the Council would look to support housing growth across the inland towns and large villages. There are exceptions to that because of flood risk, the location of a settlement in the AONB or in the case of Horncastle the large number of existing commitments. However, in the case of Alford, this is not due to flood risk, as stated in the representation, but rather because Alford is preparing a neighbourhood plan and will be allocating its own sites. It does not mean that housing applications cannot come forward in those settlements, they remain towns and large villages and are thus considered to be sustainable locations, providing they meet the policies in the Plan and are in conformity with the NPPF. They will be treated as windfall sites as set out in point 5 of the main policy SP1. In order to ensure that there is clarification on this subject the Council is proposing a minor modification at paragraph 21 with the insertion of additional wording in the sentence so it reads "Table B below shows the minimum allocation of housing across the inland towns and large villages as set out in the Settlement Proposals Document. These figures are not targets and should not be read as such."</p>
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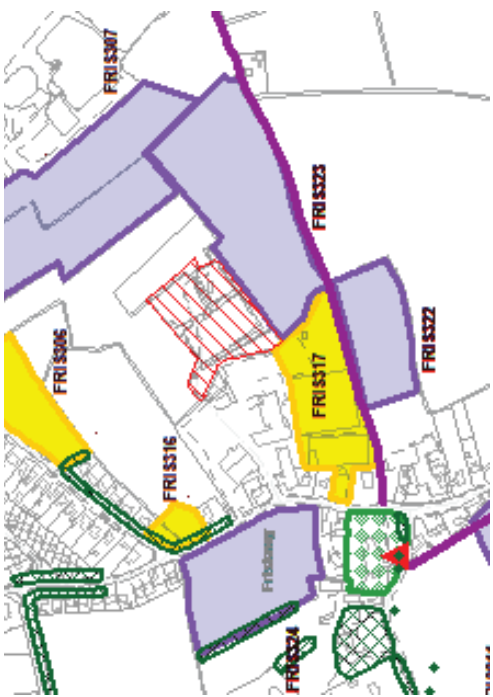
<p>Jack Mowbray Estate represent ed by Robert Doughty Consultan ts Ltd</p>	<p>SP3</p>	<p>O</p>		<p>1. We support the general approach of focussing growth in towns and large villages in the inland area. The policy however, does not acknowledge the potential impact of administrative boundaries of town and parish councils. The policy should clarify that the settlement boundaries do not coincide with Administrative boundaries and that the growth of one settlement may actually be in a neighbouring parish.</p> <p>2. We generally support the level of growth promoted for the District across the plan period. The figure, however, should not be considered to be a ceiling, and the plan should be worded accordingly. We note that the second bullet point of para 12 highlights the view that the inland housing target is a minimum, and this wording should be repeated in the policy itself.</p> <p>3. We support the intention to produce monitoring reports every six months.</p> <p>4. We object to the use of the term "windfall" without an appropriate definition. The implication of the supporting text in advance of the policy implies that windfall are small sites, but the table in paragraph 2 on page 35 indicates that 30% of the affordable housing provision will come from windfall sites, although Policy SP7 states that only sites of 15 dwellings or more will trigger a contribution towards affordable housing provision.</p> <p>5. The approach to defining growth targets for the towns in large villages in paragraph 14, by setting growth targets proportionally to the size of the settlement does not</p>	<p>1</p> <p>Acknowledgment that named settlements may include land of more than one parish. As such sustainable growth of one settlement may appropriately be located in a neighbouring parish, regardless of the apparent status of the settlement that may be the focus for this second parish.</p> <p>2 Included the word "minimum" in Policy SP3 when referring to the growth Targets for inland East Lindsey.</p> <p>3 Provide a definition of "windfall" housing to ensure clarity and consistency of use of the term in relation to setting growth targets, and assessing contribution of Windfall to both overall housing growth and the provision of affordable housing.</p> <p>4 Justification to be provided for the setting of targets for each settlement.</p>	<p>1. The Council does not believe it makes any difference to planning decisions if growth occurs over or outside a parish boundary which is different to that of the named settlement. In the consultation process for development management both parish councils would be consulted as a matter of due process. Therefore it would be unnecessary to make an amendment to the wording of the explanatory text of policy SP3.</p> <p>2. The wording of paragraph 12 concerning the fact that the inland housing figure is a minimum is already repeated in the policy itself at point 1. Therefore there is no need for any further change to the policy.</p> <p>3. The Council notes the support for the production of monitoring reports.</p> <p>4. The Council agrees with the consultee around the fact that there is no clarification on what a windfall site is in paragraph 32 and it is proposed in the minor modifications schedule for the Core Strategy that an additional sentence be added to the paragraph which states "A windfall site is any site that comes forward that is not allocated in the Settlement Proposals Document."</p> <p>5. The consultee asks for a justification for the setting of targets in each settlement. The allocation for each settlement is not a target and nowhere in the Plan does it state it is and that is not how the Council views it. Paragraphs 14, 15 and 16 of SP1 explains how the Council reaches its starting point allocation for each settlement and why, this way of distributing growth fits in with the demographic information on the District. Population growth in the District is predicated on the migration of mainly older persons as set out in the Update of Demographic Evidence by Edge Analytics 2015 and 2016, unlike natural growth or growth from for example, a resident student population where it is clear where the peaks of growth are going to occur; in the main in migrants live where they want to live and can buy a house. Therefore the Council would look to support housing growth across the inland towns and large villages. There are exceptions to that because of flood risk, the location of a settlement in the AONB or in the case of Horncastle the large number of existing commitments. It does not mean that housing applications cannot come forward in those settlements, they remain towns and large villages and are thus considered to be sustainable locations, providing they meet the policies in the Plan and are in conformity with the NPPF. They will be treated as windfall sites as set out in point 5 of the main policy SP1. In order to ensure that there is clarification on this subject the Council is proposing a minor modification at paragraph 21 with the insertion of additional wording in the sentence so it reads "Table B below shows the minimum allocation of housing across the inland towns and large villages as set out in the Settlement Proposals Document. These figures are not targets and should not be read as such."</p>
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				<p>appear to be justified, especially in light of the exceptions made for certain settlements due to Flood Risk (e.g. Alford) or the location in Wolds AONB (e.g. Binbrook)</p> <p>We object to the approach of identifying sites in the Coastal Area. Although the idea of a cap is not challenged, and we accept that the current target is met by extant planning permissions the approach of the plan is to allow for other sites to come forward, should extant consents lapse. The plan should identify preferred sites for future development, should sites need to come forward to replace lapsed consents, or should there be a future need for housing growth in a future plan period. Providing this clarity will reduce the potential for a "planning by appeal" situation arising should a shortfall arise, providing certainty for the local authority, the community, landowners and developers. Providing certainty for the future direction of growth will also be able to be informed by, and inform, future investment in services and utilities in Skegness.</p>		<p>The Council notes the support for a maximum number of houses in the coast. However the Local Plan does not allow other sites in the Coastal Zone to come forward as extant planning permissions lapse and nowhere in the Policy does this state this. There are routes for open market housing to come forward under certain criteria in the coast and these are set out in policies SP17 and SP18 but it does not say that extant permissions have to lapse first.</p>
Chestnut Homes	SP3	0	<p>The Local Authority has set a target of 7768 homes for the plan period; we recommend this be stated as a minimum figure.</p> <p>Of the district wide target, only existing commitments within the Coastal Flood area are accounted for during the plan period as part of a zero population growth strategy. We question the validity of a zero growth policy in the coastal area as, (as stated within the plan) 33% of previous completions (1981-2010) were from this area. This shows a strong desire and demand for housing in this area. The Local Plan seeks to artificially restrict future housing growth in coastal areas to existing</p>		<p>The housing target has already redistributed growth from the Coastal Zone into the inland towns and large villages. The overall target of 7768 is seen as a minimum and the plan states this at paragraph 12 and in the policy itself. From that target the coastal commitments of 1308 have been deducted leaving the inland minimum of 6460 homes. The Councils primary direction is to provide housing in the coast for local needs in that local needs means the resident population and the formation of new households. The work carried out by Edge Analytics looked at a scenario based on this direction which is the zero population growth scenario. This does not mean nil population growth but allows for new household formation based on the resident population. The 33% of growth based on previous completions was a growth amount of mainly in migration of older persons into the coastal area. To allocate this amount of growth into the coastal zone would in effect mean business as usual for the Council and would be having no regard to the fact that the coastal zone is subject to high flood risk.</p>	

					<p>commitments. We would suggest a more appropriate approach would be to reflect this housing growth in other areas of the district.</p> <p>Paragraph 10 suggests there is no evidence either way as to whether this growth will transfer inland. To encourage housing growth in the district, we would suggest it is best to redistribute this growth inland and reflect that in the overall housing target.</p> <p>We welcome the amendment to the phased delivery of housing over the plan period. A level trajectory removes a potential barrier to development when not required. We also welcome the Sedgefield approach in the front loading of the housing shortfall, which is more closely aligned with the requirements of the NPPF to boost the supply of housing and to redeem any under delivery and is advocated by the NPPG.</p> <p>We are supportive of the requirement for sites over 30 to demonstrate phasing of development in line with infrastructure requirements, however this implies that all sites over 30 dwellings will require infrastructure improvements. This wording of point 3 should be amended to 'development sites over 30, if required, should demonstrate phasing of development in line with infrastructure requirements'.</p> <p>Policy point 5 regarding windfall sites is supported. However given the high level of windfall sites historically brought forward in the district, we believe the windfall allowance of 1.5% is not sufficient and should be amended to 20% in accordance with Para 48 of the NPPF which encourages Local Authorities to make realistic allowances with regards to historic windfall delivery rates.</p>		<p>The Councils notes the support for its phased growth trajectory and the Sedgefield approach to its housing shortfall.</p> <p>The Council notes the support for its phased approach to development sites of 30 units with regard to infrastructure. The Council agrees with the consultee that the additional to the text of the words "if required" then makes the text more flexible, therefore the Council is proposing this as a minor modification to paragraph 22 of the policy text.</p> <p>The Council is satisfied with its 1.5% windfall allowance and at this time does not wish to alter it. During the first year of the life of the Plan (2016) the Council delivered in windfall housing planning permissions 90% of the figure set out in Table A and is already up to 14% of the total housing target being delivered in windfall developments. At this stage the Council is not proposing to alter this figure and will continue to monitor the situation.</p> <p>The Council does not believe it should increase its buffer to 20% in its 5 year housing supply calculation. The reason at the present time for a 5 % buffer in the housing supply calculations is set out in the Housing Topic Paper. The Council has to calculate how much undersupply, if any, to add onto the housing target. The way the Council has done this is set out in the Housing Topic Paper in Section two. The Council also has to make a judgement about whether the buffer applied to the undersupply would be 5 or 20%. The Council has determined that it should be 5% because under delivery of housing in the District is coming in general from a lack of demand. The Council contacts all those persons/developers/builders who are granted planning permission across the District to ask them when they are going to deliver their sites. There are many reasons for sites not coming forward the main ones are waiting for the market to improve and sites up for sale with planning permission waiting to be sold. Looking at the five year supply after a year from the start date of the Local Plan, the supply, with the Local Plan allocations stands at 9.45 years. This is sufficient housing to more than deliver the growth of the District in the first five years of the plan period. Given that there is a review at five years, at that time if necessary more housing can be allocated and the supply or undersupply situation can be reviewed.</p> <p>The Council had its own Housing Capital Programme (HCP) up to the end of 2015 and though there are a few sites still to be built out it is now coming to an end. This programme added to the completions over a number of years and has helped to keep the housing market in East Lindsey partly on track. In 2014/2015 the HCP contributed 50% to the District's housing completion rate. The Council believes that it has through intervention tried to support the housing market in the district and the lack of demand is outside of the control of the Council, this coupled with the slow economic recovery rate in the District should lead to the</p>
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St Andrews Healthcare	SP3	p26	0		<p>With regards to paragraph 33 and 34 of this policy, we suggest a 20% buffer is attributed to the buffer for the on-going under supply of housing in the district in accordance with Para 47 of the NPPF. This should then be re-assessed if evidence shows that sites are being brought forward. There is an undersupply of housing as at 1st February 2016 of 553 homes, which is at a level that justifies The adoption of a 20% buffer in the housing supply calculations.</p> <p>Noted at Table 'A' referring to paragraph 26 should read paragraph 31.</p> <p>It is noted at Paragraph 35 the council will monitor 'the imposition of planning conditions on outline approvals to ensure that reserved matter applications are submitted in a reasonable period of time (12 months)'. Under the Section 92 of the Town and Country Planning Act 1990, applications for reserved matters must be made within a specified time limit, normally 3 years from the date outline permission was granted. We believe in many circumstances it may not be reasonable or justified to impose such a planning condition and may not pass the 6 tests set out at Para 206 of the NPPF.</p> <p>In our experience, for larger sites it is more important to have a phased approach to the submission of reserved matters applications, with the initial phase to be within 12-18 months.</p> <p>It is considered that Policy SP3 is : not positively prepared; unjustified; and inconsistent with national policy.</p> <p>Spatial Distribution Given the identified high risk of coastal flooding it is considered</p>	<p>1. It is recommended that Policy SP3 should be amended to provide further explanatory text on how the housing</p>	<p>Spatial Distribution - The consultee asks for a justification for why each settlement has been allocated their respective amount of housing. Paragraphs 14, 15 and 16 of SP1 explains how the Council reaches its starting point allocation for each settlement and why, this way of distributing growth fits in with the demographic information on the District. Population growth in the District is predicated on the in migration of mainly older persons as set out in the Update of Demographic Evidence by</p>	<p>conclusion that a 5% buffer should be applied to the 5 year supply calculation and therefore the 553 homes shown as the undersupply is correct and the Council has not persistently under delivered on its housing. This is going to be kept under review.</p> <p>The Consultee is questioning whether the Council reasonably impose planning conditions on outline applications to ensure that reserved matters come forward in a reasonable period of time. The wording as it is in paragraph 35 would intimate that the Council will do this on all applications but this is not the case. The Council is therefore proposing a minor modification by the addition of the words "if a site appears to be not coming forward" and "12 to 18 months" instead of 12 months.</p>
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				<p>appropriate to distribute the majority of housing towards the inland areas, which is in line with paragraph 94 of the NPPF.</p> <p>However, our client is concerned with the allocation of 161 homes at Alford, as set out in Table B at paragraph 21. The allocation is not positively prepared and is unjustified given that Holton le Clay and Woodhall Spa, which are classified as 'Large Villages', both have larger allocations equal to 326 and 352 respectively.</p> <p>The larger allocations to the two Large Villages is both contradictory with SP1 and is inconsistent with the NPPF core planning principle to actively manage patterns of growth in locations which are sustainable. Furthermore, this approach to housing distribution does not meet the overriding aims of plan-making towards balancing housing growth relative to infrastructure and the size of settlements.</p> <p>In all, the spatial distribution does not clearly state why the apportionment between 'Towns' and 'Large Villages' is as set out in Table B at paragraph 21. Further justification text is required in terms of why each settlement has been allocated their respective amount.</p> <p>Housing Mix</p> <p>In terms of the housing mix, our client supports the Council's assurance at paragraph 23 that there will be an appropriate variety of house types and sizes on developments; however, in the same paragraph the Council is prescriptive in their support for the older demographic of the</p>	<p>requirement has been divided between each settlement within the Inland Area and to significantly increase the allocation of housing to Alford in accordance with its classification as a 'Town'.</p> <p>2. Paragraph 23 of Chapter 2 should be amended to delete text referring to strong support for provision of smaller houses: "The Council will ensure that there is an appropriate variety of house types and sizes on development. Given the older demographic of the District and that young people move out, this will include strong support for the provision of smaller houses, including 1 bedroom units, and housing for older people, including extra care and single storey accommodation outside areas of high flood risk. This will provide choice and help meet local needs."</p> <p>3. The allowance for windfall sites in the five year</p>	<p>Edge Analytics 2015 and 2016, unlike natural growth or growth from for example, a resident student population where it is clear where the peaks of growth are going to occur; in the main in migrants live where they want to live and can buy a house. Therefore the Council would look to support housing growth across the inland towns and large villages. There are exceptions to that because of flood risk, the location of a settlement in the AONB or in the case of Horncastle the large number of existing commitments. It does not mean that housing applications cannot come forward in those settlements, they remain towns and large villages and are thus considered to be sustainable locations, providing they meet the policies in the Plan and are in conformity with the NPPF. The consultee comments are directed at the town of Alford where they wish to see a significant increase in the allocation. At present the allocation is 161 houses. In December 2016 there were 97 commitments in Alford. Alford is one of the smallest towns in the District and is the only one working on a Neighbourhood Plan which includes site selection. This Plan is moving toward its final stages of consultation and submission and therefore any changes to the housing numbers at this stage will impact on the work the community of Alford are doing on their Plan. The Council therefore believes that the amount of housing for Alford is correct and of course this will be part of the 5 year review of the Local Plan. If the Alford Neighbourhood Plan does not come forward as stated by the Town Council they have signed a Memorandum of Understanding that the Council will Plan for the town within 6 months of the adoption of the Local Plan.</p> <p>Housing Mix – The Council does not agree with the consultee that the market should solely dictate housing mix, the Local Plan should provide a guide. Whilst the Council does not support the request by the consultee to delete the last sentence of paragraph 23, the word "strong" implies a lack of flexibility in the text and the Council would propose a minor modification by the removal of the word "strong"</p> <p>Windfall Development – The Council is satisfied with its 15% windfall allowance and at this time does not wish to alter it. During the first year of the life of the Plan (2016) the Council delivered in windfall housing planning permissions 90% of the figure set out in Table A and is already up to 14% of the total housing target being delivered in windfall developments. At this stage the Council is not proposing to alter this figure and will continue to monitor the situation.</p>
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Lenton AE (Holdings) Ltd represent ed by Brown and Co - Property and Business Consultan ts LLP	SP3	p29	O		<p>area and indicate broad locations for strategic development and/or allocate sites to promote development and flexible use of land. The opportunity should be taken now to allocate sustainable sites for housing rather than in five years from now when "additional sites can be allocated if the need and evidence arises" as outlined at paragraph 31 of the Pre-Submission Draft.</p> <p>On the first line in point 1 the word "minimum" should be inserted before "7,768 homes" to make it consistent with the general comments made leading up to the Policy and also to reflect the bullet point below. There is insufficient relationship between what is defined as the Settlement Pattern in point 4 of SP3 to the allocations proposed which presumably are in line with Table B which is on page 26 of the Plan. Generally we object to the spatial distribution and pattern within the villages. We feel that some villages are receiving more than they should.</p> <p>Particular significance to our client is the fact that the sites which are shown as Sites 2, 4 and 5 on the Plan attached to our August 2016 representations (see below) have not been allocated. They should be allocated in addition to the sites which are already allocated within Friskney or in preference to the sites which are shown as Sites FRIS306 and FRIS321. The reasons for that are referred to in the paper which we submitted on 8th August 2016 and for ease of reference a copy of that submission is attached and we wish it to be taken as part of these representations. Of major significance are: 1. The areas indicated as Areas 2, 4 and 5 are in more sustainable locations linked to the core of the village and they are very accessible to the public services and facilities. They are much closer than the other sites</p>	<p>Review spatial distribution and allocate sites in Friskney (see below). See SP4 below.</p> <p>Increase the allocation to Friskney and allocate Sites 2, 4 and 5 in our August 2016 submission.</p>	<p>The consultee is discussing their points around the village of Friskney, which is a large village and therefore has a strategic allocation of growth. The consultee believes that their sites should be allocated.</p> 
						<p>For ease the consultee is discussing sites FRIS322, FRIS323 and FRIS324. All three sites were discounted for the following reasons;</p> <p>FRIS322 - It lies to the rear of the local primary school and does not appear to have an access other than through FRIS317 which lies to the north of it. The site is an open field with low level boundary treatment. The south eastern corner of the site is Grade 1 agricultural land with the rest being Grade 2. The site is moving development away from the centre of the village and out into the open countryside and on its own the site does not lie comfortably with the existing townscape. There would be minimal impact on the historic environment because the site lies</p>	

Lenton AE (Holdings) Ltd represent ed by Brown and Co - Property and Business	SP3	p23(14)	0	<p>proposed in Friskney being Sites 306 and 321.</p> <p>The post office, village hall, recreational area, church, shop, pub and the school are shown on the village Plan and these are very close to the sites we have proposed numbered 2, 4 and 5 on our August 2016 representations. It is not a commodious route to walk/cycle from the sites shown as 321 and 306 into the core of the village and to get to these key services. This will exacerbate the need for movements by private cars.</p> <p>Also, a change to Policy SP4 as indicated (in that section) will also accommodate small scale development of the sites which are shown as numbers 6 and some possible road frontage on Site 7 on the paper which we submitted in August 2016.</p> <p>Generally there must be a clearer definition as to how the overall requirement is to be allocated and the linkage between the allocated sites and the housing growth required and the prime areas which are categorised for growth. There is no clear sustainable and reasonable Policy showing how the allocations have been made and how all the relevant factors have been taken into consideration. There needs to be clarity and sustainable allocations put in place. We consider this is not the case at the moment.</p> <p>In paragraph 14, it is suggested that the allocation and need for housing is proportional to the number of houses. This appears to underline the spatial distribution. This is, very questionable and means the distribution is not sound. It reflects, in many cases, factors that have changed and does not reflect current National Planning guidance. The Plan goes on to say that the</p>	Review spatial distribution and allocate sites in Friskney (see below).	<p>to the rear of the school which blocks views to the listed church on the opposite side of The Avenue. On balance this site whilst reasonable close to services and facilities and to the rear of the school does not form a natural extension to the built environment.</p> <p>FRIS323 - The site is an agricultural field lying to the rear of FRIS317 which would have to provide the access to the site. The site has some boundary treatment but is quite open with a public right of way running down the southern boundary. The site lies outside the built environment in its form and is in effect in the open countryside. There would be no impact on the townscape or historic environment because the site is in the open countryside. The site relates poorly to the built form of the village and FRIS317 would have to be developed for it to have an access.</p> <p>FRIS324 - The site lies on the west of The Avenue and is an open grassed field with mature boundary treatment along its rear boundary and northern boundary. The front and the boundary with the property to the south are open, especially the frontage. The site also lies within view of the listed church and building on the southern boundary though no listed is of historic interest. Development would have a significant impact on both these buildings and of the setting of the village at this point. It provides a wide open green space allowing for views of the listed church to be seen as you move southward along the Avenue set against a backdrop of trees and green field. The site is close to services and facilities with pavement access and is near to the school. An access could be formed from the Avenue.</p> <p>Overall these sites were not considered suitable as set out above and the Council does not support altering its strategic for site allocations in Friskney and even if the numbers of houses were raised for Friskney the sites put forward would not be the first to be considered by the Council.</p>
The Council does not support altering its growth strategy. The Council has not taken on any of Boston Borough Councils Housing Growth despite asking Boston if they wished East Lindsey to do this. They declined on a number of occasions. The consultee has not stated why they believe the villages they have quoted in their representation are unsustainable and not able to support growth even though these settlements have a range of services and facilities to support residents. Overall the consultee has not presented any evidence to support their views.						

Consultants LLP	SP3		S		<p>research has been started but this throws into doubt the whole of the Spatial Strategy. There are some villages where we consider the allocations are too great given their location, lack of services, lack of connectivity and the fact that they are also in close proximity to other major growth areas which should take the growth. Whilst we appreciate Boston is outside the District, the level of growth proposed in Sibsey, for example, is significant without employment opportunities. The needs for Boston should not be accommodated in Sibsey. Also to the north of the District we feel disproportionate amounts of growth has been allocated to the villages of Grainthorpe, Marsh Chapel, Tetney, North Thoresby, Holton Le Clay. We also cite in particular the villages of Manby/Grimoldby and Legbourne which we feel are not suited to the level of growth proposed. In the case of Louth, whilst we support the view that Louth should receive a high proportion of the housing growth being a key town with employment, the amount of sites that have been allocated to the neighbouring villages must be questioned. They are not sustainable villages and the focus must be to redistribute some of the growth, both to Louth and to other more sustainable locations</p> <p>Cyden Homes supports Policy SP3 of the Core Strategy. Policy SP3 provides the overall District wide housing target of 7768 homes over the plan period, of which a minimum of 6460 will be provided inland. This housing target is considered to be positively prepared, justified and consistent with national policy.</p> <p>Policy SP3 seeks that the distribution of housing growth across the inland towns and villages is in accordance with the Settlement Pattern. This approach</p>		
Cyden Homes represented by Barton Willmore	SP3				<p>The Council notes the support for Policy SP3 from the consultee.</p>		

<p>represent ed by Robert Doughty Consultants Ltd</p>	<p>SP3</p>	<p>o</p>		<p>is considered to be justified and effective.</p> <p>Policy SP3 seeks that the delivery of sites be phased over the plan period as follows: 2016 – 2021 - an average of 591 homes per annum 2021 – 2025 - an average of 481 homes per annum 2025 – 2031 -an average of 482 homes per annum</p> <p>We note that this is a change from previous versions of the Core Strategy which sought to increase housing delivery towards the latter part of the plan period.</p>	<p>1. We support the general approach of focussing growth in towns and large villages in the inland area. The policy, however, does not acknowledge the potential impact of administrative boundaries of town and parish councils. The policy should clarify that the settlement boundaries do not coincide with Administrative boundaries and that the growth of one settlement may actually be in a neighbouring parish.</p> <p>2. We generally support the level of growth promoted for the District across the plan period. The figure, however, should not be considered to be a ceiling, and the plan should be worded accordingly. We note the second bullet point of para 12 highlights the view that the inland housing figure is a minimum, and this wording should be repeated in the policy itself.</p> <p>3. We support the intention to produce monitoring reports every six months.</p> <p>4. We object to the use of the term "windfall" without an appropriate definition. The implication of the</p>	<p>1. Acknowledgment that named settlements may include land of more than one parish. As such sustainable growth of one settlement may appropriately be located in a neighbouring parish, regardless of the apparent status of the settlement that may be the focus for this second parish.</p> <p>2. Included the word "minimum" in Policy SP3 when referring to the growth</p> <p>Overall targets for inland East Lindsey.</p> <p>3. Provide a definition of "windfall" housing to ensure clarity and consistency of</p>	<p>1. The Council does not believe it makes any difference to planning decisions if growth occurs over or outside a parish boundary which is different to that of the named settlement. In the consultation process for development management both parish councils would be consulted as a matter of due process. Therefore it would be unnecessary to make an amendment to the wording of the explanatory text of policy SP3.</p> <p>2. The wording of paragraph 12 concerning the fact that the inland housing figure is a minimum is already repeated in the policy itself at point 1. Therefore there is no need for any further change to the policy.</p> <p>3. The Council notes the support for the production of monitoring reports.</p> <p>4. The Council agrees with the consultee around the fact that there is no clarification on what a windfall site is in paragraph 32 and it is proposed in the minor modifications schedule for the Core Strategy that an additional sentence be added to the paragraph which states "A windfall site is any site that comes forward that is not allocated in the Settlement Proposals Document."</p> <p>5. The consultee asks for a justification for the setting of targets in each settlement. The allocation for each settlement is not a target and nowhere in the Plan does it state it is and that is not how the Council views it. Paragraphs 14, 15 and 16 of SP1 explains how the Council reaches its starting point allocation for each settlement and why, this way of distributing growth fits in with the demographic information on the District. Population growth in the District is predicated on the in migration of mainly older persons as set out in the Update of Demographic Evidence by Edge Analytics 2015 and 2016, unlike natural growth or growth from for example, a resident student population where it is clear where the peaks of growth are going to occur; in the main in migrants live where they want to live and can buy a</p>
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Broadgate Homes	SP3			<p>supporting text in advance of the policy implies that windfall are small sites, but the table in paragraph 2 on page 35 indicates 30% of the affordable housing provision will come from windfall sites, although Policy SP7 states that only sites of 15 dwellings or more will trigger a contribution towards affordable housing provision.</p> <p>5. The approach to defining growth targets for the towns in large villages in paragraph 14, by setting growth targets proportionally to the size of the settlement, does not appear to be justified, especially in light of the exceptions made for certain settlements due to Flood Risk (e.g. Alford) or the location in Wolds AONB (e.g. Binbrook)</p>	<p>use of the term in relation to setting growth targets, and assessing contribution of Windfall to both overall housing growth and the provision of affordable housing.</p> <p>4 Justification to be provided for the setting of targets for each settlement</p>	<p>house. Therefore the Council would look to support housing growth across the inland towns and large villages. There are exceptions to that because of flood risk, the location of a settlement in the AONB or in the case of Horncastle the large number of existing commitments. It does not mean that housing applications cannot come forward in those settlements, they remain towns and large villages and are thus considered to be sustainable locations, providing they meet the policies in the Plan and are in conformity with the NPPF. They will be treated as windfall sites as set out in point 5 of the main policy SP1. In order to ensure that there is clarification on this subject the Council is proposing a minor modification at paragraph 21 with the insertion of additional wording in the sentence so it reads "Table B below shows the minimum allocation of housing across the inland towns and large villages as set out in the Settlement Proposals Document. These figures are not targets and should not be read as such."</p>
Broadgate Homes	SP3	S	<p>Broadgate takes no issue with the overall housing requirement of seeking to accommodate 7768 dwellings for the district as a whole with a minimum target of 6460 dwellings for the inland area, although it is considered that the plan should apply a greater discount for the unimplementation of "committed development" within its housing supply calculations with the deficit replaced by additional housing site allocations (see below).</p> <p>Broadgate raised concerns at the proposed phasing policy over three periods of the Plan, and welcome the changes to the publication draft of the Local Plan that have addressed this concern as set out at Policy SP3 which is now supported.</p> <p>If the Local Plan were adopted in 2018 it would have a shelf of only 13 years and whilst the vision and objectives of the strategy are commended, the LPA appear to be relying on an early plan review within the next 5 years. However, given the</p>	<p>The total quantum and distribution strategy of the Core Strategy (Policies SP1 and SP2) is supported. However, because of the objective of achieving a "step change" in housing delivery to 591 dwellings per annum in the first 5 years of the plan, and in recognition of the historically low rate of conversions of planning permissions to actual completions a discount of 20% should be applied to the contribution of existing committed development in the supply pipeline. A</p>	<p>The Council notes the support for the overall housing target of 7768 dwellings.</p> <p>The Council notes the support for the revised phasing policy over the three periods.</p> <p>The Plan period for the Local Plan started in February 2016 and all monitoring on the Plan commenced at this time. Therefore the Plan does have a shelf life of 15 years to 2031 and there is no need to extend this period.</p> <p>The Council has determined that there should be a 5% buffer on the undersupply of housing because under delivery of housing in the District is coming in general from a lack of demand. The Council contacts all those persons/developers/builders who are granted planning permission across the District to ask them when they are going to deliver their sites. There are many reasons for sites not coming forward the main ones are waiting for the market to improve and sites up for sale with planning permission waiting to be sold. Looking at the five year supply after a year from the start date of the Local Plan, the supply, with the Local Plan allocations stands at 9.45 years. This is sufficient housing to more than deliver the growth of the District in the first five years of the plan period. Given that there is a review at five years, at that time if necessary more housing can be allocated and the supply or undersupply situation can be reviewed.</p>	

				<p>need for the current plan to deliver a "step change" in housing delivery (and the recognised lower conversion of consented sites to completions) the plan should attempt to bring forward housing sites at identified settlements in the hierarchy if housing is to be successfully delivered by the spatial strategy. This flexibility is even more important given that the 2014, Household Projections, released in May 2016, show a slightly higher rate of household growth than the 2012 based projections (on which the Draft Plan is based), for the comparable period from 2012 to 2037.</p> <p>For the historic reasons of the low conversion of consented sites to completions in the district to boost supply in line with the NPPF East Lindsey should apply a higher non-implementation rate of 20% to the "inland commitments" (which total 2777 dwellings) which currently are attributed to the supply pipeline and which would equate to sites for a further 555 dwellings to be allocated.</p> <p>Because of the changes reflected in Policy SP3 with respect to phasing, the draft Local Plan is considered to meet the tests of soundness set out in paragraph 182 of the Framework. The Plan has been positively prepared in that it meets the objectively assessed development needs and is consistent with national policy but requires additional site allocations to be identified as a buffer if completion rates on committed sites remains low.</p>	<p>20% discount to the committed housing would equate to 551 dwellings which should be replaced by additional allocations to provide a suitable buffer and assist with the boosting of the supply. This contingency provision assumes greater importance because of the short shelf life of the local plan and the prospect of an early review inside 5 years which creates greater uncertainty.</p>	<p>The Council had its own Housing Capital Programme (HCP) up to the end of 2015 and though there are a few sites still to be built out it is now coming to an end. This programme added to the completions over a number of years and has helped to keep the housing market in East Lindsey partly on track. In 2014/2015 the HCP contributed 50% to the District's housing completion rate. The Council believes that it has through intervention tried to support the housing market in the district and the lack of demand is outside of the control of the Council, this coupled with the slow economic recovery rate in the District should lead to the conclusion that a 5% buffer should be applied to the 5 year supply and that the Council has not contributed to any persistent under delivery. This however, as the Plan states is being kept under constant review and will be formally reviewed again at the 5 year review period of the Plan. If at that point it is found that more sites need to be brought forward then the Council will make provision for this to happen.</p>
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<p>represent ed by WHG Planning</p>	<p>SP3</p>	<p>O</p>	<p>The Local Plan Housing Topic paper update of November 2016 provides further justification for emerging Policy SP3 and reemphasises details with regards the Council's four potential options for distribution of growth over the plan period. After consultation in December 2012, the Council determined that Option 2 was the most sustainable way of distribution its housing growth, namely via five main inland towns and twenty larger villages outside the Coastal Flood Hazard Zones. Acknowledgement was given to the fact that Option 3 was favoured by consultees, which proposes a more dispersed pattern of growth between the five inland towns, large and medium villages and housing in the small villages being permitted only through the exceptions policies and on brownfield land.</p> <p>We remain of the view that a more dispersed pattern of growth, as described with Option 4, would provide further benefits to housing delivery and ensure the housing need can be met as more sites would become available, particularly through the SHLAA, for potential development. Furthermore, as the strategic housing growth will not be going in the Coastal Zone and the predominance of smaller house builders in the District, more choice and flexibility of housing sites are required.</p> <p>It is recognised that small parish councils have given their support for the allocation of growth to the towns and large villages and to <i>"complement this distribution the council will support housing coming forward in the medium and small villages on brownfield land with buildings on it including agricultural buildings. //The updated Housing Topic paper accepts that some of the larger settlements fall within the</i></p>	<p>Conclusion</p> <p>Taking into account the above and the past undersupply of housing, we would encourage further flexibility for the residential development of smaller sites within and adjacent to an identified settlement. The five-year housing supply is over reliant on larger town and villages to accommodate the necessary growth, particularly as the council recognise many of which cannot accept growth because of capacity issues and flooding constraints.</p> <p>It is also recognised that the District has many sites with planning permission but the homes are not being built out. As at November 2015 the figure stood at 3418 which increased to a total of 4085 homes as at February 2016. This is further justification as to why other housing sites in smaller settlements should be given due consideration,</p>	<p>The Council can deliver its housing target from sites in the sustainable towns and large villages, there is no need to allocate sites within the medium or small villages which would be a more dispersed pattern of growth. There is no need to allocate land in the medium or small villages which have little or no facilities to service the day to day needs of residents. This would promote the use of the car as the main mode of transport to gain access to essential facilities such as main shopping and health provision. The plan, and the choices upon which it is based, must be in conformity with the National Planning Policy Framework (NPPF). With the NPPF clearly stating that sustainable development should be the "golden thread" running through plan making, this would inevitably move the Council toward a more sustainable solution to its housing distribution which enables a larger percentage of the population to access community facilities, employment and other services. Paragraph 55 of the NPPF does state that "housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in villages nearby." However, there needs to be a mutually supportive element to the relationship rather than putting additional growth in locations where residents will have to look elsewhere for the majority of their services. The Core Strategy does contain policies that allow a small amount of development in the medium and small villages, in particular circumstances. However, these are not locations that it feels the Council should be directing strategic growth.</p> <p>The NPPF also advocates the promotion of healthy communities in that there should be an integrated approach when considering the location of housing, economic uses and community services and facilities. In the District younger residents are moving out either to go to higher education or to work and those moving in are of the older larger birth cohorts 50+. There is also evidence that residents who are 75+ are moving out of the District. One conclusion for the young and over 75s moving out is that in the smaller villages there is not the service provision to support their needs.</p> <p>With regard to the delivery of windfall sites, The Council is satisfied with its 15% windfall allowance and at this time does not wish to alter it. During the first year of the life of the Plan (2016) the Council delivered in windfall housing planning permissions 90% of the figure set out in Table A and is already up to 14% of the total housing target being delivered in windfall developments. At this stage the Council is not proposing to alter this figure and will continue to monitor the situation.</p>
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						<p>Area of Outstanding Natural Beauty (AONB) and other have flooding issues which preclude development and in this instance, the housing will be redistributed to the medium and more sustainable inland towns. Subsequently, the more medium villages that are unable to accommodate this growth because of capacity issues, which is note in Paragraph 8.16 of the Housing Topic Paper (November 2016), resulting in further strain on other remaining medium villages. Another reason why the council should consider smaller sites, in smaller settlements, as well as larger ones in its housing allocation document.</p> <p>The current calculations, which includes windfall sites and pipeline sites, show a housing land supply of 3.85 years. It is noted that an additional 553 homes are proposed to be allocated in the Local Plan to increase the housing target in order to create a five-year supply of land.</p> <p>For windfall sites, whilst it may be acceptable to include an allowance for some housing to be supplied via this source, the scale of provision appears to be high as no compelling evidence has been provided to demonstrate that historic trends will continue going forwards. Further evidence with respect to this source needs to be provided and a robust buffer applied separate from any allowance for historic undersupply (as this source is acknowledged by the council as reducing going forwards, particularly if policy stipulates brownfield sites similar to SP4.)</p> <p>Similar concerns apply to pipeline sites as there is a high level of uncertainty as to the final numbers which will be granted planning consent or ultimately built out.</p>	<p>particularly when they are deliverable and achievable.</p> <p>The residential development of the land at Goulceby would add to the vitality of a collection of rural communities and therefore, it is considered the site is in a sustainable location within this overall network.</p>	
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It should be clear in point 1 that the figure of 7,768 homes is a minimum. Also the spatial distribution needs further consideration and how development been distributed across the District. We challenge the basis on which the allocations have been made and the background work that has gone into that. There is a high proportion of the allocations made to less sustainable locations than the town of Coningsby/Tattershall. There is no clear direction on the split that should take place between the various categories of settlement and we feel that there is an inappropriate amount of development allocated to some of the larger villages which are distant to other services, facilities and employment. Coningsby/Tattershall is a major town in the District with good services, facilities, employment and is more accessible to other parts of the area.

Allocate Site C&T302 or review the spatial policies and distribution and put this not a more sustainable reasoned Policy allocating land in the most sustainable locations.



The consultee has not explained why they believe other settlements are less sustainable than Coningsby/Tattershall.

The site in question that is being asked for consideration as an allocation is in flood zones 2 and 3. It is not the policy of the Council to allocate sites in areas of high flood risk when sequentially there are areas in either the same settlement or other settlements of the inland part of the District outside flood hazard areas. This is in conformity with National Planning Policy at paragraphs 99 and 100 states 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. This will inevitably mean that settlements with much flood risk could have a lower allocation. Coningsby has sites allocated but these all fall outside the flood risk areas.

Metacre Ltd	SP3	O	Housing Topic Paper	<p>1. Metacre have a number of concerns with Core Strategy policy SP3 and the evidence base, which it considers make the Core Strategy and Settlement Proposals DPD unsound. These concerns relate to the following matters which are then addressed in turn.</p> <ul style="list-style-type: none"> the identified District housing requirement of 7,768 dwellings is not considered to represent the full Objectively Assessed Housing Need (OAHN); the Plan does not comply with the objective of ensuring that a sufficient supply of housing can be delivered to meet identified needs and encourage sustainable growth, as it over estimates the deliverability of committed sites I proposed allocations and provides no robust evidence to support the suggested windfall allowance; there is no robust evidence to demonstrate that there is a deliverable supply of housing to meet the first five years of the plan period; there is no reasonable justification to suggest that larger scale developments over 300 dwellings should not be supported; The suggestion that Reserved Matters applications should be submitted within 12 months is unreasonable and unrealistic. <p>Identified Housing Requirement</p> <p>2. Paragraph 17 of the National Planning Policy Framework (NPPF) identifies one of the core planning principles of the planning system, which it states should underpin both plan-making and decision-making, being to proactively drive and support sustainable development to deliver the homes that the area needs, with every effort made objectively to identify and then meet these needs. NPPF paragraph 47 requires</p>	<p>Metacre consider that to make policy SP3 and the Core Strategy I Settlement Proposals DPD sound the following is required:</p> <p>i. The Council's housing evidence needs to be updated and enhanced so that a NPPF and NPPG compliant assessment of the full OAHN is undertaken.</p> <p>ii. Additional land should be allocated for housing development in the Settlement</p> <p>Proposals DPD to provide sufficient flexibility to ensure that the housing requirement is delivered. In particular land off Brackenborough Road in Louth should be allocated and in this regard please see the separate representation to the Settlement Proposals DPD.</p> <p>iii. the Council need to</p>	<p>The consultee is proposing their site LO305 should be allocated with up to 500 dwellings. The Council would not support this proposal the site was discounted from consideration not because of its size but because it was considered to have an impact on the wider landscape. Even if the housing target were to be increased this is not a site that the Council would support coming forward when more appropriate ones can be considered in the District.</p> <p>The Council considers that its housing target is correct and has been calculated to take into account the full objectively assessed need. The Council carefully looked at scenarios for growth for the District in association with the population projections. At every stage the Council has taken a pragmatic growth view of the situation.</p> <p>As set out in 2.16 of the Housing Topic Paper, the 2014-based household projections underpinned by the 2014-based SNPP, estimates that the number of households in the District will increase by 8335 over the 2014-2039 projection period, equivalent to an additional 333 households per year compared to 399 per year estimated under the 2012-based model. There appears to be a population growth difference of approximately 3.6% difference between the 2012 SNPP and the 2014 SNPP-based estimates, as set out above with the 2012 SNPP providing slightly higher growth figures.</p> <p>The Council could have chosen to use the 2014 sub national population projections with a shorter timeframe 2016 to 2031, the District wide figure using this calculation and the PG-10yr scenario would be 425 homes per year (Edge Analytics Forecasts October 2016) compared to taking a longer timeframe 2011 – 2037 set out in the June 2015 Edge Analytics Forecast of 460 homes per year. The Council also chose to take an average with the 2008 based headship rate provides a housing figure of 481 per year as set out below. This would have meant a difference of 840 homes less over the plan period. However, given the need to try and deliver the 2825 affordable houses set out in the SHMAA, the low level of present demand and slow delivery of sites with planning permission, it was felt that a higher target would offer choice to the market, help with affordable housing delivery and fulfil the national objective of trying to significantly boost housing supply.</p> <p>It is difficult to see how the Council could use evidence come up with a higher figure for its baseline housing target. The housing market in the District is improving albeit very slowly. Section 6 of the Housing Topic Paper discusses the housing market and whilst the section is not entitled "Market Signals" it does look at some of these factors such as house prices, which are rising but only very slowly. Overall, the Council would conclude that its baseline Housing Target is the correct one for</p>
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	<p>Local planning authorities (LPA) to "boost significantly" the supply of housing by, inter alia, using their Local Plan to ensure that their assessed needs for market and affordable housing". NPPF paragraph 14 also states that a presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision-taking, confirming that for plan making this means that Local Plans should meet the objectively assessed needs.</p> <p>3. In this context Met acre is concerned that the housing policies and background evidence do not form a clear, comprehensive or compliant Objectively Assessed Housing Need (OAHN) for the District. They have serious concerns with the housing analysis and evidence base supporting the Core Strategy, to the point that the identified District housing requirement of 7,768 dwellings in policy SP3 is not considered to represent the full OAHN and that it should be adjusted upwards.</p> <p>4. Attached to this representation is a separate report prepared by Chillmark Consulting which is specifically concerned with housing growth and the provision figures set out in policy SP3. The Chillmark report highlights deficiencies in terms of the scope and extent of analyses, but also with respect to the Council's use of the findings.</p> <p>5. Whilst the main parts of the evidence base set out elements of the OAHN calculation there is no clear overall analysis or report that establishes or justifies what the proposed OAHN requirement for the District is. Neither the Core Strategy nor the Housing Topic</p>	<p>produce robust and sound evidence demonstrating that the Plan has a deliverable five year housing supply, which can be maintained throughout the Plan period. It is considered that this will necessitate additional land to be allocated for housing. In particular land off Brackenborough Road in Louth should be allocated and in this regard please see the separate representation to the Settlement Proposals DPD.</p> <p>iv. The reference in paragraphs 14-16 to larger development sites over 300 dwellings not being supported should be deleted.</p> <p>v. the statement in paragraph 35 of the explanatory text to policy SP3 that a condition will be imposed on outline approvals to ensure that reserved matters applications are submitted within 12</p>	<p>the District at the present time, though this will be reviewed again in the 5 year review of the Local Plan.</p> <p>With regard to the Duty to Co-operate for the housing needs of neighbouring authorities. All these authorities can accommodate their growth within their own boundaries. Central Lincolnshire have just demonstrated this at examination of their Local Plan. North East Lincolnshire have submitted their Plan for examination and thus are demonstrating that they can accommodate their growth and Boston have been asked on numerous occasions whether East Lindsey could accommodate some of their growth but they have always come back and said no they can accommodate their own growth. Therefore there are no unmet housing needs from neighbouring authorities to take into consideration.</p> <p>The consultee is stating that the Council has not undertaken an assessment of the deliverability of the existing commitments in the District; this is incorrect, the Council has a robust programme of telephoning or writing to all those persons with housing planning permissions in the District to try and ascertain when they are going to bring their sites forward, this is noted on the Councils position statement. Only sites which the Council knows are coming forward go into the 5 year supply, unlike other Councils outline permissions do not go in automatically, neither do reserved matters permission without contact with the developer to confirm when they are coming forward. Therefore the Council is confident that its 5 year supply figures are accurate and is not sure what else it can do to establish whether a site is coming forward.</p> <p>Quite obviously some sites will come forward with less housing than anticipated but some will come forward with more. Therefore to pick apart one or two sites is not a reflection of what will happen over the Plan period. Given that the Plan has a five year review in it, this matter will be reflected upon in the review.</p> <p>The Council has historically delivered up to 50% of its housing from windfall sites, the Council has determined to reduce this in its 5 year supply to 15%, though the reality is this figure is likely to be much higher than that. The only figure that will go into the five year supply calculations from table A in the Core Strategy is the windfall 15%. The other figures from possible homes on brownfield sites are just estimates after looking at potential sites that could go forward and there for information as to other sources of housing that could come forward. What the Council is saying and perhaps this is not clear enough for the consultee is the full 7768 housing target is either in the existing commitments, or allocated including the undersupply of housing from the previous plan period.</p>	
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<p>Paper bring the various Strategic Housing Market Assessment and demographic evidence together in a comprehensive manner as laid out in National Planning Practice Guidance (NPPG). Moreover there is a lack of evidence, analysis or consideration of many of the factors identified in the NPPG at section 2a, which clearly spells out what is needed and the process to establish the OAHN.</p> <p>6. Ultimately it is considered that the Council's evidence base is a complex patch-work of material prepared over a number of years with varying base dates. There is no clear overall analysis or report that establishes or justifies what the proposed OAHN requirement for the District is. It is considered that there is a significant and substantive lack of evidence, analysis and consideration of the factors laid out in the NPPG.</p> <p>7. There is also an absence of information concerning the extent to which the Duty to Co-operate has been fulfilled in establishing whether there are unmet housing needs arising from that need to be accommodated in East Lindsey.</p> <p>8. Ultimately policy SP3 and its suggested District wide housing target is unsound as the policy is not:</p> <ul style="list-style-type: none"> Positively prepared and Consistent with national policy: NPPF paragraph 182 confirms that to be positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so. For reasons highlighted the evidence base which supports the policy is ineffective in 	<p>months should be deleted.</p>	<p>The Council is satisfied with its 15% windfall allowance and at this time does not wish to alter it. During the first year of the life of the Plan (2016) the Council delivered in windfall housing planning permissions 90% of the figure set out in Table A and is already up to 14% of the total housing target being delivered in windfall developments. At this stage the Council is not proposing to alter this figure and will continue to monitor the situation.</p> <p>The Council is proposing a minor modification to make Table A clearer with the insertion of the words after "housing target above" with "only the 15% windfall allowance will be part of the 5 year supply calculations".</p> <p>The consultee states that the Council has not published any evidence concerning why it chose 15% as the windfall allowance. Given the high delivery rate of windfall sites in the District it just seemed like a sensible figure to aim for and with the 5% buffer in the 5 year supply made up to 20%.</p> <p>Given that East Lindsey is a large rural district with plenty of land and a long history of windfall sites coming forward the Council is confident that the 15% will be reached, in fact it will be far exceeded during the Plan period.</p> <p>The Council has determined that there should be a 5% buffer on the undersupply of housing because under delivery of housing in the District is coming in general from a lack of demand. The Council contacts all those persons/developers/builders who are granted planning permission across the District to ask them when they are going to deliver their sites. There are many reasons for sites not coming forward the main ones are waiting for the market to improve and sites up for sale with planning permission waiting to be sold. Looking at the five year supply after a year from the start date of the Local Plan, the supply, with the Local Plan allocations stands at 9.45 years. This is sufficient housing to more than deliver the growth of the District in the first five years of the plan period. Given that there is a review at five years, at that time if necessary more housing can be allocated and the supply or undersupply situation can be reviewed.</p> <p>The Council had its own Housing Capital Programme (HCP) up to the end of 2015 and though there are a few sites still to be built out it is now coming to an end. This programme added to the completions over a number of years and has helped to keep the housing market in East Lindsey partly on track. In 2014/2015 the HCP contributed 50% to the District's housing completion rate. The Council believes that it has through intervention tried to support the housing market in the district and the lack of demand is outside of the control of the Council, this coupled with the slow economic recovery rate in the District should lead to the conclusion that a 5% buffer should be applied to the 5 year</p>

<p>supply and that the Council has not contributed to any persistent under delivery. This however, as the Plan states is being kept under constant review and will be formally reviewed again at the 5 year review period of the Plan. If at that point it is found that more sites need to be brought forward then the Council will make provision for this to happen</p> <p>The consultee states that the site SPY310 is a significant urban extension. The site is due to come forward beyond the Plan period and it was deemed only fair to those living in the District that the direction of travel for Spilsby be shown by the allocation of the site. Spilsby is unusual in that there is no other obvious direction in which to grow and in the future it will because of its geography be growing out to the east as shown in the Settlement Proposals Map. Unlike the site promoted by the consultee SPY310 was considered to be a suitable site.</p> <p>The Consultee is questioning whether the Council reasonably impose planning conditions on outline applications to ensure that reserved matters come forward in a reasonable period of time. The wording as it is in paragraph 35 would intimate that the Council will do this on all applications but this is not the case. The Council is therefore proposing a minor modification by the addition of the words "if a site appears to be not coming forward" and "12 to 18 months" instead of 12 months.</p> <p>The consultee questions the housing target in relation to employment growth. The work carried out by Edge Analytics shows relatively few jobs being created in relation to the growth scenarios put forward. The Councils Economic Baseline Study showed an alternative higher scenario for job growth but it was predicated on pump priming from external funding sources major investment. This is however aspirational with no clear delivery mechanism or plan and very unlikely to occur over the plan period. Therefore growth in the jobs market in the District will remain slow with agriculture and tourism being the main growth markets. Linking this to the growth of the population mainly through the in migration of older, economically inactive people is not possible. Building more homes for people who may come for a job is more than likely going to fill those homes with people coming to retire. There is no evidence that a change in how the population is growing is happening or that it will happen in the medium to long term. Having already taken the higher 2012 projections into account and taking these as an average with the 2008 projections using the PG10yr Migration Scenario has, built into the housing target resilience to delivery housing across the Plan period.</p> <p>The consultee is questioning the wording of paragraphs 14, 15 and 16 in the policy. These set out how the Council distributes its growth. The Council can see that the wording could cause</p>					
<p>Identifying the full Objectively Assessed Housing Need. Nor is there any evidence of the duty to cooperate having been complied with.</p> <ul style="list-style-type: none"> Justified: there is no sound justification for not establishing the full OAHN in order to inform the Plan policies. <p>Delivering the Housing Requirement over the Plan Period</p> <p>9. As already highlighted NPPF paragraph 47 requires local planning authorities to "boost significantly" the supply of housing by, inter alia, using their evidence base "to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing". Paragraph 17 of the NPPF also identifies one of the core planning principles of the planning system, which it states should underpin both plan-making and decision-taking, being to proactively drive and support sustainable development to deliver the homes that the area needs, with every effort made objectively to identify and then meet these needs. NPPF paragraph 152 confirms that Local Plans should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and deliver net gains across all three strands. Paragraph 7 highlights that the economic role includes contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. The NPPF also acknowledges the key role of delivering adequate housing in this regard, with paragraph 2.1 stating that planning policies should recognise and seek to address</p>					

				<p>potential barriers to investment such as a lack of housing. Similarly, NPPF paragraph 7 confirms that providing housing to meet the needs of present and future generations is a key social role of sustainability.</p> <p>10. Ultimately Development Plans should aim to allocate a sufficient supply of housing to ensure that identified needs can be delivered and to encourage sustainable growth. There is a clear national policy objective to "boost significantly" the supply of housing (NPPF 47) and NPPF 14 confirms that Local Plans should be able to meet objectively assessed needs with sufficient flexibility to adapt to rapid change.</p> <p>11. The need to ensure that the emerging Local Plan allocates sufficient land to deliver the housing requirement is particularly relevant in East Lindsey given the Council's acknowledged shortfall in housing provision in previous years. It is considered that this shortfall in provision is in part due to the absence of positive, proactive planning to secure adequate housing development, with a heavy reliance on windfall sites to deliver housing in a setting where significant greenfield countryside development is necessary. In this respect the current Local Plan and its settlement boundaries were adopted over 21 years ago and the Plan was only intended to meet the needs of the District to 2001. Furthermore the Core Strategy confirms that there is a need for significant greenfield settlement extensions if the development needs of the District are to be met. Indeed the Core Strategy appears to acknowledge the need to reduce the reliance on windfall development in order to guarantee housing delivery, as this</p>		<p>confusion and believes this needs clarifying, therefore a minor modification is proposed with paragraph 15 reworded to read;</p> <p>"This way of apportioning growth across the towns and large villages means that the Council is not bringing forward any large urban extensions allocating its growth into a few settlements but spreading it across the inland towns and large villages, as set out above this reflects the way the population grows through the in migration of mainly older persons. Whilst this means of growth may be appropriate in more urban places, East Lindsey does not have a history of delivery of large sites over 300 units. This probably reflects the fact that the predominance of house builders who operate in the District tend to be smaller, with national companies only rarely developing in the District...."</p>
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							<p>is one of the stated objectives in bullet point 2 on page 2.1.</p> <p>12. It is acknowledged that table A on page 25 of the Core Strategy suggests that the existing commitments and proposed allocations (together with site SPY30 at Spilsby) could deliver 8,336 dwellings over the plan period, providing a 7.3% buffer against the identified 7,768 housing requirement. However it is considered that the amount of housing which will realistically be delivered from these sources is overestimated.</p> <p>13. Firstly the Council identify 4,085 dwellings coming forward from committed sites with planning permission. The published information on these sites is limited but consideration has been given to the Council's two Position Statements titled 'Windfall Sites' and 'Allocated Sites', which have been submitted as part of their housing evidence. The committed sites range between 1 and 100+ dwellings and it is apparent that the Council have not undertaken any assessment of the deliverability of individual sites.</p> <p>14. It is not uncommon for sites with planning permission to not come forward for development for a variety of reasons. Indeed it is noted that since the base date of the housing evidence a number of the planning permissions which are identified as commitments appear to have expired. For example planning permissions at Alford (N/003/03576/08), Horncastle (S/086/00861/13), Woodhall Spa (S/215/2525/12) and East Kirkby (S/046/02323/12), although this is not an exhaustive list. Many</p>		
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						<p>local authorities apply discounts to committed sites to allow for planning permission not coming forward for development, which hasn't been the case in the East Lindsey Core Strategy</p> <p>15. With regards to larger sites consideration needs to be given to deliverability, taking into account market factors and delivery factors such as the need to relocate any existing users, delivery of initial infrastructure, realistic build out rates, phasing and developer capacity etc. The Council have not undertaken any deliverability assessment of the committed sites, despite it being apparent that some sites may have deliverability issues. For example it is noted that the Council's committed sites includes 171 dwellings at a site on Anchor Lane in Ingoldmells (ref. 43.1A). It would appear that the 171 dwellings relates to an outline planning permission which was granted in 1989 for a total of 227 dwellings, where Reserved Matters were then approved for part of the site. This resulting in 50 dwellings being initially built before developed ceased. Subsequently there have been numerous applications to amend house types etc. but no apparent progress completing the original outline permission which was granted over 27 years ago. This indicates possible deliverability constraints with this site, which is also located within Flood Risk Zone 3. Indeed it is apparent that over 1,000 of the dwellings in the committed supply relate to sites originally allocated for development over 16 years ago in the adopted Local Plan</p> <p>16. The Settlement Proposals DPD itself acknowledges in paragraph 2.10 that "inevitably some sites for various reasons will not come forward as anticipated during the plan period."</p>		
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<p><i>Landowners may a detailed analysis find that sites are not viable or decide not to pursue a site."</i></p>	<p>17. Furthermore it is apparent that since the housing evidence was published some planning applications have been submitted seeking less housing than anticipated. For example the Committed sites figure includes a site at Horncastle for 300 dwellings although the subsequent Reserved Matters application only sought permission for 265 dwellings.</p>	<p>18. Ultimately the Council have not undertaken a robust exercise to calculate the realistic delivery from the committed sites and it is considered that they are overestimating deliverability as a result.</p>	<p>19. Secondly the number of dwellings coming forward from the proposed allocated sites is considered to be overestimated. An example of this is the settlement extension allocation at Spilsby. The proposals map for Spilsby in the Settlement Proposals DPD shows a settlement extension to the eastern side of the town. The accompanying settlement table refers to the whole of this allocation as SPY310 and states that it includes allocated sites SPY301, 303, 304, 305 and 306. Moreover it specifically states that "It is not anticipated that all the sites will come forward during the plan period but the total approximate amount of housing to be delivered on the eastern side of Spilsby could eventually be a minimum of 600 homes". It is apparent that this entire allocation is being progressed by a single developer. Paragraph 2.11 of the Settlement Proposals DPD also states that the developer has confirmed that they anticipate the site will start to come forward during the lifetime of the plan period but</p>										

that its delivery will run beyond the plan period at a rate of 30 dwellings per annum. Bearing in mind a planning application has yet to be submitted and infrastructure will need to be provided before the first dwelling is completed, it is clear that based on the identified delivery rate a large proportion of this allocation is not going to be delivered in the plan period. Indeed this appears to have initially been acknowledged by the Council in so far as the Settlement Proposals DPD in Table A only identifies 229 dwellings as being delivered from this allocation during the plan period (35 of the identified 264 dwellings at Spilsby are from separate site allocation SPY302). These 229 dwellings are included within the proposed allocations figure of 3901 dwellings in the Core Strategy, as is confirmed in Table B on page 26. However in table A on page 25 of the Core Strategy the Council then adds an additional 350 dwellings into the housing supply from the SPY310 Spilsby settlement extension. The Core Strategy is therefore now suggesting that over twice as many houses are deliverable from this allocation (579 dwellings rather than 264).

20. Ultimately it is difficult to consider the deliverability of the Council's identified housing supply due to the limited and confusing information provided in their evidence base. Nevertheless from consideration of the evidence which is available it is apparent that the Council are overestimating the amount of housing which could be delivered from their committed and allocated sites. Met acre request an opportunity to make further comments on this matter if and when further clarification on the deliverability of the supply is provided by the Council.

					<p>21. It is acknowledged that Table A on page 25 of the Core Strategy suggests that an additional 1,935 houses could come forward over the plan period from windfall sites and possible additional homes on brownfield sites in the coastal zone and medium I small inland villages. Contrary to suggestions in the Core Strategy there is no robust published evidence to support this contention.</p> <p>22. Firstly the figures do not appear to add up correctly as 1,165 dwellings from the 15% windfall allowance plus 420 dwellings from possible additional homes in the coastal zone and medium I small inland villages totals 1,585 not the suggested 1,935.</p> <p>23. Secondly if the 420 dwellings in the coastal zone and medium I small inland villages do not have planning permission and are not proposed for allocation, then they comprise windfall sites. If this is the case then the Council are not proposing a 15% windfall allowance but a 20% windfall allowance, as the suggested windfall development is 1,585 not 1,165</p> <p>24. Thirdly, and irrespective of whether the windfall allowance is 15% or 20%, the Council have not published any robust evidence to justify such a high windfall allowance. The Council simply state that windfall sites have historically contributed up to 50% of the District's total housing supply and that because of the long historical trend of this type of delivery, the type of sites that are delivered in this way and the local nature of the delivery allowance for windfall sites is justified. However neither the Core Strategy nor Housing Topic Paper provide any evidence to justify why 15-20% allowance is realistic.</p>		
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					<p>25. Windfall development will have historically been high bearing in mind the current Local Plan was adopted over 21 years ago and was only intended to cover the period until 2001. The fact that the emerging Local Plan allocates housing sites will naturally reduce the amount of windfall development coming forward in the future, particularly as the proposed site allocations include sites as small as 3 dwellings. Indeed the Core Strategy itself acknowledges in paragraph 30 that having an up to date Local Plan with site allocations, phasing sites, monitoring delivery and having a clear delivery pathway for housing should see the windfall figure reduce.</p> <p>26. Furthermore the Core Strategy confirms in paragraph 25 that the District does not have a history of past industrial development and that <i>"it is inevitable that growth will have to occur on greenfield sites"</i>. The number of proposed allocations which take the form of greenfield settlement extensions, despite the allocation of sites as small as 3 dwellings, is a clear indication of the limited development opportunities within the currently defined settlement boundaries. This raises concerns regarding the potential for windfall development coming forward.</p> <p>27. Core Strategy policy SP4 also restricts windfall development in the medium and small villages to brownfield land and disused buildings and only then when sites have been actively marketed for community, economic or leisure uses and that the retention of conversion of any existing buildings is not possible. Such a policy is likely to further limit windfall housing development. Similarly the Core Strategy restricts</p>		
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					<p>windfall development in the coastal area beyond existing commitments due to issues with flood risk.</p> <p>28. Ultimately the Council have not provided any robust evidence to support their contention that windfall development will be able to address the shortfall in delivery from the allocated and committed sites. Furthermore a heavy reliance on windfall sites to deliver the housing requirement would not offer sufficient assurance that the necessary housing (including the past under-supply) will be delivered.</p> <p>29. It is important to ensure sufficient sites are allocated in order to guarantee delivery. This is especially the case given the poor delivery rate and the objective in bullet point 2 on page 21 of the Core Strategy for the Council to be less reliant on windfall sites.</p> <p>30. In its current form the Core Strategy and Settlement Proposals DPD are therefore considered unsound as the Plan does not:</p> <ul style="list-style-type: none"> • <i>Positively prepared</i> nor <i>Consistent with national policy</i>: As highlighted there is a clear national policy objective to boost significantly the supply of housing and NPPF confirms that that to be positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development requirements with sufficient flexibility to adapt to rapid change. It is considered that there is not enough land being allocated to provide sufficient flexibility to ensure that the housing requirement is delivered in line with NPPF. • <i>Justified</i>: there is no sound justification for not ensuring adequate housing allocations to 		
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						<p>provide sufficient flexibility to deliver the housing requirement, with related representations by Met acre demonstrating that there are additional potential housing allocations which are suitable and deliverable.</p> <p><u>Five Year Housing Supply</u></p> <p>31. NPPF paragraph 47 requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. Moreover under the terms of NPPF 49 if a Local Plan cannot demonstrate a five year supply plus buffer it will be out-of-date the moment it is adopted and NPPF 14 will be triggered with regards to decision taking. This undermines the purpose of Local Plans and is at odds with the requirement in the NPPF for plans to be kept up-to-date.</p> <p>32. The lack of information presented by the Council on relevant completions, commitments and windfalls data make consideration of the five year land supply very difficult. The onus is on the Council to robustly demonstrate that there is a deliverable five year supply for the first five years of the Plan period and how the Core Strategy policies and Settlement Proposals DPD will enable this to be maintained through the plan period. Without this the Local Plan is not consistent with national planning policy and cannot be considered sound.</p> <p>33. Moreover the Housing Topic Paper concludes at Box 5 that there is not a deliverable five year housing supply.</p> <p>34. The identified five year housing supply deficit is also considered to be</p>		
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					<p>greater than identified by the Council for a number of reasons.</p> <p>35. As previously highlighted Met acre consider that the identified housing requirement should be increased and they also have concerns regarding the extent of the housing under-supply which needs to be addressed (see attached report by Chillmark).</p> <p>36. The Housing Topic Paper states that there is a 3.35 years housing land supply which rises to 3.85 years if a 15% windfall development allowance is included. For reasons already highlighted there is no robust evidence to support the inclusion of a 15% windfall allowance. NPPF paragraph 48 confirms that an allowance for windfall sites can only be included if there is compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. As the Council have not published any data which provides compelling evidence in this regard the windfall allowance cannot be included in the five year supply calculation. This is particularly the case given that windfall development in the short term is most likely to come from sites with existing planning permission which have already been taken into account.</p> <p>37. The Council's 5 year supply is based on applying a 5% buffer rather than a 20% buffer. NPPF 47 confirms that a supply of specific deliverable sites needs to be identified to provide five years' worth of housing against the requirement, with an additional buffer of 5% to ensure choice and competition in the market for land. This is to be increased to 20% where there has been a record of persistent under delivery of housing so as to</p>		
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								<p>provide a realistic prospect of achieving the planned supply. The Council's published evidence fails to indicate the annual delivery rates prior to 2010, but the Core Strategy does confirm that there has been a significant under provision of housing in the last six years and indicates that the annual delivery over this period has persistently been below the annual housing requirement. Moreover the Council's previous draft Core Strategy confirmed that a 20% buffer should apply. However the Five Year Housing Supply Position applies only a 5% buffer.</p>									
							<p>38. This is justified in the Topic Paper on the basis of the "slow economic recovery rate in the District" and the "lack of demand outside the control of the Council". However the slow economic recovery and asserted lack of demand are not factors that absolve the District from meeting the NPPF's requirements to apply the appropriate contingency buffer and boost significantly the supply of housing. Furthermore a contributing factor to the poor delivery is likely to be the absence of an adopted and up-to-date local plan and mechanisms to ensure that housing delivery is increased. The adopted Local Plan and its settlement boundaries were adopted over 21 years ago and the Plan was only intended to meet the needs of the District to 2001. Furthermore the Core Strategy confirms that there is a need for significant greenfield settlement extensions if the development needs of the District are to be met. Accordingly for a number of years there has been a lack of positive, proactive planning to secure adequate housing development, with a heavy reliance on windfall sites to deliver housing in a setting where significant greenfield countryside development is</p>										

<p>necessary. A 20% buffer should therefore be applied as there has been a persistent under delivery of housing.</p>	
<p>39. As previously highlighted Metacre consider that the Council are overestimating the deliverability of sites and note that the Council have not actually undertaken any detailed assessment of the deliverability of individual sites, taking into account matters such as likely lead in times, realistic build out rates, phasing and developer capacity etc. Metacre request an opportunity to make further comments on this matter if and when further clarification on deliverability is provided by the Council.</p>	
<p>40. In its current form the Core Strategy and Settlement Proposals DPD are considered unsound as the Plan is not:</p>	
<ul style="list-style-type: none"> Positively prepared nor Consistent with national policy: NPPF 47 requires LPAs to boost significantly the supply of housing, which includes identifying a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement. For reasons highlighted the Council have failed to demonstrate that they have a deliverable five year housing supply. 	
<ul style="list-style-type: none"> Justified: there is no sound justification for not ensuring adequate housing allocations to ensure a deliverable five year housing supply can be maintained. <p><u>Large Scale Housing Allocations</u></p>	
<p>4.1. Paragraphs 14 to 16 of the supporting text to policy SP3 suggest that as housing demand in the</p>	

						<p>District and population growth is predicated on the migration of mainly older persons it is impossible to predict where new residents are going to want to live. Moreover it states that the way growth has been apportioned across the towns and large villages means that the Council is not bringing forward any large urban extensions. The Council considers that East Lindsey does not have a history of delivering large sites over 300 units, reflecting the fact that the predominance of house builders who operate in the District tend to be smaller, with the national companies only rarely developing in the District. The plan states that the Council strongly supports these smaller more Lincolnshire based developers and builders because they form a key employment sector and use the services and supply chain in the District. The Plan states that large urban extensions could in effect penalise the smaller developers who rely on the District for employment. The plan also states that a concern about allocating large urban extensions in the towns of the District would be their ability to come forward and be delivered. That given in migrants could choose to live anywhere and there is no evidence to show they all go to one or a few settlements in the District, East Lindsey could end up with many windfall developments outside of an allocated urban extension and only slow growth or cause no growth on the allocated sites.</p> <p>42. Firstly, and notwithstanding the above, the Settlement Proposals DPD is clearly allocating urban extensions exceeding 300 dwellings. As previously highlighted the Council are proposing a settlement extension to the east of Spilsby for over 600 dwellings. Whilst the DPD splits this</p>		
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						<p>into 5 sites it is clearly a single settlement extension which would need to be brought forward as part of a master planning exercise. The approach taken at Spilsby demonstrates that the Council is willing to allocate large urban extension sites and this site has been subdivided in order to satisfy the Council's narrative and justify its position. There is no reason why a similar approach could not be taken in other locations in the authority area in allocating larger strategic sites to meet housing need. Paragraph 52 of NPPF confirms that extensions to existing settlements can best achieve a supply of new homes, stating that local authorities should consider this approach to provide the best way of achieving sustainable development. Paragraph 15 of the draft Local Plan states that the Council states that large urban extensions are not appropriate or suitable for East Lindsey but then proposes the allocation of a significant extension to the east of Spilsby. This is contradictory and undermines the soundness of the plan as there is no justification for this approach.</p> <p>43. Notwithstanding the point that the Council is allocating a large strategic extension site there is no sound justification for suggesting that larger allocations are unjustified. Larger allocations are often better able to provide community infrastructure due to the economies of scale and can be key in delivering the level and variety of housing required in the District over the plan period. Larger sites can also make a significant contribution towards affordable housing delivery which is limited on smaller sites in the setting of the 10 unit threshold. The Council also suggests in paragraph 15 that there is a link between a</p>		
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					<p>predominance of local house builders and smaller sites suggesting that agree house builders rarely develop in East Lindsey. There is no published evidence that this is the case. If it is the case that national house builders rarely operate in the District there are a variety of reasons as to why this may be the case, one obvious one may be that the Council has not allocated suitable or appropriate sites to appeal to national operators. Equally there is no evidence that national housebuilders would not provide employment for local people and utilise local suppliers. Further to this it is important to recognise that larger allocations are often sold in parcels to more than one developer, which doesn't preclude smaller Lincolnshire based developers, but would provide the scale of development which can also attract national housebuilders. Ultimately there is no robust evidence to justify the Council's suggestion that larger site allocations should not be supported. Indeed to do so may undermine the ability of the Council to deliver its housing requirement.</p> <p>Reserved Matters Applications</p> <p>44. Metacre have concerns regarding the suggestion in paragraph 35 of the explanatory text to policy Sp3 which states that a condition will be imposed on outline approvals to ensure that reserved matters applications are submitted within 12 months</p> <p>45. Section 92 of the Town and Country Planning Act 1990 states that outline planning permission should be subject to a condition requiring applications to be made for the approval of reserved matters within 3 years. It is acknowledged that local planning authorities are allowed to consider longer or</p>		
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							<p>shorter periods of time where appropriate on planning grounds, but there must be clear justification for doing so. In so doing LPAs must also be aware of the 6 tests identified in NPPF paragraph 206, which all conditions must comply with. One of these is that the condition is reasonable in all other respects and the NPPF defines this as not placing unjustified and disproportional burdens on an applicant.</p>																
							<p>46. Following the grant of outline permission there is often significant additional survey work and assessments necessary before reserved matters applications can be submitted. Indeed conditions are often applied to outline approvals which require additional surveys and assessments to be undertaken, the results of which would have to feed into the reserved matters scheme before the submission of an application</p>																
							<p>47. Many outline applications only seek permission for the principle of a development, with all matters relating to layout, access, landscaping, appearance and scale reserved for future approval. The production of the necessary plans and supporting evidence to enable these Reserved Matters applications to be submitted can often be a lengthy process, particularly for larger developments. The fact the Core Strategy is also promoting extensive pre-application discussions with the Council and statutory bodies, together with the production of design briefs and community consultation, will add further delays to the submission of Reserved Matters.</p>																
							<p>48. Furthermore it is very common for outline applications to be submitted by the landowner or a promotional company, meaning a</p>																

						<p>period of marketing and contract negotiations will be required before the above work can be started and reserved matters submitted.</p> <p>49. It is therefore unreasonable to suggest that all Reserved Matters applications should be submitted within 12 months. Indeed applying such a condition could place such a burden on applicants that it could undermine otherwise viable and deliverable sites being brought forward. For example if a landowner were to obtain outline permission for a site with such a condition attached, prospective developers might be put off from purchasing the site on the basis that they would be unable to prepare and submit a reserved matters application within such a tight timeframe.</p> <p>50. There may very well be circumstances where a scheme with outline permission could seek approval for reserved matters within 12 months, and where the requirement for this might be justified in planning terms. However it is highly unlikely that this would be the case for the vast majority of outline applications and the suggestion of applying a blanket condition is therefore entirely unreasonable. Any decision to apply a shorter, or longer, timeframe on an outline application should be considered on a site-by-site basis at the application stage.</p> <p>51. This element of the policy is there unsound as it is not: <i>Justified</i> – for reasons already highlighted it is not the most appropriate strategy when considered against the alternatives, i.e. continuing to allow a 3 year time frame for submission of Reserved Matters unless the circumstances of a</p>		
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								<p>specific application justifies a shorter timeframe.</p> <p><i>Consistent with national policy – as it would fail one of the 6 condition tests, namely that the condition is reasonable in all other respects. In this regard it places unjustified and disproportionate burdens on an applicant which would fail the test of reasonableness.</i></p>																		
							<p>Consultation Representations for and on Behalf of Metacre Ltd. Report by Chilmark Consulting</p> <p>Introduction</p> <p>1. These representations are submitted by Chilmark Consulting Ltd. (CCL) for and on behalf of Metacre Ltd. and are particularly concerned with housing growth and provision as set out in the <i>East Lindsey District Core Strategy: Publication Version</i> (November 2016) (ELDCS).</p> <p>2. The representations follow on from and update the submission made in August 2016 on behalf of Metacre Ltd. to the previous version of the East Lindsey District Core Strategy (March 2016).</p> <p>3. Policies and supporting justification for future housing requirements and provision are set out in Chapter 2 (A Sustainable Pattern of Places, Growth and Housing) and then in Chapter 3 (Affordable Housing) of the ELDCS.</p> <p>4. The key policies relating to housing are Strategic Policy 3! SP3Housing Growth and the Location of Inland Growth; and Strategic Policy 7 (SP7IAffordable and Low Cost Housing).</p>																			

					<p>5. The ELDCS policies are based largely on two recent housing demand and market assessment evidence documents:</p> <ul style="list-style-type: none"> • <i>The East Lindsey Affordable Housing Needs Assessment Update</i> (October 2016). It appears that this document is the same as the Strategic Housing Market Assessment Update report referred to in the ELDCS (see paragraph 7, p.22 for example); • <i>The East Lindsey Demographic Forecasts: Updating the Evidence</i> (October 2016); <p>6. these studies have updated previous evidence that underpinned the earlier version of the Draft Core Strategy, namely:</p> <ul style="list-style-type: none"> • <i>The Coastal Lincolnshire Strategic Housing Market Assessment</i> (September 2012); • <i>The East Lindsey SHMA Update</i> (January 2014); and • <i>The East Lindsey: Updating the Demographic Evidence</i> (June 2015). <p>7. In addition, the Council has published an updated <i>Local Plan Housing Topic Paper</i> (November 2016) which updates the previous Topic Paper published in March 2016. The Topic Paper aims to illustrate how the Council has objectively assessed its housing need and thereby concluded what its proposed housing target for the plan period is.</p> <p>8. Metacre is concerned that the housing policies and evidence of the ELDCS does not form a clear, comprehensive or compliant Objectively Assessed Housing Need (OAHN) for the District.</p>		
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	<p>9. Metacre considers that there is still a significant and substantive lack of evidence, analysis and consideration of the factors laid out in the National Planning Practice Guidance (NPPG) at Section 2a that establishes what needs to be considered through the process of establishing an OAHN.</p> <p>10. On this basis, Metacre object to the ELDCS policies SP3 and SP7 which are unsound because they are unjustified and ineffective in delivering sufficient housing to meet needs in full.</p> <p>11. The following sections set out the reasons and basis for Metacre's concerns in greater detail.</p> <p>Housing Demand Requirements</p> <p>12. The <i>Coastal Lincolnshire SHMA</i> covered both East Lindsey and Boston districts which were considered to form a contiguous Housing Market Area. It was completed at a time when the East Midlands Regional Plan (ASS) remained in place prior to its revocation in 2013. The SHMA did not therefore undertake a new assessment of future housing requirements and referred to the RSS figures accordingly through its work.</p> <p>13. The <i>East Lindsey SHMA Update</i> was published in January 2014 and was based on the former <i>SHMA Practice Guidance</i> (2007) subsequently replaced by the NPPG. It presented an update for East Lindsey District only following updated household projections for the 2011-2031 period prepared by Edge Analytics and published in the <i>Demographic Forecasts for East Lindsey: Updating the Evidence</i> (November 2013) report.</p> <p>14. The <i>East Lindsey Demographic Forecasts: Updating the Evidence</i></p>

							<p>report (October 2016) was prepared by consultants Edge Analytics for the Council.</p>	<p>15. The purpose of the report is to provide a further and updated demographic analysis for the District to incorporate the 2014-based Sub-National Population Projections (2014 SNPP) data and the 2014-base CLG Household Projections. It offers an update on previous work undertaken in 2015 which used the 2012 CLG Household Projections.</p> <p>16. The <i>Demographic Forecasts: Updating the Evidence</i> report is based on the latest CLG 2014-based Household Projections, which represent the most recent Government household projection data published. It establishes and tests alternative trend scenarios (at Table 8) resulting in a demographic growth range of +334 to +474 dpa over the period 2016-2031. At Table 9 the report considers alternative headship rates and draws conclusions on different rates of household formation under the DCLG Household Headship Rates in 2008, 2012 and 2014. The report does not identify or recommend a specific or preferred output household or dwelling growth scenario.</p> <p>17. Turning to affordable housing needs, the <i>Housing Topic Paper</i> describes the <i>Affordable Housing Needs Assessment Update</i> as a revision to the SHMA (see paragraph 1.1), but this Assessment only covers affordable housing matters and does not extend to a wider update of the market for the HMA.</p> <p>18. The Affordable Housing Needs Assessment Update (October 2016) albeit published only in a draft form, indicates a need for 2,825 new affordable dwellings over the plan period (188 dpa) at paragraph 2.97.</p>	
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						<p>This new analysis is welcomed by Metacre as it resolves a significant deficiency arising from the earlier version of the ELDCS and a point of objection previously raised. However, as set out below, the affordable housing analysis is considered to be an under-estimate of the actual level of need and therefore raises the need to adjust, upwards, the District's OAHN figure.</p> <p>19. The demographic evidence and the affordable housing needs assessment work do not form a complete OAHN figure for the District or a complete SHMA (and the previous <i>Coastal Lincolnshire SHMA</i> and its update were based on the superseded <i>SHMA Practice Guidance</i> which was revoked by the NPPG). They take a relatively narrow view being concerned with demographic and household growth analysis and do not cover other factors such as market signals.</p> <p>20. The demographic evidence does look at the potential employment growth arising from the demographic projection scenarios modelled (Table 10 in Section 5) but there is no wider economic projection work included within the analysis, or available elsewhere in the ELDCS evidence base.</p> <p>21. The scenarios presented are demographic-led and economic factors (unemployment rates, economic activity rates, commuting flows, etc.) are either fixed or trend based within these scenarios. There is not a separate analysis of potential economic growth forecasts or projections for the District that might anticipate an alternative approach to housing requirements.</p>		
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						<p>22. It is the ELDCS Housing Topic Paper which purports to illustrate the District's OAHN and to set the housing target (paragraph 1.1). At paragraph 2.17 the Topic Paper confirms that the ELDCS should have its housing target set based on the 2012-base demographic projections and work undertaken in the <i>East Lindsey: Updating the Demographic Evidence</i> (June 2015) rather than the 2014-based projections. The Council's conclusion is based on the District's aim to boost housing growth in conformity with national policy; the need to deliver affordable is supported by Metacre as representing a positive approach to meeting housing needs and supporting economic growth.</p> <p>23. The Topic Paper reviews four population growth scenarios set out in the <i>Demographic Forecasts: Updating the Evidence</i> report. It concludes at paragraph 2.28 that Scenario 3 (PG-10yr) is the most appropriate as it reflects in-migration patterns over a ten-year period and represents growth of 481dpa (7,215 homes in total) over the plan period.</p> <p>24. To reach what the ELDCS and the Housing Topic Paper considers to be the planned housing requirement, the PG-10yr figure from the <i>East Lindsey: Updating the Demographic Evidence</i> (June 2015) is adjusted upwards by adding 553 dwellings which are said to represent under-supply shortfalls arising in previous years (see Metacre's separate comments on this issue later in this representation), resulting in a planned housing target of 7,768 dwellings (517 dpa). This figure is taken forward into policy SP3 in the ELDCS.</p>		
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							<p>25. As Metacre have raised in previous objections, the ELDCS and the <i>Housing Topic Paper</i> do not provide a clear or comprehensive basis for establishing the OAHN requirement.</p> <p>26. Neither the ELDCS nor the <i>Housing Topic Paper</i> bring the various SHMA and demographic evidence together in a comprehensive manner as laid out in the NPPG. There is a lack of evidence, analysis or consideration of many of the factors identified in the NPPG at section 2a, which clearly spells out what is needed and the process to establish the OAHN, including:</p> <ul style="list-style-type: none"> • Employment trends through an assessment of the likely change in job numbers based on past trends and/economic forecasts (Section 2, paragraph 018). The <i>Demographic Forecasts: Updating the Evidence (2016)</i> and the <i>Updating the Demographic Evidence (2015)</i> work has considered the job creation arising from the projected future population but there has not been an assessment of this in relation to economic forecasts or cross-referenced/aligned to the proposed future employment land requirements (set out in the <i>Employment Land Review, September 2016</i>). <p>The <i>East Lindsey Economic Baseline (2016)</i> confirms that economic forecasts have not been prepared (page 72) but there is "cause for optimism" with modelling by Central Lincolnshire Local Plans Team indicating a growth of 6,000 jobs in the next 25 years (240 jobs per annum - jpa). The demographic job growth analysis prepared shows 124 jpa (<i>Housing Topic Paper, paragraph 2.24</i>) meaning there is likely to be a gap between the stock of job and the population</p>		
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					<p>to fill them. At the current economic activity rate (75%) there would be a 9,979 surplus of jobs to local workers. With such significant job growth potential, the planned supply of housing needs to be significantly expanded to ensure there are sufficient workers available locally to fill the employment opportunities without adverse consequences such as unsustainable patterns of commuting arising.</p> <ul style="list-style-type: none"> Market signals that should be used to adjust household projections. These should use a range of market indicators on the balance of demand and supply of dwellings compared to national and local averages (paragraph 019). The <i>Housing Topic Paper</i> contains some partial and limited information at section 6 on house sales and completions but these are not benchmarked to other areas in the HMA. Price data is referred to in passing at paragraph 7.5 but the level of analysis is slight and uses broad average prices rather than looking in greater detail at lower and upper quartile prices, prices by type of dwelling and data on rents, land values, etc. The relevant analysis, undertaken in detail for the current 2016 period is not presented in the ELDCS evidence base. Coverage of house prices is covered only in the <i>Coastal Lincolnshire SHMA (2012)</i> based on data from 2009 and 2010/11 (see Figure 68, et seq.) which is of course now significantly dated. Affordable housing - The <i>Affordable Housing Needs Assessment Update</i> is the basis for understanding affordable housing needs in the District. The Assessment takes an approach to calculating affordable housing needs that derives the number of households in need from those claiming housing benefit. The 		
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					<p>affordable housing needs model identifies that the level of households drawing housing benefit in, is set as a constant over the plan period.</p> <p>There is no guidance in the NPPF that requires a narrow, welfare assessment to be used rather than a more standard, accepted practice that models household income distributions and examines those in housing need drawing from the Council's Housing Register.</p> <p>While many households choose to live in private rented accommodation with housing benefit support, other households may prefer an affordable tenancy, but are unable to access one due to unavailability of existing or new affordable rented stock. To reduce the number of households claiming housing benefit, more affordable housing would need to be provided.</p> <p>Without sufficient affordable housing, there will be continued pressure on the private rented sector and associated need for additional housing benefit support for households otherwise unable to afford local housing costs.</p> <p>Taking the Draft ELDCS total housing target of 7,768 dwellings and applying a 30% affordable housing contribution (as policy SP7 proposes, rising to 40% for the Woodhall Spa site) this would generate some 2,330 affordable dwellings. As a sensitivity, at 40% contribution, the affordable housing delivery would be circa 3,107 dwellings over the plan period.</p> <p>While this helps meet some of the identified affordable housing need (2,825 dwellings) as set out in the Affordable Housing Needs Assessment Update report, it does not ensure that the need for</p>		
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					<p>affordable housing is met in full. A helpful review of recent High Court decisions concerning the relationship between OAHN and the need for affordable housing is set out at paragraph 1.7, et seq. of the <i>Affordable Housing Needs Assessment Update</i>, with the conclusion drawn at paragraph 1.8 that the full OAHN should include meeting the need for affordable housing.</p> <p>The provision of such housing to meet the need in full is therefore essential and the overall OAHN for the District needs to be adjusted upwards to ensure that sufficient homes are planned and delivered in total. Adjustment of the policy SP7 percentage contribution upwards (above 30% in most cases) would be inappropriate as it would result in a lack of viability for residential schemes as the <i>Economic Viability Assessment (2015) analysis shows</i>.</p> <p>27. Overall, there is nowhere presented a comprehensive calculation of the OAHN in accordance with the NPPG that brings all the necessary evidence together. The <i>Housing Topic Paper</i> does not present that information in a complete or comprehensive analysis.</p> <p>28. In conclusion, Metacre consider that there are manifest deficiencies in the housing demand and housing requirements evidence presented that underpins policies SP3 and SP7 and these policies are not effective or justified as currently drafted.</p> <p>Housing Supply</p> <p>29. Data on the level of housing completions is not easily available in a clear form.</p> <p>The <i>Housing Topic Paper</i> notes at paragraph 7.7 that over a 30 year period to 2015, there was an average</p>		
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34. The *Housing Topic Paper* records a figure of 4,085 dwellings as committed, as at February 2016 (Box 2). Of this total, some 2,956 dwellings are windfall sites indicating a strong reliance on windfalls (despite the ELDCS objective at the 2nd bullet point on page 21, to "be less reliant on windfall sites") and is symptomatic of a lack of positive, proactive planning to secure adequate site allocations, including larger sites to meet the housing target.

Housing Land Supply

35. Details of the current housing land supply position are set out in the *Housing Topic Paper* at Section 2.

36. This document concludes at Box 5 that there is a 3.35 years' land supply for the five year period. If a windfall development allowance is included (at a rate of 15% of the total deliverable housing), then Box 6 concludes that there is a 3.85 years housing land supply.

37. Metacre are concerned that the level of deficiency in the five-year housing land supply situation is actually more serious than the Council's own assessment.

38. The *East Midlands Regional Plan* policy 13a established a housing target of 600 dwellings per annum for the District. This target has been used by the District in calculating the housing requirement from 2006 to 2010 according to the *Housing Topic Paper* (page 11). The RSS was revoked on 20th March 2013 and, until its revocation remained formally part of the Development Plan, including the housing requirements in policy 13a. On this basis, Metacre consider that the housing target for the period

						<p>2006 to 2013 should have been 4,800 dwellings, not the 3,000 dwellings used in the Council's five-year housing land calculation.</p> <p>39. Furthermore, the <i>Housing Topic Paper</i> (Box 1, page 14) indicates that a 'revised five-year target' is to be used from 2011 to 2021 "<i>calculated at 481 per annum</i>".</p> <p>40. The 481 figure is a blend average of the annual dwelling requirements set out in the <i>Updating the Demographic Evidence</i> report (Table 1), using the 2008-based and 2012-based CLG Household Projections. Critically however, as noted previously, that figure does not represent an OAHN requirement as it does not take into account all of the factors and steps necessary to accord with the NPPG, including addressing needs arising elsewhere in the Housing Market Area.</p> <p>41. In addition, the NPPF is clear that either a 5% or 20% contingency buffer is to be added to the base housing target. A 20% contingency is appropriate in circumstances where there is a persistent record of under-delivery.</p> <p>42. The Housing Topic Paper (page 11) notes that the Council considers that a 5% contingency buffer should be applied. This is justified in the Topic Paper on the basis of the "<i>slow economic recovery rate in the District</i>" and the "<i>lack of demand outside the control of the Council</i>".</p> <p>43. East Lindsey District however has a record of persistent under-delivery resulting in a significant shortfall in housing completions and a consequent under-supply over many years. The slow economic recovery and asserted lack of demand (although dwelling sales volumes</p>					

					<p>have been increasing since 2012) are not factors that absolve the District from meeting the NPPF's requirements to apply the appropriate contingency buffer and boost significantly the supply of housing.</p> <p>44. Metacre consider that a 20% buffer should be applied given the ongoing failure to secure sufficient housing delivery measured against the housing targets in each of the previous six years and in most years prior to that.</p> <p>45. There is a significant and sustained shortfall in housing land supply arising in the District which is manifesting in terms of the lack of completions well below the housing target.</p> <p>Shortfall Housing Provision from Earlier Periods</p> <p>46. The <i>Housing Topic Paper</i> identifies a 553 dwelling shortfall under-supply as at 1st February 2016 (paragraph 3.5, page 17).</p> <p>47. The shortfall appears to be calculated on the basis of the District Council's conclusion that there is a 3.85 year housing land supply and therefore a 1.15 year under-supply which then equates the 553 dwellings.</p> <p>48. It is Metacre's conclusion that the level of under-supply is greater than that set out by the Council. This is based on.</p> <p>49. Over the period April 2006 – February 2016 a total of 4,695 dwellings were completed according to the Council's records. The housing targets over that period equated to 5,642 dwellings (based on consideration of the relevant Development Plan housing targets including the RSS up to 2013 and the</p>		
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						<p>interim ELDCS target from then onwards). This leaves the District with an under-supply shortfall of 948 dwellings as at February 2016 and it is reasonable to expect that the future planned housing requirement for the District seeks to remedy this significant deficiency caused by persistent under-delivery of housing.</p> <p>50. Metacre welcome the fact that the ELDCS proposes an upward adjustment to the overall housing requirement to help reduce the identified shortfall. This is in accordance with the NPPF at paragraph 47, however the level of under-supply to be addressed through the Plan should be increased to the level established by Metacre.</p> <p>51. Metacre welcomes use of the 'Sedgefield' approach to dealing with under-supply of housing (making good the shortfall within the immediate five-year period). This accords with the NPPG at Section 3, paragraph 034 which confirms that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. <i>Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the Duty to Co-operate.</i></p> <p>Windfall Housing Development</p> <p>52. The NPPF allows local authorities to take account of windfall housing developments within the five-year housing supply if there is compelling evidence that such sites have consistently become available.</p> <p>53. The ELDCS notes at paragraph 29 on page 28 that historically, windfall housing sites have contributed up to 50% of the District's total</p>		
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						<p>housing supply. In paragraph 30, the Plan identifies that it believes an allowance of 15% of the total housing supply should be used as a windfall total each year.</p> <p>54. The <i>Housing Topic Paper</i> does not elaborate on the appropriate levels of windfall allowance in any great detail other than noting at page 16 that many of the windfall sites are small scale, infill development which are less susceptible to wider economic fluctuations experienced by volume housebuilders and therefore ensure a "continuous level of delivery".</p> <p>55. Metacre previously raised concerns over the application of such a significant level of windfall development to meeting housing land supply and delivery requirements and believes that windfall developments should not be factored in at the level proposed by the Council and should either be removed entirely or a smaller proportion allowed (there is no specific evidence supporting a 15% allowance).</p> <p>56. The reliance on windfall development sites (some 328 dwellings in the five-year period) to help meet housing requirements is very significant. The rationale for applying a 15% windfall supply allowance to the deliverable supply is not further supported by published data. It raises significant concerns over the potential for infrastructure contributions to be made by such developments, resulting in an over-reliance on larger development sites to pay for necessary facilities and services.</p> <p>57. Metacre is therefore concerned that policy SP3 does not represent a</p>		
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							<p>justifiable or sound housing development strategy for the District.</p> <p>The Planned Housing Delivery Trajectory</p> <p>58. The future planned housing trajectory is set out in policy SP3. It proposes three phases of housing delivery over the plan period:</p> <ul style="list-style-type: none"> ● 591 dpa in the period 2016 to 2021; ● 481 dpa in 2021 to 2025; and ● 482 dpa for the period 2025 to 2031. <p>59. Metacre welcomes the front-loading of the housing trajectory and notes that this is a revised approach from the backloaded trajectory set out in the earlier Draft ELDCS (March 2016).</p> <p>60. There is a need however to ensure sufficient sites, including larger sites, are allocated in order to guarantee delivery. The heavy reliance on windfall sites in the five-year period and beyond to deliver necessary housing does not offer sufficient assurance that the necessary housing (including the past under-supply) will be delivered.</p> <p>61. The planned trajectory does represent a more positive, proactive approach to meeting housing requirements than the earlier ELDCS. However, the overall approach from the Council still appears overly cautious and while purporting to be based on demand-side evidence of sales, values and completions, this data, where it is presented, does not indicate that there is a lack of demand. Issues of housing affordability, choice, mix and location in juxtaposition to economic</p>																
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						<p>opportunities are more likely characteristically affecting housing take-up and completions.</p> <p>Conclusions</p> <p>62. Overall, the East Lindsey District housing evidence base published to support the emerging ELDCS and particularly policies SP3 and SP7 is a complex patch-work of material prepared over a number of years with varying base dates.</p> <p>63. The main parts of the evidence base do set out elements of the OAHN calculation but there is no clear overall analysis or report that establishes or justifies what the proposed OAHN requirement for the District is. The <i>Housing Topic Paper</i> indicates that it provides this analysis, but put simply, it does not.</p> <p>64. The evidence available is therefore used to inform the ELDCS policies with little further critical review and demographic growth scenarios appear to be taken as the basis for the ELDCS without further or comprehensive interrogation as to whether matters of employment/housing balance or current market signals have actually been taken fully into account.</p> <p>65. There is also an absence of any information concerning the extent to which the Duty to Co-operate has been fulfilled in establishing whether there are unmet housing needs arising from that need to be accommodated in East Lindsey or vice versa.</p> <p>66. Housing land supply evidence concludes that there is not a five-year housing land supply (with the Council's estimate ranging from 3.35 without windfalls to 3.85 years' with). The rather opaque approach and lack</p>		
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					<p>of information presented on relevant completions, commitments and windfalls data coupled with statements concerning levels of shortfall in supply without a full assessment of the extent of that under-supply, make an effective consideration of land supply matters difficult to achieve. Metacre are concerned that this represents a significant limitation of the ELDCS housing policy evidence.</p> <p>67. The lack of five-year supply is significant, the level of previous undersupply is extensive and the most recent calculation fails to recognise that there has been persistent under-delivery warranting a 20% contingency in accordance with the NPPF.</p> <p>68. For these reasons Metacre consider that the ELDCS policies SP3 and SP7 are unjustified by the evidence available and ineffective in identifying the full Objectively Assessed Housing Need of the District and in ensuring a sufficient supply of housing land in order to meet needs. The ELDCS is therefore considered to be unsound in this regard.</p>		
HBF	SP3	p25	O	<p>Table A sets out an overall housing land supply of between 8,336-10,271 dwellings against a housing requirement of 7,768 dwellings which indicates a contingency of between 7.3% - 32.2% for unforeseen circumstances which prevent sites coming forward as envisaged.</p> <p>Currently the Council is proposing a 5% buffer in its 5 YHLS calculation rather than 20% buffer which the HBF consider more appropriate given the historic under delivery of housing. The Council is proposing a phased housing delivery of 591 dwellings per annum between 2016- 2021 and</p>		<p>The Council has determined that there should be a 5% buffer on the undersupply of housing because under delivery of housing in the District is coming in general from a lack of demand. The Council contacts all those persons/developers/builders who are granted planning permission across the District to ask them when they are going to deliver their sites. There are many reasons for sites not coming forward the main ones are waiting for the market to improve and sites up for sale with planning permission waiting to be sold. The Council does not believe it should increase its buffer to 20% in its 5 year housing supply calculation. Looking at the five year supply after a year from the start date of the Local Plan, the supply, with the Local Plan allocations stands at 9.45 years. This is sufficient housing to more than deliver the growth of the District in the first five years of the plan period. Given that there is a review at five years, at that time if necessary more housing can be allocated and the supply or undersupply situation can be reviewed.</p>	

					<p>482 dwellings per annum thereafter as set out in Policy SP3. This phasing is proposed in order to deliver the housing under supply from the period 2011 – 2016 in accordance with the Sedgefield approach to shortfalls. The HBF supports the use of the Sedgefield approach.</p> <p>As set out in the Council's Housing Topic Paper dated November 2016 there will not be a 5 years housing land supply (YHLS) on adoption of the DPDs and it is unlikely that the Council will be able to maintain a 5 YHLS throughout the plan period. The HBF estimate the Council's actual 5 YHLS is even less than the 3.85 years stated. Without a 5 YHLS the DPDs fail the NPPF soundness tests of positively prepared, effective and consistent with national policy (para 182). Unless there is a 5 YHLS under the NPPF (para 49) the policies for the supply of housing in the DPDs including all policies restricting housing development (see the Court of Appeal Judgement <i>Richborough Estates Partnership LLP v Cheshire East Borough Council & SoS CLG (C1/2015/0894)</i>) would be rendered instantly out of date on adoption of the DPDs.</p> <p>When allocating more housing sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets including multiple outlets on Sustainable Urban Extensions (SUE). The maximum delivery is achieved not just because there are more sales outlets but</p>		<p>The Council had its own Housing Capital Programme (HCP) up to the end of 2015 and though there are a few sites still to be built out it is now coming to an end. This programme added to the completions over a number of years and has helped to keep the housing market in East Lindsey partly on track. In 2014/2015 the HCP contributed 50% to the District's housing completion rate. The Council believes that it has through intervention tried to support the housing market in the district and the lack of demand is outside of the control of the Council, this coupled with the slow economic recovery rate in the District should lead to the conclusion that a 5% buffer should be applied to the 5 year supply and that the Council has not contributed to any persistent under delivery. This however, as the Plan states is being kept under constant review and will be formally reviewed again at the 5 year review period of the Plan. If at that point it is found that more sites need to be brought forward then the Council will make provision for this to happen.</p>
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Sutton on Sea Caravan Club Represented by Rapleys				because the widest possible range of products and locations are available to meet the widest possible range of demand. Although the HBF would not wish to comment on the merits or otherwise of individual sites contained within the Council's housing trajectory it is critical that the Council's assumptions on lapse rates I non implementation allowance, lead in times and delivery rates contained within its calculations are correct and realistic to provide sufficient flexibility in its land supply. These assumptions should be supported by house builders.	The Caravan Club believes that additional housing land should be allocated in East Lindsey, and that should the Sutton-on-Sea Caravan Club site find an alternative nearby location for its operations, to support the needs of the local community, the current site is a sustainable site for the allocation of residential development within the emerging Core Strategy. The site constitutes brownfield land, close to the settlement boundary of Sutton-on-Sea, with a full range of local facilities and public transport links in close proximity. The allocation of additional housing land and the inclusion of the site as a potential residential development would help to ensure that there is a sufficient	National Planning Policy at paragraphs 99 and 100 states 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. The Council has done this by working out what the housing need would be in the coast with natural household formation of the existing population, this is the zero population scenario and then redistributed growth from the Coastal Zone into the inland towns and large villages. The Councils primary direction is to provide housing in the coast for local needs, in that local needs means the resident population and the formation of new households. There were as at February 2016 1308 housing commitments on the coast, with another 31 being granted permission up to December 2016. These commitments are located right across the coastal zone but are presently not being built out quickly. From the work done by Edge Analytics, housing to provide for the needs for the existing population (zero population growth scenario) means that the Council should be allocating 735 houses across the plan period, with commitments of 1308 this actually leaves a technical over supply of 573 home. This should provide an adequate buffer during the first five years of the Plan for this area of the District. Additional work carried out on the 2014 population projections using the same scenario shows a decline in the need to 630 homes over the plan period. The policy however is to remain at 735 homes. One of the consultees in the June 2016 consultation stated that they carry out 120 private property surveys a year and 90% of them are for people outside Lincolnshire who wish to come and retire. Extrapolating this figure out to the 1308 existing commitments in the Local Plan means that technically only 130 of them will be taken up by local
Sutton on Sea	Sutton on Sea		This letter stands as our representation to the publication version Core Strategy consultation on behalf of The Caravan Club. This representation relates to <i>Strategic Policy 3 (SP3) - Housing Growth and the Location of Inland Growth</i> of the consultation document. The policy lays out the Council's housing target of 7768 homes for the plan period, and the ways in which it hopes to meet that target. Site and Surroundings Sutton on Sea Caravan Club site is located to the south west of Sutton on Sea adjacent to the settlement boundary. The site has an approximate area of 3.45ha and is currently used as a caravan site for touring caravans. The site has a total of 110 pitches, 71 of which are hardstanding. The site also includes a number of buildings accommodating a reception, site shop, information room, toilet and shower block and laundry. The site is bounded by mature trees and hedgerow, to the east of the site are a number of residential dwellings and to the west is Crabtree Fishing Ponds. To the north directly across the road is open farmland. The access to the site is from Crabtree Lane and there are a number of existing tarmac roads on the site. Given the large amount of existing hardstanding on the site it is considered that this site constitutes a previously developed, brownfield site.			

				<p>The site is approximately 1km from the local shops and restaurants located in Sandilands in south Sutton on Sea and approximately 2km from the town centre of Sutton on Sea. Sutton on Sea has a wide range of services and facilities including local shops, a post office, primary school, doctors surgeries and dentists. There is a bus stop located approximately 700m from the entrance to the site which provides services between Louth, Mablethorpe, Chapel St Leonards and Skegness.</p> <p>National Planning Policy Framework The National Planning Policy Framework (NPPF) was published by the government in 2012 and sets out the overarching national planning policies for the country. The NPPF sets out the "presumption in favour of sustainable development." This principle is a "golden thread" which should weave through both the construction of plans and decisions taken in relation to them. More specifically:</p> <p><i>Local Planning Authorities should positively seek opportunities to meet the development needs of the area, . . . Local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. This is unless any adverse impacts of doing so would significantly and demonstrably outweigh benefits when assessed against the policies in the framework taken as a whole, or unless specific policies in the framework indicate development should be restricted.</i></p> <p>The NPPF sets out 12 core concepts which should underpin the development of plans. Those worthy of consideration in the current instance are:</p> <p><i>Proactively drive and support sustainable economic development to deliver homes... that the country needs... every effort should be made objectively to identify and then meet the housing needs of an area, . . . Encourage the effective use of land by reusing land that has been previously developed</i></p>	<p>housing supply in the area to support and maintain its role as an important service centre within the area.</p>	<p>residents. The Council do not consider it appropriate to build houses for what would be a growing population of in migrants into the District who are in the main older and therefore more vulnerable to the dangers of flood risk. It is considered important that there is enough housing for the existing resident population which the existing commitments should allow, this includes those already living in the coast and working in the tourism industry. There will be support for housing developments on brownfield land subject to criteria, the single plot exceptions policy and support for affordable housing and Specialised Housing For Older Persons. Also support will be given for housing for specialised vulnerable groups such as disabled local people.</p> <p>The Council has established monitoring for the coastal zone and set up two working groups to take on work during the 5 year review of the Plan looking at two key subjects, housing and caravan occupancy. These groups will work with the Council and other key partners toward obtaining evidence and creating policies that all partners including the Environment Agency and the Emergency Planning Services can sign up to and bring forward at the 5 year review point of the Plan.</p> <p>East Lindsey has had since 2013 two near misses with regard to flood events, one in December 2013 and the latest one in January 2017. The January 2017 event was only 2 hours from a major event when circumstances shifted and danger was averted. Predicting that event was difficult and it is a foregone conclusion that eventually there will be a major flood event along the East Lindsey Coastline. Whilst the emergency planning services are well prepared for an evacuation of the most vulnerable and those not able to self-evacuate, the numbers are already enormous (20,000 in January 2017) and until such time as a way can be found that mitigates the risks of flood risk in this dangerous zone with partners agreement, the Council will not support a strategic increase in the population. At the present time there is no evidence that this policy is having a detrimental impact on the coastal zone, house prices are not rising faster than anywhere else, and the housing waiting list is not rising. It will be for the work of the Housing Working Group to examine these facts more closely and report back into the 5 year review of the Local Plan.</p> <p>The Council considers that its policy for coastal housing is in conformity with national planning policy. The Council understands that this is a radical new direction for policy on the coast and because of this above all other reasons there is a 5 year review of the Local Plan. It is essential that the Council monitors the coast to ensure that its policy is not going to start having a detrimental effect. The Council has set up a Coastal Housing Working Group to work with partners including interests from developers to look at impacts, and to try and see if at the end of the review period there is a way of bringing forward (if necessary) housing safely in this area of high flood risk with all partners agreement.</p>
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					<p><i>(Brownfield land) provided that it is not of high environmental value, · Contribute to conserving and enhancing the natural environment.</i></p> <p><i>Actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development in locations which are or can be made sustainable.</i></p> <p><i>Paragraph 35 states that "plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people," developments should be designed where practical to :</i></p> <p><i>Give priority to pedestrian and cycle movements and have access to high quality public transport.</i></p> <p><i>Paragraph 50 states that Local Authorities should "deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities."</i></p> <p><i>Chapter 11, Conserving and Enhancing the Natural Environment, encourages a planning system which contributes to and enhances the natural and local environment. Paragraph 111 states: "planning policies should encourage the effective use of land by re-using land that has previously been developed land (brownfield land) provided that it is not of high environmental value."</i></p> <p><i>Strategic Policy 3 (SP3)- Housing Growth and the Location of Inland Growth recognises both the level of housing need and the importance of meeting it. To this end, the Council have provided guidelines for development locations. 6,460 homes should be provided inland; over the next five years 591 house should be provided per annum.</i></p> <p><i>The consideration of sites such as Sutton-on-Sea Caravan Park may relieve pressure to develop on greenfield sites within the district's boundaries, and ensure that sufficient housing is provided. Previously developed land such as this should be utilised in accordance with national policy. It is adjacent to development limits, and can accommodate residential development</i></p>		
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POLICY SP4 – HOUSING IN MEDIUM AND SMALL VILLAGES

Name of responder	Policy No	Page No, Para No	Settlement Proposals Map or Site No	Settlement Proposals page No	Page No, Para No	Q3 Response	Q4 Change Sort	Councils Response
Hey AM	SP4					<p>Policies SP3 and SP4 limit the allocation of new housing to Towns and Large Villages only. Of 104 named settlements within the District, some 73 are deemed to be Medium or Small Villages and as such are to have no new housing proposed. Meaning that over 70% of settlements are to be allocated no new development and are to be limited to conversion of redundant buildings only for additional housing etc.</p> <p>This omission is in conflict with the provisions of the National Planning Policy Framework - specifically Para 14 thereof where Plan-Making is enjoined to seek positive opportunities to meet development needs. Policies SP3 and SP4 are negative in content.</p> <p>Para 17 requires that support be given to thriving rural communities. Proposing no new development is not offering support to thriving communities, rather it is seeking to have them wither and (probably) fail. Para 55 requires that housing should be located where it will enhance or maintain the vitality of rural communities.</p> <p>Refusing to allow limited new housing does not enhance or maintain vitality. Vitality does not require large numbers of new houses, but it does</p>	<p>Policy SP 4 should be altered to read Elsewhere in medium and small villages development of new houses will be permitted (subject to compliance with reasonable planning requirements) up to (either) 10% of the existing stock or a fixed number - say 5 or 6 over the first five year period and then to be reviewed.</p> <p>- Elsewhere in medium and small villages development of new houses will be permitted (subject to compliance with reasonable</p>	<p>The Council in its Sustainable Communities Topic Paper sets out the background to the Settlement Pattern and its evidence base.</p> <p>The plan, and the choices upon which it is based, must be in conformity with the National Planning Policy Framework (NPPF). With the NPPF clearly stating that sustainable development should be the "golden thread" running through plan making, this would inevitably move the Council toward a more sustainable solution to its housing distribution which enables a larger percentage of the population to access community facilities, employment and other services.</p> <p>Paragraph 55 of the NPPF does state that "housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in villages nearby." However, there needs to be a mutually supportive element to the relationship rather than putting additional growth in locations where residents will have to look elsewhere for the majority of their services. The Core Strategy does contain policies that allow a small amount of development in the medium and small villages, in particular circumstances. However, these are not locations that it feels the Council should be directing strategic growth.</p> <p>The NPPF also advocates the promotion of healthy communities in that there should be an integrated approach when considering the location of housing, economic uses and community services and facilities. In the District younger residents are moving out either to go to higher education or to work and those moving in are of the older larger birth cohorts 50+. There is also evidence that residents who are 75+ are moving out of the District. One conclusion for the young and over 75s moving out is that in the smaller villages there is not the service provision to support their needs.</p>

<p>require some. The contrast is made with the Policy LP 2 in the Central Lincolnshire Draft Local Plan where nearly all settlements may expect a limited number of new houses to maintain vitality.</p> <p>Lastly and in confirmation of the above, Para 182 of the National Planning Policy Framework does confirm that the Local Plan must be positively prepared.</p> <p>The negative approach of Policies SP3 and SP 4 does not comply.</p>	<p>planning requirements) up to (either) 10% of the existing stock or a fixed number - say 5 or 6 over the first five year period and then to be reviewed.</p> <p>This change would alter the Local Plan into something positive and therefore compliant with the NPPF.</p>	<p>In the Sustainable Communities Topic Paper at section 3 the Council explores the link between the retention of services and facilities. The consultee states that residential development would support services in villages. There is no evidence to support this and clearly the retention or loss of facilities has other factors at play then housing development.</p> <p>The consultee is proposing a change to policy SP4. The Council cannot support this proposed change for a number of reasons. Firstly, as set out above the medium and small villages of the District are considered to unsustainable and do not offer the services and facilities residents need meaning that they have to travel to obtain them. Secondly, the Council is already proposing some housing in these settlements within Policies SP4, SP5 and SP8 and SP9. Thirdly setting a % requirement or maximum target for each settlement would undermine the overall strategy of the Council to try and grow those settlements which have services and facilities and place growth so that residents can easily access it by other means than the car. The Council therefore would not support the changes to Policy SP4 as proposed by the consultee in that it would promote unsustainable development in settlements with little or no services to support the resident population and this would be out of conformity with national planning policy.</p>	<p>The Council notes the support given to the redevelopment of sites in the medium and small villages.</p> <p>The medium and small villages have very little services or facilities and the car is the predominant form of transport to access every day needs including shopping, health and education provision. Development of additional housing in these settlements therefore needs to be on an exceptional basis only and the Council believes it is justified in placing certain caveats around development to ensure that it is only brought forward in exceptional circumstances. One of those caveats is that the site must demonstrate that it cannot be used for a community, economic or leisure use and actively marketing a site for 12 months will evidence this to the Council. There are other exception policies in the Plan which also ask for 12 months marketing, SP14 – Town/Village Centres and Shopping where the Council is trying to ensure minimum loss of community and cultural facilities which once gone are unlikely to be replaced and SP18 – Coastal Housing, where the Council is trying to provide flexibility around brownfield sites in the coastal zone even though the area is subject to flood risk and any policy without this flexibility could leave brownfield sites with no suitable alternative use.</p>
<p>We welcome the support given to the redevelopment of sites in Medium and Small Villages.</p> <p>We welcome the acceptance that marketing of a site needs to be for an appropriate use and an appropriate price. We are concerned, however, by the inclusion of the 12 month time limit. The timescale for a successful marketing exercise will vary from site to site and the policy should be amended to reflect this fact. The 12 month period should also be deleted. It is also noted that marketing exercises are referred to in other policies, such as when referring to Bed and Breakfast properties in the coastal towns, although the marketing exercise</p>	<p>1 Delete reference to the 12months time period for marketing exercises, preferring instead to "an appropriate marketing exercise"</p> <p>2 Replace "Brownfield" with "Derelict and/or vacant"</p> <p>3 Delete reference to retention of existing buildings, unless</p>	<p>The Council notes the support given to the redevelopment of sites in the medium and small villages.</p> <p>The medium and small villages have very little services or facilities and the car is the predominant form of transport to access every day needs including shopping, health and education provision. Development of additional housing in these settlements therefore needs to be on an exceptional basis only and the Council believes it is justified in placing certain caveats around development to ensure that it is only brought forward in exceptional circumstances. One of those caveats is that the site must demonstrate that it cannot be used for a community, economic or leisure use and actively marketing a site for 12 months will evidence this to the Council. There are other exception policies in the Plan which also ask for 12 months marketing, SP14 – Town/Village Centres and Shopping where the Council is trying to ensure minimum loss of community and cultural facilities which once gone are unlikely to be replaced and SP18 – Coastal Housing, where the Council is trying to provide flexibility around brownfield sites in the coastal zone even though the area is subject to flood risk and any policy without this flexibility could leave brownfield sites with no suitable alternative use.</p>	<p>1 Delete reference to the 12months time period for marketing exercises, preferring instead to "an appropriate marketing exercise"</p> <p>2 Replace "Brownfield" with "Derelict and/or vacant"</p> <p>3 Delete reference to retention of existing buildings, unless</p>
<p>represented by Robert Doughty Consultants Ltd</p>	<p>SP4</p>	<p>O</p>	<p></p>

Larkfleet Homes represented by Robert Doughty Consultants Ltd	SP4	O	<p>in that case is limited to 6 months. This variation of timescales has not been acknowledged, explained or justified.</p> <p>The policy limits development opportunities to Brownfield land, whilst stating that the purpose of the policy is to avoid settlements being blighted by derelict sites. Given the rural nature of the settlements it is possible that substantial and prominent sites could become vacant and derelict in a number of settlements, whilst not fulfilling the definition of Brown field land. Examples may include farm buildings in the centre of settlements. The term "Brown Field Land" should be deleted and replaced with "derelict and/or vacant sites"</p> <p>The policy relies on retention and conversion of buildings as a first step, although in many cases the buildings will not be of any specific merit, may in fact have been a blight on the settlement, and their retention may not be a positive measure. The requirement to retain buildings should be deleted or replaced with appropriate text.</p>	<p>it can be proved that the existing building is of special merit worthy of retention</p>	<p>Policy SP19 only asks for 6 months because hotel losses can be clawed back through the granting of permissions for new hotels. Therefore the Council does not agree that the 12 months should be removed from the policy.</p> <p>The policy uses the term brownfield land to describe the type of land it refers to. The Council agrees with the consultee that farm buildings could be included in with the policy, in fact many of the smaller settlements have farm buildings within their notional boundaries and these can become run down and untidy. The policy does not have a clear explanation of what the Council means by brownfield land and the conclusion from those reading it would be that it would be the national definition which reads "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time". In order to clarify this a minor modification is proposed for the policy by adding a sentence onto the end of paragraph 1 reads "Brownfield land in the context of this policy is that land as defined by the NPPF with the addition of agricultural buildings"</p> <p>The policy asks that consideration be given to the conversion of any buildings on the site. The policy does not insist that all buildings are converted and retained and does not state that new housing on the site will not be supported if conversion is not carried out. It asks for the matter to be clearly evidenced and if it can be then the removal of buildings would be supported. The Council does not agree with the request to remove the references to conversion of buildings and believes it is a reasonable ask that those wishing to develop such sites consider what the conversion of such buildings which could add character to a rural settlement.</p> <p>The Council notes the support given to the redevelopment of sites in the medium and small villages.</p> <p>The medium and small villages have very little services or facilities and the car is the predominant form of transport to access every day needs including shopping, health and education provision. Development of additional housing in</p>
			<p>We welcome the support given to the redevelopment of sites in Medium and Small Villages.</p> <p>We welcome the acceptance that marketing of a site needs to be for an appropriate use and an appropriate price. We are</p>	<p>1 Delete reference to the 12-month time period for marketing exercises, referring instead</p>	

Chestnut Homes	SP4	O				<p>The policy asks that consideration be given to the conversion of any buildings on the site. The policy does not insist that all buildings are converted and retained and does not state that new housing on the site will not be supported if conversion is not carried out. It asks for the matter to be clearly evidenced and if it can be then the removal of buildings would be supported. The Council does not agree with the request to remove the references to conversion of buildings and believes it is a reasonable ask that those wishing to develop such sites consider what the conversion of such buildings which could add character to a rural settlement.</p>
	SP4	O		<p>We support a constrained approach to development in medium and small villages in line with the principles of sustainability and access to local amenities and services. However, we question whether there is the need or evidence to excessively restrict this development, particularly the requirement to marketing sites for 12 months for community, economic or leisure use. NPPF advocates the overriding need to supply housing and this could severely constrain the supply of suitable smaller sites in the district, especially as these sites will support smaller local housebuilders.</p>		<p>The Council notes the support for policy SP4.</p> <p>The medium and small villages have very little services or facilities and the car is the predominant form of transport to access every day needs including shopping, health and education provision. Development of additional housing in these settlements therefore needs to be on an exceptional basis only and the Council believes it is justified in placing certain caveats around development to ensure that it is only brought forward in exceptional circumstances. One of those caveats is that the site must demonstrate that it cannot be used for a community, economic or leisure use and actively marketing a site for 12 months will evidence this to the Council.</p>
Gin Property Ltd represented by Robert Doughty Consultants Ltd	SP4	O		<p>We welcome the support given to the redevelopment of sites in Medium and Small Villages.</p> <p>We welcome the acceptance that marketing of a site needs to be for an appropriate use and an appropriate price. We are concerned, however, by the inclusion of the 12 month time limit. The timescale for a successful marketing exercise will vary from site to site and the policy should be amended to reflect this fact. The 12 month period should also be deleted. It is also noted that marketing exercises are referred to in other policies too, such as</p>	<p>1 Delete reference to the 12months time period for marketing exercises, preferring instead to "an appropriate marketing exercise"</p> <p>2 Replace "Brownfield" with "Derelict and/or vacant"</p> <p>3 Delete reference to retention of existing</p>	<p>The Council notes the support given to the redevelopment of sites in the medium and small villages.</p> <p>The medium and small villages have very little services or facilities and the car is the predominant form of transport to access every day needs including shopping, health and education provision. Development of additional housing in these settlements therefore needs to be on an exceptional basis only and the Council believes it is justified in placing certain caveats around development to ensure that it is only brought forward in exceptional circumstances. One of those caveats is that the site must demonstrate that it cannot be used for a community, economic or leisure use and actively marketing a site for 12 months will evidence this to the Council. There are other exception policies in the Plan which also ask for 12 months marketing, SP14 – Town/Village Centres and Shopping where the Council is trying to ensure minimum loss of community and cultural facilities which once gone are unlikely to be replaced and SP18 – Coastal Housing,</p>

<p>when referring to Bed and Breakfast properties in the coastal towns, although the marketing exercise in that case is limited to 6 months. This variation of timescales has not been acknowledged or justified.</p> <p>The policy limits development opportunities to Brownfield land, whilst stating that the purpose of the policy is to avoid settlements being blighted by derelict sites. Given the rural nature of the settlements it is possible that substantial sites could become vacant and derelict in a number of settlements, whilst not fulfilling the definition of Brown field land. Examples may include farm buildings in the centre of settlements. The Term Brown Field Land should be deleted and replaced with "derelict and/or vacant sites"</p> <p>The policy relies on retention and conversion of buildings as a first step, although in many cases the buildings will not be of any specific merit, and their retention may not enhance the settlement. The requirement to retain buildings should be deleted or replaced with appropriate text.</p>	<p>buildings, unless it can be proved that the existing building is of special merit</p>	<p>where the Council is trying to provide flexibility around brownfield sites in the coastal zone even though the area is subject to flood risk and any policy without this flexibility could leave brownfield sites with no suitable alternative use. Policy SP19 only asks for 6 months because hotel losses can be clawed back through the granting of permissions for new hotels. Therefore the Council does not agree that the 12 months should be removed from the policy.</p> <p>The policy uses the term brownfield land to describe the type of land it refers to. The Council agrees with the consultee that farm buildings could be included in with the policy, in fact many of the smaller settlements have farm buildings within their notional boundaries and these can become run down and untidy. The policy does not have a clear explanation of what the Council means by brownfield land and the conclusion from those reading it would be that it would be the national definition which reads "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time". In order to clarify this a minor modification is proposed for the policy by adding a sentence onto the end of paragraph 1 reads "Brownfield land in the context of this policy is that land as defined by the NPPF with the addition of agricultural buildings"</p> <p>The policy asks that consideration be given to the conversion of any buildings on the site. The policy does not insist that all buildings are converted and retained and does not state that new housing on the site will not be supported if conversion is not carried out. It asks for the matter to be clearly evidenced and if it can be then the removal of buildings would be supported. The Council does not agree with the request to remove the references to conversion of buildings and believes it is a reasonable ask that those wishing to develop such sites consider what the conversion of such buildings which could add character to a rural settlement.</p> <p>The Policy is clear in its support for windfall sites within and adjoining the inland towns and large villages, the Council does not believe it can be clearer and changed the policy</p>	<p>Change the Policy to facilitate</p>	<p>That should be more enabling to support other smaller sites which are located within or directly</p>
			<p>O</p>	
			<p>SP4</p>	
<p>Linton AE (Holdings) Ltd</p>				

<p>represent ed by Brown and Co - Property and Business Consultants LLP</p>	<p>SP4</p>	<p>o</p>	<p>adjoining the main body of the settlement. That is consistent with Criteria 5 under Policy SP3. That would cater for obvious infilling opportunities which do not appear to be accommodated for in other policies within the Plan. Those sites would fall within the 15% windfall allowance as illustrated in Table An on page 25 of the Plan.</p>	<p>limited growth for small scale schemes/plots within or adjoining existing villages. Consider using Policies similar to those found in the Central Lincolnshire JPU Submission Plan and to cover situations where specific allocations are not made.</p>	<p>during the last round of consultation to say "adjoining" to allow for more flexibility.</p>	
<p>represent ed by Robert Doughty Consultants Ltd</p>	<p>SP4</p>	<p>o</p>	<p>1. We welcome the support given to the redevelopment of sites in Medium and Small Villages. 2. We welcome the acceptance that marketing of a site needs to be for an appropriate use and an appropriate price. We are concerned, however, by the inclusion of the 12 month time limit. The timescale for a successful marketing exercise will vary from site to site and the policy should be amended to reflect this fact. The 12 month period should also be deleted. It is also noted that marketing exercises are referred to in other policies too, such as when referring to Bed and Breakfast properties in the coastal towns, although the marketing exercise in that case is limited to 6 months. This variation of timescales has not been acknowledged or justified. 3. The policy limits development opportunities to Brownfield Land, whilst stating that the purpose of the policy is to avoid settlements being blighted by derelict sites. Given the rural nature of the</p>	<p>1 Delete reference to the 12months time period for marketing exercises, preferring instead to "an appropriate marketing exercise" 2 Replace "Brownfield" with "Derelict and/or vacant" 3 Delete reference to retention of existing buildings, unless it can be proved that the existing building is of special merit</p>	<p>The Council notes the support given to the redevelopment of sites in the medium and small villages. The medium and small villages have very little services or facilities and the car is the predominant form of transport to access every day needs including shopping, health and education provision. Development of additional housing in these settlements therefore needs to be on an exceptional basis only and the Council believes it is justified in placing certain caveats around development to ensure that it is only brought forward in exceptional circumstances. One of those caveats is that the site must demonstrate that it cannot be used for a community, economic or leisure use and actively marketing a site for 12 months will evidence this to the Council. There are other exception policies in the Plan which also ask for 12 months marketing, SP14 – Town/Village Centres and Shopping where the Council is trying to ensure minimum loss of community and cultural facilities which once gone are unlikely to be replaced and SP18 – Coastal Housing, where the Council is trying to provide flexibility around brownfield sites in the coastal zone even though the area is subject to flood risk and any policy without this flexibility could leave brownfield sites with no suitable alternative use. Policy SP19 only asks for 6 months because hotel losses can be clawed back through the granting of permissions for new hotels. Therefore the Council does not agree that the 12 months should be removed from the policy.</p>	<p>The policy uses the term brownfield land to describe the type of land it refers to. The Council agrees with the consultee that farm buildings could be included in with the policy, in fact many of the smaller settlements have farm buildings within their notional boundaries and these can become run</p>

<p>down and untidy. The policy does not have a clear explanation of what the Council means by brownfield land and the conclusion from those reading it would be that it would be the national definition which reads "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time". In order to clarify this a minor modification is proposed for the policy by adding a sentence onto the end of paragraph 1 reads "Brownfield land in the context of this policy is that land as defined by the NPPF with the addition of agricultural buildings"</p> <p>The policy asks that consideration be given to the conversion of any buildings on the site. The policy does not insist that all buildings are converted and retained and does not state that new housing on the site will not be supported if conversion is not carried out. It asks for the matter to be clearly evidenced and if it can be then the removal of buildings would be supported. The Council does not agree with the request to remove the references to conversion of buildings and believes it is a reasonable ask that those wishing to develop such sites consider what the conversion of such buildings which could add character to a rural settlement.</p> <p>The Council in its Plan does not state that other areas in medium and small villages will be needed to meet the identified housing need. The brownfield sites that come forward in these settlements are considered over and above the identified need and are not part of the strategic allocations which together with existing commitments meet the housing target.</p>	<p>settlements it is possible that substantial sites could become vacant and derelict in a number of settlements, whilst not fulfilling the definition of Brownfield Land. Examples may include farm buildings in the centre of settlements. The term Brownfield Land should be deleted and replaced with "derelict and/or vacant sites"</p> <p>4. The policy relies on retention and conversion of buildings as a first step, although in many cases the buildings will not be of any specific merit, and their retention may not enhance the settlement. The requirement to retain buildings should be deleted or replaced with appropriate text.</p>							<p>It is recognised that an element of Policy SP3 (previously Policy SP2) has been extracted to create an independent policy to control residential proposals in medium and smaller settlements.</p> <p>Focus is given to the areas within medium and small settlements that have buildings on them which may "once have served a useful purpose" which are now run down and abandoned. Whilst we support this notion, other sites within small settlements will be required to help meet the council's identified housing need. Sites which relate well to an</p>
<p>represent ed by WHG Planning</p>	<p>SP4</p>	<p>O</p>						

POLICY SP5 – SPECIALIST HOUSING FOR OLDER PEOPLE

Name of responder	Policy No	Page No, Para No	0	Settlement Proposals Map or Site No	Settlement Proposals page No	Page No, Para No	Q3 Response	Q4 Change Sort	Councils Response
McCarthy & Stone	SP5		0				<p>Thank you for the opportunity to comment on the consultation papers for the aforementioned document. As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the aforementioned consultation insofar as it affects or relates to housing for the elderly.</p> <p>We have previously provided commentary on the emerging East Lindsey Core Strategy in January 2013. In our commentary we outlined how private sheltered housing schemes specifically for the elderly, such as those provided by McCarthy & Stone, will have a key role in addressing the District's future housing needs. Furthermore we outlined the multiple benefits that owner occupied private sheltered housing for the elderly provides both to residents and the wider community. For your convenience and to avoid repetition, please find attached a copy of this representation.</p> <p>My Client would like to commend the Council's willingness to positively</p>		<p>The Council notes the support for the policy.</p> <p>The consultee is concerned about the cascade local connection criteria in connection with the coastal zone. The policy links the development of extra care units in the coastal zone to local need. This is to ensure that only those that already live in the coast are eligible for extra care and the Council is not shipping in vulnerable older residents who may be out of flood risk into a high flood risk area to obtain extra care. To allow a free market within the coast on extra care could in effect be allowing older vulnerable people to come from areas where they are now safe to live in areas of high flood risk putting their lives at risk if a flooding event occurred. The Council cannot support this approach because of the danger to life it presents and whilst the consultee may have a business model that they use this does not outweigh the argument against flood risk and the dangers it poses.</p>

Chestnut Homes	SP5	0	<p>population in excess of 10,000 to 15,000 to be confident of sufficient local interest to fill the development.</p> <p>This is problematic in East Lindsey as there are relatively few locations that meet this criterion and many of the largest towns are located within the coastal zone. As many of these settlements do not have a population significantly in excess of 10,000, filling all units of Extra Care accommodation will inevitably require some in-migration from elsewhere in the District. This will no doubt be exacerbated by the paucity of existing Extra Care provision in East Lindsey (as well of the wider County) and individuals who need this accommodation will wish to re-locate to ensure their needs are met.</p> <p>We therefore consider that the requirement for specialist accommodation for the elderly, and in particular Extra Care accommodation, in the coastal zone to demonstrate that occupation will be taken up by local need as detailed in Policy SPS makes the proposed Local Plan markedly less effective in delivering these forms of accommodation. We are particularly concerned about the application of the <i>Local Connection Criteria</i> in Annex 1 to Extra Care accommodation which does not consider a resident's need for this form of accommodation which will be their principle underlying reason for the move.</p> <p>We would respectfully ask the Council to reconsider whether the application of local connection criteria to a form of supported accommodation, of which there is an acknowledged deficit, in the areas where it is most likely to be delivered is the most pragmatic way of facilitating greater delivery over the local plan period.</p> <p>It is acknowledged the role this policy will play in the facilitating of</p>	We recommend	Housing specifically designed for older people with care needs means that they are a vulnerable section of the community.
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POLICY SP6 – NEIGHBOURHOOD PLANNING

Name of responder	Policy No	Page No, Para No	Settlement Proposals Map or Site No	Settlement Proposals page No	Page No, Para No	Q3 Response	Q4 Change Sort	Councils Response
<p>represent ed by Robert Doughty Consultants Ltd</p>	<p>SP6</p>	<p>0</p>	<p></p>	<p></p>	<p></p>	<p>We welcome in principle the support given to the Neighbourhood Planning Process.</p> <p>We also welcome the acceptance that in the absence of a neighbourhood plan any development proposals will be assessed against the strategic policies in the Local Plan and the National Planning Policy Framework. Some clarity should be provided to confirm the relationship between made neighbourhood Plans and the adopted local plan, especially in those cases when the neighbourhood plan comes forward after the adoption of the Local Plan, to clarify the roles of the different documents with regard to landscape and heritage designations, site allocations, etc.</p>	<p>1 Text to be included to clarify the relationship between neighbourhood plans and local plans, especially in relation to other designations, such as landscape, heritage and biodiversity and strategic allocations.</p>	<p>The Council notes the support given to the neighbourhood planning process.</p> <p>Neighbourhood plans must be in general conformity with local and national policy so it is difficult to see how the relationship between them and the Local Plan can be clarified other than that via the NPPF. Neighbourhood Plans would have to provide evidence if they wished to alter landscape and heritage designations and they can allocate additional growth if they wish and there is evidence to support this. The Council believes that Policy SP6 provides the necessary clarification around neighbourhood plans.</p>
<p>Larkfleet Homes represent ed by Robert Doughty Consultants Ltd</p>	<p>SP6</p>	<p>0</p>	<p></p>	<p></p>	<p></p>	<p>We welcome in principle the support given to the Neighbourhood Planning Process.</p> <p>We also welcome the acceptance that in the absence of a neighbourhood plan any development proposals will be assessed against the strategic policies in the Local Plan and the National Planning Policy</p>	<p>1 Text to be included to clarify the relationship between neighbourhood plans and local plans, especially in relation to other designations, such as</p>	<p>The Council notes the support given to the neighbourhood planning process.</p> <p>Neighbourhood plans must be in general conformity with local and national policy so it is difficult to see how the relationship between them and the Local Plan can be clarified other than that via the NPPF. Neighbourhood Plans would have to provide evidence if they wished to alter landscape and heritage designations and they can allocate additional growth if they wish and there is evidence to support this.</p>

Jack Mowbray Estate represented by Robert Doughty Consultants Ltd	SP6	O	<p>Framework. Some clarity should be provided to confirm the relationship between made neighbourhood plans and the adopted Local Plan, especially in those cases when the neighbourhood plan comes forward after the adoption of the Local Plan, to clarify the roles of the different documents with regard to landscape and heritage designations, site allocations, etc.</p> <p>We welcome in principle the support given to the Neighbourhood Planning Process.</p> <p>We also welcome the acceptance that, in the absence of a neighbourhood plan, any development proposals will be assessed against the strategic policies in the adopted Local Plan and the National Planning Policy Framework. Some clarity should be provided to confirm the relationship between made neighbourhood plans and the adopted local plan, especially in those cases when the neighbourhood plan comes forward after the adoption of the Local Plan, to clarify the roles of the different documents with regard to landscape and heritage designations, site allocations, etc</p> <p>We acknowledge the positive approach the Local Authority is taking to neighbourhood planning. However the exclusion of Alford within the Settlement proposals due to the preparation of a Neighbourhood plan is not supported.</p> <p>NPPF Para 157 states that 'Crucially Local Plans should... allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where</p>	<p>landscape, heritage and biodiversity and strategic allocations.</p> <p>1 Text to be included to clarify the relationship between neighbourhood plans and local plans, especially in relation to other designations, such as landscape, heritage and biodiversity and strategic allocations</p>	<p>The Council believes that Policy SP6 provides the necessary clarification around neighbourhood plans.</p>	<p>The Council notes the support given to the neighbourhood planning process.</p> <p>Neighbourhood plans must be in general conformity with local and national policy so it is difficult to see how the relationship between them and the Local Plan can be clarified other than that via the NPPF. Neighbourhood Plans would have to provide evidence if they wished to alter landscape and heritage designations and they can allocate additional growth if they wish and there is evidence to support this. The Council believes that Policy SP6 provides the necessary clarification around neighbourhood plans.</p>
Chestnut Homes	SP6	O			<p>Alford Town Council are undertaking a Neighbourhood Plan with site selection. They have signed a memorandum of understanding that they have 6 months from the time of the Local Plan adoption to bring forward their Plan or the Council will step in and make their allocations. The Council believes it is right to allow Alford to make their own allocations in their neighbourhood plan and as the Local Plan says, until that time sites will be supported if they meet the policies in the development plan and conform with national policy.</p>	

St Andrews Healthcare	SP6	0		<p>appropriate'. The exclusion of a town which is identified for growth within the Local Plan does not meet one of the basic requirements of the Local Plan, to allocate sites to promote development.</p> <p>For further discussion regarding Alford please see the comments made in the Settlement Proposals Development Plan section.</p> <p>It is noted the policy makes reference to the Local Authority stepping in should a neighbourhood plan fail to deliver their plan and there is a gap in the delivery of housing or during the interim period between plans should sites come forward they will be supported (should they conform to other policies). Given the Local Authorities lack of a Local Plan since 1999 resulting in unplanned housing developments, this strategy provides uncertainty to housing developments, especially in Alford.</p> <p>The lack of allocated sites in Alford in this Local Plan will potentially lead to a continued ethos of unplanned developments in the town.</p>	<p>1. For the purposes of consistency with paragraph 184 of the NPPF, the Core Strategy should be amended to provide greater clarity on the strategic policies for Alford. It will be then expected of the Alford Neighbourhood Plan to reflect these policies and plan</p>		<p>Alford Town Council is undertaking a Neighbourhood Plan, which is site selecting and which is moving toward consultation and submission. The Town Council has signed a Memorandum of Understanding that the Council will Plan for the town within 6 months of the adoption of the Local Plan if they fail to bring their Plan forward. Neighbourhood Plans have to be in general conformity with the local plan and national planning policy and Policy SP6 states this, it has to be in conformity with all policies and so Policy SP6 should not pick policies out as the consultee is suggesting. The Council would not support any other changes for the policy except those outlined in the minor modifications schedule.</p>
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Gin Property Ltd represented by Robert Doughty Consultants Ltd	SP6				<p>Despite the above, it is considered that Policy SP6 is both unjustified and inconsistent with national policy. In its current form, the Core Strategy contains insufficient explanatory text on what strategic policies of the emerging Core Strategy the Neighbourhood Plan will need to conform with and how the Neighbourhood Plan will align with the priorities not only in Alford, but the wider local area, as underlined at paragraph 184 of the NPPF.</p> <p>Reference is also made to the preparation of memorandums of understanding between the Council and those Town or Parish Councils undertaking a Neighbourhood Plan to agree timetables for completion of neighbourhood plans. It is considered that any such memorandum of understanding should contain a review mechanism closely aligning policy principles 2 and 3 of SP6 to ensure that planned growth is delivered.</p>	<p>positively to support them.</p> <p>It is recommended that further explanatory text should be provided to underline the contents of a memorandum of understanding and what review mechanisms will be put in place should a Town or Parish Council fail to be adopted to an agreed timetable.</p>	
	O				<p>We welcome in principle the support given to the Neighbourhood Planning Process.</p> <p>We also welcome the acceptance that in the absence of a neighbourhood plan any development proposals will be assessed against the strategic policies in the Local Plan and the National Planning Policy Framework. Some clarity should be provided to confirm the relationship between made neighbourhood Plans and the adopted local plan, especially in those cases when the Neighbourhood plan comes forward after the adoption of the Local Plan, to clarify the roles of the different documents with regard to</p>	<p>1 Text to be included to clarify the relationship between neighbourhood plans and local plans, especially in relation to other designations, such as landscape, heritage and biodiversity and strategic allocations.</p>	<p>The Council notes the support given to the neighbourhood planning process.</p> <p>Neighbourhood plans must be in general conformity with local and national policy so it is difficult to see how the relationship between them and the Local Plan can be clarified other than that via the NPPF. Neighbourhood Plans would have to provide evidence if they wished to alter landscape and heritage designations and they can allocate additional growth if they wish and there is evidence to support this. The Council believes that Policy SP6 provides the necessary clarification around neighbourhood plans.</p>

<p>represent ed by Robert Doughty Consultants Ltd</p>	<p>SP6</p>	<p>O</p>		<p>landscape and heritage designations, site allocations, etc. We welcome in principle the support given to the Neighbourhood Planning Process.</p> <p>We also welcome the acceptance that, in the absence of a neighbourhood plan, any development proposals will be assessed against the strategic policies in the Local Plan and the National Planning Policy Framework. Some clarity should be provided to confirm the relationship between made neighbourhood plans and the adopted Local Plan, especially in those cases when the neighbourhood plan comes forward after the adoption of the Local Plan, to clarify the roles of the different documents with regard to landscape and heritage designations, site allocations, etc.</p> <p>Policy LP4: Growth in Villages</p> <p>Whilst Neighbourhood Plans are being acknowledged as delivering additional growth, and the CPRE are pleased to note this recognition, the role of these Plans and the relation with the strategic objectives for East Lindsey and SP2 (Sustainable Development) the Core Strategy should also take Neighbourhood Plans into account with SP1 (Sustainable Patterns of Places). The South East Lincolnshire Local Plan: Draft for Public Consultation (2016) identifies Neighbourhood Plans as having a key role to play with strategic planning in Boston and South Holland, and the same thing should also be taken into with planning for East Lindsey.</p> <p>The CPRE fully supports the principles of Neighbourhood Plans and will seek to assist communities that wish to develop them in the plan area.</p>	<p>1 Text to be included to clarify the relationship between neighbourhood plans and local plans, especially in relation to other designations, such as landscape, heritage and biodiversity and strategic allocations.</p>	<p>The Council notes the support given to the neighbourhood planning process. Neighbourhood plans must be in general conformity with local and national policy so it is difficult to see how the relationship between them and the Local Plan can be clarified other than that via the NPPF. Neighbourhood Plans would have to provide evidence if they wished to alter landscape and heritage designations and they can allocate additional growth if they wish and there is evidence to support this. The Council believes that Policy SP6 provides the necessary clarification around neighbourhood plans.</p>
<p>CPRE Lincolnshire</p>	<p>SP2, SP4, SP6?</p>	<p>S</p>		<p>The Council notes the support for the Policy.</p> <p>The Council is not sure which policies the consultee is referring to because the Local Plan does not have an LP4 policy, Central Lincolnshire Local Plan does and this policy refers to growth in smaller villages. There is a policy at SP6 supporting Neighbourhood Development Plans which covers this topic.</p>	<p>The Council notes the support for the Policy.</p>	<p>The Council notes the support for the Policy.</p> <p>The Council is not sure which policies the consultee is referring to because the Local Plan does not have an LP4 policy, Central Lincolnshire Local Plan does and this policy refers to growth in smaller villages. There is a policy at SP6 supporting Neighbourhood Development Plans which covers this topic.</p>

CHAPTER 3 – AFFORDABLE HOUSING

Name of Responder	Policy No	Page No, Para No	Settlement Proposals Map or Site No	Settlement Proposals page No	Page No, Para No	Q3 Response	Q4 Change Sort	Councils Response
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CHAPTER 3 – GENERAL COMMENTS

Lindum Homes	Chapter 3				EVA	<p>We note the Strategic Housing Market Assessment identifies a need for 2825 affordable homes across the plan period, which is 36% of overall target of 7768 dwellings. The table at paragraph 2 of Chapter Three highlights potential sources of affordable housing, which concludes 2611 affordable homes would come forward over the lifetime of the plan, including contributions from windfall sites, the housing capital programme, and so on. This is clearly less than the identified need. Furthermore, we consider the figures set out in the table to be optimistic. The contribution of Windfall sites assumes that all windfall developments will include an element of affordable housing, although many will fall below the 15-house trigger for providing affordable housing, and therefore the contribution of affordable housing will be much less. The Economic Viability Assessment clearly demonstrates that larger sites will not be viable if they are</p>	<p>A new policy should be provided supporting the delivery of affordable housing in general, and not just as part of a market development or rural development sites. Sites should be allocated for 100% of affordable housing schemes where appropriate.</p>	<p>The Council believes that the figures in Table A concerning the amount of affordable housing to come forward from windfall developments over the Plan period is a very conservative estimate. To evidence this statement, in the period from the start of the Plan period February 2016 to 31st January 2017, the Council approved windfall housing permissions to deliver 317 affordable houses. This nearly makes up the whole amount of estimated delivery just in year one of the Plan Period and the Council can therefore be confident that the 349 affordable houses plus more will be approved and come forward.</p> <p>The contribution for affordable housing set out in the policy is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council's Economic Viability Assessment was completed in September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will</p>
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				<p>required to provide 30%/o. The potential level of affordable housing provision based on the Policy approach, therefore, will fall somewhat short of the identified need, focussing as it does on the contribution of housing as a "Developer Contribution" on qualifying sites (SP7) and as Rural exception sites in medium and small villages (SP8). Indeed, the plan states at one point that "the majority of the new affordable homes will be expected to be provided as part of market housing sites and funded by developed contributions." The Plan should make provision to facilitate the delivery of affordable homes through other methods.</p> <p>A new policy should be provided setting out a context for the provision of affordable housing other than on qualifying sites and as exceptions in small settlements. Consideration should be given to the protection of those sites when they come forward, or where justified through the allocation of sites specifically for this use.</p>		<p>support viability assessments being sent to an independent valuer and abides by those decisions.</p> <p>Therefore the Council believes that the amount of affordable housing set out in the policy as 30% and 40% in Woodhall Spa as a higher value area is justified as a starting point for negotiations. The EVA is considered to be up to date, it is not possible for the Council to keep doing every year a new EVA in case matters have changed, and this is not considered to be proportional evidence.</p> <p>The Council believes that the % of affordable housing as a starting point in negotiations is sound. This is a matter which will be part of the 5 year review of the Local Plan and the affordable housing provision will be adjusted according to an EVA done at that time.</p> <p>The Council cannot see how it can create another policy for affordable housing other than those set out in the Local Plan. Allocating sites for 100% affordable housing could only be done with the owners/developers consent, to do so without would just mean the sites would not come forward and would in effect be blighted or viability assessments would be submitted and the sites would end up with market housing/affordable housing on them possibly in unsustainable locations. A site owner/developer can submit a planning application for a 100% affordable housing site and this does happen, the site will then be judged on its own merits.</p>
North Somercotes Parish Council	Chap 3	O		<p>7. Page 37 - para 12 - The need for starter homes and houses for downsizing is very important in rural areas, which is recognised in the NPPF. The development of such housing for those who fulfil the local connection criteria but who do not qualify for or want affordable/social housing should also be supported. This includes in this settlement where flood risk is an issue but not insurmountable. The small scale development on Woolpack Meadows was very popular and property for sale on there is usually sold within a</p>	North Somercotes Parish Council	<p>The consultee is responding around the parish of North Somercotes which lies within the Coastal Zone. As at January 2017 North Somercotes had 57 housing commitments. Affordable housing in the Coastal Zone is supported in the Local Plan with a local connection criteria to ensure that only those with local need obtain affordable housing, that means they already live in the high flood risk area and are not going to be moving out of a safe area into a dangerous area. The Single Plot Exceptions Policy also covers the Coastal Zone as does the development of brownfield sites for open market housing in all the settlements of the Coastal Zone. The consultee has provided no evidence that affordable housing contributions are stalling sites in North Somercotes, as far as the Council are aware no developer in the village has reapplied to have their contributions reduced or removed and given the fact that the Economic Viability Assessment supports 0%</p>

<p>affordable housing in this zone, if they did apply then their application may be supported.</p> <p>The Council is not applying CIL at the present time, so this matter is not relevant.</p> <p>The consultee asks why Policy SP8 does not apply in the coast. This is because the Coastal Zone housing is covered in Chapter 10 as set out above.</p> <p>The Single Plot Exceptions Policy is an exceptions policy so should only be used in exceptional circumstances. It has been used in the Coastal Zone in circumstances whereby a local person who could not access the open market but had access to suitable land applied successfully to build a house. They were able to provide evidence that they could not access the open market in the settlement they resided in, they had resided there for a number of years, they were also content with the 80% on value and the size of the property they could have within the policy guidelines, they therefore passed both the Sequential and Exception Test as set out in National Planning Policy.</p>		<p>matter of weeks of it coming on to the market.</p> <p>Demand is so clearly there for private rental properties, as the Parish Council already has a waiting list of 9 families with local connections for its 6 properties, but affordable housing developer contributions in this area are what has stalled many developments in the past. Starter homes using Right to Buy schemes, and serviced self-build plots should be supported as these are more likely to be taken up in this settlement where home ownership is higher than the district average, and young professional people and small families want to stay in the area. These prospective home owners are also most likely to be in a position economically to afford the suggested £5k CIL contribution for being able to build in the area, and an ongoing additional precept amount per annum, towards Flood Defence and Maintenance. Most would see this as a small price to pay to remain where they have grown up and wish to remain close to family and friends.</p> <p>7.2 Page 38 - SPB - Rural Exceptions- why would this not also apply to large villages, where need was proven?</p> <p>7.3 page 40 - Single Plot Exceptions- This is a welcome policy but has never, to the Parish Council's knowledge, been used. This is believed to be because of the restrictions over and above that which the NPPF provides for. The Parish Council supports a policy that is more likely to actually be used which means:</p> <ul style="list-style-type: none"> • Ability to prove local connection against an objectively set criteria 	

<ul style="list-style-type: none"> Property to remain 'affordable' for 5 years and any sale during that time to be at 80% of market value 	<ul style="list-style-type: none"> Site is in or adjoining the settlement and does not constitute isolated or sporadic development 				
<p>However, it is difficult to see any justification for the subjective criteria such as - the applicant</p>	<p>Demonstrating that they are unable to afford a suitable home currently available in the parish - and in fact this negates the purpose of the self-build regulations. Also how is the affordability of the dwelling to be measured relative to the applicant or successors? Furthermore, in a flood risk area where we should be encouraging innovative housing solutions, such as live/work dwellings, or living upstairs with all ancillary accommodation downstairs, then the site size of 0.1 hectare</p>				
	<p>may be sufficient land but the internal floor space is insufficient and it is not clear why this is being limited, over and above what might be desirable to ensure the proper use, or reuse of land as a finite resource. The national figures should instead be used - £250k value, 80%, 5 years - as being quite sufficient and more likely to encourage take up, for example for self-build.</p>				

POLICY SP7 – AFFORDABLE AND LOW COST HOUSING, RURAL EXCEPTIONS

Name of Responder	Policy No	Page No, Para No	0	Settlement Proposals Map or Site No	Settlement Proposals page No	Page No, Para No	Q3 Response	Q4 Change Sort	Councils Response
Metacre Ltd	SP7		0				<p>Metacre Ltd has concerns regarding the following criterion of Core Strategy Policy SP7: Affordable and Low Cost Housing.</p> <p><u>Criterion on 4</u></p> <p>There is no objection to the principle of allowing financial obligations towards the off-site provision of affordable housing in lieu of on-site requirements. However it is considered that the suggested mechanism for calculating the financial contribution should not be included within the policy as this level of detail is inappropriate for the Core Strategy.</p> <p><u>Criterion on 5</u></p> <p>The comment in the policy that the Council will support commuted sums where there is an identified need for affordable Gypsy and Traveller pitches in relevant settlements is considered unsound.</p> <p>Both regulation 122 of the Community Infrastructure Levy Regulations 2010 and paragraph 204 of the NPPF confirm that planning obligations should only be sought where they meet all of the following three tests:</p>	<p>Criterion 4</p> <p>It is considered that the suggested mechanism for calculating the financial contribution should not be included within the policy as this level of detail is inappropriate for the Core Strategy.</p> <p>Criterion on 5</p> <p>The comment in the policy that the Council will support commuted sums where there is an identified need for affordable Gypsy and Traveller pitches in relevant settlements should be deleted.</p>	<p>With regard to criterion 4, the consultee has not said why including the mechanism for calculating the financial contribution is not appropriate in terms of level of detail and therefore should not be included in the Core Strategy. It is therefore difficult for the Council to respond other than to say that in order to be clear and transparent the Council believes it should set out how it will calculate financial contributions. This also avoids the need to set the matter out in a separate Supplementary Planning Document.</p> <p>The Council disagrees with the consultee in that Gypsy and Traveller pitches can fall under the affordable housing definition if they are managed as rented affordable housing and there is an identified need. As long as the Council only applies this within the limits set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 then there is no reason why the Council could not apply criterion 5. In that case there would have to be shown an affordable housing need in the relevant settlement and applied to affordable rented pitches. With regard to the consultees planning application the Council has not asked for this type of contribution and has no intention to at this time.</p>

<ul style="list-style-type: none"> • they are necessary to make the development acceptable in planning terms; • they directly relate to the development; and • They are fairly and reasonably related in scale and kind to the development. 	
<p>NPPG paragraph: 001 Reference 1 0: 23b-001-20140306 confirms, under the heading 'When can planning obligations be sought by the local planning authority?' that <i>"planning obligations mitigate the impact of unacceptable development to make it acceptable in planning terms."</i> In other words, obligations can only be compliant with CIL and NPPF policy where development would have to be refused planning permission without them. Planning obligations should not be used to secure contributions to the achievement of wider planning objectives that are not necessary to allow planning permission to be given for a particular development.</p>	
	<p>It is acknowledged that NPPF policy supports LPAs setting out standards for the delivery of affordable housing within residential development and thus LPAs may seek an appropriate financial contribution towards affordable housing, where this is in lieu of on-site provision. However,</p>

Cyden Homes Ltd	SP7	5,7, 8	o	<p>5. The capacity of developments to contribute an element of affordable housing has been established through the District wide Economic Viability Assessment (EVA) 2015. Where affordable housing is delivered via developer contributions t/1e Council will positively engage with those wishing to bring development forward to ensure that contributions meet housing needs without making development unviable</p> <p>7. From the evidence in the Economic Viability Assessment. The Council has resolved to seek a contribution of 30% from all sites for 15 or more units in the medium and high value zones defined by the EVA this is in effect the whole District excepting Woodhall Spa which is a very high value area and the Coastal Zone which is defined as a low value area.</p> <p>In the very high value area - Woodhall Spa, it is proposed that a higher percentage of affordable homes of 40% is sought. We have previously made representations to the Council regarding the 'GVA Economic Viability Assessment 2013 & update 2015 (EVA)', on the grounds that the figures used in the assessment of New Homes Sales Prices are not realistic or achievable.</p> <p>The EVA does not explain where it has derived its assessment of property prices or its assumptions that new build should generate a significant uplift from resale of older properties. The EVA also does not differentiate between older type property values where the property sizes are smaller than new build homes.</p>	<p>The Local Plan should consider revisiting the EVA and update with a more realistic and evidence based assessment of property prices in the study area. The policy (SP?) should then be amended to accurately reflect the percentage of Affordable Housing that is deliverable within development viability.</p>	<p>The figures used in the EVA are considered to be a reasonable reflection of the house prices at that time in the District. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council's Economic Viability Assessment was completed in September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will support viability assessments being sent to an independent valuer and abides by those decisions. Therefore the Council believes that the amount of affordable housing set out in the policy as 30% and 40% in Woodhall Spa as a higher value area is justified as a starting point for negotiations.</p> <p>With regard to the price of new build versus the price of second hand housing. It does appear from examination of the houses for sale in just postcode in the District LN11 that the price does depend on the quality of the new build just as it depends on the quality of the second hand house. Overall new builds of good quality appear to be markedly more expensive than second hand houses. At the price range of under £500k second hand houses for 4 bed detached range from £400k to £475k and the one new build was set at £475k. It would be very difficult to pin down an exact premium amount and 15% in some cases appears to be an under estimate and in others a large over estimate. However taking it in the round 15% would appear to be a reasonable estimate. The EVA did an assessment of the existing property values achieved across the District at that time. The EVA states that "It is generally accepted that new build properties typically sell for a premium over existing homes, which reflects its 'newness', much as you do when purchasing a car. Through our analysis it was established that new build properties currently sell at a premium of between 8% and 35% over existing properties. The average premium was 16.67%. In order to establish what the likely new build values would be across this District we applied a premium of 15% to the existing sales values" The 15% was lower than the average premium.</p> <p>The EVA is considered to be up to date, it is not possible for the Council every year to keep commissioning a new EVA in</p>
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Cyden Homes Ltd	SP7	(14)	O			<p>We therefore conclude that the Core Strategy Policy (SP7) in respect of requiring 30 or 40% Affordable Housing is not sound.</p>	<p>The Core Strategy advises that: -</p> <p><i>14. With regard to the housing mix for affordable housing; from the SHMAA it would appear as if the 50% of the 2825 need should be 2 bedroom properties followed by 25% of 3 bedroom properties and a smaller need for 4 bedroom and 1 and 2 + bedroom flats.</i></p> <p>The Councils own 'East Lindsey Housing Strategy 2013 to 2018' in chapter 4.2 Housing Demand, recognises the considerable housing demand for one bedroom properties.</p> <p><i>4.2 Housing Demand • The Housing Register East Lindsey continues to have high numbers of households on the Housing Register. The waiting list has increased significantly over the last year partly due to the merger of the Councils waiting list with New Lynx Housing Trust's list therefore the current demand for accommodation in the District stands at 4,820 (Stock demand December 12). There is a high demand for all types of accommodation across the District with the highest demand for 1 bed ground floor accommodation.</i></p> <p><i>There are currently 6,972 social housing properties in East Lindsey giving a ratio of 0.69 demand compared to number of properties i.e. there is 0.69 applicants requiring each property. The chart</i></p>	<p>The policy (SP7) should then be amended to accurately reflect the percentages of housing demand for each dwelling type in accordance with the 'East Lindsey Housing Strategy 2013 to 2018' in accordance with the following percentages: -</p> <ul style="list-style-type: none"> • One Bed Property – 57% • Two Bed Property – 25% • Three Bed Property – 15% • Four plus Bed Property – 3% 	<p>case matters have changed, and this is not considered to be proportional evidence. The Council believes that the % of affordable housing as a starting point in negotiations is sound. This is a matter which will be part of the 5 year review of the Local Plan and the affordable housing provision will be adjusted according to an EVA done at that time, the Council will also monitor any viability assessments being undertaken as part of the determination of planning applications and feed this into the review of the EVA.</p> <p>The Councils most up to date evidence base for the types of dwellings in the District is the 2016 Strategic Housing Market Assessment (SHMA) (Affordable Housing Needs Assessment). The Housing Strategy was adopted in 2013 so is less up to date than the SHMA? The Council has taken this more up to date evidence and this is what is set down in paragraph 14 of the Policy. The consultee has not made it clear why this change is important and the Council believes that the information in paragraph 14 gives an up to date indication of the affordable housing mix as at 2016.</p>
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National Federation of Gypsy Liaison Groups	SP7				<p><i>below shows the number of bedrooms required by applicants on the housing register.</i></p> <p><i>Number of bedrooms required</i></p> <p><i>Not stated, 1</i></p> <p><i>2 bed, 1200</i></p> <p><i>3 bed, 717</i></p> <p><i>4 bed, 142</i></p> <p><i>5 bed, 9</i></p> <p><i>1 bed, 2751</i></p> <p><i>Source: Housing Register</i></p> <p>We therefore conclude that the Core Strategy Policy (SP7) in respect of requesting the 2/3 and 4 Bed mix stated is not sound.</p>		
CPRE Lincolnshire	SP7				<p>We support the proposal to seek committed sums to assist in the provision of Traveller sites as set out in Strategic Policy 7</p>		The Council notes the support for this part of the Policy.
					<p><u>Housing – Residential Caravansites and temporary accommodation</u></p> <p>Whilst the Core Strategy does acknowledge new caravans with Strategic Policy 15 (Widening the Inland Tourism and Leisure Economy), there is no policy provision for residential caravan sites other than travellers and gypsies accommodation. There are a number of existing residential sites in the plan area and demand may grow as an alternative solution to low cost affordable housing on unallocated land in the countryside.</p> <p>CPRE Lincolnshire would resist such applications in principle but would suggest that any such applications be considered using identified criteria for gypsies etc.</p> <p>Residential caravans are excluded from the Flood Re’ insurance provisions so may not be able to obtain affordable flood risk insurance for contents if sited in a flood zone.</p>		<p>The Council does not believe it requires a policy for residential caravan sites. The demand for these in the District is low, so low that there has not been an application come forward in the last 5 years. The Plan therefore focuses on holiday accommodation where there is ongoing pressure for further development. Any site wishing to come forward for residential caravan sites would have to conform to national planning policy and the wider policies in the Local Plan, there is nothing in the Plan to suggest that a site in the right place would not be supported.</p>

CPRE Lincolnshire	Chapter 3 SP7		O		<p>There are a number of instances around the Plan area where farmers particularly have developed temporary caravan sites for migrant workers in areas of flood risk. There appears to be no provision for sites of this type within the plan for East Lindsey, and again the general provisions of gypsies etc. sites might provide a model for decision making.</p> <p>Finally, tourism growth is a key priority for the GLLEP and County Council over the life of the Plan with a doubling of growth forecast. There may in the plan period therefore be a growing demand for accommodation for tourists and this should be acknowledged with the Core Strategy for East Lindsey.</p>		
					<p>Rural Areas</p> <p>Affordable housing plays a significant role in cementing established rural communities and small extensions to such communities to provide additional housing to meet locality needs is a laudable policy objective which the CPRE supports in general.</p> <p>If the national policy review prevails then such sites may not be able to be retained in the affordable sector in perpetuity, undermining the original intention of the policy and resulting in gentrification, albeit delayed for five years, but ultimately displacing the households that the policy was intended to protect.</p> <p>To counter this, the LPA's could levy a significant infrastructure contribution to such sites that might come forward with some of the proceeds being used to fund affordable housing in perpetuity in the village, perhaps by funding the acquisition of existing property to be held in trust.</p>		<p>The Council notes the support of the consultee.</p> <p>The Council has a policy for affordable housing contributions and this policy endeavours to ensure that sites do not become unviable by excessive infrastructure contributions. The Council would not support any further constraints in this regard.</p>

<p>represent ed by Robert Doughty Consultan ts Ltd</p>	<p>SP7</p>	<p>O</p>	<p>We do not object to the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>2. We are concerned, however at the assumed delivery rates for affordable housing in the table in paragraph 2 at the top of page 35. The assumed contribution to affordable housing from windfall schemes is listed as 349. This figure, however, is 30% of the assumed total delivery rates for windfall sites shown on Table A - Page 25. As windfall developments many of the sites can be assumed to be less than 15 dwellings, and will not, therefore, provide any affordable housing contribution at all. The table of page 35 is therefore making over ambitious claims for affordable housing delivery over the plan period.</p> <p>3. From the supporting text for Policy SP7 it is clear that the cash contributions for offsite provision of affordable housing will be calculated based on the land value, and not the market value of a finished property. The third bullet point in section 4 of SP7 should be re-written to clarify this fact.</p> <p>4. The requirement of 30% on all market housing sites would not appear to be justified by the EVA. Tables G and R of the EVA demonstrate that developments of over 25 dwellings would only just be viable, with developments over 150 dwellings in towns being marginal. This has been calculated based on the assumed 5106 contributions set out in Table 13 of the EVA (Page 37) An examination of the list of example applications and their 5106 contributions, however, indicates that more recent applications are</p>	<p>1 The 0/o requirement for affordable housing should be reduced, to maintain the viability of development in East Lindsey and the higher requirement for 1 and 2 bed rented properties.</p> <p>2 The third bullet point in section 4 of SP7 should be re-written to clarify the fact that the cash contribution for off-site provision of affordable homes will be calculated on the equivalent land value, and not the market value of a finished property.</p> <p>3 Table A on page 35 should be amended to reflect a more realistic level of contribution of affordable housing to come forward on windfall sites, many of which will fall below the trigger for the provision of</p>	<p>1. The Council notes the support for the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>2. The Council believes that the figure in Table A concerning the amount of affordable housing to come forward from windfall developments over the Plan period is a very conservative estimate. To evidence this statement, in the period from the start of the Plan period February 2016 to 31st January 2017 the Council approved windfall housing permissions with approval to deliver 317 affordable houses. This nearly makes up the whole amount of estimated delivery and the Council can therefore be confident that the 349 affordable houses plus more will be approved and come forward.</p> <p>3. Paragraph 10 in the explanatory text and point 5 in the policy makes it clear that the cash contributions are market values and explains how the market values are calculated. They do not mention land values as set out by the consultee. The Council believes using market values as set out in the policy is a clear and fair way to work out the financial contribution and that the policy should not be changed.</p> <p>4. Tables G and R show that only much larger sites could have a question mark over viability. The Local Plan only has one site in it that is over the threshold in table G and very few sites over the threshold in Table R. To lower the whole area based on what could be a few sites would lower the main starting point of the Council to provide sufficient affordable housing. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council's Economic Viability Assessment was completed in September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will support viability assessments being sent to an independent valuer and abides by those decisions. Therefore the Council believes that the amount of affordable housing set out in the policy as 30% is justified as a starting point for negotiations. This is a matter which will be part of the 5 year review of the Local Plan. The consultee discusses other requirements for contributions and their effect on the ability of sites to provide</p>
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Lindum Homes represented by Robert Doughty Consultants Ltd	SP7	0		<p>expected to make higher contributions towards education and healthcare provision. Application 5/086/01100/15 - Wincey Gardens, Horncastle, for instance, contributed £5,123 per dwellings, as opposed to the £2,250 assumed in Table 13. The extra £2,900 per dwelling would tip marginal and viable sites well into the unviable area. The only sites that would appear to be able to support the affordable housing provision are those below 15 dwellings, which will not be required to provide affordable housing.</p> <p>5. We note that the need for affordable housing is primarily for smaller rented properties, as opposed to shared ownership. The policy could be amended to maximise the delivery of rented properties, which would also lead to a reduced target.</p>	affordable housing	<p>affordable housing and the Council does realise that this can have an impact on delivery and the policy wording does not particularly reflect this. The Council is therefore proposing a minor modification to the wording of paragraph 5 to include an additional sentence at the end which reads "The Council acknowledges that there are a variety of factors involved in bringing sites including the provision of infrastructure and site remediation, these can all have an impact on the amount of affordable housing being brought forward."</p> <p>5. The Council is unsure how maximising the delivery of rented properties would lead to a reduced need for affordable housing. The SHMA 2016 showed a need for 2825 additional affordable homes over the 15 year plan period. This matter will be reviewed along with the other housing policies in the 5 year review of the Local Plan along with an updated SHMA.</p>
				<p>1. We do not object to the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>2. We are concerned, however at the assumed delivery rates for affordable housing in the table in paragraph 2 at the top of page 35, as this figure of 349 is 30% of the assumed delivery rates for affordable housing shown on Table A – Page 25. As windfall developments many of the sites can be assumed to be less than 15 dwellings, and will not, therefore, provide any affordable housing contribution at all.</p> <p>3. From the supporting text for Policy SP7 it is clear that the cash contributions for offsite provision of affordable housing will be</p>	<p>The percentage requirement for affordable housing provision as a part of a market housing scheme should be reduced to ensure that development is still viable and that the affordable housing provision seeks to meet the specific needs of the area.</p>	<p>1. The Council notes the support for the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>2. The Council believes that the figure in Table A concerning the amount of affordable housing to come forward from windfall developments over the Plan period is a very conservative estimate. To evidence this statement, in the period from the start of the Plan period February 2016 to 31st January 2017 the Council approved windfall housing permissions with approval to deliver 317 affordable houses. This nearly makes up the whole amount of estimated delivery and the Council can therefore be confident that the 349 affordable houses plus more will be approved and come forward.</p> <p>3. Paragraph 10 in the explanatory text and point 5 in the policy makes it clear that the cash contributions are market values and explains how the market values are calculated. They do not mention land values as set out by the consultee. The Council believes using market values as set out in the policy is a clear and fair way to work out the financial contribution and that the policy should not be changed.</p>

<p>calculated based on the land value, and not the market value of a finished property. The third bullet point in section 4 of SP7 should be re-written to clarify this fact.</p> <p>4. The requirement of 30% would not appear to be justified by the EVA. Tables G and R off the EVA demonstrate that developments of over 25 dwellings would only just be viable, with developments over 150 dwellings in towns being marginal. This has been calculated based on the assumed 5106 contributions set out in Table 13 of the EVA (Page 37). An examination of the list of example applications and their 5106 contributions however, indicates that more recent applications are expected to make higher contributions towards education and healthcare provision. Application S/086/01100/15 Wincey Gardens, Horncastle, for instance, contributed of £5,123 per dwellings, as opposed to the £2,250 assumed in Table 13. The extra £2,900 per dwelling would tip marginal and viable sites well into the unviable area. The only sites that would appear to be able to support the affordable housing provision are those below 15 dwellings, which will not be required to provide affordable housing.</p> <p>5. We note that the need for affordable housing is primarily for smaller rented properties, as opposed to shared ownership. The policy could be amended to maximise the delivery of rented properties, which would also lead to a reduced target.</p> <p>6. The supporting text for Policy SP7 states that the cash</p>	<p>The third Bullet point of Section 4 of the policy should be amended to clarify the basis on which contributions for offsite provision of affordable housing will be calculated i.e. on the basis of land purchase costs and not the market value of finished properties.</p>	<p>4. Tables G and R show that only much larger sites could have a question mark over viability. The Local Plan only has one site in it that is over the threshold in table G and very few sites over the threshold in Table R. To lower the whole area based on what could be a few sites would lower the main starting point of the Council to provide sufficient affordable housing. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council's Economic Viability Assessment was completed in September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will support viability assessments being sent to an independent valuer and abides by those decisions. Therefore the Council believes that the amount of affordable housing set out in the policy as 30% is justified as a starting point for negotiations. This is a matter which will be part of the 5 year review of the Local Plan. The consultee discusses other requirements for contributions and their effect on the ability of sites to provide affordable housing and the Council does realise that this can have an impact on delivery and the policy wording does not particularly reflect this. The Council is therefore proposing a minor modification to the wording of paragraph 5 to include an additional sentence at the end which reads "The Council acknowledges that there are a variety of factors involved in bringing sites including the provision of infrastructure and site remediation, these can all have an impact on the amount of affordable housing being brought forward."</p> <p>5. The Council is unsure how maximising the delivery of rented properties would lead to a reduced need for affordable housing. The SHMA 2016 showed a need for 2825 additional affordable homes over the 15 year plan period. This matter will be reviewed along with the other housing policies in the 5 year review of the Local Plan along with an updated SHMA.</p> <p>6. This is a repeat of the comments made at paragraph 3.</p>
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			<p>contributions for offsite provision of affordable housing will be calculated based on the land value, and not the market value of a finished property. The third bullet point in section 4 of SP7 should be re-written to clarify this fact.</p>		
<p>Lark fleet Homes represent ed by Robert Doughty Consultants Ltd</p>	<p>SP7</p>	<p>2, 25</p>	<p>0</p>		
			<p>1. We do not object to the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>2. We are concerned, however at the assumed delivery rates for affordable housing in the table in paragraph 2 at the top of page 35, as this figure of 349 is 30% of the assumed delivery rates for affordable housing shown on Table A – Page 25? As windfall developments many of the sites can be assumed to be less than 15 dwellings, and will not, therefore, provide any affordable housing contribution at all.</p> <p>3. From the supporting text for Policy SP7, it is clear that the cash contributions for offsite provision of affordable housing will be calculated based on the land value, and not the market value of a finished property. The third bullet point in section 4 of SP7 should be re-written to clarify this fact.</p> <p>4. The requirement of 30% of affordable housing provision on all market housing sites would not appear to be justified by the EVA. Tables G and R of the EVA demonstrate that developments of over 25 dwellings would only just be viable with developments over 150 dwellings in towns being marginal. This has been calculated based on the assumed 5106 contributions set out in Table 13 of the EVA (Page 37) An examination of the list of example applications and their 5106 contributions,</p>		
				<p>1 The 0/o requirement for affordable housing should be reduced, to maintain the viability of development in East Lindsey and the higher requirement for 1 and 2 bed rented properties.</p> <p>2 The third bullet point in section 4 of SP7 should be re-written to clarify the fact that the cash contribution for off-site provision of affordable homes will be calculated on the equivalent land value, and not the market value of a finished property.</p> <p>3 Table A on page 35 should be amended to reflect a more realistic level of</p>	
				<p>1. The Council notes the support for the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>2. The Council believes that the figure in Table A concerning the amount of affordable housing to come forward from windfall developments over the Plan period is a very conservative estimate. To evidence this statement, in the period from the start of the Plan period February 2016 to 31st January 2017 the Council approved windfall housing permissions with approval to deliver 317 affordable houses. This nearly makes up the whole amount of estimated delivery and the Council can therefore be confident that the 349 affordable houses plus more will be approved and come forward.</p> <p>3. Paragraph 10 in the explanatory text and point 5 in the policy makes it clear that the cash contributions are market values and explains how the market values are calculated. They do not mention land values as set out by the consultee. The Council believes using market values as set out in the policy is a clear and fair way to work out the financial contribution and that the policy should not be changed.</p> <p>4. Tables G and R show that only much larger sites could have a question mark over viability. The Local Plan only has one site in it that is over the threshold in table G and very few sites over the threshold in Table R. To lower the whole area based on what could be a few sites would lower the main starting point of the Council to provide sufficient affordable housing. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that “the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable” this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council’s Economic Viability Assessment was completed in September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward</p>	

				<p>however, indicates that more recent applications are expected to make higher contributions towards education and healthcare provision. Application 5/086/01100/15 – Winney Gardens, Horncastle, for instance, contributed £5,123 per dwellings, as opposed to the £2,250 assumed in Table 13. The extra £2,900 per dwelling would tip marginal and viable sites well into the unviable area. The only sites that would appear to be able to support the affordable housing provision are those below 15 dwellings, which will not be required to provide affordable housing.</p> <p>5. We note that the need for affordable housing is primarily for smaller rented properties, as opposed to shared ownership. The policy could be amended to maximise the delivery of rented properties, which would also lead to a reduced target.</p>	<p>Contribution of affordable housing to come forward on windfall sites, many of which will fall below the trigger for the provision of affordable housing.</p>	<p>successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will support viability assessments being sent to an independent valuer and abides by those decisions. Therefore the Council believes that the amount of affordable housing set out in the policy as 30% is justified as a starting point for negotiations. This is a matter which will be part of the 5 year review of the Local Plan. The consultee discusses other requirements for contributions and their effect on the ability of sites to provide affordable housing and the Council does realise that this can have an impact on delivery and the policy wording does not particularly reflect this. The Council is therefore proposing a minor modification to the wording of paragraph 5 to include an additional sentence at the end which reads "The Council acknowledges that there are a variety of factors involved in bringing sites including the provision of infrastructure and site remediation, these can all have an impact on the amount of affordable housing being brought forward."</p> <p>5. The Council is unsure how maximising the delivery of rented properties would lead to a reduced need for affordable housing. The SHMA 2016 showed a need for 2825 additional affordable homes over the 15 year plan period. This matter will be reviewed along with the other housing policies in the 5 year review of the Local Plan along with an updated SHMA.</p>	
<p>Jack Mowbray Estate represented by Robert Doughty Consultants Ltd</p>	<p>SP7</p>	<p>O</p>	<p>We do not object to the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>We are concerned, however, at the assumed delivery rates for affordable housing in the table in paragraph 2 at the top of page 35. The assumed contribution of affordable housing from windfall schemes is listed as 349. This figure, however, is 30% of the assumed delivery rates for windfall housing shown on Table A – Page 25. Windfall developments will be assumed to be less than 15 dwellings, and will not, therefore, provide any affordable housing contribution at all. As a result the table t page 35 makes over ambitious claims for</p>	<p>Text to be included to clarify the relationship between neighbourhood plans and local plans, especially in relation other designations, such as landscape, heritage and biodiversity and strategic allocations.</p>	<p>1. The Council notes the support for the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>2. The Council believes that the figure in Table A concerning the amount of affordable housing to come forward from windfall developments over the Plan period is a very conservative estimate. To evidence this statement, in the period from the start of the Plan period February 2016 to 31st January 2017 the Council approved windfall housing permissions with approval to deliver 317 affordable houses. This nearly makes up the whole amount of estimated delivery and the Council can therefore be confident that the 349 affordable houses plus more will be approved and come forward.</p> <p>3. Paragraph 10 in the explanatory text and point 5 in the policy makes it clear that the cash contributions are market values and explains how the market values are calculated. They do not mention land values as set out by the consultee. The Council believes using market values as set out in the</p>		

		<p>affordable housing delivery over the plan period.</p> <p>From the supporting text for Policy SP7 it is clear that the cash contributions for offsite provision of affordable housing will be calculated based on the land value and not the market value of a finished property. The third bullet point in section 4 of SP7 should be re-written to clarify this fact.</p> <p>The requirement of 30% affordable housing provision on all market housing sites would not appear to be justified by the EVA. Tables G and R off the EVA demonstrate that developments of over 25 dwellings would only just be viable, with developments over 150 dwellings in towns being marginal. This has been calculated based on the assumed 5106 contributions set out in Table 13 of the EVA (Page 37). An examination of the list of example applications and their 5106 contributions however, indicates that more recent applications are expected to make higher contributions towards education and healthcare provision. Application 5/086/01100/15 – Wincey Gardens, Horncastle, for instance, contributed of £5,123 per dwellings, as opposed to the £2,250 assumed in Table 13. The extra £2,900 per dwelling would tip marginal and viable sites well into the unviable area. The only sites that would appear to be able to support the affordable housing provision are those below 15 dwellings, which will not be required to provide affordable housing.</p> <p>We note that the need for affordable housing is primarily for smaller rented properties, as</p>		<p>policy is a clear and fair way to work out the financial contribution and that the policy should not be changed.</p> <p>4. Tables G and R show that only much larger sites could have a question mark over viability. The Local Plan only has one site in it that is over the threshold in table G and very few sites over the threshold in Table R. To lower the whole area based on what could be a few sites would lower the main starting point of the Council to provide sufficient affordable housing. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council's Economic Viability Assessment was completed in September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will support viability assessments being sent to an independent valuer and abides by those decisions. Therefore the Council believes that the amount of affordable housing set out in the policy as 30% is justified as a starting point for negotiations. This is a matter which will be part of the 5 year review of the Local Plan. The consultee discusses other requirements for contributions and their effect on the ability of sites to provide affordable housing and the Council does realise that this can have an impact on delivery and the policy wording does not particularly reflect this. The Council is therefore proposing a minor modification to the wording of paragraph 5 to include an additional sentence at the end which reads "The Council acknowledges that there are a variety of factors involved in bringing sites including the provision of infrastructure and site remediation, these can all have an impact on the amount of affordable housing being brought forward."</p> <p>5. The Council is unsure how maximising the delivery of rented properties would lead to a reduced need for affordable housing. The SHMA 2016 showed a need for 2825 additional affordable homes over the 15 year plan period. This matter will be reviewed along with the other housing policies in the 5 year review of the Local Plan along with an updated SHMA.</p>
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Chestnut Homes	SP7	O		<p>opposed to shared ownership. The policy could be amended to maximise the delivery of rented properties, which would also lead to a reduced target.</p> <p>The Local Authority proposes a policy seeking 30% affordable housing implemented across the district with the exception of Woodhall Spa which would attract a 40% contribution.</p> <p>Viability is crucial to the delivery of new housing and the overall housing strategy and its inclusion within the proposed affordable housing policy is welcomed and should remain a key ongoing factor to this policy. The policy specifies that "a viability assessment of development costs from an accredited body" is required. We would question the need for the policy to state the Council will commission an assessment. In our opinion it is for the developer to undertake the assessment which is verified by the Local Planning Authority. The wording should be altered to reflect this.</p> <p>We however question the validity of the Economic Viability Assessment which does not fully consider landowner expectations and increasing build costs. The assumptions used within the assessment can be debated, however in general the assessment shows a snap shot in time which over the plan period will change, making viability essential.</p> <p>The use of such a high contribution in comparison to neighbouring districts does not provide momentum for inward investment or housing growth and instead creates an obstacle for those looking to develop in the area, knowing a viability assessment submission is likely to be submitted</p>		<p>The figures used in the EVA are considered to be a reasonable reflection of the house prices at that time in the District. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council's Economic Viability Assessment was completed in September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will support viability assessments being sent to an independent valuer and abides by those decisions. Therefore the Council believes that the amount of affordable housing set out in the policy as 30% and 40% in Woodhall Spa as a higher value area is justified as a starting point for negotiations. The EVA is considered to be up to date, it is not possible for the Council to keep doing every year a new EVA in case matters have changed, and this is not considered to be proportional evidence. The Council believes that the % of affordable housing as a starting point in negotiations is sound. This is a matter which will be part of the 5 year review of the Local Plan and the affordable housing provision will be adjusted according to an EVA done at that time. The consultee discusses other requirements for contributions and their effect on the ability of sites to provide affordable housing and the Council does realise that this can have an impact on delivery and the policy wording does not particularly reflect this. The Council is therefore proposing a minor modification to the wording of paragraph 5 to include an additional sentence at the end which reads "The Council acknowledges that there are a variety of factors involved in bringing sites including the provision of infrastructure and site remediation, these can all have an impact on the amount of affordable housing being brought forward."</p> <p>The Council agrees with the consultee that the text at paragraph 5 of the policy and the policy itself at point 2 do not agree with each other. The Council is proposing a minor</p>
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<p>SP7</p>	<p>p37</p>	<p>O</p>	<p>Whilst it is appreciated there may be a shortage of affordable housing, the creation of an affordable housing Policy through Policy SP8 will undoubtedly assist in the release of sites which will help make up for this provision. That needs to stand aside of the levels of affordable housing provided for in Policy SP7. There needs to be a more direct linkage between points 1 and 2 and the figure of 30% should be reduced. As an example of what has been examined recently and which is likely to become adopted are matters relating to the Central Lincolnshire Joint Planning Unit where in areas of higher value, outside the Lincoln Policy Area, generally a 20% rate will apply. This is more deliverable and certainly when bill costs are the same, if not more, in some of the more rural locations to be found in the East Lindsey District and with values being lower, undoubtedly there will be significant viability pressures which may not see release of housing land for economic and sustainable reasons. We believe 20% should be the target. Also the Policy does not cater for the provision of starter homes which will in the future be an important category within the delivery of affordable and low cost housing. It will also assist with the viability issue where commonly it is expected that there will be a discount of around 20% as opposed to intermediate private rented housing where there can be discounts of 50% or more on the Market Value. This makes it extremely difficult, particularly in East Lindsey, to build affordable housing and to help deliver the affordable housing land supply.</p>	<p>Reduce affordable housing TARGET to 20% and to encourage more delivery from exception sites in areas of proven affordable need.</p>	<p>modification to bring these two pieces of the policy together in that the wording of the main policy text at point 2 should be amended to delete the words "the Council" and replace with the word "they".</p> <p>The Council cannot support just plagiarising another Councils policies without any evidence to support the matter. Central Lincolnshire have their own Economic Viability Assessment and therefore that is their evidence which they apply in their area. East Lindsey has its own Economic Viability Assessment which is used as its evidence base.</p> <p>The figures used in the EVA are considered to be a reasonable reflection of the house prices at that time in the District. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council's Economic Viability Assessment was completed in September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will support viability assessments being sent to an independent valuer and abides by those decisions. Therefore the Council believes that the amount of affordable housing set out in the policy as 30% and 40% in Woodhall Spa as a higher value area is justified as a starting point for negotiations. The EVA is considered to be up to date, it is not possible for the Council to keep doing every year a new EVA in case matters have changed, and this is not considered to be proportional evidence. The Council believes that the % of affordable housing as a starting point in negotiations is sound. This is a matter which will be part of the 5 year review of the Local Plan and the affordable housing provision will be adjusted according to an EVA done at that time.</p> <p>The Governments Starter Home policy has not been brought forward and therefore at this time cannot be considered further.</p>
<p>St Andrews</p>	<p>SP7</p>	<p>S</p>	<p>It is considered that Policy SP7 is consistent with the NPPF.</p>	<p>The Council notes the support for the policy from the consultee</p>	

Healthcare	SP7			<p>Affordable housing has a significant impact on the viability of plan-making and a site. The Council will need to carefully consider viability and costs in plan-making, as set out in paragraph 173 of the NPPF, and ensure that the recommended provision of affordable housing in Alford (i.e. 30%/o contribution) will not detrimentally impact upon the deliverability of associated infrastructure contributions or requirements, but instead, enhance the deliverability of the Core Strategy over the plan period.</p> <p>Notwithstanding, the policy requirement to seek a 30%/o developer contribution towards the provision of affordable housing, our client welcomes the inclusion of explanatory text at paragraphs 6 and 10 underlining that the Council will adopt</p> <p>A flexible approach towards issues of viability and the timing of affordable housing delivery.</p>		
Gin Property Ltd represented by Robert Doughty Consultant Ltd	SP7	0		<p>We do not object to the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>We are concerned, however at the assumed delivery rates for affordable housing in the table in paragraph 2 at the top of page 35, as this figure of 349 is 30%/o of the assumed delivery rates for affordable housing shown on Table A – Page 25. As windfall developments many of the sites can be assumed to be less than 15 dwellings, and will not, therefore, provide any affordable housing contribution at all.</p> <p>From the supporting text for Policy SP7 it is clear that the cash contributions for offsite provision of</p>		<p>1. The Council notes the support for the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>2. The Council believes that the figure in Table A concerning the amount of affordable housing to come forward from windfall developments over the Plan period is a very conservative estimate. To evidence this statement, in the period from the start of the Plan period February 2016 to 31st January 2017 the Council approved windfall housing permissions with approval to deliver 317 affordable houses. This nearly makes up the whole amount of estimated delivery and the Council can therefore be confident that the 349 affordable houses plus more will be approved and come forward.</p> <p>3. Paragraph 10 in the explanatory text and point 5 in the policy makes it clear that the cash contributions are market values and explains how the market values are calculated. They do not mention land values as set out by the consultee. The Council believes using market values as set out in the</p>

		<p>affordable housing will be calculated based on the land value, and not the market value of a finished property. The third bullet point in section 4 of Sp7 should be re-written to clarify this fact.</p> <p>The requirement of 30% would not appear to be justified by the EVA. Tables G and R off the EVA demonstrate that developments of over 25 dwellings would only just be viable, with developments over 150 dwellings in towns being marginal. This has been calculated based on the assumed 5106 contributions set out in Table 13 of the EVA (Page 37) An examination of the list of example applications and their 5106 contributions however, indicates that more recent applications are expected to make higher contributions towards education and healthcare provision. Application S/086/01100/15 – Wincey Gardens, Horncastle, for instance, contributed of £5,123 per dwellings, as opposed to the £2,250 assumed in Table 13. The extra £2,900 per dwelling would tip marginal and viable sites well into the unviable area. The only sites that would appear to be able to support the affordable housing provision are those below 15 dwellings, which will not be required to provide affordable housing.</p> <p>With regard to SPY 310 the EVA demonstrates that sites of this size cannot meet the 30% housing requirement. Although only a portion of the site will come forward in the plan period the draft local plan rightly acknowledges the longer-term potential of this site beyond the plan period. As such the opening up works of the site, in relation to road works,</p>	<p>policy is a clear and fair way to work out the financial contribution and that the policy should not be changed.</p> <p>4. Tables G and R show that only much larger sites could have a question mark over viability. The Local Plan only has one site in it that is over the threshold in table G and very few sites over the threshold in Table R. To lower the whole area based on what could be a few sites would lower the main starting point of the Council to provide sufficient affordable housing. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council's Economic Viability Assessment was completed in September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will support viability assessments being sent to an independent valuer and abides by those decisions. Therefore the Council believes that the amount of affordable housing set out in the policy as 30% is justified as a starting point for negotiations. This is a matter which will be part of the 5 year review of the Local Plan. The consultee discusses other requirements for contributions and their effect on the ability of sites to provide affordable housing and the Council does realise that this can have an impact on delivery and the policy wording does not particularly reflect this. The Council is therefore proposing a minor modification to the wording of paragraph 5 to include an additional sentence at the end which reads "The Council acknowledges that there are a variety of factors involved in bringing sites including the provision of infrastructure and site remediation, these can all have an impact on the amount of affordable housing being brought forward."</p> <p>5. With regard to the comments made about site SPY310, the Council understands that this is a large site which will have many infrastructure needs, including the provision of a new doctor's surgery. But the 30% affordable housing provision is a starting point only and as set out in paragraph 5 (repeated above) the Council will be working with the developer to ensure that any infrastructure provision on this site will not make it unviable. This work has already commenced with pre application discussions, the amount of affordable housing shown in the table on page 35 of the Local</p>
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<p>Plan is a conservative estimate and the Council realises that with regard to this site it may alter as discussions progress with the developer. In order to make this clearer a minor modification is proposed by the insertion of the word "estimate" and the deletion of "coming forward" in that part of the table which refers to SPY310.</p> <p>6. The Council is unsure how maximising the delivery of rented properties would lead to a reduced need for affordable housing. The SHMA 2016 showed a need for 2825 additional affordable homes over the 15 year plan period. This matter will be reviewed along with the other housing policies in the 5 year review of the Local Plan along with an updated SHMA.</p>		<p>The Council cannot support just copying another Councils policies without any evidence to support the matter. Central Lincolnshire have their own Economic Viability Assessment and therefore that is their evidence which they apply in their area. East Lindsey has its own Economic Viability Assessment which is used as its evidence base.</p> <p>The figures used in the EVA are considered to be a reasonable reflection of the house prices at that time in the District. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council's Economic Viability Assessment was completed in September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will support viability assessments being sent to an independent valuer and abides by those decisions. Therefore the Council believes that the amount of affordable housing set out in the policy as 30% and 40% in Woodhall Spa as a higher value area is justified as a starting point for negotiations. The EVA is considered to be up to date, it is not possible for the Council to keep doing every year a new EVA in case matters have changed, and this is not considered to be proportional evidence. The Council believes that the % of affordable</p>	<p>drainage strategy, landscaping, open space, etc. will be disproportionately expensive. It is not reasonable to assume that the site in Spilsby will be able to deliver 30% affordable housing across its lifetime and especially not in its early stages.</p> <p>We note that the need for affordable housing is primarily for smaller rented properties, as opposed to shared ownership. The policy could be amended to maximise the delivery of rented properties, which would also lead to a reduced target.</p>	<p>Whilst it is appreciated there may be a shortage of affordable housing, the creation of an affordable housing Policy through Policy SP8 will undoubtedly assist in the release of sites which will help make up for this provision. That needs to stand aside of the levels of affordable housing provided for in Policy SP7. There needs to be a more direct linkage between points 1 and 2 and the figure of 30% should be reduced. As an example of what has been examined recently and which is likely to become adopted are matters relating to the Central Lincolnshire Joint Planning Unit where in areas of higher value, outside the Lincoln Policy Area, generally a 20% rate will apply. This is more deliverable and certainly when values are lower and the build costs are the same, if not more in some of the more rural locations to be found in the East Lindsey District, undoubtedly there will be significant viability pressures which may not see release of housing land for sound economic reasons. We believe 20% should be the target. Also the Policy does not cater for the provision of starter homes which will in the future be an important category within the delivery of</p>	<p>Reduce affordable housing TARGET to 20% and to encourage more delivery from exception sites in areas of proven affordable need.</p>	<p>o</p>	<p>Linton AE (Holdings) Ltd represented by Brown and Co - Property and Business Consultants LLP</p>	<p>SP7</p>
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<p>represent ed by Robert Doughty Consultan ts Ltd</p>	<p>SP7</p>	<p>O</p>	<p>affordable and low cost housing. It will also assist with the viability issue where commonly it is expected that there will be a discount of around 20% as opposed to intermediate private rented housing where there can be discounts of 50% or more on the Market Value. This makes it extremely difficult, particularly in East Lindsey, to build affordable housing and to help deliver the affordable housing land supply.</p>	<p>We do not object to the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>We are concerned, however, at the assumed delivery rates for affordable housing in the table in paragraph 2 at the top of page 35. The assumed contribution of affordable housing from windfall schemes is listed at 349. This figure, however, is 30% of the assumed total delivery rates for windfall sites shown on Table A – Page 25. As windfall developments, many of the sites can be assumed to be less than 15 dwellings and will not, therefore, provide any affordable housing contribution at all. As a result, the table of page makes over ambitious claims for affordable housing delivery over the plan period.</p> <p>From the supporting text for Policy SP7 it is clear that the cash contributions for offsite provision of affordable housing will be calculated based on the land value and not the market value of a finished property. The third bullet point in section 4 of SP7 should be re-written to clarify this fact.</p> <p>The requirement of 30%/o affordable housing sites provision on all market housing sites would not appear to be justified by the EVA.</p>	<p>1 The 0/o requirement for affordable housing should be reduced, to maintain the viability of development in East Lindsey and the higher requirement for 1 and 2 bed rented properties.</p> <p>2 The third bullet point in section 4 of SP7 should be re-written to clarify the fact that the cash contribution for off-site provision of affordable homes will be calculated on the equivalent land value, and not the market value of a finished property.</p> <p>3 Table A on page 35 should</p>	<p>affordable and low cost housing. It will also assist with the viability issue where commonly it is expected that there will be a discount of around 20% as opposed to intermediate private rented housing where there can be discounts of 50% or more on the Market Value. 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The Local Plan only has one site in it that is over the threshold in table G and very few sites over the threshold in Table R. To lower the whole area based on what could be a few sites would lower the main starting point of the Council to provide sufficient affordable housing. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council' s Economic Viability</p>	<p>1. The Council notes the support for the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>2. The Council believes that the figure in Table A concerning the amount of affordable housing to come forward from windfall developments over the Plan period is a very conservative estimate. To evidence this statement, in the period from the start of the Plan period February 2016 to 31st January 2017 the Council approved windfall housing permissions with approval to deliver 317 affordable houses. This nearly makes up the whole amount of estimated delivery and the Council can therefore be confident that the 349 affordable houses plus more will be approved and come forward.</p> <p>3. Paragraph 10 in the explanatory text and point 5 in the policy makes it clear that the cash contributions are market values and explains how the market values are calculated. They do not mention land values as set out by the consultees. The Council believes using market values as set out in the policy is a clear and fair way to work out the financial contribution and that the policy should not be changed.</p> <p>4. Tables G and R show that only much larger sites could have a question mark over viability. The Local Plan only has one site in it that is over the threshold in table G and very few sites over the threshold in Table R. To lower the whole area based on what could be a few sites would lower the main starting point of the Council to provide sufficient affordable housing. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council' s Economic Viability</p>	<p>1. The Council notes the support for the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>2. The Council believes that the figure in Table A concerning the amount of affordable housing to come forward from windfall developments over the Plan period is a very conservative estimate. To evidence this statement, in the period from the start of the Plan period February 2016 to 31st January 2017 the Council approved windfall housing permissions with approval to deliver 317 affordable houses. This nearly makes up the whole amount of estimated delivery and the Council can therefore be confident that the 349 affordable houses plus more will be approved and come forward.</p> <p>3. Paragraph 10 in the explanatory text and point 5 in the policy makes it clear that the cash contributions are market values and explains how the market values are calculated. They do not mention land values as set out by the consultees. The Council believes using market values as set out in the policy is a clear and fair way to work out the financial contribution and that the policy should not be changed.</p> <p>4. Tables G and R show that only much larger sites could have a question mark over viability. The Local Plan only has one site in it that is over the threshold in table G and very few sites over the threshold in Table R. To lower the whole area based on what could be a few sites would lower the main starting point of the Council to provide sufficient affordable housing. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council' s Economic Viability</p>	<p>1. The Council notes the support for the use of 15 dwellings as the trigger for the provision of affordable housing.</p> <p>2. The Council believes that the figure in Table A concerning the amount of affordable housing to come forward from windfall developments over the Plan period is a very conservative estimate. To evidence this statement, in the period from the start of the Plan period February 2016 to 31st January 2017 the Council approved windfall housing permissions with approval to deliver 317 affordable houses. This nearly makes up the whole amount of estimated delivery and the Council can therefore be confident that the 349 affordable houses plus more will be approved and come forward.</p> <p>3. Paragraph 10 in the explanatory text and point 5 in the policy makes it clear that the cash contributions are market values and explains how the market values are calculated. They do not mention land values as set out by the consultees. The Council believes using market values as set out in the policy is a clear and fair way to work out the financial contribution and that the policy should not be changed.</p> <p>4. Tables G and R show that only much larger sites could have a question mark over viability. The Local Plan only has one site in it that is over the threshold in table G and very few sites over the threshold in Table R. To lower the whole area based on what could be a few sites would lower the main starting point of the Council to provide sufficient affordable housing. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. The Council' s Economic Viability</p>
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<p>Tables G and R of the EVA demonstrate that developments of over 25 dwellings would only just be viable, with developments over 150 dwellings in towns being marginal. This has been calculated based on the assumed 5106 contributions set out in Table 13 of the EVA (Page 37). An examination of the list of example applications and their 5106 contributions, however, indicates that more recent applications are expected to make higher contributions towards education and healthcare provision. Application 5/086/01100/15 – Wincey Gardens, Horncastle, for instance, contributed £5,123 per dwellings, as opposed to the £2,250 assumed in Table 13. The extra £2,900 per dwelling would tip marginal and viable sites well into the unviable area. The only sites that would appear to be able to support the affordable housing provision are those below 15 dwellings, which will not be required to provide affordable housing.</p> <p>We note that the need for affordable housing is primarily for smaller rented properties, as opposed to shared ownership. The policy could be amended to maximise the delivery of rented properties, which would also lead to a reduced target.</p>	<p>be amended to reflect a more realistic level of Contribution of affordable housing to come forward on windfall sites, many of which will fall below the trigger for the provision of affordable housing.</p>	<p>Assessment was completed in September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will support viability assessments being sent to an independent valuer and abides by those decisions. Therefore the Council believes that the amount of affordable housing set out in the policy as 30% is justified as a starting point for negotiations. This is a matter which will be part of the 5 year review of the Local Plan. The consultee discusses other requirements for contributions and their effect on the ability of sites to provide affordable housing and the Council does realise that this can have an impact on delivery and the policy wording does not particularly reflect this. The Council is therefore proposing a minor modification to the wording of paragraph 5 to include an additional sentence at the end which reads "The Council acknowledges that there are a variety of factors involved in bringing sites including the provision of infrastructure and site remediation, these can all have an impact on the amount of affordable housing being brought forward."</p> <p>5. The Council is unsure how maximising the delivery of rented properties would lead to a reduced need for affordable housing. The SHMA 2016 showed a need for 2825 additional affordable homes over the 15 year plan period. This matter will be reviewed along with the other housing policies in the 5 year review of the Local Plan along with an updated SHMA.</p>	<p>The figures used in the EVA are considered to be a reasonable reflection of the house prices at that time in the District. The contribution for affordable housing at 30% is only a starting point and the policy makes this clear in paragraph 5 that "the Council will positively engage with those wishing to bring forward development to ensure that contributions meet housing needs without making development unviable" this final wording is strengthened from previous versions of the policy at the behest of consultees to reflect a strong desire from the Council to be flexible around this issue. There is no blanket 40%, this only applies in Woodhall Spa which is a very high value area. The Council's Economic Viability Assessment was completed in</p>
<p>Affordable Housing Policy SP7 applies a 3-tiered approach to affordable housing provision which is dependent on the perceived desirability/sales values of different geographical areas. This is divided into;</p> <ul style="list-style-type: none"> • Low value and coastal zone • Medium and high value areas • The highest value area Woodhall Spa (only) 	<p>Policy SP7 (Affordable Housing) should be amended as set out above, to recognise from the outset of negotiations, that a variety of factors will bear on the eventual level of</p>	<p>Policy SP7 (Affordable Housing) should be amended as set out above, to recognise from the outset of negotiations, that a variety of factors will bear on the eventual level of</p>	<p>0</p>
<p>Broadgate Homes</p>	<p>SP7</p>	<p>0</p>	<p></p>

<p>affordable housing provided in association with development. Innovative ways of funding will assist delivery.</p>	<p>September 2015 and since then the % values in the EVA have been applied as the starting point to planning applications coming forward successfully. Each site is judged on its own merits and the Council can and does adjust the affordable housing contribution down if other infrastructure needs are deemed necessary. The policy also makes clear that the Council will support viability assessments being sent to an independent valuer and abides by those decisions. Therefore the Council believes that the amount of affordable housing set out in the policy as 30% and 40% in Woodhall Spa as a higher value area is justified as a starting point for negotiations. The EVA is considered to be up to date, it is not possible for the Council to keep doing every year a new EVA in case matters have changed, and this is not considered to be proportional evidence. The Council believes that the % of affordable housing as a starting point in negotiations is sound. This is a matter which will be part of the 5 year review of the Local Plan and the affordable housing provision will be adjusted according to an EVA done at that time.</p> <p>The policy does cover what the consultee is discussing in their response. Negotiations on affordable housing are not holding up applications to any great extent and the Council has a quick system for viability assessments with independent checking by the Valuation Office when the matter is questioned. The consultee discusses other requirements for contributions and their effect on the ability of sites to provide affordable housing and the Council does realise that this can have an impact on delivery and the policy wording does not particularly reflect this. The Council is therefore proposing a minor modification to the wording of paragraph 5 to include an additional sentence at the end which reads "The Council acknowledges that there are a variety of factors involved in bringing sites including the provision of infrastructure and site remediation, these can all have an impact on the amount of affordable housing being brought forward." The Council would also state that nearly all the housing allocations are greenfield sites and therefore there should be limited remediation on them when bringing them forward.</p>
<ul style="list-style-type: none"> • 0% AH contribution • 30% • 40% <p>Housing delivery in the district in the past has been affected by viability and question marks about demand. The plan in this context must focus on boosting market housing and be realistic about what housebuilders can deliver. Although criterion 2 of Policy SP7 recognises that where contributions compromise the viability (subject to evidence) the affordable housing percentage can be reduced in reality this is a lengthy process and will delay and add unnecessary costs to housing delivery.</p> <p>Viability issues affecting sites are variable and not dependant simply on the sales value pf property but also the site-specific costs of service infrastructure connections and abnormal construction costs that may be applicable. In every area, there are pockets of land that achieve improved sales values. The higher assumed average sales price of a property (per sq. m) in Woodhall Spa compared with other settlements would not justify a 10% increase in on site affordable provision (which equates in the case of Site WSP 314 to an extra 30 affordable dwellings).</p> <p>The Councils own evidence base shows that the affordability gap (between the price of housing in the district relative to average income) is reducing;</p> <ul style="list-style-type: none"> • Ratio of x 7.4 in 2005 • Ratio of x 6.21 in 2013 • Ratio of x 4.74 in 2015 	<p>affordable housing provided in association with development. Innovative ways of funding will assist delivery.</p>

		<p>On sites of 15 or more dwellings, the Plan proposes a contribution to affordable housing of 30% and 40% in high value areas. Broadgate note the conclusions of the Review and Update of the East Lindsey Viability Assessment (September 2015). However, what can be provided by developers in terms of contributions depends on a wide variety of factors that vary over time, not least negotiations with landowners, who may or may not make land available for development unless they receive what is a reasonable and acceptable payment for the land in question. More than one landowner is often involved who may have different aspirations and a different set of considerations in determining what is best for their own financial arrangements.</p> <p>Furthermore, in many instances, payment for land may be in stages as the development progresses, particularly on large schemes, with the provision for potential uplift in land value if this happens to be the case. Notwithstanding the conclusions of the Viability Assessment, these factors make it difficult at the outset to determine the viability of a scheme and any negotiations over planning obligations and particularly the level of affordable housing provision, need to recognise these factors.</p> <p>To achieve an adequate supply of affordable housing and to maintain a steady flow from completions, the council need to be more pragmatic in terms of what development can deliver. With formal consultees looking for more contributions from development, the blanket imposition of a percentage up to 40% affordable housing under Policy SP7 is not considered to be helpful to accelerating the provision of the site.</p>	
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POLICY SP8 – RURAL EXCEPTIONS

Name of Responder	Policy No	Page No, Para No	Settlement Proposals Map or Site No	Settlement Proposals page No	Q3 Response	Q4 Change Sort	Councils Response
█	SP8	0			<p>Single Plot Exception Object.</p> <p>Land Orb ORB301 considered suitable April 2013. (Owned by family). Families/individuals not having to prove local connections and any resale limited to 80% of current market value. Sites now selected where fewest car movements essential. This is outrageous a particular area saturated with businesses, caravan/chalet parks, fishing lakes, Racing Stadium, imminent construction of wind farm sub-station with immense associated traffic, also route for coastal areas. Therefore this particular site should receive some consideration as continual planning permissions granted for developer/Commercial gain. Time for some consistency and common sense applied.</p>	<p>Comments under Q3 apply.</p>	<p>Orby is a small village in the Local Plan Settlement Pattern. It has very few services or facilities to service its residents for their day to day needs and therefore there is a high use of the car for day to day living. Having taxi services, call connect and school transport does not score any points in the Settlement Pattern as this still does not provide services for day to day living. Orby does not have a food shop, doctors, shopper's bus service nor a commuter bus service. Therefore this is not a settlement which the Council considers suitable for the allocation of its strategic housing need and the allocation of ORB301 is not considered suitable.</p>
Chestnut Homes	SP8	0			<p>A rural exceptions policy is supported to help achieve affordable housing in rural communities, however we feel that this may not be possible in many circumstances without the requirement of cross subsidy. This is particularly the case with the current lack of public subsidy grant funding for affordable rented housing.</p> <p>Paragraph 54 of the NPPF states that 'Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional</p>		<p>The Council would not support cross subsidy on rural exception sites because housing on these types of sites are meant to be an exception not the norm and are to provide for local housing need in rural locations where open market housing may not necessarily be supported. The Local Plan is not going to allocate open market housing in medium and small villages and it is these settlements that therefore would be looking for rural exception affordable housing. These settlements have very few services and facilities to meet the needs of residents and it would be out of conformity with national planning policy to look to build open market housing that does not look to meet local needs but is then available to all. Given the population demographics of the District, there is a high likelihood that any open market housing built on rural exception sites to cross subsidise affordable housing would be bought by those coming into the District as in</p>

		<p>affordable housing to meet local needs."</p> <p>We have developed rural exceptions sites elsewhere in Lincolnshire and conclude that without an element of cross subsidy market housing the scheme would be unworkable. The restriction to permitting this in the policy will hamper the delivery of affordable housing in rural locations where an identified need has been established. In circumstances where cross subsidy is requested, a full viability assessment should accompany the planning application submission.</p> <p>We also believe that this policy should not be restricted to rural areas. A flexible exceptions policy can help deliver a significant amount of affordable housing and is a key policy tool to access the high need identified in the district.</p> <p>We believe that the policy should be applicable to all main settlements, as well as this could provide an additional source of affordable housing in these locations.</p> <p>This is particularly relevant to the coastal areas where the constrained housing policy has been relaxed for affordable exceptions sites such as New Lynx on-going development at Saxon Fields, off The Meadows, Skegness.</p>	
<p>migrants and they would be older persons. This would mean that this age group would be located in settlements that could not provide the necessary services and facilities to meet their day to day needs.</p>			

POLICY SP9 – SINGLE PLOT EXCEPTIONS

Name of Responder	Policy No	Page No, Para No	Settlement Proposals Map or Site No	Settlement Proposals page No	Page No, Para No	Q3 Response	Q4 Change Sort	Councils Response
<p>represent ed by Robert Doughty Consultants Ltd</p>	SP9					<p>We object to SP9. This is the only policy in the plan to support Custom and Self-Build housing, despite this tenure being a major thrust of government policy. Government Policy seeks to support provision of self and custom build properties for all, without any restriction. This policy fails to meet that requirement because it treats Custom Build Housing as a means to deliver "affordable housing" with all the associated restrictions on tenure and re-sale price, which is contrary to government policy.</p> <p>If, as it seems, the intention of this policy is to deliver exception sites and not self-build and custom built housing, the provisions should be subsumed within either Policy SP8 or SP7. The Plan should be amended to support more general delivery of custom and self-build homes.</p>	<p>1 The policy should not include any restriction on re-sale value of custom build houses, unless it is specifically an affordable housing policy, in which case the provisions of Policy SP9 should be subsumed with either Policy SP8 or SP7.</p> <p>2 Further policy support to the provision of Custom and Self-Build Homes without any restriction on sale values or tenure should be provided within the plan.</p>	<p>Policy SP9 is not a self-build policy in the terms of the Governments self-build register, it is an affordable housing policy to help those that would not normally be able to access the open market. There is no need for a separate self-build housing policy in East Lindsey. The District is a large district authority with many single plot sites coming forward every year which anyone can buy and then build their own home. As at the end of January 2017 there were approximately 100 single plots with planning permission across the District which have not yet been started on site. There is nothing preventing this happening in the sustainable settlements which includes all the inland towns and large villages and it is happening already. Policy SP9 is designed for a different set of circumstances and is meant to help residents stay in their own settlements where they cannot access the open market in the normal way. Initially it was aimed at young people in the smaller rural settlements, whose parents may have had some land and where property prices precluded the purchase of a property. The reality is it actually has been used and is being enquired about by people mainly in matrimonial split ups across the District. A couple part company and have some land or a large garden, one of them cannot afford to buy in their settlement but they can afford to build a small dwelling and it is a way of them resolving a housing issue and being able to access the open market and remain in a settlement where they have established links. Monitoring the effectiveness of the policy is part of the Council`s monitoring programme.</p>
<p>Lark fleet Homes represent ed by Robert Doughty</p>	SP9					<p>We object to SP9. This is the only policy in the plan to support Custom and Self-Build housing, despite this tenure being a major thrust of government policy. Government Policy seeks to support</p>	<p>1 The policy should not include any restriction on re-sale value of</p>	<p>Policy SP9 is not a self-build policy in the terms of the Governments self-build register, it is an affordable housing policy to help those that would not normally be able to access the open market. There is no need for a separate self-build housing policy in East Lindsey. The District is a large district</p>

Consultants Ltd			<p>provision of self and custom build properties for all, without any restriction. This policy fails to meet that requirement because it treats Custom Build Housing as a means to deliver "affordable housing" with all the associated restrictions on tenure and re-sale price, which is contrary to government policy.</p> <p>If, as it seems, the intention of this policy is to deliver exception sites, the provisions should be subsumed with in either Policy SP8 or SP7. The Plan should be amended to support more general delivery of custom and self-build homes.</p>	<p>custom build houses, unless it is specifically an affordable housing policy, in which case the provisions of Policy SP9 should be subsumed with either Policy SP8 or SP7.</p> <p>2 Further policy support to the provision of Custom and Self-Build Homes</p> <p>Without any restriction on sale values or tenure should be provided within the plan.</p>	<p>authority with many single plot sites coming forward every year which anyone can buy and then build their own home. As at the end of January 2017 there were approximately 100 single plots with planning permission across the District which have not yet been started on site. There is nothing preventing this happening in the sustainable settlements which includes all the inland towns and large villages and it is happening already. Policy SP9 is designed for a different set of circumstances and is meant to help residents stay in their own settlements where they cannot access the open market in the normal way. Initially it was aimed at young people in the smaller rural settlements, whose parents may have had some land and where property prices precluded the purchase of a property. The reality is it actually has been used and is being enquired about by people mainly in matrimonial split ups across the District. A couple part company and have some land or a large garden, one of them cannot afford to buy in their settlement but they can afford to build a small dwelling and it is a way of them resolving a housing issue and being able to access the open market and remain in a settlement where they have established links. Monitoring the effectiveness of the policy is part of the Council's monitoring programme.</p>	<p>Policy SP9 is not a self-build policy in the terms of the Government's self-build register, it is an affordable housing policy to help those that would not normally be able to access the open market. There is no need for a separate self-build housing policy in East Lindsey. The District is a large district authority with many single plot sites coming forward every year which anyone can buy and then build their own home. As at the end of January 2017 there were approximately 100 single plots with planning permission across the District which have not yet been started on site. There is nothing preventing this happening in the sustainable settlements which includes all the inland towns and large villages and it is happening already. Policy SP9 is designed for a different set of circumstances and is meant to help residents stay in their own settlements where they cannot access the open market in the normal way. Initially it was aimed at young people in the smaller rural settlements, whose parents may have had some land and where property prices precluded the purchase of a property. The reality is it actually has been used and is being enquired about by people mainly in matrimonial split ups across the District. A couple part company and have some land or a large garden, one of them cannot afford to buy in their settlement but they can afford to build a small dwelling and it is a way of them resolving a housing issue</p>
Gin Property Ltd represented by Robert Doughty Consultants Ltd	SP9	O	<p>We object to SP9. This is the only policy in the plan to support Custom and Self-Build housing, despite this tenure being a major thrust of government policy. Government Policy seeks to support provision of self and custom build properties for all, without any restriction. This policy fails to meet that requirement because it treats Custom Build Housing as a means to deliver "affordable housing" with all the associated restrictions on tenure and re-sale price, which is contrary to government policy.</p> <p>If, as it seems, the intention of this policy is to deliver exception sites, the provisions should be subsumed with in either Policy SP8 or SP7. The Plan should be amended to support more general delivery of custom and self-build homes.</p>	<p>1 The policy should not include any restriction on re-sale value of custom build houses, unless it is specifically an affordable housing policy, in which case the provisions of Policy SP9 should be subsumed with either Policy SP8 or SP7.</p> <p>2 Further policy support to the provision of Custom and Self-Build Homes without</p>	<p>1 The policy should not include any restriction on re-sale value of custom build houses, unless it is specifically an affordable housing policy, in which case the provisions of Policy SP9 should be subsumed with either Policy SP8 or SP7.</p> <p>2 Further policy support to the provision of Custom and Self-Build Homes without</p>	<p>Government's self-build register, it is an affordable housing policy to help those that would not normally be able to access the open market. There is no need for a separate self-build housing policy in East Lindsey. The District is a large district authority with many single plot sites coming forward every year which anyone can buy and then build their own home. As at the end of January 2017 there were approximately 100 single plots with planning permission across the District which have not yet been started on site. There is nothing preventing this happening in the sustainable settlements which includes all the inland towns and large villages and it is happening already. Policy SP9 is designed for a different set of circumstances and is meant to help residents stay in their own settlements where they cannot access the open market in the normal way. Initially it was aimed at young people in the smaller rural settlements, whose parents may have had some land and where property prices precluded the purchase of a property. The reality is it actually has been used and is being enquired about by people mainly in matrimonial split ups across the District. A couple part company and have some land or a large garden, one of them cannot afford to buy in their settlement but they can afford to build a small dwelling and it is a way of them resolving a housing issue</p>

<p>and being able to access the open market and remain in a settlement where they have established links. Monitoring the effectiveness of the policy is part of the Council's monitoring programme.</p>	<p>Policy SP9 is not a self-build policy in the terms of the Government's self-build register, it is an affordable housing policy to help those that would not normally be able to access the open market. There is no need for a separate self-build housing policy in East Lindsey. The District is a large district authority with many single plot sites coming forward every year which anyone can buy and then build their own home. As at the end of January 2017 there were approximately 100 single plots with planning permission across the District which have not yet been started on site. There is nothing preventing this happening in the sustainable settlements which includes all the inland towns and large villages and it is happening already. Policy SP9 is designed for a different set of circumstances and is meant to help residents stay in their own settlements where they cannot access the open market in the normal way. Initially it was aimed at young people in the smaller rural settlements, whose parents may have had some land and where property prices precluded the purchase of a property. The reality is it actually has been used and is being enquired about by people mainly in matrimonial splits across the District. A couple part company and have some land or a large garden, one of them cannot afford to buy in their settlement but they can afford to build a small dwelling and it is a way of them resolving a housing issue and being able to access the open market and remain in a settlement where they have established links. Monitoring the effectiveness of the policy is part of the Council's monitoring programme.</p>	<p>any restriction on sale values or tenure should be provided within the plan.</p>	<p>1 The policy should not include any restriction on re-sale value of custom build houses, unless it is specifically an affordable housing policy, in which case the provisions of Policy SP9 should be subsumed with either Policy SP8 or SP7.</p> <p>2 Further policy support to the provision of Custom and Self-Build Homes without any restriction on sale values or tenure should be provided within the plan.</p>	<p>Policy SP9 is not a self-build policy in the terms of the Government's self-build register, it is an affordable housing policy to help those that would not normally be able to access the open market. There is no need for a separate self-build housing policy in East Lindsey. The District is a large district authority with many single plot sites coming forward every year which anyone can buy and then build their own home. As at the end of January 2017 there were approximately 100 single plots with planning permission across the District which have not yet been started on site. There is nothing preventing this happening in the sustainable settlements which includes all the inland towns and large villages and it is happening</p>	
<p>represent ed by Robert Doughty Consultants Ltd</p>	<p>SP9</p>	<p>O</p>	<p>We object to SP9. This is the only policy in the plan to support Custom and Self-Build housing, despite this tenure being a major thrust of government policy. Government Policy seeks to support provision of self and custom build properties for all, without any restriction. This policy fails to meet that requirement because it treats Custom Build Housing as a means to deliver "affordable housing" with all the associated restrictions on tenure and re-sale price, which is contrary to government policy.</p> <p>If, as it seems, the intention of this policy is to deliver exception sites, the provisions should be subsumed within either Policy SP8 or SP7. The Plan should be amended to support more general delivery of custom and self-build homes</p>	<p>any restriction on sale values or tenure should be provided within the plan.</p>	<p>Policy SP9 is not a self-build policy in the terms of the Government's self-build register, it is an affordable housing policy to help those that would not normally be able to access the open market. There is no need for a separate self-build housing policy in East Lindsey. The District is a large district authority with many single plot sites coming forward every year which anyone can buy and then build their own home. As at the end of January 2017 there were approximately 100 single plots with planning permission across the District which have not yet been started on site. There is nothing preventing this happening in the sustainable settlements which includes all the inland towns and large villages and it is happening</p>
<p>represent ed by WYG Planning</p>	<p>SP9</p>	<p>O</p>	<p>The overall aim of Policy SP9 (Draft Policy SP4) is to provide a self-help solution for individuals to use their own resources to provide low cost housing that meets their own needs within their own respective community. The policy sets out specific criteria in which landowners need to meet.</p> <p>It is considered that this policy is too restrictive in nature given the</p>	<p>any restriction on sale values or tenure should be provided within the plan.</p>	<p>Policy SP9 is not a self-build policy in the terms of the Government's self-build register, it is an affordable housing policy to help those that would not normally be able to access the open market. There is no need for a separate self-build housing policy in East Lindsey. The District is a large district authority with many single plot sites coming forward every year which anyone can buy and then build their own home. As at the end of January 2017 there were approximately 100 single plots with planning permission across the District which have not yet been started on site. There is nothing preventing this happening in the sustainable settlements which includes all the inland towns and large villages and it is happening</p>

NFU	SP9	O	<p>criteria that needs to be met. The Self-Build Custom House Building Act (March 2015) requires councils to establish a register of individuals or community groups who have expressed an interest in acquiring land for this purpose. Our recommendation remains that Policy SP9 should be fully replaced by a more general policy which gives encouragement for the provision of plots for self-build and custom-build properties as specified within the abovementioned Act.</p> <p>The Council should support the development of self-built and custom-built homes in a less restrictive nature, which in turn will contribute to the housing provision to meet the overall housing need which should be achieved as soon as possible.</p>	<p>already. Policy SP9 is designed for a different set of circumstances and is meant to help residents stay in their own settlements where they cannot access the open market in the normal way. Initially it was aimed at young people in the smaller rural settlements, whose parents may have had some land and where property prices precluded the purchase of a property. The reality is it actually has been used and is being acquired about by people mainly in matrimonial split ups across the District. A couple part company and have some land or a large garden, one of them cannot afford to buy in their settlement but they can afford to build a small dwelling and it is a way of them resolving a housing issue and being able to access the open market and remain in a settlement where they have established links. Monitoring the effectiveness of the policy is part of the Council's monitoring programme.</p>	<p>There is no requirement to repeat either national policy or legislative requirements in the Local Plan. There is already under Class Q a way of providing for the conversion of farm buildings in to residential properties and therefore this does not need a further policy in the Local Plan.</p>
			<p>This may not be the correct policy to single out, but there seems to be no encouragement in the Plan for the conversion of vernacular farm buildings to residential uses which is allowed under Class Q of the General Permitted Development Order. We would like to see inclusion in policy SP9 or a similar, relevant place, support for the conversion of farm buildings to, amongst other uses, residential use to help the farm be profitable and save the features of the building.</p>	<p>Insert in SP9 or elsewhere a criteria that farm buildings may be converted for a residential use along the lines graded under class Q of the General Permitted Development Order.</p>	

CHAPTER 4 – RAISING THE QUALITY OF OUR BUILT ENVIRONMENT

Name	Policy Number	Page Number, Text (para Number)	Settlement Proposals Map or Site Number	Settlement Proposals Page Number	Evidence Document	Page Number, Text (para Number)	Q3 Response	Q4 Change Sought	Response

POLICY SP10 – DESIGN

KCS Developments Represented by Barton Wilmore	SP10						<p>1. Whilst our Client understands and welcomes the Council's aspirations to deliver high quality development, the requirement for all developments for dwellings and major development which lies outside the existing industrial estates to be accompanied by a completed place-making checklist is not justified.</p> <p>In reality, the pre-application process is the correct avenue for discussing the design matters relating to a development, rather than the completion of an arbitrary pro-forma. Indeed, there is no requirement for a place-making checklist within the NPPF and to impose this requirement upon landowners and developers is onerous and it is not considered to be an effective way in which to ensure high quality design.</p> <p>Of major concern is the comment that <i>"the Council will support development on design grounds that satisfy the checklist"</i>. An arbitrary pro-forma should not be used as a tool to approve or refuse a</p>		<p>1. The Council notes the support for the Council's aspirations to deliver high quality design. The Place Making Checklist is a tool to be used to enhance and improve design, it asks a series of questions that go beyond a design and access statement to encourage a more responsive and thoughtful approach to design. It uses a traffic light system rather than a narrative approach, so as not to be onerous to complete. The checklist was drawn up after work the Council undertook with OPUN, a charity promoting good design practice, and has been developed so that the "man in the street" can access a simple tool to help understand the design process. It provides a good</p>
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GLNP	SP10	Place making			<p>planning application as is implied by the Policy, each application should be considered on its own merits. The checklist itself includes questions relating to landscaping and the historic environment and these matters are covered via separate standalone policies elsewhere within the Plan and it is unnecessary to include such matters in the checklist.</p> <p>2. In addition to the above, point 10 of the policy requires certain types of development to not only satisfy the place-making checklist, but also a site-specific design brief. This would include gateway sites into a settlement and application on sites over 4 hectare. Our Client objects to this proposal as the Council consider a 'gateway' site to be "<i>a site which lies at the entrance to a settlement and is therefore the first one that is seen on entering the built up area</i>".</p> <p>This could be open to interpretation and it is considered that if the Council wish to make reference to 'gateway' site, these should be defined within the Settlement Proposals DPD, to ensure that the interpretation is clear and beyond doubt. In addition, the requirement in such instances for an applicant to satisfy both the place-making checklist and a site design brief is totally unnecessary and is overly onerous.</p> <p>The information required within the place-making checklist could be incorporated within the site specific design brief.</p> <p>Policy SPIO is unsound as currently drafted as it is not justified, effective or in accordance with national planning policy and therefore does not meet the tests set out at paragraph 182 of the NPPF. Our client therefore strongly objects to the policy.</p> <p>The GLNP supports the inclusion of a landscaping section in the checklist that</p>	<p>starting point during pre-application discussions prior to the production of a design and access statement. The policy states that "the Council will support development on design grounds that satisfy the checklist', it does not say "only support" so it would be for the developer to justify why a development that did not satisfy the checklist was still of sufficient design quality to be approved.</p> <p>2. The respondent has not explained why they object to the definition of a gateway site, or suggested what alternative definition should be used. The Council believes that the explanation as to what a "Gateway" site is, is clear and no further explanation is required. The size of the sites for other developments were taken from looking across the District and seeing what sort of sites had an impact in design terms on settlements and in general how large they were. In reality these were few and therefore it would only be occasionally that developers of such sites coming forward would have to use the place making checklist.</p> <p>The Council notes the support</p>
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CPRE Lincolnshire	Chapt er 4 SP10	checklis t	C					<p>references green space for habitats and wildlife. This indicates ELDCs commitment to the natural environment and green infrastructure as a key part of a positive living environment for health, recreation, climate change and wildlife.</p> <p><u>Best&MostVersatileAgricultureLand</u></p> <p>The CPRE works to protect and enhance the countryside for the benefit of future generations, therefore, the CPRE is concerned that best and most versatile agricultural land Grades 1, 2 and 3a should be saved for the benefit of future generations.</p> <p>The best Grade 1 farmland is a rare national asset, comprising only about 3% of all farmland in England, but a high proportion of it is located in East Lindsey. The NPPF Paragraph 143 states that when preparing Local Plans, local planning authorities should safeguard the potential of Best and Most Versatile agricultural land.</p> <p>In refusing the recent recovered Appeal (APP/R0660/A/13/2197532), the Secretary of State emphasised the need for the Local Plan to review all BMV agricultural land and to assign for development only sites of lowest grade to minimise loss of valuable farmland.</p> <p>Therefore, it is important that East Lindsey Council acknowledges the value of the agricultural land both for its local economic value, and also its national significance, this acknowledgement is embodied in the Core Strategy.</p> <p><u>NPPF and Brownfield Reuse</u></p> <p>A core planning principle of the NPPF, as stated in Paragraph 17, is that Local Plans should encourage the effective use of land by reusing land that has been previously developed (brownfield), provided it is not of high environmental value.</p> <p>The Government has announced Brownfield as a planning priority and has introduced</p>		Comments from the consultee are noted, though the consultee has not suggested any changes to the Local Plan.
CPRE Lincolnshire	Chapt er 4 SP10		O					<p>The Council is committed to bringing forward brownfield land where it is appropriately located. The Council has a limited supply of such sites, most of which are small and would not accommodate many dwellings, therefore it is inevitable that greenfield land will have to</p>		

CPRE Lincolnshire	Chapt er 4	SP10	O				<p>new funding and measures to unlock its potential. Like Government, CPRE believes brownfield land ought to be re-used in advance of needless countryside development.</p> <p>Therefore, CPRE Lincolnshire implores East Lindsey Council to do everything in its gift to support and utilise much needed Brownfield regeneration, and also protect valued Countryside.</p> <p>Brownfield Regeneration</p> <p>Elsewhere in Lincolnshire, planning authorities are focusing more effort on re-using Brownfield, such as in the Central Lincolnshire Further Draft Local Plan, which acknowledges maximising the re-development of key brownfield sites, but matching funding from Government's <i>Brownfield Package</i>, to unlock the potential of brownfield land for future development, also needs to be taken into account with East Lindsey's Local Plan.</p> <p>CPRE believes in accordance with the NPPF, it is important that the Local Plan will not undermine future regeneration efforts by releasing 'too much' brownfield land for development. CPRE believes East Lindsey Council must adopt a Local Plan that encourages brownfield land to be brought back into use with effective land use policies.</p>		be released in order to meet the District's housing and employment land needs.
Environment Agency	SP10	(10,11)	S			We strongly support the policy and supporting text in respect of design of new development and in particular: point 1, the use of brownfield land unless it is of high environmental value; point 6, supporting recycling, re-use and reduction of demand for finite resources and the water consumption standard to not exceed 110			<p>The NPPF encourages the reuse of previously development land, and the Council has allocated those sites that are suitably located and many more have come forward through planning permissions. The Council has also introduced two policies, SP4 (Housing in Medium and Small Villages) and SP18 (Coastal Housing) which allow development in location where housing would not normally be granted, where they bring forward the redevelopment of a brownfield site. The circumstances in Central Lincolnshire are different to East Lindsey, with both Lincoln and Gainsborough having large amounts of brownfield land to develop. East Lindsey has much smaller amounts of brownfield land, which is often small sites accommodating few dwellings.</p> <p>The Council notes the support from the consultee</p>

						<p>litres per day per person; and point 7, pollution protection for water resources.</p> <p>East Lindsey includes land that overlies important aquifers, which support the public water supply, water features and the wider environment. It is important that the Local Plan seeks to protect these resources, which are used for distribution to the public and industry. We welcome the inclusion of supporting text to ensure those proposing development refer to appropriate guidance and assessment criteria.</p> <p>We strongly support the inclusion of part 6 of the Policy, to ensure water consumption in new development does not exceed 110 litres per day per person and are pleased that the importance of water is well recognised in the Core Strategy. Within the 2013 report 'Water stressed areas - final classification' the area of England serviced by Anglian Water Services is identified as an 'area of serious water stress'. This high level assessment is based upon individual assessments of waterbodies. The importance of water management is also recognised by the Greater Lincolnshire Local Enterprise Partnership (GLEP). In addition to inclusion as a strategic priority within their Strategic Economic Plan (SEP) and European Structural Investment Funding Strategy (ESIF), the GLEP's Water Management Plan identifies the GLEP's aim is 'for water management across Greater Lincolnshire to act as an incentive to investment for the GLEP's priority industries and for effective water management to be a positive contributor to economic growth'.</p> <p>In addition, the GLEP has identified the delivery of water efficiency measures through housing growth as a priority in order to address future water resource issues, and to support an increased need for both housing and employment growth. This is particularly prudent within sectors where water is a key and significant requirement e.g. agro food and seasonal tourism. The demand associated with tourism is</p>		
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<p>Represented by Robert Doughty Consultancy</p>	<p>SP10</p>	<p>(14)</p>	<p>0</p>				<p>specifically covered within this local plan - point 9, page 119, which is welcomed.</p> <p>A recent draft paper produced for the Water Resources East project led by Anglian Water supported the use of the 110 litre level. The draft report recommends: That Government should strengthen the commitment to water demand management measures through instigating changes to the Building Regulations within areas of water stress that would make higher standards in such areas automatic - rather than optional - for local authorities. Again, we fully support East Lindsey in adopting this optional standard.</p> <p>The provision of increased water efficiency measures will support wider economic growth objectives both within East Lindsey and across Greater Lincolnshire. Whilst we recognise that some developers may highlight these standards as a viability issue, we would draw their/your attention to the DCLG Housing Standards Review (Sept 14) and in particular Section 4.5 "Water" and Appendix B5 of the document which indicates the additional cost of upgrading from the national standard set out in the Building Regulations (of 125 litres/person/day) to meet the tighter Building Regulations optional requirement of 110 litres/person/day (equivalent to Code for Sustainable Homes level 3/4) is no more than £9 per dwelling.</p> <p>This amount will be offset by cost savings to the householder (excluding possible energy savings) in the order of £20 per annum (Assumes a saving of 15litres/day/person - 2.4 persons per dwelling, 365 days per annum and a cost of water at £1.5138 per cubic metre of water- AWS current price for metered water).</p> <p>We support aspirations for delivering high quality design. We are uncertain, however, how the "Place Making checklist" would provide any enhancement to the Design and Access Statement.</p> <p>The Definition of Gateway sites needs greater clarity. Is the gateway a site that is</p>	<p>1. Clarification should be provided regarding the relationship between the "place making checklist" and Design and Access statements.</p>	<p>1. The Council notes the support for the aspirations of policy SP10. The Place Making Checklist is a tool to be used to enhance and improve design, it asks a series of questions that go beyond a design and</p>
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					<p>visible from the road approach to a settlement or is it adjacent to the road? There is no quantifiable justification for the size limits for other developments requiring the "Place Making Checklist".</p> <p>Lack of clarity on this issue means that the plan would be ineffective as it does not provide the clear indication to allow decision makers to react to development proposal, as required by para 154 of the NPPF.</p>	<p>2 Justification should be provided regarding the size threshold for use of the "Place making checklist".</p> <p>3 Clarification and justification should be provided regarding the nature and definition of "Gateway" sites.</p>	<p>access statement to encourage a more responsive and thoughtful approach to design. It uses a traffic light system rather than a narrative approach, so as not to be onerous to complete. The checklist was drawn up after work the Council undertook with OPUN, a charity promoting good design practice, and has also been developed so that the "man in the street" can access a simple tool to help them think and develop good design. It provides a good starting point during pre-application discussions prior to the production of a design and access statement. The Council believes that the Plan is still effective and the word "encouraged" in paragraph 16 of the explanatory text does indicate that the use of the check list is not mandatory, the word encourage is however missing from paragraph 14 and in order to ensure clarity in the Plan a minor modification is proposed for this paragraph with the deletion of the words "should be able" and replaced with "will be encouraged" to satisfy the Councils place making checklist". The policy states that "the Council will support development on design grounds that satisfy the checklist, it does not say "only support" so it would be for the developer to justify why a development that did not satisfy the checklist</p>
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Larkfleet Homes Represented by Robert Doughty Consultancy	SP10					<p>We support aspirations for delivering high quality design. We are uncertain, however, how the "Place Making checklist" would provide any enhancement to the Design and Access Statement.</p> <p>The Definition of Gateway sites needs greater clarity. Is the gateway a site that is visible from the road approach to a settlement or is it adjacent to the road? There is no quantifiable justification for the size limits for other developments requiring the "Place Making Checklist".</p> <p>Lack of clarity on this issue means that the plan would be ineffective as it does not provide the clear indication to allow decision makers to react to development proposal, as required by para 154 of the NPPF.</p>	<p>1 Clarification should be provided regarding the relationship between the "place making checklist" and Design and Access statements.</p> <p>2 Justification should be provided regarding the size threshold for use of the "Place making checklist".</p> <p>3 Clarification and justification should be provided regarding the nature and definition of "Gateway" sites.</p>	<p>was still of sufficient design quality to be approved.</p> <p>2. The size of the sites for other developments were taken from looking across the District and seeing what sort of sites had an impact in design terms on settlements and in general how large they were. In reality these were few and therefore it would only be occasionally that developers of such sites coming forward would have to use the place making checklist.</p> <p>3. The Council believes that the explanation as to what a "Gateway" site is clear and no further explanation is required.</p> <p>1. The Council notes the support for the aspirations of policy SP10. The Place Making Checklist is a tool to be used to enhance and improve design, it asks a series of questions that go beyond a design and access statement to encourage a more responsive and thoughtful approach to design. It uses a traffic light system rather than a narrative approach, so as not to be onerous to complete. The checklist was drawn up after work the Council undertook with OPUN, a charity promoting good design practice, and has also been developed so that the "man in the street" can access a simple tool to help them think and develop good design. It provides a good starting point during pre-application discussions</p>

<p>prior to the production of a design and access statement. The Council believes that the Plan is still effective and the word "encouraged" in paragraph 16 of the explanatory text does indicate that the use of the check list is not mandatory, the word encourage is however missing from paragraph 14 and in order to ensure clarity in the Plan a minor modification is proposed for this paragraph with the deletion of the words "should be able" and replaced with "will be encouraged" to satisfy the Councils place making checklist". The policy states that "the Council will support development on design grounds that satisfy the checklist', it does not say "only support" so it would be for the developer to justify why a development that did not satisfy the checklist was still of sufficient design quality to be approved.</p> <p>2. The size of the sites for other developments were taken from looking across the District and seeing what sort of sites had an impact in design terms on settlements and in general how large they were. In reality these were few and therefore it would only be occasionally that developers of such sites coming forward would have to use the place making checklist.</p> <p>3. The Council believes that the explanation as to what a "Gateway" site is</p>											
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Mowbray Estate Represented by Robert Doughty Consultancy	SP10	0				<p>We support aspirations for delivering high quality design. We are uncertain, however, how the "Place Making checklist" would provide any enhancement to the Design and Access Statement.</p> <p>The Definition of Gateway sites needs greater clarity. Is the gateway a site that is visible from the road approach to a settlement or is it adjacent to the road? There is no quantifiable justification for the size limits for other developments requiring the "Place Making Checklist".</p> <p>Lack of clarity on this issue means that the plan would be ineffective as it does not provide the clear indication to allow decision makers to react to development proposal, as required by para 154 of the NPPF.</p>	<p>1 Clarification should be provided regarding the relationship between the "place making checklist" and Design and Access Statements.</p> <p>2 Justification should be provided regarding the size threshold for use of the "Place making checklist".</p> <p>3 Clarification and justification should be provided regarding the nature and definition of "Gateway" sites</p>	<p>clear and no further explanation is required.</p> <p>1. The Council notes the support for the aspirations of policy SP10. The Place Making Checklist is a tool to be used to enhance and improve design, it asks a series of questions that go beyond a design and access statement to encourage a more responsive and thoughtful approach to design. It uses a traffic light system rather than a narrative approach, so as not to be onerous to complete. The checklist was drawn up after work the Council undertook with OPUN, a charity promoting good design practice, and has also been developed so that the "man in the street" can access a simple tool to help them think and develop good design. It provides a good starting point during pre-application discussions prior to the production of a design and access statement. The Council believes that the Plan is still effective and the word "encouraged" in paragraph 16 of the explanatory text does indicate that the use of the check list is not mandatory, the word encourage is however missing from paragraph 14 and in order to ensure clarity in the Plan a minor modification is proposed for this paragraph with the deletion of the words "should be able" and replaced with "will be encouraged" to satisfy the Councils place making</p>
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Chestnut Homes	SP10	(9)	0					<p>checklist". The policy states that "the Council will support development on design grounds that satisfy the checklist", it does not say "only support" so it would be for the developer to justify why a development that did not satisfy the checklist was still of sufficient design quality to be approved.</p> <p>2. The size of the sites for other developments were taken from looking across the District and seeing what sort of sites had an impact in design terms on settlements and in general how large they were. In reality these were few and therefore it would only be occasionally that developers of such sites coming forward would have to use the place making checklist.</p> <p>3. The Council believes that the explanation as to what a "Gateway" site is clear and no further explanation is required.</p>
							<p>1. Within the explanation text (paragraph 9) it is stated that 'The use of sustainable brownfield sites within existing settlements should always be given priority over more distant greenfield sites'. We do not support this, requiring a 'sequential' test to justify the use of greenfield over brownfield sites.</p> <p>This is not a 'design issue' and should be resolved ahead of this either in its allocation or by considering the merits of a 'windfall site'. This section of the policy should be removed.</p> <p>2. Point 6 of the policy regarding new developments being designed to Building Regulations water consumption standard for water scarce area, not to exceed 110 litres</p>	<p>1. This is not a formal 'sequential test'. The text does not say that permission will not be granted where brownfield development exists. The Council has taken this approach in allocating its sites. Where suitable brownfield sites are available, they have been allocated within the plan. As the respondent says, once the Council has an adopted plan and a five year supply of housing, if an application comes in for development elsewhere, the Council will have to</p>

						<p>per day per person. We question the evidence to establish the district as a 'water scarce area' to justify the 110 litres per day person over and above the standard the standard 125 litres per day per person already enforced by Part G of Building Regulations.</p> <p>We believe the constraint is flawed as post completion there is no provision to restrict occupiers from changing appliances/fitting less efficient ones.</p> <p>3. Point 9 of the policy requires the completion of the Place Making Checklist for all non-industrial developments. We support the principle to execute good design principles but believe a Design and Access Statement can achieve a more cohesive explanation of the principles on a site by site basis rather than a standardised format. This is in line with national planning policies.</p> <p>4. Similarly point 10 requires site specific design briefs on certain types of sites and requires applicants to enter into pre-application dialogue to agree a design brief. Should the Local Authority insist on design briefs for certain sites, it should prepare them as part of the Local Plan process</p>		<p>assess where or not permission should be granted as a windfall site. The need to release additional greenfield land if there are suitable brownfield sites in a settlement will be part of that deliberation. While not a 'design issue' per se, it will form part of those considerations and it was felt that this was the best location to include this, without the need for a separate policy.</p> <p>2. The evidence for the water standards comes from the Water Cycle Study and is strongly supported by the Environment Agency.</p> <p>3. The Council notes the support for the aspirations of policy SP10. The Place Making Checklist is a tool to be used to enhance and improve design, it asks a series of questions that go beyond a design and access statement to encourage a more responsive and thoughtful approach to design. It uses a traffic light system rather than a narrative approach, so as not to be onerous to complete. The checklist was drawn up after work the Council undertook with OPUN, a charity promoting good design practice, and has also been developed so that the "man in the street" can access a simple tool to help them think and develop good design. It provides a good starting point during pre-</p>
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Hardys Farm Ltd Represented by Robert Doughty Consultancy	SP10	p44	O			<p>We support aspirations for delivering high quality design. We are uncertain, however, how the "Place Making checklist" would provide any enhancement to the Design and Access Statement.</p> <p>The definition of Gateway sites requires greater clarity. Is the Gateway a site that is visible from the road approach to a settlement or is it adjacent to the road? There is no quantifiable justification for the size limits for other developments requiring the "Place Making Checklist".</p> <p>Lack of clarity on this issue means the plan would not be effective as it does not provide the clear indication to allow decision makers to react to development proposals, as required by paragraph 154 of the NPPF.</p>	<p>1 Clarification should be provided regarding the relationship between the "place making checklist" and Design and Access Statements.</p> <p>2 Justification should be provided regarding the size threshold for use of the "Place making checklist".</p> <p>3 Clarification and justification should be provided regarding the nature and definition of "Gateway" sites.</p>	<p>application discussions prior to the production of a design and access statement.</p> <p>4. It cannot be guaranteed sites requiring a design brief will be allocated, windfall sites may also require this and so it is not possible to cover all sites. Nor is it necessarily desirable as Plans have a long shelf life and circumstances surrounding individual sites can change over time. The Council will prepare design brief where it believes these are necessary for a site. However, as paragraph 16 states, this is intended to be part of the collaborative process of pre-application advice.</p>
						<p>1. The Council notes the support for the aspirations of policy SP10. The Place Making Checklist is a tool to be used to enhance and improve design, it asks a series of questions that go beyond a design and access statement to encourage a more responsive and thoughtful approach to design. It uses a traffic light system rather than a narrative approach, so as not to be onerous to complete. The checklist was drawn up after work the Council undertook with OPUN, a charity promoting good design practice, and has also been developed so that the "man in the street" can access a simple tool to help them think and develop good design. It provides a good starting point during pre-</p>		

<p>application discussions prior to the production of a design and access statement. The Council believes that the Plan is still effective and the word "encouraged" in paragraph 16 of the explanatory text does indicate that the use of the check list is not mandatory, the word encourage is however missing from paragraph 14 and in order to ensure clarity in the Plan a minor modification is proposed for this paragraph with the deletion of the words "should be able" and replaced with "will be encouraged" to satisfy the Councils place making checklist". The policy states that "the Council will support development on design grounds that satisfy the checklist", it does not say "only support" so it would be for the developer to justify why a development that did not satisfy the checklist was still of sufficient design quality to be approved.</p> <p>2. The size of the sites for other developments were taken from looking across the District and seeing what sort of sites had an impact in design terms on settlements and in general how large they were. In reality these were few and therefore it would only be occasionally that developers of such sites coming forward would have to use the place making checklist.</p> <p>3. The Council believes that the explanation as to</p>											
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Gin Property Ltd Represented by Robert Doughty Consultancy	SP10	0				<p>We support aspirations for delivering high quality design. We are uncertain, however, how the "Place Making checklist" would provide any enhancement to the Design and Access Statement.</p> <p>The Definition of Gateway sites needs greater clarity. Is the gateway a site that is visible from the road approach to a settlement or is it adjacent to the road? There is no quantifiable justification for the size limits for other developments requiring the "Place Making Checklist".</p> <p>Lack of clarity on this issue means that the plan would be effective as it does not provide the clear indication to allow decision makers to react to development proposal, as required by para 154 of the NPPF.</p>	<p>1 Clarification should be provided regarding the relationship between the "place making checklist" and Design and Access statements.</p> <p>2 Justification should be provided regarding the size threshold for use of the "Place making checklist".</p> <p>3 Clarification and justification should be provided regarding the nature and definition of "Gateway" sites.</p>	<p>what a "Gateway" site is clear and no further explanation is required.</p> <p>1. The Council notes the support for the aspirations of policy SP10. The Place Making Checklist is a tool to be used to enhance and improve design, it asks a series of questions that go beyond a design and access statement to encourage a more responsive and thoughtful approach to design. It uses a traffic light system rather than a narrative approach, so as not to be onerous to complete. The checklist was drawn up after work the Council undertook with OPUN, a charity promoting good design practice, and has also been developed so that the "man in the street" can access a simple tool to help them think and develop good design. It provides a good starting point during pre-application discussions prior to the production of a design and access statement. The Council believes that the Plan is still effective and the word "encouraged" in paragraph 16 of the explanatory text does indicate that the use of the check list is not mandatory, the word encourage is however missing from paragraph 14 and in order to ensure clarity in the Plan a minor modification is proposed for this paragraph with the deletion of the words "should be able" and replaced with "will be encouraged" to satisfy the</p>
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<p>Anglian Water Services Ltd</p>	<p>SP10</p>	<p>S</p>						<p>Councils place making checklist". The policy states that "the Council will support development on design grounds that satisfy the checklist', it does not say "only support" so it would be for the developer to justify why a development that did not satisfy the checklist was still of sufficient design quality to be approved.</p> <p>2. The size of the sites for other developments were taken from looking across the District and seeing what sort of sites had an impact in design terms on settlements and in general how large they were. In reality these were few and therefore it would only be occasionally that developers of such sites coming forward would have to use the place making checklist.</p> <p>3. The Council believes that the explanation as to what a "Gateway" site is clear and no further explanation is required.</p> <p>This has been logged as support response because the wording of the response is positive. However, Anglian Water has ticked the boxes to say that the Plan is Legally Sound and Compliant but has then ticked the boxes to say that the Plan is unsound on the grounds of being Positively Prepared, Justified, Effective, and Consistent with National Policy. The response then says that they would support the option water efficiency standard being</p>
						<p>Policy SP10 refers to development not exceeding the optional higher water efficiency standard of 110 litres per person per day.</p> <p>We would support the optional water efficiency standard being applied for residential development within the East Lindsey Local Plan area based upon the available evidence relating to water resources including Environment Agency's Water Stressed Area – Final classification maps.</p>		<p>This has been logged as support response because the wording of the response is positive. However, Anglian Water has ticked the boxes to say that the Plan is Legally Sound and Compliant but has then ticked the boxes to say that the Plan is unsound on the grounds of being Positively Prepared, Justified, Effective, and Consistent with National Policy. The response then says that they would support the option water efficiency standard being</p>

HBF	SP10									<p>Policy SP10 - Design Bullet Point 6 proposes the higher optional standard for water efficiency of 110 litres per person per day. The NPPG is explicit that higher water efficiency standards should only be proposed in identified areas of water stress. It is noted that "the East Lindsey Phase 2 Water Cycle Study 2016 shows that there are no issues which indicate that the planned scale, location and timing of planned development within the District is unachievable from the perspective of supplying water and waste services and preventing the deterioration of water quality in receiving waters" (para 10 page 119). Therefore it is recommended that Bullet Point 6 of Policy SP10 is deleted</p>	<p>Therefore it is recommended that Bullet Point 6 of Policy SP10 is deleted</p>	<p>applied but this level is already included in the Plan. The inclusion of higher optional standards for water has been strongly supported by the Environment Agency on the basis that the area is in an 'are of high water stress'. The importance of water management is also recognised by the Greater Lincolnshire Local Enterprise Partnership (GLEP). The inclusion of the requirement for the optional standard is supported by the Water Cycle Strategy, produced for the Council by independent consultants. The Council therefore sees no justification to remove this from the policy when East Lindsey is in a water stress area.</p>
Metacre Ltd De Pol Associates	SP10									<p>Metacre Ltd has concerns regarding the following criterion of Core Strategy Policy SP10: Design.</p> <p>1. Criterion 1 This criterion states that the Council will safeguard the best and most versatile (BMV) agricultural land. This is considered more restrictive than the National Planning Policy Framework (NPPF) as it implies that development on BMV land is unacceptable. NPPF paragraph 112 merely requires account to be given to the economic and other benefits of BMV land and states that where 'significant development of agricultural land' is demonstrated to be necessary local authorities should seek to use areas of poorer quality land in preference to that of a higher quality. It does not preclude the development of BMV land. Moreover it is evident from s.78 appeal decisions that development which involves the loss of BMV land can still be deemed sustainable and acceptable under the terms of the NPPF. The presence of BMV</p>	<p>1. Criterion 1 It is considered that if reference is to be made to BMV agricultural land then this should better reflect the wording in NPPF paragraph 112.</p> <p>2. Criteria 9 & 10 It is considered that the criteria should be deleted</p>	<p>1. The Council believe that the wording of the policy is consistent with paragraph 112 of the NPPF which, as the respondent states, requires that 'where significant development of agricultural land' is demonstrated to be necessary local authorities should seek to use areas of poorer quality land in preference to that of a higher quality'. Paragraph 9 explains that the agricultural industry is still an important part of the District's economy and that @In selecting sites for development, the preference should be to seek to utilise lower grade agricultural land to that of a higher grade'; this does not say that higher grade</p>

		<p>is only one of a number of factors to be taken into account in the balancing exercise.</p> <p>Given the clear need for significant edge of settlement greenfield development within the District it is considered that this policy wording is unsound as it fails the test of being consistent with national policy. It is considered that if reference is to be made to BMV agricultural land then this should better reflect the wording in NPPF paragraph 112.</p> <p>2. Criteria 9 and 10</p> <p>Criterion 9 states that major developments outside the existing industrial estates should be accompanied by the Council's place-making checklist. Criterion 10 states that all sites over 4ha will be supported on design grounds if they satisfy both the place-making checklist and adhere to a site-specific design brief.</p> <p>To suggest that all planning applications for sites over 4ha should first agree a design brief with the Council is both unrealistic and unsupported by national policy. Whilst NPPF encourages pre-application engagement with the LPA this is not identified as a prerequisite for a planning application to be valid. Furthermore there is no evidence provided by the Council to demonstrate that they have the capacity and resources available to undertake such an exercise for every development site in the District which is over 4ha in size. Such an approach could also lead to unnecessary delays in the delivery of acceptable and sustainable development. To suggest that all proposals must adhere to the place making checklist in order to be acceptable is also overly prescriptive and not supported by national policy.</p> <p>The criteria are therefore both unjustified and not consistent with national policy. It is considered that the criteria should be deleted</p>		<p>agricultural land cannot be released if there is sufficient justification.</p> <p>2. The Place Making Checklist is a tool to be used to enhance and improve design, it asks a series of questions that go beyond a design and access statement to encourage a more responsive and thoughtful approach to design. It uses a traffic light system rather than a narrative approach, so as not to be onerous to complete. The checklist was drawn up after work the Council undertook with OPUN, a charity promoting good design practice, and has also been developed so that the "man in the street" can access a simple tool to help them think and develop good design. It provides a good starting point during pre-application discussions prior to the production of a design and access statement. The size of the sites for other developments were taken from looking across the District and seeing what sort of sites had an impact in design terms on settlements and in general how large they were. In reality these were few and therefore it would only be occasionally that developers of such sites coming forward would have to use the place making checklist. The Council believes that the Plan is still effective and the word "encouraged" in</p>
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<p>Blue Anchor Leisure Represented by Robert Doughty Consultancy</p>	<p>SP10</p>	<p>0</p>				<p>We support aspirations for delivering high quality design. We are uncertain, however, how the "Place Making checklist" would provide any enhancement to the Design and Access Statement.</p> <p>The Definition of Gateway sites requires greater clarity. Is the gateway a site that is visible from the road approach to a settlement or is it adjacent to the road? There is no quantifiable justification for the size limits for other developments requiring the "Place Making Checklist".</p> <p>Lack of clarity on this issue means the plan would not be effective as it does not provide the clear indication to allow decision makers to react to development proposals, as required by para 154 of the NPPF.</p>	<p>1 Clarification should be provided regarding the relationship between the "place making checklist" and Design and Access Statements.</p> <p>2 Justification should be provided regarding the size threshold for use of the "Place making checklist".</p> <p>3 Clarification and justification should be provided regarding the nature and definition of "Gateway" sites.</p>	<p>paragraph 16 of the explanatory text does indicate that the use of the check list is not mandatory, the word encourage is however missing from paragraph 14 and in order to ensure clarity in the Plan a minor modification is proposed for this paragraph with the deletion of the words "should be able" and replaced with "will be encouraged" to satisfy the Councils place making checklist".</p> <p>1. The Council notes the support for the aspirations of policy SP10. The Place Making Checklist is a tool to be used to enhance and improve design, it asks a series of questions that go beyond a design and access statement to encourage a more responsive and thoughtful approach to design. It uses a traffic light system rather than a narrative approach, so as not to be onerous to complete. The checklist was drawn up after work the Council undertook with OPUN, a charity promoting good design practice, and has also been developed so that the "man in the street" can access a simple tool to help them think and develop good design. It provides a good starting point during pre-application discussions prior to the production of a design and access statement. The Council believes that the Plan is still effective and the word "encouraged" in paragraph</p>
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<p>Represented by Robert</p>	<p>SP10</p>	<p>0</p>	<p></p>	<p></p>	<p></p>	<p>We support aspirations for delivering high quality design. We are uncertain, however, how the "Place Making checklist" would</p>	<p>1 Clarification should be provided regarding the relationship between the "place making checklist" and</p>	<p>16 of the explanatory text does indicate that the use of the check list is not mandatory, the word encourage is however missing from paragraph 14 and in order to ensure clarity in the Plan a minor modification is proposed for this paragraph with the deletion of the words "should be able" and replaced with "will be encouraged" to satisfy the Councils place making checklist". The policy states that "the Council will support development on design grounds that satisfy the checklist', it does not say "only support" so it would be for the developer to justify why a development that did not satisfy the checklist was still of sufficient design quality to be approved. 2. The size of the sites for other developments were taken from looking across the District and seeing what sort of sites had an impact in design terms on settlements and in general how large they were. In reality these were few and therefore it would only be occasionally that developers of such sites coming forward would have to use the place making checklist. 3. The Council believes that the explanation as to what a "Gateway" site is clear and no further explanation is required. 1. The Council notes the support for the aspirations of policy SP10. The Place Making Checklist is a tool</p>
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Doughty Consultancy				<p>provide any enhancement to the Design and Access Statement.</p> <p>The Definition of Gateway sites needs greater clarity. Is the gateway a site that is visible from the road approach to a settlement or is it adjacent to the road? There is no quantifiable justification for the size limits for other developments requiring the "Place Making Checklist".</p> <p>Lack of clarity on this issue means that the plan would be ineffective as it does not provide the clear indication to allow decision makers to react to development proposal, as required by para 154 of the NPPF.</p>	<p>Design and Access statements.</p> <p>2 Justification should be provided regarding the size threshold for use of the "Place making checklist".</p> <p>3 Clarification and justification should be provided regarding the nature and definition of "Gateway" sites.</p>	<p>to be used to enhance and improve design, it asks a series of questions that go beyond a design and access statement to encourage a more responsive and thoughtful approach to design. It uses a traffic light system rather than a narrative approach, so as not to be onerous to complete. The checklist was drawn up after work the Council undertook with OPUN, a charity promoting good design practice, and has also been developed so that the "man in the street" can access a simple tool to help them think and develop good design. It provides a good starting point during pre-application discussions prior to the production of a design and access statement. The Council believes that the Plan is still effective and the word "encouraged" in paragraph 16 of the explanatory text does indicate that the use of the check list is not mandatory, the word encourage is however missing from paragraph 14 and in order to ensure clarity in the Plan a minor modification is proposed for this paragraph with the deletion of the words "should be able" and replaced with "will be encouraged" to satisfy the Councils place making checklist". The policy states that "the Council will support development on design grounds that satisfy the checklist", it does not say "only</p>
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Lenton AE (Holdings) Ltd Represented by Brown & Co	SP11	O				<p>It is our firm belief, contrary to comments seen, that the development of Site 4 will not cause material harm to the Heritage assets which we understand in this case is believed to be the Church. The Church is relatively well screened and further screening can be provided to safeguard the integrity of this asset. Also with a well-designed scheme, there will certainly not be substantial harm. We feel this and the mitigation that can be put in place would result in this being a more favourable site than others which have been proposed where there are other major Policy considerations and problems which need to be taken into consideration in the Planning process. Consistent with the NPPF it should be made clear that an element of materiality needs to be applied to harm. Anything can cause harm but it is a question of the materiality that should be taken into consideration and that is not sufficiently catered for within the current Policy – see para 132–134 of the NPPF. In this case there would be less than substantial harm and this, together with other benefits afforded by the allocation of this site in preference to others, would outweigh the limited harm and lack of Policy compliance of other sites proposed in the District and in particular those labelled as Sites 321 and 306 in the village of Friskney.</p>	<p>Allocate Sites 2, 4 and 5 on the plans attached to our representations attached and dated 8th August 2016.</p>	<p>The representation has been made under SP11. However, SP11 does not allocate sites and so cannot be amended to meet the representation. This issue is better dealt with under the Settlement Proposals document and a copy of the representation has been copied to the Settlement Proposals for consideration. The site was discounted on more grounds than heritage assets and so there wider issues to consider.</p>
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CHAPTER 5 – GYPSIES, TRAVELLERS AND SHOWPEOPLE

Name	Policy Number	Page Number, Text (para Number, Text)	Settlement Proposals Map or Site Number	Settlement Proposals Page Number	Evidence Document	Page Number, Text (para Number, Text)	Q3 Response	Q4 Change Sought	Response
							Q3 Response	Q4 Change Sought	Response
POLICY SP12 – GYPSIES, TRAVELLERS AND SHOWPEOPLE									
Lincolnshire County Council			Burgh le Marsh	24			<p>A G&T Transit Site is included on the map next to the Bypass. However, there is no additional information provided as to its suitability in planning terms similar to the information provided for other allocated sites in pp 25 – 27. Consequently the site is included without justification.</p> <p>The proposed development is 1 km away from Burgh Le Marsh and is contrary to proposed Policy SP 12 which states that sites should:</p> <ul style="list-style-type: none"> Demonstrate that there is safe access to the nearest town, or large settlements amenities by means of pedestrians and vehicles being segregated or be accessible by public transport <p>The LCC Gypsy and Traveller Liaison Officer (GTLO) has confirmed that a transit site "should be located within a reasonable distance to services and ideally linked by a safe pedestrian access (footpath)". Occupiers of the site would have to cross a busy main road with limited routes to Burgh Le Marsh.</p>	<p>The proposed allocated G&T transit site at Burgh Le Marsh Bypass should be deleted and a more suitable alternative provided.</p> <p>The process by which the Burgh site has come to be "allocated" can be criticised insofar as there was no public consultation concerning the proposal in advance of the consideration of the matter by the Planning Policy Committee on 13 October, and the allocation, appears to have been proposed without there having been any (documented) consideration of the respective planning merits of the sites, and thus any consideration of whether the Burgh site provided "the most appropriate strategy when considered against reasonable alternatives".</p>	<p>The Traveller Transit site which lies just outside the settlement of Burgh Le Marsh has been subject to two planning applications. Prior to the debate that occurred on October 13th 2016 at the Planning Policy Committee it was subject to two rounds of public consultation through the development management process. To ensure that Members had all the relevant information in their decision making they were given the report that the officer had written for the Planning Committee and the officer came in to the meeting and gave the same presentation and was subject to questioning by Members. The Planning Committee had already had that presentation and decided to defer the application for a site visit which was occurring after the Planning Policy Meeting and after full Council on</p>

<p>the 2nd November 2016 when the allocations in the Local Plan were approved for pre submission consultation.</p> <p>Members determined that the site was sustainable enough to allocate it for transit provision. The Council considers that this site has been consulted on and a further round of consultation has now taken place in the pre submission consultation.</p> <p>The site is already being used as a transit Gypsy site and provides for the majority of the District's transit provision need as identified in the Gypsy and Traveller Needs Assessment 2016.</p> <p>With regard to details and an assessment of the site in the Plan, the site has been subject to an individual sustainability appraisal as had all the other sites put forward. The Council has only put separate assessments of the housing sites in the Plan because it believes these will help developers when they look at the sites to see that there are no major constraints. There is no need to do this with the Gypsy provision and it draws attention to this provision singling out this minority group which the Council believes could be seen as a form of inequality.</p> <p>Policy SP12 with regard to transit sites only says that</p>	<p>This site is currently subject to a re-submitted planning application which was previously refused by ELDC (S/023/02439/16) to which LCC has objected.</p>

								<p>the Council will support them and they should be in reasonable proximity to the nearest town, large or medium village. A transit site is only a temporary stopping place for the Travelling Community who come to the District during the summer months, normally starting around Easter and as the weather declines in the autumn the numbers also decline with little or no visits during the winter months. This site therefore to all intents and purposes is a holiday caravan site for Gypsies and Travellers and the Council regards it as in a sustainable location for this use. There is a holiday caravan site to the rear of this site further away from Burgh le Marsh and the County Council made no objections to any planning applications submitted for this site on the grounds of sustainability. The Council would question what the difference is between the two sites.</p>
<p>Settlement proposals SA</p>	<p>10, 11</p>	<p>The Mablethorpe Industrial site is council owned (elsewhere in the core strategy topic paper Gypsy & Traveller 2016 is stated would allow for 7 pitches), this is in the Councils control, but several times the council state that Mablethorpe has still to be considered for the need of employment, (so in fact this site may not be an option) surely the council should have considered the employment part prior to putting this forward for transit pitches (when this may never happen) Its not good enough just to say it on paper without the real inclination to act on this. The council</p>	<p>The planning policy for government 2015 states that local authorities should</p> <ul style="list-style-type: none"> a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets b) identify a supply of specific, develop-able sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15 	<p>Mablethorpe Industrial Estate has no identified need for additional employment land in the East Lindsey Employment Land Review. The empty land on the industrial estate has been unused for a number of years with no interest from developers. Therefore the allocation of what is one plot for 7 transit Gypsy pitches on the site is not going to impact on the overall employment provision for the town.</p>				

						<p>have no back up plan in place for these pitches if Mablethorpe industrial site was considered to be of more need for employment purposes.</p> <p>Burgh Le Marsh Bypass which is for 18 pitches, should have been passed for planning but was refused by committee, which makes no sense when it was suitable and should have been assessed & determined in accordance with the presumption in favour of sustainable development (NPPF & the Government Traveller planning policy 2015). This application is in again for 18 pitches and whilst this should be passed if in the event it should once again be failed/refused, then again the council have no back up plan in place for this</p> <p>Site C at Louth which is Brackenfrayer, Brackenborough Road site that has planning for 11 rented residential pitches, this site passed January 20-11 is in private ownership & is on the open market for one million pounds, it is not developed other than a condition which the council deemed to make this live just before planning became extant (but this was rather controversial at the time, as there had been no material operation carried out at that time that would have complied with the Town & Country planning act 1990). The material start that the council stated to make this live was the gate entrance being widened & Highways road (bell-mouth) widened. But in fact Highways had no agreement with the owner, the roadway was not widened other then by scraping off weeds from the side soil verges, & weeds removed to add a hand gate to widen gateway, this was said to be the legal material start. If this is in fact deemed as not be live then it would be extant & the planning process would have to be re- started. <u>(Anyone_of_the_objectors_to_this_site could take this to a judicial review as</u></p>	<p>3 sites are put forward from the council's original 10, one site is council owned 2 are private. The key words are specific deliverable sites, these sites are not shown to be specifically deliverable or achievable. The sites that have been chosen for Traveller/Gypsy sites should be sites that are ready and available. There should be a timetable set for the delivery of these 3 sites.</p> <p>Clearly if Burgh Le Marsh is passed which should be known by the time you the inspector receives these comments then this site will not take much to be up and running as it is already in progress of development and has been used for Travellers in prev10us years.</p>	<p>The site outside Burgh Le Marsh has been allocated in the Local Plan for Gypsy Transit provision, the Council believes that it is a sustainable site which provides for a substantial amount of its transit provision. It is for the Planning Committee to assess the detail of the site as put forward by the applicant.</p> <p>The proposed allocated site on Brackenborough Road, Louth which has planning permission for 11 pitches has a legal start on it and the Council has investigated this. The Council is presently moving into the process of having meaningful negotiations with the landowner in order to purchase the site, if these fail then the Council will move to compulsory purchase the site.</p>
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<p>Planning Committee and time to read it through an adjournment; the Planning Case Officer came in to the meeting and gave the same presentation as had been given to the Planning Committee with the relevant photos and was subject to questioning by Members.</p>	<p>The Planning Committee had already had that presentation and decided to defer the application for a site visit which was occurring after the Planning Policy Meeting and after full Council on the 2nd November 2016 when the allocations in the Local Plan were approved for pre submission consultation.</p>	<p>Members of the Planning Policy Committee determined that the site was sustainable to allocate it for transit provision and that it met the majority of the Districts transit provision need.</p>	<p>The Council considers that this site has been consulted on and a further round of consultation has now taken place in the pre submission consultation.</p>	<p>The site is already being used as a transit Gypsy site and provides for the majority of the District`s transit provision need as identified in the Gypsy and Traveller Needs Assessment 2016.</p>

						<p>settlement" is set forth in point 7 of the Policy. While criteria other than proximity are set forth in respect of each of permanent and transit sites, in neither case is the capacity of the settlement's services and infrastructure to accommodate additional demand taken into account as and positively set forth as a qualifying criterion.</p> <p>East Lindsey District Council (hereinafter, "ELDC") has indicated it will pursue the site at Burgh le Marsh Bypass as a potential Gypsy/Traveller site. The inclusion of this site in the Local Plan gives rise to failure of the plan on grounds of both legal compliance and soundness.</p> <p>1. Legal compliance. The guidance notes for completion of this form indicate an assessment of legal compliance of the Local Plan should consider whether a) "the appropriate bodies have been consulted", b) "the process of community involvement has been in general conformity with the Council's Statement of Community Involvement", and c) preparation has been "in line with the relevant legislation. Taking these points in turn:</p> <p>a) Failure to consult appropriate bodies.</p> <p>Burgh le Marsh Town (hereinafter, "we" or "the Town Council") unequivocally asserts a flagrant breach of the requirement to publicly consult on the suitability or otherwise of this site before it is included in the Local Plan as mandated by Town and Country Planning Act 2004 (Sections 19 and 20 refer). In a letter dated 31 October 2016, we wrote to East Lindsey District Council to confirm that while neither we nor any of our residents had been consulted in any way on the suitability of the site for</p>		<p>consultation through the development management process. The council took legal advice from its Monitoring Officer and to ensure that Members had all the relevant information in their decision making at that Committee they were given the report that the officer had written for the Planning Committee and adjournment; the Planning Case Officer came in to the meeting and gave the same presentation as had been given to the Planning Committee with the relevant photos and was subject to questioning by Members.</p> <p>Members determined that the site was sustainable enough to allocate it for transit provision. Members spent 4 hours considering the site in Burgh le Marsh and the alternative sites and came to the conclusion that the provision was best met by the allocation of the site outside Burgh le Marsh and the 7 pitches on the Mablethorpe Industrial Estate. Given that the need is now and not in the future the site in Burgh le Marsh is up and running and has been for a number of years and meets the majority of the provision today.</p> <p>The Council considers that this site has been consulted on and a further round of consultation has now taken place in the pre submission consultation.</p>
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<p>The site is already being used as a transit Gypsy site and provides for the majority of the District`s transit provision need as identified in the Gypsy and Traveller Needs Assessment 2016.</p>	<p>Policy SPI2 with regard to transit sites only says that the Council will support them and they should be in reasonable proximity to the nearest town, large or medium village. A transit site is only a temporary stopping place for the Travelling Community who come to the District during the summer months, normally starting around Easter and as the weather declines in the autumn the numbers also decline with little or no visits during the winter months. This site therefore to all intents and purposes is a holiday caravan site for Gypsies and Travellers and the Council regards it as in a sustainable location for this use.</p> <p>There is a holiday caravan site to the rear of this site further away from Burgh le Marsh and the consultee made no objections to any planning applications submitted for this site on the grounds of sustainability or unsuitability. The Council would question what the difference is between the two sites.</p> <p>The proposed allocated site on Brackenborough</p>
<p>inclusion in the emerging Local Plan, we had in fact been consulted on the planning application for the development of the site. On the understanding that assertions of our having been consulted on the suitability of the site as part of the process in preparing the emerging Local Plan were emanating from within ELDC, in said letter we also respectfully requested ELDC to provide evidence of the alleged consultation. As per the response from ELDC in an email from Chief Executive Stuart Davy on 1 November 2016, rather than publicly consult on the site`s suitability for inclusion in the Local Plan ELDC instead decided to effectively substitute consultation on the application for consultation on the suitability of the site thereby abrogating the legal requirement to consult on the Local Plan under the legislation hereinbefore mentioned. Mr Davy asserted that at the Planning Policy Committee meeting on 13 October 2016 the site was raised and considered as part of the Local Plan allocations with the acceptance that "it had been out for consultation through the planning process and the officer recommendation for approval, [so] Members determined to debate whether the site was suitable for allocation in the Local Plan. He further asserted "consultation had been carried out through the Planning Application process."</p> <p>In the course of reviewing said planning application for the site, we were alerted to fact that the Lincolnshire County Council Traveller Liaison Officer which revealed that he had not even been consulted on the Planning Application, but was made aware of it by individuals such as the County Council member for Burgh le Marsh, Councillor Chris Pain.</p>	

							<p>must have regard to national policies and guidance issued by the Secretary of State.”</p> <p>In this case, there was an absence of early or effective engagement with the settled community of Burgh le Marsh either through its representatives on the Town Council or directly with the wider electorate via consultation on inclusion of the site as a preferred Gypsy/Traveller site in the Local Plan. Consultation via the Planning Application process is not a substitute for Local Plan consultation being both pre-emptive with potential for grave detrimental effect.</p> <p>2. Tests of soundness. We assert failure of this section of the Local Plan against the tests of soundness set forth in the National Planning Policy Framework, namely, a) it was not positively prepared and b) is not justified. Taking these points in turn:</p> <p>a) Positively prepared. The Department for Communities and Local Government circular Planning Policy for traveller sites August 2015, states in Paragraph 7a that “early and effective community engagement with both settled and traveller communities” is advocated in using the evidence base to plan positively for and managing development of these sites. Without such engagement, any evidence gathered is of nil merit.</p> <p>b) Justified. We support and reiterate the assertions of the LCC Gypsy/Traveller Liaison Officer in respect of the second planning application for the Burgh Bypass Gypsy/Traveller Site (ELDC application S/023/02439/16), such that ELDC’s failure to document the planning merits of the site and determine whether the site is the most appropriate strategy as determined</p>		
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	<p>against review of reasonable alternatives nullifies the reasonability and validity of the proposal to include this site as a preferred Gypsy/Traveller site in the Local Plan. It is our feeling the incomplete research in this case can only give rise to reckless assertions where methodical, reasoned conclusions are vital.</p> <p>The plans fails the legal compliance test in respect of</p> <p>a) Conformity with EDLC's own Statement of Community Involvement. Neither the local community nor its directly elected representatives was afforded opportunity to consider and comment on inclusion of the Burgh Bypass site as a preferred Gypsy/Traveller site in the Local Plan. The potential impact of allocating this site for Gypsy/Travellers is significant in light of increasing pressures on infrastructure and local services thereby warranting due consideration by the local community.</p> <p>b) Divergence from relevant legislation. The Department for Communities and Local Government circular Planning Policy for traveller sites August 2015, states in Paragraph 7a that "early and effective community engagement with both settled and traveller communities" is advocated in using the evidence base to plan positively for and managing development of these sites." Section 19(2) of the Town and Country Planning Act 2004 requires that "in preparing a local development document the local planning authority must have regard to national policies and guidance issued by the Secretary of State." In this case, there was an absence of early or effective engagement with the settled community of Burgh le Marsh either</p>	

Metacre Ltd Represented by De Pol Associates	SP12	O				<p>through its representatives on the Town Council or directly with the wider electorate via consultation on inclusion of the site as a preferred Gypsy/Traveller site in the Local Plan.</p> <p>The policy states that the Council will support new permanent Gypsy & Traveller sites adjacent to or in a reasonable proximity to a town or large village. It does subsequently refer to sites complying with a range of criteria, although none of these relate to having to identify a need. As such the Policy could essentially allow an unlimited number of permanent gypsy and traveller sites across the District, which is considered inappropriate given that such sites are often located in areas which would otherwise be protected from development. As such it is considered that an additional criterion should be added to the policy requiring a need to be demonstrated for any new sites to be granted permission.</p> <p>The supporting text also refers to the criteria within the policy being used to identify sites in the Settlement Proposals DPD and in this regard the DPD proposals map identifies a site to the north of Brackenhorough Road in Louth as a Gypsy & Traveller site.</p> <p>The Government's planning policy for traveller sites (August 2015) states that Councils, in producing their Local Plan, should identify and update annually a supply of specific 'deliverable' sites. The Council's Gypsy and Traveller Study refers to the site to the north of Brackenhorough Road in Louth benefiting from an extant permission for permanent traveller pitches, granted on appeal in May 2011. This site is referenced throughout the document as having permission for "11 authorised pitches" which will contribute towards a recognised need. The permission</p>	<p>The site at Brackenhorough Road, Louth should not be an allocated gypsy and traveller site as it fails the test of deliverability. The proposed allocation should therefore be deleted.</p> <p>An additional criterion should also be added to the policy requiring a need to be demonstrated for any new sites to be granted planning permission.</p>	<p>The proposed allocated site on Brackenhorough Road, Louth which has planning permission for 11 pitches has a legal start on it and the Council has investigated this. The Council is presently moving into the process of having meaningful negotiations with the landowner in order to purchase the site, if these fail then the Council will move to compulsory purchase the site.</p>
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National Federation of Gypsy Liaison Groups	SP12	(2)	0				<p>relating to this site is subject to a number of conditions which prevent the permitted use of the site until further details have been submitted to and approved by the Council. These details include the proposed means of sewerage disposal, external lighting, landscaping, site management plan, noise mitigation scheme and measures to improve roosting and breeding areas for Barn Owls. Further protected species surveys must also be undertaken prior to commencement of development. Indeed the permission may have now expired.</p> <p>The costs involved in both in the preparation of these necessary details and the implementation of any agreed works would be significant for a scheme of no more than 11 pitches. Moreover the fact that the site has not come forward in the five years since permission was granted indicates that the site is not deliverable in this regard.</p> <p>On this basis it is considered that this site should not be an allocated gypsy and traveller site as it fails the test of deliverability.</p> <p>We generally support Strategic policy 12 but consider the words "in or adjacent to" in section 2 of the policy are too restrictive. We see no reason to have different criteria in relation to medium villages.</p>	<p>The same criteria should be applied to medium villages as those relating to larger settlements</p>	<p>The Council notes the general support for the policy.</p> <p>Medium villages are smaller in character than towns or large villages and therefore a different set of criteria would apply to them. This is why the policy limits the number of pitches for medium villages and only seeks small scale development. Adjacent or in a medium village would mean the small scale development of no more than 3 pitches</p>
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	<p>this and despite my clients making land available for employment allocation (land which adjoins significant existing employment development and meets the Councils requirement for the land to easily connect to the road network and that can be integrated into its setting in terms of layout and landscaping) the Council have failed to make any allocation of employment development land in or adjacent to the largest village in the district, Woodhall Spa. Within the emerging local plan the Council refers to an existing industrial site on Tattershall Road in Woodhall Spa, having room for further expansion. However, this site is only approximately 0.4 hectares in total and only has approximately 0.2 hectares of space for expansion. This site is also adjacent to land the Council have allocated for housing and therefore some employment uses will not be compatible with housing close by. Bearing in mind that the last Planning Permission the Council granted in the Woodhall spa area for employment development, (in 2016 on my client's land at Roughton Moor) was 1.6 hectares in size, this potential to expand the Tattershall Road site by 0.2 hectares seems wholly inadequate.</p> <p>As the Council is not proposing any employment allocation in or adjacent to the largest village in the district. I do not consider this part of the emerging local plan to be positively prepared or effective. By not having an employment allocation adjacent to the largest village in the district, the Emerging Local Plan fails to meet the goals of strategic Policy 13 { SP13 } paragraph 2 <i>"supporting proposals which bring forward employment land in or adjoining large villages"</i> or paragraph 4 <i>"to strengthen the rural economy by supporting... ..development where it can provide local employment"</i></p> <p>In the supporting text for this SP13 (paragraph 6) the Councils says it</p>	<p>suitable for employment allocation {Please see attached plan on which this land is edged red }. The land is situated adjacent to significant existing employment use. In 2016, ELDC granted Planning Permission on 1.6 hectares of this land, in order to expand one of the existing businesses. The site meets the Council's other objectives of being one which easily connects to the road network (a Highway standard access, suitable for future development, has already been installed) and can be integrated in terms of layout and landscaping. I therefore propose an allocation of 1.6 hectares of employment land at Roughton Moor. Such an allocation will better support the Councils goals set out in Strategic Policy 13 (SP13) paragraph 2 and 4.</p> <p>If the allocation of an additional 5 hectares of employment land in Horncastle is not deliverable, I suggest this allocation is split between Coningsby/Tattershall and Roughton Moor, with a further 2 hectare allocation of at Roughton Moor. This will better support</p>	<p>planning permission and the remaining undeveloped area at the Tattershall Road industrial site there is no requirement for any further allocation for the Woodhall Spa Area.</p> <p>Since 2000 there have been two applications proposing further development of the Tattershall Road site, in 2003, an application was approved for 6 further units but this was not implemented. The most recent, an Outline Application was made in 2010. With such little uptake of employment land and units within the Woodhall Spa area the Council see no reason to allocate further at this present time but will continue to monitor the situation through its Employment Land Assessment.</p> <p>Work is still ongoing to find a resolve to the highways issues facing Horncastle in partnership with Lincolnshire County Council.</p> <p>Horncastle industrial estate has flourished on the back of its location on the strategic road network and if the highways issues were to preclude the allocation from coming forward the Council have taken the strategic decision to provide an additional 5 hectares of employment land in Louth. Louth very much like Horncastle is situated on the recognised strategic road network.</p> <p>The policy at criterion 2 does state that it would support employment land coming forward in or adjoining the large villages, which Woodhall Spa is one, therefore the developer can at any time submit an application if they wish to bring forward this land for employment use.</p>
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England R	SP13	o					<p>recognises that there is an issue with highway infrastructure in Horncastle which may prevent their allocation of 5 hectares coming forward in the plan period and that the Council therefore proposes a fall-back position of allocating an additional 5 hectares of employment land in Louth. Surely if the Horncastle employment land is not deliverable, it would be more appropriate to move this allocation to a location closer to Horncastle. For example, to split the allocation between Coningsby/Tattershall and Woodhall Spa (Roughton Moor).</p> <p>I welcome and support the designation of Horncastle as a Town and suitable location for new development.</p> <p>However I do object to the failure to allocate enough land for employment. Having identified a need for additional land requirement on the Holmes Way industrial site, then stating it is unlikely to come forward in the short to medium term because of highway infrastructure constraints.</p> <p>I welcome and support the planned goal of growing employment alongside towns and large villages. Land to the east of Holmes industrial estate has two existing accesses from industrial estate and also has access to Mareham road. Also as acknowledged within the strategic housing land availability assessment 2016 (SHLAA), there is the potential for a connecting road between Mareham Road and Spilsby Road (A158) thus allowing traffic to move out of the industrial estate without having to use the already busy Boston Road and Mareham Road (A153) junction.</p> <p>Horncastle is one of the largest towns in the ELDC area, so benefits from Economies of scale and reduced need for excessive travel being very close to existing and potential housing.</p>	<p>Strategic Policy 13 (SP13) paragraph 4 to strengthen the rural economy by supporting development where it can provide local employment. I believe the above suggested changes will make Strategic Policy 13 positive and effective.</p>	<p>More employment land should be allocated and access issues remedied for the current industrial estate to allow natural and sustainable growth of a busy and vibrant area .</p>	<p>The Council has allocated the objectively assessed need for employment land within Horncastle however recognises that transport issues may preclude this coming forward over the plan period. The Council are however and will continue to work alongside Lincolnshire County Council to resolve the highways issue and have allocated additional land in Louth for employment use.</p>
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Associated British Foods Represented by Rapleys	SP13	O				<p>If no employment development is allocated in this area it could restrict development and growth of existing firms and restrict the potential to enhance and develop business clusters and provide business centres and step-up units, that are identified as mechanisms for delivering a strong economy.</p> <p>Background – client and site Associated British Food (ABF) is the freehold owner of the former Fisher’s Seeds Site (Site), North Holme Road in Louth. Our client wishes to ensure that there is the appropriate policy framework for the future redevelopment of the Site. ABF has previously submitted representations to earlier stages of the Local Plan in respect of their land interests within Louth. Representations were submitted to the East Lindsey District Council Emerging Local Plan Consultation: Core Strategy and Settlements Proposals Plan (June-August 2016) and the Draft Core Strategy Consultation (November 2012 – January 2013).</p> <p>The Site extends to 2.8 hectares and is located on the Fairfield Industrial Estate on the northern side of Louth.</p> <p>The Wider Fairfield Industrial Estate which extends approximately 88ha in size and has a wide range of uses, including a number of ‘non industrial’ uses such as retail, office, educational and leisure based activities. It is noted that the Estate includes several undeveloped sites and some vacant buildings.</p> <p>The Site was previously used for agro-industrial purposes, including the storage of seed in large silos. The former use became redundant and the Site was subsequently cleared in 2009.</p>	<p>We consider it necessary for Strategic Policy 13 to be re worded to take account of the principles of NPPF Paragraph 22 in order to avoid long term protection of employment sites and allow flexibility for alternative uses of land or buildings to be considered.</p>	<p>Evidence shows that the District needs all the allocated employment land in Louth for employment and making it mixed use or any other use would undermine this objective. Also with the issues raised over the Highway infrastructure in Horncastle, Louth is having a further allocation of 5 ha. The Councils property services have confirmed that the employment land that the Council owns in Louth is selling so the market remains viable and there is a proven need and demand. It is therefore not considered appropriate to alter the employment allocation to anything other than employment.</p>
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						<p>The Site has been vacant for approximately 7 years and has been subject to marketing during that period. There has been no meaningful or serious interest expressed from the Class B employment sector. This vacant brownfield site should be brought back into effective use and in this regard it is considered that the Site has the potential to accommodate a wide range of land and/or economic uses or deliver housing.</p> <p>In sustainable development terms, the Site's redevelopment potential is strengthened by its current vacant status and accessible location within the defined settlement boundary of Louth, both in terms of local population and choice of transport modes.</p> <p>Representation We consider current draft Strategic Policy 13 to be unsound.</p> <p>It is noted in supporting Paragraph 6 to the SP13 that <i>'the District remains flexible with regard to employment land, in that it should not guard land for employment uses unnecessarily but still wants to ensure that if opportunities come forward they can be supported'</i>. We agree that it should not guard land for employment uses unnecessarily.</p> <p>This approach is particularly supported towards unallocated employment sites (in the Settlement Proposals DPD) which have been vacant for a considerable period of time such as our client's. We do not consider it appropriate to designate the Site as an 'Employment Area' for employment uses, which the document currently suggests to be defined as 'traditional B class employment uses' only; as this does not include the types of uses already provided on the Fairfield Industrial</p>		
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CPRE Lincolnshire	Chapters 6, 11	o					<p>Estate, including retail, quasi retail operators and services.</p> <p>Paragraph 22 of the NPPF (2012) states that '<i>planning policies should avoid long term protection of sites for employment use where there is no reasonable prospect of a site being used for that purpose. Where there is no reasonable prospect of a site being used for allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities</i>'. </p> <p>On this basis, in order for the Policy and the Local Plan to be compliant with Paragraph 22 of the NPPF (2012) we consider it necessary to reflect flexibility directly within the Strategic Policy 13 rather than just within the supportive text. The policy should reflect a mechanism to allow either the removal of such employment sites as employment land or include a policy which specifically identifies a wide range of alternative economic uses which are responsive to identified development needs of the District or the market.</p>			CPRE Lincolnshire	Chapters 6, 11	o			<p>Transport and Accessibility</p> <p>In Chapter 6 (Employment) home working is being acknowledged in East Lindsey as opposed to being within Chapter 11 (Transport and Accessibility). The Transport Section under the population and commuter flows also needs to connect people to jobs, and the historic trend of increased commuter flows. CPRE Lincolnshire believes insufficient consideration has been given to the impact of the rise in home working, which rose from 38,547 in 1991 to 98,518 in 2011. According to the Office of National Statistics, there is now</p>		<p>It is not clear from how the respondent wishes for home working to be reflected within Chapter 11 relating to Transport and Accessibility. Chapter 11 is a strategic transport policy and therefore does not seek to reflect the various working patterns and types in existence across the District. The Council feels the support for home working is best placed within Chapter 6 which covers the many facets of employment.</p>
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CHAPTER 7 – DIVERSE ECONOMY, TOWN/VILLAGE CENTRES AND SHOPPING

Name	Policy Number	Page Number, Text (para Number)	Settlement Proposals Map or Site Number	Settlement Proposals Page Number	Evidence Document	Page Number, Text (para Number)	Q3 Response	Q4 Change Sought	Response
							Q3 Response	Q4 Change Sought	Response
POLICY SP14 – TOWN/VILLAGE CENTRES AND SHOPPING									
NHS Property Services		19	0				<p>Chapter 7- Paragraph 19- Proposals involving the closure of community facilities</p> <p>Faced with financial pressures, the NHS requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of unneeded or unsuitable sites and properties for best value is an important component in helping to provide funding for new or improved services and facilities.</p> <p>Restrictive policies, especially those which require substantial periods of marketing, could prevent or delay required investment in services and facilities. It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal.</p>		<p>The Council recognises the financial pressures faced by the NHS but do not agree that a 12 month marketing period for community facilities to be onerous. The NPPF is clear in stating that planning policies and decisions should "guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs".</p> <p>To assume that a surplus NHS facility would be suitable for housing or any other use would depend on its location which need to be assessed during the planning application stage.</p>

<p>Morrisons representation by Peacock & Smith</p>	<p>SP14</p>						<p>An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing).</p> <p>Much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or O1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses), and should not be subject to restrictive policies or periods of marketing.</p>	<p>Chapter 7 – Diverse Economy, Town/Village Centres and Shopping Morrisons support the East Lindsey Local Plan Publication Version and the approach taken in Chapter 7 and agrees that Strategic Policy 14 (SP14) is consistent with National Planning Policy.</p> <p>Louth is the main shopping and commercial centre within East Lindsey District and as such its retail offer and presence should be protected and enhanced where possible. Morrison’s supports Louth’s designation as a ‘town’ in the settlement hierarchy. Expanding or improving the town centre’s retail facilities is the first criteria set out in SP14. As the main supermarket in Louth and an important anchor to the town centre; Morrison’s are always looking to improve their qualitative retail offer and potentially their presence in Louth and this should be supported by the Council.</p> <p>To ensure Louth’s vibrant town centre and retail offer, the Council must</p>		<p>The support for Policy SP14 is noted.</p> <p>The Council recognise the omission of the car park as an error and is therefore proposing a minor modification to amend the town centre boundary accordingly to include this area.</p> <p>With regards to the primary and secondary shopping frontage demarcation. The Council previously resolved that insofar as secondary shopping frontages were concerned there were few locations where there are sufficient retail uses along an unbroken frontage as to warrant a designation.</p> <p>For clarity the Council proposes a minor modification to remove all</p>
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reference from Chapter 7 relating to Secondary shopping frontages.		ensure that proposals to improve the existing retail offer are supported. This approach would also assist in clawing back retail expenditure that is going outside of Louth's catchment area to places like Cleethorpes and Grimsby.	
It is therefore proposed the second sentence of paragraph 3 of the supporting text be amended to read as follows.		It is recognised in the Core Strategy and its supporting documents and evidence base that the Morrison's store in Louth is a key driver in generating footfall across the town centre. The principle of providing a modern food store that anchors the town centre and prevents leakage outside the catchment area should be encouraged. It is also compliant with the Council's Retail Study Update. Morrison's supports the findings of the Retail and Economic Assessment Update 2014 which found that the need for further convenience retail floor space within Louth has been met up to 2018 and that there is limited capacity (671 sq. m net) for new floor space by 2028. Morrisons are therefore in agreement that no new retail sites need to be designated for development in the Plan period (up to 2031).	
"To that end, the Plan aims to maintain the integrity of the primary shopping frontages for retail uses but will support amenities in the defined coastal amusement areas as shown in the Settlement Proposals Document".		Morrisons agrees that it is important for the town centres to be clearly defined on the Settlement Proposals Map but questions the Town Centre Boundary for Louth as it includes the Morrisons store but not the adjoining car park which serves the store and its customers in making linked trips into the town centre. As the store and building and car park are 'one unit'; both the store building and its car park should be contained within the town centre boundary for Louth.	
To reduce repetition the last sentence of paragraph 3 is to be removed.		The Settlement Proposals Document will show the extent of the town centres and the Primary Shopping Area as defined by primary frontages".	
The first sentence of paragraph 11 of the supporting text is to be reworded so that it reads as follows:		Paragraph 12 is to be removed in its entirety.	
"The Settlement Proposals Document will show the extent of the town centres and the Primary Shopping Area as defined by primary frontages".		Within Paragraph 16 it is proposed that the 4 th sentence is removed in its entirety which reads as follows:	
Paragraph 12 is to be removed in its entirety.		The Settlement Proposals Map for Louth Town Centre fails to clearly identify the primary and secondary frontages - this should be made clear	
Within Paragraph 16 it is proposed that the 4 th sentence is removed in its entirety which reads as follows:			
"The Council will support tourism-based business in secondary shopping areas including cafes, pubs,			

<p>restaurants and hot food takeaways in the coastal towns, with the exception of coastal amusements.</p> <p>Within the policy wording the first sentence is to be reworded so that its reads as follows:</p> <p>"The town centres in Alford, Coningsby, Tattershall, Horncastle, Louth, Mablethorpe, Skegness and Spilsby, and the primary shopping frontages will be defined on the Settlement Proposals Map".</p> <p>Criterion 3 and 7 of Policy SP14 are to be removed in their entirety as they relate to secondary frontages.</p> <p>The Council propose a minor modification to the Settlement proposal key to remove reference to protected shopping frontages inland and coastal and replace this with a single designation of Primary Shopping Frontages. Similarly the key is to be amended so that the Coastal Amusement Areas are correctly coloured to those areas shown on the maps themselves.</p>			<p>and there should be an opportunity for further consultation on these.</p>						
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CHAPTER 8 – WIDENING THE INLAND TOURISM AND LEISURE ECONOMY

Name	Policy Number	Page Number, Text (para Number)	Settlement Proposals Map or Site Number	Settlement Proposals Page Number	Evidence Document	Page Number, Text (para Number)	Q3 Response	Q4 Change Sought	Response
POLICY SP15 – WIDENING THE INLAND TOURISM AND LEISURE ECONOMY									
█	SP15						SPF15 (2), relating to location for new tourism facilities, specifically contradicts the immediate discussion, particularly para 7. Para 7 says that locations outside of existing boundaries are acceptable if they are centred around large villages and towns. SPF15 (2) appears to say they are not. SPF15(2) should clarify that locations without footpath access to towns and large villages should be supported where there is either public transport, or a pedestrian route segregated from traffic, where those villages/towns offer suitable facilities.		Paragraph 7 of the supporting text refers to caravan and log cabin accommodation, but it is agreed that this could be clearer. Amend sentence 2 of paragraph 7 to read "To ensure that those visiting the District have access to these facilities the Council will support caravan and log cabin development that is in close proximity to these settlement."

CHAPTER 9 – INLAND FLOOD RISK

Name	Policy Number	Page Number, Text (para Number)	Settlement Proposals Map or Site Number	Settlement Proposals Page Number	Evidence Document	Page Number, Text (para Number)	Q3 Response	Q4 Change Sought	Response
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POLICY SP 16 – INLAND FLOOD RISK

Environment Agency	SP16						<p>We support the Chapter on inland flood risk, which outlines the Council's approach to guide vulnerable housing development away from areas at high risk, whilst supporting business, leisure and commercial uses. Flood risk is a significant issue and one that will only increase in the coming years due to climate change. We commend East Lindsey for adopting this proactive strategy to mitigate and adapt to climate change, which is fully in line with the National Planning Policy Framework (as required at paragraph 94).</p> <p>The Policy will also ensure that any development coming forward will incorporate appropriate mitigation measure into its design to protect occupants.</p>		<p>The Council notes the support of the consultee.</p>
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Chestnut Homes	SP16	o				<p>This Chapter also recognises the potential for flood risk resulting from an increase of discharges from foul water disposal. We support the Policy requirement for new development to show how such increases, along with surface water, will be managed.</p> <p>This approach is clearly evidence based, demonstrating the plan is positively prepared, justified and consistent with National Policy.</p>		
					<p>It is unclear the justification for supporting business, leisure and commercial uses in areas of flood risk over housing. National guidance can adequately deal with this issue, alongside site specific flood risk assessments for development proposals.</p> <p>As stated within SP4 we question whether there is the need to excessively restrict development regarding the requirement to marketing sites for 12 months for business, leisure or commercial use. We believe there is a large need for more housing and the fewer constraints to deliver the better.</p> <p>The policy outlines that housing developments in areas of inland flood risk should not have ground floor sleeping accommodation unless it can be demonstrated that flood mitigation measures can be incorporated into its design. We support this stance and believe this should be reflected in policy SPS to allow ground floor accommodation should mitigation measures be incorporated into the developments design.</p> <p>We support the provision of SUDS as an integral part of the design process. This should include the</p>		<p>National Planning Policy at paragraphs 99 and 100 states 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.</p> <p>There are occasions when it would be necessary to build in areas of flood risk and the policy sets this out, but these should be exceptions not the norm and other uses apart from the more vulnerable housing should be sought for a site before it is considered for housing. Business, commercial and leisure use are less vulnerable and therefore the first choice as appropriate uses in a flood risk area. The Council worked with the Environment Agency on the creation of this policy are satisfied that it will help alleviate the risk of flooding in the inland parts of the District without</p>	

<p>Represented by Brown & Co.</p>	<p>SP16</p>	<p>p77</p>	<p>o</p>	<p>retention of any existing water feature where possible. It will not always be preferable, viable or possible to retain all such features and we suggest the policy wording for Paragraph 6 be amended accordingly.</p> <p>The policy states 'all developments must be accompanied by a site-specific floor risk assessment'. In accordance with NPPF (Foot note 20) a site-specific flood risk assessment is required for proposals of 1hectare or greater in Flood Zone 1. We believe the policy point 1.1 should be amended to reflect this.</p>	<p>preventing suitable development to come forward.</p> <p>The consultee points out that at point 1.1 the policy asks for suitable flood risk assessments on all development and they are correct that this will not necessarily be the case. The Council is proposing a minor modification that will resolve this matter by the addition of the words "in line with national policy" at the end of the sentence at point 1.1.</p>	<p>This is not a policy specific comment but actually relates to why a site has not been allocated. It is in this case because the site is in Flood Zone 3 with no part of it outside in a lower zone. The sites the consultee has mentioned all have lower flood risk areas in which to develop and their capacities have been discounted accordingly. The Council is not allocating any sites which lie wholly in flood risk because National Planning Policy at paragraphs 99 and 100 states 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.</p>
<p></p>	<p></p>	<p></p>	<p></p>	<p>This Policy illustrates that housing in areas of inland flood risk is possible and indeed has regularly occurred in the area and is proposed on other sites. Therefore, we cannot understand why such a negative view has been taken on the site C&T302. As alluded to previously, given that mitigation can take place and development has already occurred in the near locality in the recent past, we feel the benefits that would flow from allocating and developing this site outweigh the negative impacts. The risk can be overcome and this will be dealt with by a strategic flood risk assessment of the site and to show that the residents will not be affected. Point 4 in SP16 is relevant and demonstrably a development in this site can be achieved. This site does bring other benefits because of its connectivity, proximity to the school and that it will create and formalise communication links that will be of benefit to the community generally. The analysis of the site which is attached at Appendix 1, confirms many of the points that we have made in the representations which we submitted in August 2016.</p>	<p></p>	<p></p>

					<p>Again for ease of reference we attach a copy of those again at Appendix 2. The comments made there should be taken as part of these representations and brought forward for further investigation and discussion through the review and Inquiry process.</p> <p>On the 2016 FRA (ELDC evidence base) the site in question is shown in Flood Zone 2 and we refer particularly to Table 1 in 3.26 of the FRA Report. The fact that there has been no material flooding of this area in the recent past is relevant. We would draw to your attention the fact that significant allocations have been made in the Flood Zones identified in the plans at 5.0 and 5.3 in the Plan and also the comments on Tattershall suggest “any development around the core of the village will require a detailed Flood Risk Assessment”. It does not say that development should not be permitted – it just means that careful consideration needs to be given to the development of the sites which are in an area where there is a risk but it is a relatively remote risk. The narrative mentions the proximity to the River Bain which is the other side of the village and also the River Witham which is 2km away. There is a substantial amount of Property and other interests between the two river sources and the Property.</p> <p>We would also take this opportunity of drawing to your attention some specific sites which have been allocated which shows the inconsistency in the Plan formulation and the fact that our client’s Site C&T302 should be allocated being right in the heart of Tattershall village close to the facilities and with all the other benefits that would flow from a development of this site. The sites</p>

<p>Anglian Water Services Ltd</p>	<p>SP16</p>	<p>(6,)</p>	<p>o</p>			<p>worth mentioning are: 1. Grainthorpe – GRA211.</p> <p>2. Marshchapel – MAR217, MAR226, MAR300 and MAR304 (coastal).</p> <p>3 Tetney – TNY308.</p> <p>4. Wainfleet – WAI407 (part), WAI401 (part), WAI308 and WAI308B (check western boundary as it may be that the flood area is within WAI1308 – allocation plan not particularly clear and if the western boundary of this site illustrates a continuation of the built edge of the development to the north, then there is no part of WAI308B in the flood plain and all the land that is in the flood plain falls into Site 1308.</p> <p>5. Woodhall Spa – WSP304 (part to the north).</p> <p>We draw to your attention particularly the table in 6.6 which confirms the main towns/villages which are up to significant and other risk from tidal flooding. Grainthorpe is designated as an area with significant risk and there are many other villages/towns mentioned where there are allocations</p>	<p>It is considered that Policy SP16 should be amended as follows:</p> <p>6. It is therefore suggested that Policy SP16 should be amended as follows:</p> <p>All new development must show how it proposes to provide adequate surface and water disposal including avoiding impacting on surface water flow routes or ordinary watercourses. The Council will expect this to involve the use of</p>	<p>The Policy was updated at the behest of the consultee in the last round of consultation in June 2016 to take in surface water and foul water together, therefore the Council consider point 6 to be adequate now.</p> <p>At Point 9 the consultee is asking for additional wording at the end of the sentence and the Council agrees that this. This actually allows a developer to provide evidence that capacity is currently available and can be provided which will give confidence to those making decisions on sites in the future. The Council therefore</p>
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					<p>We also welcome the reference to foul water treatment and disposal which has been included in Policy SP16. However would suggest that Policy SP12 is reworded so that the applicant provides evidence of whether capacity is currently available and if not how this could be addressed in time to serve the development.</p>	<p>Sustainable Drainage Systems along with other appropriate design features (such as green roofs and permeable surface treatments), including the retention of any existing water features on a site.</p> <p>9. All new development must show how it provides adequate foul water treatment and disposal or that it can be provided in time to serve the development.</p>	<p>supports this as a minor modification.</p>
<p>Witham 3rd IDB</p>	<p>S</p>				<p>Thank you for the opportunity to comment on this stage of the Local Plan. Witham Third District Internal Drainage Board supports the Policies contained in the Plan and the Plan in general.</p> <p>In order for the sites to be viable, all sites require a suitable drainage strategy to be in place that ensures that the surface water can be adequately dealt with and without causing detriment to others. Many of the sites have already been subject to pre application discussions to establish a suitable drainage strategy.</p> <p>Through the planning process the Board will continue to comment on the individual planning applications, as and when they are submitted.</p>		<p>The Council notes the support from the consultee.</p>
<p>[REDACTED]</p>	<p>O</p>						<p>National Planning Policy at paragraphs 99 and 100 states 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</p>

						<p>level rises we are likely to experience, a more cautious and proactive approach would be to consider one of models which shows the potential impact of sea level changes on inland flooding, and to prioritise those areas for development which are most resistant to sea level rises at the very far end of current predictions.</p> <p>SP16 Explicitly supports residential and commercial development on sites identified as at risk of flooding, subject to limited conditions. This policy has not be subject to suitable Sustainability Assessment and is particularly questionable. Any development on sites at risk of flooding should be permitted only after a strict sequential test, regardless of whether the site is brownfield or otherwise suitable</p>	<p>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.</p> <p>There are occasions when it would be necessary to build in areas of flood risk otherwise those areas could become blighted and a detriment to residential amenities and the policy sets this out, but these should be exceptions not the norm and other uses apart from the more vulnerable housing should be sought for a site before it is considered for housing. Business, commercial and leisure use are less vulnerable and therefore the first choice as appropriate uses in a flood risk area. The Council worked with the Environment Agency on the creation of this policy are satisfied that it will help alleviate the risk of flooding in the inland parts of the District without preventing suitable development to come forward.</p>
Wragby Parish Council		0				<p><u>Water Resources and Flooding</u></p> <p>Parish Councillors are aware that there are a number of sites within the Village which are prone to flooding and, whilst they accept that new housing within the village is necessary, such development should only be permitted on sites that are not identified at risk of flooding.</p> <p>Parish Councillors support the views of the CPRE that such sites should be allocated well away from identified flood risk zones or those that, given current knowledge, will become subject to flooding within 100 years of the end of the plan period.</p>	<p>National Planning Policy at paragraphs 99 and 100 states 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.</p> <p>There are occasions when it would be necessary to build in areas of flood risk otherwise those areas</p>

											<p>could become blighted and a detriment to residential amenities and the policy sets this out, but these should be exceptions not the norm and other uses apart from the more vulnerable housing should be sought for a site before it is considered for housing. Business, commercial and leisure use are less vulnerable and therefore the first choice as appropriate uses in a flood risk area. The Council worked with the Environment Agency on the creation of this policy are satisfied that it will help alleviate the risk of flooding in the inland parts of the District without preventing suitable development to come forward.</p>
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CHAPTER 10 – COASTAL EAST LINDSEY

Name	Policy Number	Page Number, Text (para Number)	Settlement Proposals Map or Site Number	Settlement Proposals Page Number	Evidence Document	Page Number, Text (para Number)	Q3 Response	Q4 Change Sought	Response
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GENERAL COMMENTS ON THE CHAPTER 10

Note - This refers to North Somercotes and D Jolliffe who have commented on other policies but the comments all relate to the fact that the settlement is located in the Coastal Zone.

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North Somercotes Parish Council				<p>East Lindsey council were invited to the meeting but chose not to attend</p> <p>Sequential testing in the context of flood risk. This policy is holding back sustainable development.</p> <p>The Environment Agency and therefore the councils fail to take in to account the millions of pounds spent by the government on local sea defences to protect life, land and property. From the flood mapping provided to the public, the mapping fails to take in to account sea defences when providing flood risk assessments. Planning permission is then commonly refused as a result of incorrect / non comprehensive information being given to the public.</p> <p>The public believe that the council all too commonly use the environmental agency flood mapping as a tool to decline planning applications. Sequential testing is applied. so that the council can inform us there are other areas locally with less risk of flooding. This I simply yet another way for the council to refuse planning requests.</p>		<p>judgements concerning the risk within the Coastal Flood Hazard Zones. The Council works with the Environment Agency on the evidence and formation of policy covering flood risk and there have not been any major significant changes since those maps were drawn up.</p> <p>Improving the flood defences does not alter the volumes of water which could come into the District from the sea should there be a major event; that volume of water is going to increase with sea level rise. The consultee is only looking at a scenario that covers today but when you build a house it could be inside for a 100 years, in that time, sea level rise and the number of major events could have increased significantly. The Council has to take this into account when planning for the future, business as usual with regard to building new housing in the Coast is not an option when the occupiers of those properties going into the future could then be danger.</p> <p>Whilst the sea defences may be robust along the coast there have been two near misses for East Lindsey since 2013, one in December 2013 and on in January 2017, on the last occasion, the East Lindsey coastline missed a major event by only two hours due to a change in weather conditions. Housing is permanent and long term and with climate change this situation could get worse with more frequent events and a greater volume of water behind the defences. The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy.</p>
				<p>1. Preamble: At the outset the Parish Council should say that it appreciates the vast amount of work and</p>	<p>10.1 Undertake an immediate full and meaningful consultation with the</p>	<p>North Somercotes is a large village which lies within the Coastal Flood Hazard Zones, the Council agrees it is a sustainable settlement with a</p>

Preamble				<p>effort that has gone into the collection, collation and analysis of evidence and production of the documents for publication as part of the Local Plan. Unfortunately, however some of this evidence appears to be inaccurate and some appears to result in a distinctly negative outcome for North Somercotes, particularly when compared to other smaller less sustainable settlements such as Grainthorpe and Hogsthorpe which are also in the Coastal East Lincolnshire area.</p> <p>1.1 East Lindsey Settlement Proposals – Development Plan document – Publication Version – page 174 North Somercotes, population C1800 (1732 - 2011 census), is a large service village on the strategic road network some 1.5/2 miles from the coast, adjacent to the coastal conservation zone. The settlement is largely self-sufficient, minimising the need to travel but with a commuter bus service, and is 20-30 minutes by car to Mablethorpe, Louth and Grimsby, and 45mins 1 hour to Skegness and Lincoln on County Council maintained highways/gritting routes. It provides a range of smaller communities along the coastal strip and inland with employment, retail and key services and facilities as well as supporting a growing tourist trade both in summer and winter (c.60,000 visitors Nov-Jan during Seal viewing season). People are attracted to the area to live and for leisure time, because of the high quality of the area and the accessibility of essential services and other facilities. Current grant funded initiatives by the County</p>	<p>Parish Council and public and other stakeholders regarding the housing and infrastructure needs of this community to ensure its long term vitality and viability to agree a growth target, whether or not this is part of the strategic housing allocation or an agreed notional growth allocation – <i>this is to meet the requirement to have positively engaged with consultees and stakeholders.</i></p> <p>10.2 Re-examine the application and impact of the Coastal Policy, particularly given the inconsistent way some communities are then reclassified as 'inland' and the potential for negative effect, and preferably recast this as a Flood Risk Policy based on identified risk, actual flood events, community ability to respond, etc. – <i>this is to avoid inconsistencies in approach and meet the requirement for a positively prepared proactive plan.</i></p> <p>10.3 Include the Parish Council as a key member of the Working Group looking at future housing design for flood risk areas</p>	<p>wide range of services and facilities but it does lie in the Coastal Flood Hazard zone and therefore just like the other settlements in this high flood risk area is subject to the policies set out in Chapter 10 of the Local Plan.</p>
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	<p>Council to support local businesses are aimed at improving the range of cultural and other business opportunities available, rather than just tourism, as well as extending the tourist season beyond the current 10 months to one that is 'all year-round'.</p> <p>1.2 The wide range of services and facilities include 3 convenience shops – one with extended hours post-office, farm shop, butchers, two public houses, 5 restaurants, take-aways, 2 community/village halls, junior and senior football clubs, playing field and sports pavilion, pre-school nursery/playgroup, Rainbows, Brownies, army cadets, youth club, primary school and secondary school, over-60s club, private meals-on-wheels service, Church, Cemetery, Public Toilets, small industrial unit, Fire Station, Coast Guard station, Doctors surgery with dispensary, dentist, service garage and bus depot. There is a wide opportunity for leisure activities including horse riding, tennis court. Leisure club with pool and gym, billiards and snooker club, WI, yoga and bowls. There are over 60 businesses listed in the parish ranging from small businesses and self-employed home-based enterprises to large employers, including Lakeside Park Holiday centre, various B&B establishments, Fishing Lakes and camping sites, which also provide a source of local employment in tourism.</p> <p>1.3 By any measure this is a significant rural settlement and the Local Plan should facilitate the maintenance and</p>	<p>10.4 Amend the self-build Register to include the ability for those already living and working in the coastal areas to indicate their preference for these areas so that they can continue to live/work there, and so that ELDC can capture the un-met need this register represents – currently it says •The Council is unable to support open market housing in areas of high flood risk or in locations without services and facilities. This is clearly out-with the purpose of the Self-Build legislation and the NPPF for those with a local connection in sustainable communities irrespective of geographic location.</p> <p>10.5 Agree that the Sequential Test is met within the confines of this settlement for those with a local connection and actively promote the introduction of CIL payments now for those in flood risk areas on the coast to enable them to fulfil the Exceptions test while contributing to wider community benefit that will be consistent with other elements of the plan,</p>
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				<p>enhancement of these services in order to sustain the vibrant quality of life for those that live and work here. This settlement now represents, in terms of wider sustainability criteria, one of the most sustainable locations for future development on the coast. The Parish Council and District and County Council colleagues must therefore ensure that there is a fair and appropriate balance struck which ensures the right level of sustainable development for our resident population, by way of an inclusive, positive and proactive Core Strategy and Local Plan which mitigates the flood risk constraints and turns them to advantage. Unfortunately, at present this will not be possible with the Strategy as applied or the Plan as written.</p> <p>1.5 Reluctantly, the Parish Council has reached the conclusion that there is no alternative but to state that it believes that the failure to make even a preliminary assessment of this community's growth needs, and the resultant negative outcomes from some of the underlying policy proposals, do not therefore fulfil the requirement for the Local Plan to be positively prepared, justified, effective, or consistent with national policy. The reasons for this conclusion are detailed below.</p>	<p>meet NPPF requirements and promote sustainability.</p> <p>10.6 Using the Community Infrastructure Levy (CIL) process, 155 houses could generate at least £775K at £5k per property as a contribution to local Flood Prevention Infrastructure Schemes, together with an amount per annum towards such infrastructure. For example the 22 houses alone on site NS0201 off Keeling St, centrally located for schools, shops and services, could generate £110K and provide perfectly safe high quality homes. It is clearly possible to build affordable housing with mitigation that meets EA requirements, so there is no reason why this same mitigation cannot be afforded to market housing for local people, including starter homes and self-build plots, for example.</p> <p>10.7 Permission for such housing could also be conditioned to ensure take-up of renewables, minimisation of energy and water use in</p>

	<p>design, construction and use, and the requirement to have flood resilience/resistance and meet lifetime home standards, for example .Such building methods and systems are already widely in use in the UK, as well as flood prone areas in Europe.</p>								
	<p>10.8 Given that most of the areas within and around the coastal settlements are already in "danger for most" and "danger for all", a balance must be struck between the risks and ensuring the continued sustainability of the settlements is not being compromised. The Parish Council are clear that this must explicitly include North Somercotes, whether or not housing growth is considered Strategic or notional. Where the lowest risk is the lower of the hazard zones- e.g., 'danger to some' , or 'danger to most' , or even if necessary 'danger to all' – this then needs to be considered alongside innovative solutions that will generate revenue for Flood Defences, provide community and wider</p>								

	<p>sustainability benefits, minimise the use of scarce resources, while securing high quality, innovative homes.</p>						
	<p>10.9 The Exceptions policy should not just be for affordable homes, it should include right to buy and self-build, with the same criteria as NPPF with the goal being to ensure that everyone has the opportunity to live in a decent home, which they can afford, in a community where they want to live, taking account of climate change and flood risk constraints.</p>						
	<p>10.10 Account should be taken of the Property Flood Resilience Action Plan – DEFRA 9/2016, by ensuring the use of:</p>						
	<p>A. Planning Conditions for properties at risk from flooding, whatever the source, to include:</p> <ul style="list-style-type: none"> • Flood resilience measures proactively built in as standard for those potentially exposed to the flood risk • Mandatory Flood Action Plan and sign up to EA Flood Lines 						
	<p>B. Building Regulations which</p>						

	<p>require the property to be flood resilient and resistant, with construction tailored to the need of the properties in the area defined at risk with focus on methods which speed post-flood recovery</p>		
	<p>C. Funding for district wide protection by way of CIL contribution per development and precepting the whole district – immediately for new properties and gradual introduction for existing properties in flood risk areas.</p>		
	<p>D. Provision of funding advice for householders in flood risk areas to install identified measures, via Government loans and access to technical advice on measures/costs and benefits</p>		
	<p>E. The Exception Test can then be met as a result of the wider community benefit derived from the CIL, and by precepting, and further enhanced by a requirement for each property to demonstrate an agreed minimum contribution by utilising a range of climate change/low carbon initiatives:</p> <ul style="list-style-type: none"> ● <i>High quality flood resilient/resistant design</i> 		

North Somercotes Parish Council				Chapter 1/2	P6	<p>4. Development Plan document 2016-2031</p> <p>4.1 The Parish Council fundamentally disagrees with the proposals for the differential treatment of some coastal settlements and the punitive impact on North Somercotes. The negative impact of this approach and policy must be carefully considered at the settlement level in order to achieve a balance between the needs of the community to thrive set against the real, but low, risk of flooding.</p> <p>4.2 As previously noted, no analysis appears to have been done of the number of households which would be needed to keep the population of North Somercotes broadly stable, allowing for the provision of high quality homes for the existing live/work population; young adults – which are being lost to the community – expanding</p>	<ul style="list-style-type: none"> • Reduced demand on resources – for construction and in use • Use of sustainable materials • Renewable energy sources • Recycling • Green roof, rainwater harvesting, etc. <p>Some of these are particularly important given the deprivation and fuel poverty experienced in our rural areas.</p>	<p>There is no evidence that the national planning policy of sequentially locating housing development away from areas of high flood risk has had a negative impact on North Somercotes. It lies well within the Coastal Flood Hazard Zones and since 2001 has had 112 new properties built and has at December 2016, 57 housing commitments. If the demand for housing was high then market signals would start to show an increase in property prices, build out of existing commitments and an increase in the housing register, none of these are taking place. By the consultees own admission the sites with planning permission are not being built out and this would also back up that the market for new build housing is weak.</p> <p>North Somercotes lies well within the Coastal Flood Hazard Zones and to leave the settlement would mean travelling through red zones (danger for all) therefore like Skegness and Mablethorpe and other coastal settlements it is deemed to be covered by Chapter 10 of the Local</p>
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	<p>families, and older residents wishing to downsize.</p> <p>4.3 Therefore, this number does not feature in the surveys or assessments which were carried out and by failing to apply its own stated policy of zero population calculation for North Somercotes and simply aggregating all the extant Coastal permissions together, then saying this will fulfil each settlement's requirements, ELDC has failed to identify this settlement's needs first, and then consider the constraints second. The distribution of these permissions does not relate to the growth figure for North Somercotes as previously noted.</p> <p>4.4 The Parish Council consider this to be a gross oversimplification to deal with what is undeniably a difficult and complex situation, which results in unjustified and negative effects for individual communities. The negative impact of this approach for North Somercotes is illustrated below:</p> <p>4.5 On Page 160 Development Plan document 2016-2031 – for North Somercotes it lists 55 existing commitments in Allocations and windfall sites – Appendix 2 refers. However, an examination of this number indicates there are a number of anomalies, which have previously been drawn to the attention of ELDC, but remain unchanged.</p> <p>4.6 The Woolpack Development of 42 houses was finished some years ago. The allocated site</p>		<p>Plan. If there is a local housing need in the settlement then affordable housing will be supported as it already has been with the Parish Council submitting an application and having it approved. There are also a few brownfield sites in the settlement which could if housing demand is such come forward.</p> <p>The Council has crossed checked and everyone who put forward land in North Somercotes for consideration for housing has been added onto the Council's consultation lists and this means that from that time on they would have had consultation letters when consultations were carried out on the Local Plan.</p> <p>What would occur if North Somercotes was an inland village is not relevant because it is not, it is located in the Coastal Flood Hazard Zone and therefore subject to the potential of a high risk flood event. The zero population growth scenario does not mean no growth but allows for the formation of new households from the existing resident population in the whole coastal zone. The Council has not drilled down to the need in individual settlements because residents have the ability to move around in the Coastal Zone or leave the zone altogether. The Council has to take a wider strategic view of the flood risk in the coast and plan over this whole of this area.</p> <p>From the work done by Edge Analytics, housing to provide for the needs for the existing population (zero population growth scenario) which calculates that new household formation means that the Council should be allocating 735 houses across the plan period in the Coastal Zone, with commitments of 1308 homes this actually leaves a technical over supply of 573 home or a buffer of 44%. This should provide an</p>
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<p>adequate buffer during the first five years of the Plan for this area of the District. 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.</p> <p>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 this has formed over a long period of time an imbalance in the population which is exacerbated in the coastal zone. 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 but it would appear from looking at the evidence that the new build market is not robust but 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 for the incoming 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). This second hand market is also fuelled by a high churn in the older population in that mortality rates will be high, given the age of the occupants of the majority of these properties, leaving many empty homes for sale. This predominance of bungalows has been driven in the past by high rates of in migration when flood risk was not</p>		<p>listed LR569/68 with 33 houses refers to land which shares a boundary with the Woolpack Development but is at the rear of The Sycamores on Keeling St. This site which was granted back in 1968 has been discussed with the local developer who informed the Parish Council that he never agreed to 33 homes, his preference was always for 19, and he confirmed that he has no intention at present of bringing the site forward in the next 5 years nor with 33 houses.</p> <p>4.7 The 33 are unrealistic and it is suggested the number should therefore be corrected to 19, and on the basis of stated non-delivery by the developer in the next 5 years, should in any case be discounted.</p> <p>4.8 ELDC appear to have omitted or for some reason not listed a windfall site on Churchill Road, N/132/0004/06 previously N132/00419/04 which is for 2 x detached houses, 2 x detached Bungalows and 1 pair semi-detached bungalows. This plot has been on the market for some time (most latterly put back on in 2015) and currently shows no sign of movement. Therefore, with no developer identified so no developer statement of intention to build in the next 5 years realistically it should be discounted.</p> <p>4.9. This makes a total of 48 as a starting point. However, where there is no developer identified or a confirmed lack of intention to build these out in the next five years, they should be discounted. This includes the 2</p>			
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		<p>with outline permission leaving a more realistic total of 20 and a maximum of 28 if you put back the 2 outline and 6 unknown developer intention.</p> <p>4.10 The full planning permission for the Parish Council's own development of housing for rental by local people, where there is already a waiting list of 9 for the 6 two and three bed properties, will be submitted in February following receipt of a further tranche of funding just received from the Homes and Communities agency which has provided support to this innovative project.</p> <p>4.11 Para 1.2 page 6 bullet points 6 and 7 -When a query was raised with ELDC staff during the 2016 consultation why none of the 2012 sites put forward for North Somercotes has been assessed against the criteria and a sustainability appraisal done for each site, the Parish Council was told initially that because of flood risk no coastal sites had been looked at. When asked why no figures were given anywhere for the number of houses that would be required to keep the population for North Somercotes stable, the response was that the Plan would only show those sites needed to deliver the Plan, and that in any case 'no sites have been put forward to look at' for North Somercotes.</p> <p>4.12 Extant coastal permissions are being factored in to the Plan, albeit the delivery of 55 for North Somercotes is in some doubt, which will impact upon the Plan as a whole, and the Parish Council can see no</p>		<p>such a major issue in terms of national planning policy.</p> <p>This is not a matter that the planning system can solely rectify because the existing resident population is not going to form more new households unless the structure of the economy changes and there are on offer more higher paid, skilled jobs to entice those leaving the coast to stay. The Local Plan can give those wanting to expand or start new business in the coast the planning tools to support this (with the caveat around flood risk) but it cannot physically fund it, this is down to external structures and processes such as the LEP and the Council itself as an organisation. This is the second scenario that the Councils Economic Baseline Study paints where the economy is levered into growing by the influence of partners and funding.</p> <p>The Council has developed an Economic Action Plan which will drive forward projects that try to increase economic growth across the District which a particular focus on the coast. There are two projects to look at coastal housing and coastal caravans in connection with the occupancy period. Both these projects will run during the 5 year review of the Local Plan with an aim to work with the housing developers and caravan site owners, other key partners such as the Environment Agency, Anglian Water, the County Council and the Emergency Services to assess evidence, and try to formulate policy around these two key areas for the future of the coast going forward. By the time of the Examination of the Local Plan this work will have started. One of the measures the Council will be looking at is the formation of new households in the coast, if this flat lines or starts to increase then this could be a signal that the economic changes that are hoped for in the</p>
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coast are actually working. Therefore at this present time the allocation of more housing in the coast would not be to meet that existing resident population and the Council considers that the existing commitments are just over 50% more than is actually required and should provide an adequate buffer for at least the five year review of the Local Plan.

By examining the zero population growth scenario for the coastal zone and establishing that there is enough housing in the existing commitments to fulfil housing needs in that zone there is no need to look at individual settlements or to carry out major work on infrastructure requirements because that work has been done in the assessment of planning applications for the existing commitments. Failure to take that into account at that time would have meant consideration for a refusal of planning permission.

Justification for the exclusion of the zero population growth figure for North Somercotes at the start of the exercise. Residents and stakeholders in this community other than the Parish Council have remarked upon the fact that this omission is unacceptable, a view which the Parish Council strongly endorses, and which amply illustrates the earlier statement regarding lack of engagement and meaningful consultation.

4.13 It has been stated by ELDC (email 24 November 2016) that if North Somercotes was to be considered as an inland town (like Grainthorpe, Huttoft and Hogsthorpe despite them clearly being in the Coastal area) then using the example of Huttoft, (population 585 in 2011), their zero population calculation had come to 53 as a starting point. The ELDC officer, seemingly unaware of the actual population noted that as North Somercotes was a lower population than Huttoft, the 55 extant permissions would mean that like Horncastle and Huttoft, this settlement's housing needs would have been met and therefore no allocation would have been given anyway even if it was to be reclassified as 'inland'.

4.14 This is disturbing for a number of reasons. Firstly, Huttoft at 585 is obviously around a third the size of North Somercotes and using the same percentage applied to Huttoft (approx. 9%) would give a housing need to keep this population stable of 155 over the plan period. Whilst the community would not wish to increase to this level, nor have

					<p>the infrastructure to assimilate it, it is vastly different to the notional 55 let alone the more realistic and objective assessment of c28 extant permissions likely to get built out.</p> <p>4.15 Secondly, and despite the main local developer in this settlement not having had any correspondence from or discussion with ELDC regarding his intentions for several years, it is understood that ELDC - having apparently recently researched developers' intentions (according to the <i>ELDC Local Plan Review of Evidence and Project Plan</i>) - are confident that only 43% of extant permissions are deliverable. This confirms the Parish Council's own analysis which that only 20-28 of the stated 55 permissions are likely to be built out in the next 5 years. This falls far short of the number of houses required to maintain this settlement at zero population growth pushing it into an unacceptable 'no growth' scenario, and the potential for lack of supply to meet local demand, and a further increase in house prices - fig 1 refers.</p> <p>4.16 Also of concern, the Parish Council is aware of at least one site that was put forward in response to ELDC's call for land on 9-2-14, and which specifically included land in North Somercotes. Yet despite the Leader of the Council's statement that "All land identified to us will be assessed for suitability" the Parish Council has been unable to locate any such objective assessment against this settlement's identified need anywhere in the supporting papers. Similarly, site NS0201 capacity 22 on the</p>		
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North Somercotes Parish Council				O	Chptr 3	p4,	<p>Old Camp Ground (Coxen's Yard) Keeling St, is available and has remained so since it was first identified in 2012, yet the owner received no enquiry regarding its availability and this would appear to be the same for the 27 various other plots in the Parish that were identified at that time.</p> <p>4.17 page 13, para 2.8 – no notional housing need has ever been put forward for or discussed with North Somercotes – why is this?</p> <p>4.18 page 13, para 2.12- how does the extant commitments map out against the identified need for each settlement, and how realistic are these numbers if the analysis undertaken by North Somercotes is a benchmark?</p> <p>4.19 page 15, para 2.21- no infrastructure assessment has been carried out for this large village, which the Parish Council believe cannot be objectively justified</p> <p>5. Settlement Proposals map page 4 and site selections</p> <p>5.1 The foregoing has already detailed a number of anomalies and inaccuracies, including the incorrect details for Grainthorpe, and the actual position of North Somercotes in terms of its wide range of facilities and services detailed in section 1 above.</p> <p>5.2 The artificial separation of Coastal and Inland is a recipe for confusion, particularly when bizarrely a number of those settlements on the coast are then reclassified as 'inland'. 'Coastal' is merely a descriptive</p>		
							<p>The Council determined when working with the Environment Agency that those settlements that fell totally into the coastal zone, such as North Somercotes would be classed in that zone. For those on the edge of the zone they would in this Plan period only be classed as "inland" settlements.</p> <p>Having a flood risk zone which is covered by one Chapter in the Core Strategy makes it clearer for those wishing to develop in this high flood risk area and on what the Council will and will not support. It makes it working with partners such as the Environment Agency and reaching a clear transparent agreement on how flood risk is going to be dealt with</p>		

North Somercotes Parish Council	SP3	Chapter 2	<p>geographical term, it is not an accepted classification for denoting any other shared characteristics or homogeneity. This settlement does not recall asking for a separate coastal policy and certainly does not support the implementation in its current form or the unjustified results.</p> <p>5.3 A more logical approach is a Water Management and Flood Risk Policy. This would apply to all settlements regardless of their geographic location, being only concerned with their flood risk characteristics and constraints, and how this needs to be managed to achieve the right balance between sustainable communities and the management of risk.</p> <p>5.4 The Parish Council does not and cannot support such a divisive and unfairly exclusive policy or outcomes in its current form.</p>	<p>easier and this too helps those developing in what is a difficult area of the District. In this way the Council has been able to develop a clear set of parameters including Annex 2 in the Core Strategy which sets out the sequential and exception test for development in the Coastal Zone.</p>	
			<p>6. Page 21 – the stated preference to locate housing in areas which offer a range of community facilities and have good access to jobs, key services and infrastructure, away from areas of all types of flood risk is laudable, but it cannot be done at the exclusion of an existing and thriving settlement as previously noted.</p> <p>6.1 This is particularly the case when the specifics of the settlement have not been taken into account in the same way as other large villages, and that no growth figures or other infrastructure constraints have been looked at.</p>		<p>Whilst the sea defences may be robust along the coast there have been two near misses for East Lindsey since 2013, one in December 2013 and on in January 2017, on the last occasion, the East Lindsey coastline missed a major event by only two hours due to a change in weather conditions. Housing is permanent and long term and with climate change this situation could get worse with more frequent events and a greater volume of water behind the defences. The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy.</p> <p>The Council is unsure in what context the comments are made with regard to older persons, the Older Persons</p>

<p>housing policy in the Core Strategy covers the Coastal Zone and with regard to other housing Policy SP18 allows for open market housing on brownfield sites and affordable housing if there is a need within the settlement. The Single Plot Exceptions Policy also covers the Coastal Zone.</p>		<p>6.2 For example, unlike some of the other settlements in the district which shelter behind the sea wall that protects from the high tides of the North Sea, North Somercotes is between 1.5 and 2 miles from the sea with an intervening heavily wooded land mass over 8m high in places.</p> <p>6.3 ELDC state that evidence of past events will guide new housing away from areas of greatest risk – North Somercotes would agree entirely with this principle since the village has never been flooded, not even during the extreme events of 1953, nor in 2013 or 2017 - see Appendix 3 and Appendix 4. Coastal locations should benefit from the same strategy as inland, according to flood risk at the site specific location, which in many instances is actually less than a large proportion of Louth for example where extreme 'localised' events have a higher occurrence rate.</p> <p>6.4 Page 31-32 - SPS - Specialist Housing for elderly People – page 31 para 4 – our young population are arguably just as much if not more in need of housing as already noted, so should also be able to benefit from suitable housing. To do otherwise will perpetuate an ageing population and an increasing dependency on council services</p> <p>6.5 Neighbourhood Planning page 33 – it seems that the Parish Council will have to bring forward its application for Neighbourhood Planning to achieve any semblance of a positive and proactive future for</p>	
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North Somercotes Parish Council		Chapter 6 p.59	0					this community, using specific evidence rather than rigid approaches, which it had intended to do once the Chapel Fields Housing Development was underway.		
							8. Page 59 – Employment. There is a small industrial estate in North Somercotes with potential capacity to extend, but the Parish Council are not aware that this has been examined for potential to contribute to the economy in the same way that no growth target has been established for the community.		North Somercotes is discussed in Section 16 of the Employment Land Review document which is available on the Council's website. The industrial area in North Somercotes contains a block of 5 units and 1 freestanding unit. It is a relatively modern site located on the edge of the village and has easy access to the A1031. The site was developed to provide local opportunities for start-up businesses and in addition to a vacant unit, has space for future expansion within the current boundary. There have been no recent applications on the site other than for a change of use in respect of Plot 1 some 13 years ago. Therefore, it is proposed that no additional provision be made in the village. Any additional employment in large villages, which North Somercotes falls into is supported in Policy SP21 – Coastal Employment	
POLICY SP17 – COASTAL EAST LINDSEY										
North Somercotes Parish Council	SP17						9. Coastal East Lindsey- the Parish council has already noted above the various anomalies and inconsistencies which arise from the application of this policy and, in its opinion, the unjustified negative results of treating coastal communities in this way. On the one hand it is stated that housing growth		The Flood risk maps are the most up to date information that the Council has available in order to make judgements concerning the risk within the Coastal Flood Hazard Zones. The Council works with the Environment Agency on the evidence and formation of policy covering flood risk and there have not been any major significant changes since	

					<p>those maps were drawn up. Improving the flood defences does not alter the volumes of water which could come into the District from the sea should there be a major event; that volume of water is going to increase with sea level rise. The consultee is only looking at a scenario that covers today but when you build a house it could be inside for a 100 years, in that time, sea level rise and the number of major events could have increased significantly. The Council has to take this into account when planning for the future, business as usual with regard to building new housing in the Coast is not an option when the occupiers of those properties going into the future could then be danger.</p> <p>Whilst the sea defences may be robust along the coast there have been two near misses for East Lindsey since 2013, one in December 2013 and on in January 2017, on the last occasion, the East Lindsey coastline missed a major event by only two hours due to a change in weather conditions. Housing is permanent and long term and with climate change this situation could get worse with more frequent events and a greater volume of water behind the defences. The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy.</p> <p>5 years in terms of the length of time for the review of the Local Plan is considered a reasonable period considering the danger to life that flood risk poses and the complexities of examining any possible new policy creation.</p>
	<p>doesn't equal protection of services, yet elsewhere this is given as a reason for allocating growth in less than ideal settlements, i.e. 100 houses in Hogsthorpe.</p> <p>9.1 If the coast is to be a vibrant place where people want to live, invest, visit and work and if it is to have a strong, diverse and growing economy and business sector, then the development of good quality flood resilient housing that takes account of the site specifics of a location, not just a broad-brush generic approach that labels everywhere on the coast 'high risk' without taking cognisance of the specific factors, is essential to allow these stated aims to be achieved and consistent with the Greater Lincolnshire SEP vision and objectives.</p> <p>9.2 The current EA data is still being modelled using statistics from 2006, including the now Discredited 1953 EA Flood Extent Map data, which showed the whole settlement underwater. The redrawn EA 1953 map which was revised in 2012 at the instigation of the Parish Council working with the EA to take direct witness evidence and photographs is attached – Appendix 3 - which shows no flooding of the main area of the village.</p> <p>9.3 Since this data is significantly out of date by some 10 years, it does not take into account the considerable accretion along this coastline since 2006 nor the multimillion pound improvement works to the Tetney to Saltfleet sea</p>				

						<p>defences, which started in 2009. As an example, the new sea defence height at Donna Nook and Red Farm (where the 1953 breach occurred owing to rabbit activity in the sea bank) is now some 6.25m above ordnance datum (aod), where previously 2006 levels have this at 5m above or below in some areas.</p> <p>9.4 The EA say that work to process and rerun the data using the new heights and vastly improved defences following the recent works, as well as factoring in climate change figures and other relevant data will take up to another 2 years.</p> <p>9.5 The Environment Agency Flood warning system covers this area and the Parish Council has two volunteer flood wardens who work as a key part of the Emergency Response Team that has been successfully deployed both in 2013 and 2017 - although no risk from flooding occurred, some sand bags were required to prevent overtopping in 2013 owing to the access route over the sea bank being below 4m and which the Parish Council had requested the EA to repair some considerable time prior to the event.</p> <p>9.6 The Parish Council is currently working on the draft of a new Emergency Response Plan together with colleagues in Lincolnshire County Council as well as other agencies, including the EA, Police and Coastguard, medical staff, local farmers and various village organisations.</p> <p>9.7 Those parts of Coastal Lincolnshire in Flood Zone 3 that are most likely to be flooded</p>		
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					<p>were identified during the recent event on 13 January 2017, and are shown on the EA Flood Alert and Flood Warning maps that were on the EA.gov site. These show North Somercotes village unlikely to be affected, and it wasn't, and are at Appendix 4. They show the situation for the coastal community as a whole and this community specifically. From this it can be seen that treating this settlement differently to Grainthorpe or Hogsthorpe for example is clearly unreasonable. Whilst the breach locations modelled may be different on another occasion, what is relevant is that the risk to this community is not commensurably different to that of the smaller settlements reclassified as inland, and this community is larger and probably better able to cope in terms of its facilities and preparedness, being largely self-sustaining in the unlikely event of being cut off from all three points of exit inland.</p> <p>9.8 This community now has exceptionally well protected coastal defences. Which the County Council and other partners have committed to maintaining as a key feature of their Strategic Economic Plan. Water management in this area is a national priority, not simply a local one, as a significant proportion of the UK's food security relies upon Greater Lincolnshire's agriculture, horticulture and food manufacturing industries.</p> <p>9.9 This generic approach of 'no development' is also in marked contrast to the evidence and importance of the economic</p>		
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				<p>benefit which housing would bring to the area, which as noted above is contained in the Lincolnshire Enterprise Partnership Strategic Economic Plan. This is also readily recognised and planned for by the Joint Lincolnshire Flood Risk and Drainage Management Partnership (JLFRDMP) in their Strategy and Strategic Vision, which sits alongside the Humber Coastal Management Strategy.</p> <p>9.10 The Parish council firmly believes that taking account of flood risk and coastal change does not mean a cessation of development and fully expects a more positive and more proactive approach commensurate with the potential and aspirations of this large service village, in line with the SEP and the NPPF.</p> <p>9.11 These proposals do not adequately support this settlement's resident's current needs or aspirations and there is also no valid contemporaneous evidence base or risk assessment of the potential negative social and economic impact which could result if a 'no growth' housing strategy is allowed to happen by default.</p> <p>9.12 The five-year review proposed is too long – market housing growth, suitably mitigated, that meets the needs of this community should be permitted. Once the EA revised figures are available this can then be reassessed. In the meantime, risks can be mitigated for in the same way as they are currently for affordable housing, using the old figures until such time as the new ones are available.</p>	
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Environment Agency	SP17	Annex 2	S				<p>9.13 Similarly, there is no reason why a watching brief cannot be kept on the building-out of extant permissions, and the allowance of new developments brought forward accordingly after analysis in any 12-month period.</p> <p>We strongly support the inclusion of a separate policy to cover the coastal settlements of East Lindsey. This is due to the significant issue of flood risk, which will only increase in the coming years due to climate change. We commend East Lindsey for adopting this proactive strategy to mitigate and adapt to climate change, which is fully in line with the National Planning Policy Framework (as required at paragraph 94).</p> <p>Having worked with East Lindsey and other partnership bodies, such as Lincolnshire County Council and adjacent coastal authorities, over many years it is our opinion that the approach within the coastal policy is appropriate and gives proper consideration of flood risk.</p> <p>We have worked closely with East Lindsey to provide guidance which simplifies and steers those proposing development in the high flood risk area, through the Sequential and Exception Test processes. It is our opinion that this policy, together with Annex 2, will provide applicants/developers with the necessary localised guidance on how flood risk to new development can be managed in</p>		The Council notes the support from the Environment Agency for Policy SP17
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<p>Hardys Farm Ltd Represented by Robert Doughty</p>	<p>SP17</p>	<p>O</p>				<p>the coastal settlements. The Policy will also ensure that any development coming forward will incorporate appropriate mitigation measures into its design to protect occupants.</p> <p>We are pleased that the policy includes support for the improvement and creation of new flood defences, which will almost certainly be required in some format in the coming years.</p> <p>This approach is clearly evidence based, demonstrating the plan is positively prepared, justified and consistent with National Policy.</p> <p>We support the identification of Ingoldmells as a main settlement under Policy SP17 – Coastal East Lindsey and the support given by that policy to development that contributes directly to the local economy and extends and diversifies the tourism market.</p> <p>We also support the acceptance given by the policy and Annex two of the draft plan that identifies caravans and other similar tourism accommodation (along with a range of other uses) as meeting the terms of the Sequential Test and passing the first section on the exception test. This acknowledgement will save time and resources of both applicants and the planning authority in bringing forward and considering planning applications without needless repetitive consideration of the same issue. This approach will give investors' confidence to bring</p>	<p>The policy should be amended to highlight the relationship, both functionally and spatially, between clusters of settlements such as Ingoldmells, Skegness and Chapel St Leonards.</p>	<p>The Council notes the support for Policy SP17 and Annex Two from the consultee.</p> <p>The Council do not agree with the consultee that Chapel St Leonards, Ingoldmells and Skegness form a continuous strip of development along the coast because they do not. There is an area between Chapel St Leonards and Ingoldmells which remains open countryside and separates the two settlements, this area is protected from caravan development in the Local Plan on Page 87 of the Core Strategy.</p> <p>The reason for the protection of this area to the south of Chapel St Leonards is ensure that the two settlements do not coalesce and remain separate with their own individual separate identities. It is considered important to retain this green space as the last green area between the two settlements in what is otherwise a mono landscape of holiday accommodation.</p>
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Blue Anchor Leisure Represented by Robert Doughty	SP17	0			<p>forward the necessary development to support the local economy.</p> <p>The policy should, however, acknowledge the fact that a number of named settlements, such as Skegness, Ingoldmells and Chapel St Leonards, form a continual strip of development along the coast and, rather than trying to retain the non-existent separation between the settlements, promote a form of development that reflects and takes maximum advantage of the nucleated form of development along the coast. In this way the infrastructure necessary to support the permanent and holiday populations can be planned for, and delivered, in a co-ordinated manner</p>	<p>The policy should be amended to highlight the relationship, both functionally and spatially, between clusters of settlements such as Ingoldmells, Skegness and Chapel St Leonards.</p>	<p>Planning is not just about economic growth but also about protecting, maintaining and enhancing the environment and society. Allowing development over all the green space along the coast on balance is not a positive action and means that the mono landscape of holiday accommodation that already exists along is perpetuated to the wider visual detriment of the area. The NPPF at para 114 states that local planning authorities should maintain the character of the undeveloped coast and this area falls into that. There are many other suitable locations for caravan development along the coast. There is no reason why sites cannot expand outside of this zone.</p> <p>With regard to infrastructure planning that the consultee discusses; leaving a green space between settlements would not prevent this, there is no highway route planned over this space, it per se is not required in itself, the consultee has not elaborated on what infrastructure they mean, so it is not possible for the Council to respond further.</p>	<p>The Council notes the support for Policy SP17 and Annex Two from the consultee.</p> <p>The Council do not agree with the consultee that Chapel St Leonards, Ingoldmells and Skegness form a continuous strip of development along the coast because they do not. There is an area between Chapel St Leonards and Ingoldmells which remains open countryside and separates the two settlements, this area is protected from caravan development in the Local Plan on Page 87 of the Core Strategy.</p> <p>The reason for the protection of this area to the south of Chapel St Leonards is ensure that the two</p>
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										<p>settlements do not coalesce and remain separate with their own individual separate identities. It is considered important to retain this green space as the last green area between the two settlements in what is otherwise a mono landscape of holiday accommodation.</p> <p>Planning is not just about economic growth but also about protecting, maintaining and enhancing the environment and society. Allowing development over all the green space along the coast on balance is not a positive action and means that the mono landscape of holiday accommodation that already exists along is perpetuated to the wider visual detriment of the area. The NPPF at para 114 states that local planning authorities should maintain the character of the undeveloped coast and this area falls into that. There are many other suitable locations for caravan development along the coast. There is no reason why sites cannot expand outside of this zone.</p> <p>With regard to infrastructure planning that the consultee discusses; leaving a green space between settlements would not prevent this, there is no highway route planned over this space, it per se is not required in itself, the consultee has not elaborated on what infrastructure they mean, so it is not possible for the Council to respond further.</p>
										<p>acknowledgement will save time and resources of both applicants and the planning authority in bringing forward and considering planning applications without needless repetitive consideration of the same issue. This approach will give investors' confidence to bring forward the necessary development to support the local economy.</p> <p>The policy should, however, acknowledge the fact that a number of named settlements, such as Skegness, Ingoldmells and Chapel St Leonards, form a continual strip of development along the coast and, rather than trying to retain the non-existent separation between the settlements, promote a form of development that reflects and takes maximum advantage of the nucleated form of development along the coast. In this way the infrastructure necessary to support the permanent and holiday populations can be planned for in a co-ordinated manner.</p>
POLICY SP18 – COASTAL HOUSING										
Environment Agency	SP18									The Council notes the support from the Environment Agency for Policy SP18

					<p>existing commitments. Having worked with East Lindsey and other partnership bodies, such as Lincolnshire County Council and adjacent coastal authorities, on its development over many years, it is our opinion that the approach is appropriate and gives proper consideration to flood risk. This Policy has been developed from robust evidence assembled over the last seven years. It takes into account the recommendations from the Lincolnshire Coastal Study, the Environment Agency's flood hazard maps, and housing need assessments.</p> <p>The approach accords with the National Planning Policy Framework in that it seeks to direct housing to areas of lowest risk. At the same time it seeks to provide housing, by exception, to sustain the existing community recognising that some new dwellings will be required for the formulation of new households and the continued need to address the affordable housing shortfall.</p> <p>The Policy will ensure that new dwellings incorporate appropriate mitigation, taking advice from the Environment Agency.</p> <p>We fully support the Council in adopting this proactive strategy to mitigate and adapt to climate change impacts.</p> <p>This approach is clearly evidence based, demonstrating the plan is positively prepared, justified and</p>		
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Chestnut Homes	SP18	O				
<p>consistent with National Policy.</p> <p>As stated previously, we do not support the constrained housing policy in this area. The inclusion of market housing on brownfield sites is welcomed, however question why it should be restricted to such land. When existing commitments are built out, will there be no more development in the coastal areas? What is the fall-back position should the existing commitments not come forward?</p> <p>It is understood and supported that housing should be located away from the flood zone where possible, with significant strategic growth being placed elsewhere. However, it is unclear the impact that will be made on the coastal settlements in the longer term.</p> <p>We welcome policy point 3 supporting housing for specific identified vulnerable or minority groups and affordable housing, providing there is evidence of a local need. This policy provides an acceptance that housing can safely be developed in coastal areas and as such, in our opinion should be extended to include market housing.</p>			<p>Policy point 4 regarding ground floor sleeping accommodation should be altered to be permitted where appropriate flood mitigate can be demonstrated. We are currently constructing dwellings with ground floor sleeping accommodation within Skegness which the Flood Risk Assessment demonstrated would be achievable with the rising of finished floor levels to mitigate against flooding.</p> <p>As outlines in our response to SP8, we believe this policy should reflect the ability to deliver affordable housing cross subsidised with market housing.</p>	<p>National Planning Policy at paragraphs 99 and 100 states 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.</p> <p>The Council has done this by working out what the housing need would be in the coast with natural household formation of the existing population, this is the zero population scenario and then redistributed growth from the Coastal Zone into the inland towns and large villages. The Councils primary direction is to provide housing in the coast for local needs, in that local needs means the resident population and the formation of new households.</p> <p>There were as at February 2016 1308 housing commitments on the coast, with another 31 being granted permission up to December 2016. These commitments are located right across the coastal zone but are presently not being built out quickly. From the work done by Edge Analytics, housing to provide for the needs for the existing population (zero population growth scenario) means that the Council should be allocating 735 houses across the plan period, with commitments of 1308 this actually leaves a technical over supply of 573 home. This should provide an adequate buffer during the first five years of the Plan for this area of the District. Additional work</p>		

<p>set up a Coastal Housing Working Group to work with partners including interests from developers to look at impacts, and to try and see if at the end of the review period there is a way of bringing forward (if necessary) housing safely in this area of high flood risk with all partners agreement.</p>					
<p>National Planning Policy at paragraphs 99 and 100 states 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.</p>	<p>I believe the number of required new builds along the coast needs to be increased to take into account future requirements to 2031. I understand this plan allows for a 0 % growth scenario and is based on evidence from 2012 population and household projections.</p>	<p>With regard to the above mentioned policy I believe the the plan is not Positively Prepared. It is un sound in its policies, and these are not applied consistently. COASTAL EAST LINDSEY – Why we have taken this approach states :</p> <p>"The council recognises that Coastal communities must not be allowed to decline through lack of action. Greater Lincolnshire Coastal Vision is to sustain and develop Coastal prosperity through infrastructure and to protect and sustain the Coastal environment ... support and strengthen the flood defences... The Council recognise that delivery of the Coastal Vision may begin to generate infrastructural impacts for some key Inland communities as MOVEMENTS TO THE COAST INCREASE "</p> <p>There is currently a .5% chance of flooding with an assumed 1 - 200 year event , and as part of Strategic Policy 17 the Council will support improvements to the existing flood defences, the creation of new flood defences and infrastructure associated with Emergency Planning. As a resident of Sandilands for 52 years I have seen considerable improvements to the Sea defences. There have been two</p>	<p>The Council has done this by working out what the housing need would be in the coast with natural household formation of the existing population, this is the zero population scenario and then redistributed growth from the Coastal Zone into the inland towns and large villages. The Councils primary direction is to provide housing in the coast for local needs, in that local needs means the resident population and the formation of new households.</p> <p>There were as at February 2016 1308 housing commitments on the coast, with another 31 being granted permission up to December 2016. These commitments are located right across the coastal zone but are presently not being built out quickly. From the work done by Edge Analytics, housing to provide for the needs for the existing population (zero population growth scenario) means that the Council should be</p>	<p>The policy concerning Residential Build and Social Housing needs to be changed in flood risk areas as it is Discriminatory. If the mitigation measures to meet the requirements of the Environment Agency are in place, then Residential Housing and Social housing should both be allowed. Especially as many sites form a combination of both.</p>	
<p>SP18</p>	<p>O</p>				

	<p>over toppings of the Sea wall since I have been here, neither was serious, and none have occurred since the defences have been upgraded.</p> <p>In effect the ELDC approach precludes future development beyond this plan in the Coastal Area , (except for Social Housing) when in effect through mitigation measures working with the Environment Agency development should continue if the community is to continue to grow and prosper .</p> <p>All relevant development in areas of flood risk has to show how it has passed the Sequential and Exception tests.</p> <p>The sequential test steers development to areas of lowest risk. Residential Housing does not pass this test, but Social Housing does.</p> <p>Section 5 states that the Coastal area has the Highest need for Affordable Housing, and the Council continue to support the provision of this type of housing within the Coastal Area. As of the 28th February there were 1308 commitments on the Housing Register, and a target set of 735 by 2031 which means a 30 % reduction in build rates compared to recent years. Whilst this is stated as a technical over supply of 546 homes (it is in fact an oversupply of just 258 at normal build rates). It is also not known if all the commitments will be constructed as can be evidenced by properties that lay dormant on Alford road .The plan may in effect have allowed for no growth in build figures in the coastal area, which is at variance with the declared aim to sustain and</p>		<p>allocating 735 houses across the plan period, with commitments of 1308 this actually leaves a technical over supply of 573 home. This should provide an adequate buffer during the first five years of the Plan for this area of the District. Additional work carried out on the 2014 population projections using the same scenario shows a decline in the need to 630 homes over the plan period. The policy however is to remain at 735 homes.</p> <p>With regard to social housing in the Coast. The Local Plan specifically has a local connection criteria for the Coastal Zone so that only those already living in that area can obtain a social house. This is to stop people moving into the area from what is safe areas outside the coast into unsafe areas in order to obtain a social house. This is not considered discriminatory because bringing people who are not at risk and putting them at risk of a flood event would override other considerations.</p> <p>Whilst the sea defences may be robust along the coast there have been two near misses for East Lindsey since 2013, one in December 2013 and on in January 2017, on the last occasion, the East Lindsey coastline missed a major event by only two hours due to a change in weather conditions. With climate change this situation could get worse with more frequent events and a greater volume of water behind the defences. The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy.</p>	
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					<p>develop coastal prosperity. Even before this plan has taken effect there is a great need for Residential Development in this area, as can be witnessed by the lack of housing stock for sale. If this area is to continue to grow and prosper, it needs a combination of both Residential Development and Affordable Housing to meet the needs of a growing population.</p> <p>It is stated within their policy regarding flooding " this can be mitigated against by incorporating into design flood mitigation measures such as rising floor levels " –</p> <p>"Housing will not be permitted with Ground floor sleeping accommodation " – and "Flood mitigation should be applied as per the advice of the environment Agency. " In view of this if the requirements of the Environment Agency can be met and the flood risk mitigated, then surely both Residential and Affordable Housing should be allowed if the plots/ sites are suitable in other respects for development. Not only is this policy discriminatory, but unsound.</p> <p>On the basis that the Local Plan seeks to meet objectively assessed development and infrastructure requirements, and is consistent with achieving sustainable development this is not the case, and I don't believe it has been Positively Prepared.</p> <p>This policy has also not been applied consistently.</p> <p>In 2004 we made representations to ELDC for the 1st Deposit Draft plan for a section of land to be</p>		
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		<p>included in the Current plan. The land in question is surrounded on three sides by residential properties and on the other by a disused Railway line. It should have been included in the plan as it would have been an ideal Residential and or Affordable housing development, and was a natural progression to a development we had completed with all the infrastructure in place. In effect it passed both the Sequential and Exception tests for Social housing. This included mains services, drains, and a Highway Adopted Road with a good vision splay onto the A 52 Hut toft Road and a Bus service close by. Despite other contact by our Representatives and most recently a letter from myself (14 / 8/14) requesting that this parcel of land be incorporated with the local plan, ELDC did not look into the viability Of the land for Development or contact me concerning this in answer to my request. I eventually rang the ELDC to speak to a Planning Officer and was told that it would not be included in the Local Plan as it was within the Flood risk area. It is , but it met both the Sequential & Exception test requirements</p> <p>. There is currently an application being considered for part of this land (not by ourselves) but it does not have the infrastructure in place or take into account a larger section of land adjacent to it .I believe other residential applications within the flood zone have been given Planning Permission, and most recently one very close to the site and in fact closer to the sea. Planning is also being granted in villages with little or no social infrastructure.</p>				
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<p>The Council has done this by working out what the housing need would be in the coast with natural household formation of the existing population, this is the zero population scenario and then redistributed growth from the Coastal Zone into the inland towns and large villages. The Councils primary direction is to provide housing in the coast for local needs, in that local needs means the resident population and the formation of new households. There were as at February 2016 1308 housing commitments on the coast, with another 31 being granted permission up to December 2016. These commitments are located right across the coastal zone but are presently not being built out quickly. From the work done by Edge Analytics, housing to provide for the needs for the existing population (zero population growth scenario) means that the Council should be allocating 735 houses across the plan period, with commitments of 1308 this actually leaves a technical over supply of 573 home. This should provide an adequate buffer during the first five years of the Plan for this area of the District. Additional work carried out on the 2014 population projections using the same scenario shows a decline in the need to 630 homes over the plan period. The policy however is to remain at 735 homes.</p> <p>One of the consultees in the June 2016 consultation stated that they carry out 120 private property surveys a year and 90% of them are for people outside Lincolnshire who wish to come and retire. Extrapolating this figure out to the 1308 existing commitments in the Local Plan means that technically only 130 of them will be taken up by local residents. The Council do not consider it appropriate to build</p>						
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										houses for what would be a growing population of in migrants into the District who are in the main older and therefore more vulnerable to the dangers of flood risk. It is considered important that there is enough housing for the existing resident population which the existing commitments should allow, this includes those already living in the coast and working in the tourism industry. There will be support for housing development on brownfield land subject to criteria, the single plot exceptions policy and support for affordable housing and Specialised Housing For Older Persons. Also support will be given for housing for specialised vulnerable groups such as disabled local people.
										The Council considers that its policy for coastal housing is in conformity with national planning policy. The Council understands that this is a radical new direction for policy on the coast and because of this above all other reasons there is a 5 year review of the Local Plan. It is essential that the Council monitors the coast to ensure that its policy is not going to start having a detrimental effect. The Council has set up a Coastal Housing Working Group to work with partners including interests from developers to look at impacts, and to try and see if at the end of the review period there is a way of bringing forward (if necessary) housing safely in this area of high flood risk with all partners agreement.

POLICY SP19 – HOLIDAY ACCOMMODATION										
Hardys Farm Ltd	SP19	p87	O						Policy SP19 should identify the importance	Whilst the sea defences may be robust along the coast there have

<p>Represented by Robert Doughty</p>		<p>SP19, to increase the amount of holiday accommodation in coastal East Lindsey, because tourism is a major feature of the local economy. Growth of the visitor economy is also a priority of the Greater Lincolnshire Local Enterprise Partnership (GLLEP) who state on page 35 of the "Strategic Economic Plan 2016 Refresh" that, "Significant growth (in the visitor economy) can be generated from extending the season and converting day visitors to overnight stays".</p> <p>The Local Plan, however, refers to the protection and increasing the level of accommodation within the area without providing a clear indication of the current level of supply and what level of growth would be deemed appropriate.</p> <p>The Steam Report, published as evidence to support the Coastal Area part of the Local Plan, presents clear information regarding the number of beds, visitor days, employment etc, demonstrating the value (in terms of income and jobs). The report also concludes that the growth in bed space and, therefore, visitor numbers and income is informed by a growth in the number of new caravans and static properties, but it does not go on to develop a preferred strategy for the wider tourism industry, or to respond to changing trends in provision, as highlighted above. In order to deliver continued growth in the visitor economy to meet the aspirations of the GLLEP Strategic Economic Plan of extending the tourist season and converting day visitors to overnight stays, a great reliance is placed on caravan based accommodation as the</p>	<p>of extending the season and converting day visitors to overnight stays. This will accord with other policies in the plan (e.g. SP20) and the aims of the Greater Lincolnshire Local Enterprise Partnership, which will ensure a positive approach to policy and ensure an effective delivery of the wider objectives for the area.</p>	<p>been two near misses for East Lindsey since 2013, one in December 2013 and on in January 2017, on the last occasion, the East Lindsey coastline missed a major event by only two hours due to a change in weather conditions. These two events occurred demonstrate that the winter months are the most dangerous with regard to flood risk and its impacts. With climate change this situation could get worse with more frequent events and a greater volume of water behind the defences.</p> <p>Caravans are considered to be a vulnerable form of development and at the present time there is no proven means to ensure the safety of the occupiers of the caravan sites during the winter months.</p> <p>There is no legal way for the Council to ensure that site owners evacuate their sites during a major event, there are no conditions that the Council could impose or enforce in time to save lives if an event occurred during the winter months. There is no fair, transparent or legal way of limiting the number of sites that could be open or the numbers of people involved. This means that technically the numbers of those living and visiting the coast during the most dangerous period of the year could be on a par with the summer months. The issue of an increase in the numbers of people in the coast during the winter months with the existing population to also considered to be a key factor in determining whether it is safe to approve longer occupancy periods. Therefore at the present time the safety of the occupiers of the caravan sites and the existing residents must outweigh any economic benefit until such time as a way can be found to overcome the issues involved and have all partners signed up to a way</p>
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	<p>primary accommodation in the East Lindsey Coastal Area.</p> <p>The trends of holiday accommodation provision also change over time, leading to different spatial requirements for holiday accommodation and this is clearly represented in Skegness, where the original accommodation was based around hotels and guest houses before the creation of the first Butlin's holiday camp and the subsequent development in static caravan and chalet based holiday camps and caravan parking. Newer holiday camps, however, are moving away from the high density, highly regimented layout, towards a lower density more varied layout, incorporating higher levels of landscaping. The Council's policy needs to accept this change and accommodate new developments.</p> <p>The tourism based economy relies upon maintaining an attractive offer for holiday makers and the need to protect the beauty of the area should be balanced against the impact of increased levels of accommodation. This offer is informed by a number of factors, such as the ease of getting to the area, the natural beauty, proximity of the sea and beach, and availability of entertainment. There is, however, a clear perception on behalf of the local authority that caravan parks, despite accommodating more visitors than any other sector and being the main area for growth, are inherently unattractive and there is a move to limit the amount of land taken for such uses. This view appears to be based on the high</p>		<p>forward. At the present time this is not the case.</p> <p>The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy, in that the occupancy period has been worked out with the Environment Agency as the period which covers both Easter and the October Half Term holidays. It does not cover Christmas because this lands right in the middle of the most dangerous period of the year.</p> <p>The Council does not wish to do this on a case by case basis because the end result will be the same with the same occupancy condition because it has been agreed with the Environment Agency.</p> <p>The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy. The reason for the protection of this area to the south of Chapel St Leonards is ensure that the two settlements do not coalesce and remain separate with their own individual separate identities. It is considered important to retain this green space as the last green area between the two settlements in what is otherwise a mono landscape of holiday accommodation.</p> <p>Planning is not just about economic growth but also about protecting, maintaining and enhancing the environment and society. Allowing development over all the green space along the coast on balance is not a positive action and means that the mono landscape of holiday accommodation that already exists along is perpetuated to the wider visual detriment of the area. The NPPF at para 114 states that local planning authorities should maintain the character of the undeveloped coast and this area falls into that.</p>	
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<p>density and regimmented form of the older caravan parks.</p> <p>The Local Plan has correctly identified growth in tourist accommodation as a priority, but fails to design policies that will support the increased visitor numbers and allow the area to adapt to new trends in accommodation, therefore, retaining the form of development that is unwelcomed by the Council and will be increasingly unpopular with holiday makers and less profitable for investors.</p> <p>The policy is clearly concerned at the impact large scale caravan parks have had on the character of the coastal area, and the settlements at the core of the holiday trade, such as Skegness and Mablethorpe, despite the fact caravan parks make the greatest contribution to the supply of holiday accommodation, but does not appear to assess the potential positive aspects of the newer trends in layout that may, on the one hand, lead to greater land take, but, on the other, have less drastic impact on the wider landscape due to the lower density, more varied layout and increased landscaping. These new trends in the layout and design of caravan sites go way beyond the minimum spacing standards set out and required under the licencing regime. Nor is there any reference to the relationship between neighbouring settlements and the benefit of, for instance, concentrating development around clusters of settlements, such as Ingoldmells, Skegness and Chapel St Leonards, as the policy refers to each settlement individually without</p>	<p>There are many other suitable locations for caravan development along the coast. There is no reason why sites cannot expand outside of this zone.</p> <p>With regard to infrastructure planning that the consultee discusses; leaving a green space between settlements would not prevent this, there is no highway route planned over this space, it per se is not required in itself, the consultee has not elaborated on what infrastructure they mean, so it is not possible for the Council to respond further.</p>

		reference to the close physical and operational links between neighbouring settlements.
		As a result of the Council's established approach, the plan seeks to limit further land take for these uses. It does this in two ways:
		<ol style="list-style-type: none"> 1. Section 5 of the policy, which supports new caravans, log cabins, chalets and camping and touring sites subject to the provision of landscaping and green infrastructure, etc, to mitigate the potential impact of the development, and then only if they do not extend out into the open countryside,
		<ol style="list-style-type: none"> 2. The protection of specific "Protected Open Spaces" between Ingoldmells and Chapel St Leonards and Ingoldmells and Addelethorpe.
		<p>The issue of landscape and connectivity to the existing settlements need not be referred to in Section 5 of Policy SP19, as these are already requirements set out in policy SPIO - Design. We, therefore, object to the inclusion of the reference to these issues in Section 5 of the policy, which should now end with the phrase "adjoin or are in a town, large or medium village." This is an unnecessary duplication of policies and does nothing to make the policy more effective. There must also be an acceptance that new caravan parks will inevitably extend development into the open countryside around existing settlements.</p>

		<p>With regard to the "Protected Open Spaces", we note the original designation dates to the 1980's Lincolnshire Structure Plan, which is no longer in force, and no subsequent analysis has been undertaken to either justify the principle of the approach or the detailed designation itself. This is despite the fact the protected area has increased significantly. Although development forms a single unbroken whole along the coast, the purpose of the "Protected Open Areas" appears to be to preserve the perception of individual settlements when viewed from the A52. No assessment appears to have been undertaken to assess the impact in the approach on the way that Skegness, Ingoldmells and Chapel St Leonards function together, or to assess the impact of the designation on the wider tourism market. Clearly each area has a different offer within the wider tourism market, although they all operate as a whole, with the services of each town supported by holiday makers from the neighbouring area. Provision of different centres within the coastal strip also reduces the need for holiday makers, residents and businesses to travel long distances to access services, reducing the need for shorter every day journeys, and to reduce the potential for congestion at a single hub: a policy approach that assumes they are free standing settlements is inappropriate and does not take full account of the tourism market in setting the spatial planning policies for the area.</p>				
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Golden Beach Holiday Park	SP19	O	<p>Complaint regarding East Lindsey District Council's First Consultation Responses to Chapter 10 in the Local Plan, Coastal East Lindsey and the revised Local Plan</p> <p>It's hard to argue that this plan does not hamper the growth of tourism or enhance the existing market of which the caravan industry has the lions share. If anything, as this complaint will show, it will stifle the trade and has the potential to lead to the long term decline of the Coastal Zone and the deterioration of its tourism industry. Coastal East Lindsey has 4 of the most deprived seaside towns in England and this plan does nothing to help buck that trend. If anything, it will only exacerbate the severe deprivation in these towns. This complaint calls for the ELDC to reconsider the Local Plan especially Chapter 10 – Coastal East Lindsey as it not only provides concrete evidence that this Plan goes against National Government Policy but that evidence the ELDC use for the local plan and in the first consultation response to be insufficient and insubstantial.</p> <p>Following "Recommendations from the Culture Media and Sport Select Committee"¹, outlined recently in a 30th June 2016 House of Commons briefing paper "Tourism: statistics and policy", National Government policy on tourism states that one of its aims is to "reduce regulation which might hamper the growth of tourism businesses"². Additionally, the National Planning Policy Framework wants local government to "support existing</p>	<p>I would strongly suggest the ELDC reconsider this Local Plan, change policies to challenge the deprivation, increase opportunities for the caravan industry to prosper and develop and allow the coastal zone to be competitive with other resorts.</p>	<p>Whilst the sea defences may be robust along the coast there have been two near misses for East Lindsey since 2013, one in December 2013 and on in January 2017, on the last occasion, the East Lindsey coastline missed a major event by only two hours due to a change in weather conditions. These two events occurred demonstrate that the winter months are the most dangerous with regard to flood risk and its impacts. With climate change this situation could get worse with more frequent events and a greater volume of water behind the defences.</p> <p>Caravans are considered to be a vulnerable form of development and at the present time there is no proven means to ensure the safety of the occupiers of the caravan sites during the winter months.</p> <p>The Council has not denied that the coast has a high level of deprivation but there is no evidence that opening caravan sites for longer will drive this deprivation level down. Caravan site employment is in the main low skilled and low paid and therefore having more of the same could only perpetuate the existing situation and what is becoming a mono economy of the coast. There is nothing in the coastal policy that prevents a caravan site from expanding their site providing they are in conformity with the other policies in the Local Plan. There is no legal way for the Council to ensure that site owners evacuate their sites during a major event, there are no conditions that the Council could impose or enforce in time to save lives if an event occurred during the winter months. There is no fair, transparent or legal way of limiting the number of sites that could be open or the numbers of people involved. This means that technically the numbers of those living and visiting the coast during</p>
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		<p>business sectors³ and “retain and enhance existing market”⁴. The ELDC’s Local Plan does not conform with these aims, especially when considering the caravan industry. National Planning Policy also advises to “set out the opportunities for development”⁵ but significantly the ELDC have not provided any opportunity for the caravan industry to progress and develop in this plan.</p> <p>The Department for Communities and Local Government recommends identifying “priority areas for economic regeneration”⁶. An Office of National Statistics report ‘A Profile of Deprivation in Larger English Seaside Destinations’ from 2013 and a DCLG report ‘England’s Smaller Seaside Towns: a benchmarking study’ from 2011 provide concrete evidence that four towns in East Lindsey’s coastal zone are the most deprived in the whole nation. The ELDC should therefore be identifying these four towns as priority areas for economic regeneration; thus far they have failed to do so appropriately. The Local Plan does not acknowledge the severity of the deprivation nor does it offer a remedy of any kind.</p> <p>The ONS report found Skegness and Ingoldmells to be the “most deprived”⁷ large seaside town in England which is measured across 7 domains including: Income; Employment; Health; Education, Skills and Training; Housing; Crime and Living Environment. There is no further evidence to suggest that the report’s findings have changed.</p>		<p>the most dangerous winter period of the year could be on a par with the summer months. The emergency services have to plan for a worst case scenario and in the winter this would be in the cold and the dark. The issue of an increase in the numbers of people in the coast during the winter months with the existing population to consider also has to be a key major factor in determining whether it is safe to approve longer occupancy periods. Therefore at the present time the safety of the occupiers of the caravan sites and the existing residents must outweigh any perceived and as yet evidenced economic benefit until such time as a way can be found to overcome the issues involved and have all partners signed up to a way forward. At the present time this is not the case.</p> <p>The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy, in that the occupancy period has been worked out with the Environment Agency as the period which covers both Easter and the October Half Term holidays. It does not cover Christmas because this lands right in the middle of the most dangerous period of the year.</p> <p>The Council does not wish to do this on a case by case basis because the end result will be the same with the same occupancy condition because it has been agreed with the Environment Agency.</p> <p>The Council has in its Economic Action Plan two projects to look at coastal housing and coastal caravans in connection with the occupancy period. Both these projects will run during the 5 year review of the Local Plan with an aim to work with the housing developers and caravan site owners, other key partners such as the Environment Agency, Anglian</p>	
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<p>Water, the County Council and the Emergency Services to assess evidence, and try to formulate policy around these two key areas for the future of the coast going forward. By the time of the Examination of the Local Plan this work will have started.</p>		<p>In the Council's first consultation response they state that Skegness is now in the top three of English seaside destinations. However, despite asking for evidence of this and what the top three is, the only evidence I can find is that Skegness is in the top 3 for deprivation in English seaside towns. Not just in the top 3 but the top 1.</p> <p>The DCLG report on smaller seaside towns ranked 3 of East Lindsey's towns as the first, second and fourth most deprived in England across the same 7 domains. Mablethorpe is the most deprived small seaside town, followed by Chapel St. Leonards in second and Sutton on Sea in fourth. All 3 towns are ranked the worst in the following categories: Health; Education, Skills and Training; Employment, and they are in the worst 5 for income. Mablethorpe and Chapel St. Leonards also rank in the worst 5 for Crime. The report highlights that these 3 East Lindsey towns have the greatest economic problems amongst small seaside towns in England.⁹</p> <p>These facts are inescapable but the ELDC are ignoring them. In Chapter 10 – Coastal East Lindsey, the ELDC should undoubtedly change the wording in point 5 - <i>The Council recognises that coastal communities must not be allowed to decline through lack of action and it must therefore work with partners to ensure there are opportunities to overcome deprivation reinvigorate the economy and improve the quality of life.</i></p> <p>I have supplied concrete evidence to show that 4 towns within the</p>	
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					<p>ELDC's coastal zone have been allowed to decline. They are, in fact, 4 of the most deprived seaside towns in England; therefore "must not be allowed to decline" is utterly redundant and ignorant of the current status of these towns. Surely the council cannot admit to being this blind. Not allowing caravan sites to extend their occupancy period or even allowing development across more land can, to a large extent, be considered a "lack of action".</p> <p>It's a narrow-minded approach from the ELDC to limit the occupancy period, the benefits of extending the season are extensive; most have been explained already in the first consultation process. The ELDC have suggested the economic benefits of opening for longer to include the Christmas period would be "small"¹⁰, however, it is unjustifiable to do this as so far it is an unknown quantity. Although the economic benefit would be better than small, any economic increase would be an improvement on nothing.</p> <p>The re-development of caravan parks will require more land to maintain the same number of caravans and visitor numbers. New developments or re-developments will improve the quality of caravan sites and competition but also customer experience. Unless more land is allowed to be developed as caravan parks, we will see a decrease in visitor numbers.</p> <p>This example of a re-development perfectly highlights the need for more land for caravan parks continue to improve. Until recently this particular caravan site had</p>		
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				<p>119 caravans in the traditional grid style on what was essentially just a field. Now it has been re-developed to cater for the modern, larger caravan on concrete plots with road access to each caravan and a parking space at each caravan. Furthermore, the caravans will be anchored down to the concrete bases and there is also the potential for better landscaping. This re-developed section now has space for 89 caravans which equates to a loss of 30, or 25%. So in the original set up, if each caravan's rent was £2000 (a conservative amount by today's standards that would have an income of £238,000 before tax. After there- development, the income would be £178,000, a loss of £60,000; this will make a huge difference to this caravan park, not to mention the cost of the redevelopment in the first place. At the very least another 2 acres of land would be required to return to the same number of caravans, the same number of bed spaces and the same level of income.</p> <p>This caravan park has lost a minimum of 30 caravans in the re-development, 180 bed spaces and a large amount of income in order to improve their facilities, their appeal to potential customers and their customer's experience. If this was to be applied to the whole coastal zone, we could see a loss of over 10,000 caravans and 61,000 bed spaces.</p> <p>It is cases like this which clearly show there is a need for more land to maintain caravan numbers and visitor numbers. Councillor Richard Fry has previously been quoted as saying there are too many caravans on the coast but only this confirms the British</p>	
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					<p>Holiday and Home Parks Association's thinking that there is little working knowledge of caravan parks within councils.</p> <p>The Environment Agency provides an advisory booklet and information about what to do and what not to do in the event of a flood¹¹. In it, it explains that 6 inches can knock you off your feet and 2 feet of water can move a car. In the ELDC's first consultation response to the Local Plan, it says "during an event caravans will be moved around by incoming water"¹². I have asked for evidence of caravans being moved by flood water and the ELDC have been unable to provide any. Not only are they 2 feet off the ground but caravans are anchored down, especially in modern developments, securing them to the ground thus making the ELDC's statement unfounded and baseless. I have even contacted the National Caravan Council and the British Holiday and Home Parks Association for evidence on caravans being moved by flood water; they were also unable to supply any examples to support the ELDC's claim.</p> <p>The ELDC could be accused of fear-mongering with this claim; it is unfathomable that they would make such a statement without any supporting evidence. Perhaps it would be more progressive and forward thinking for the ELDC to have conditions in site licences whereby all caravans must be anchored down along with flood evacuation plans. This lack of progression further reiterates the BH&HPA's judgment that there is a lack of working knowledge of caravan parks within councils'.</p>		
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					<p>The ELDC have been using an EA fact sheet on high tides but failed to acknowledge that the highest tides on the evidence supplied are during October¹³ when all caravan parks are open. I have supplied further evidence from The National Tidal and Sea Level Facility that confirms high tides are more often than not during the caravan season. 55% of the highest spring tides have occurred during the caravan season from 2008 to date and up to 2026, the highest tides are predicted to be during the caravan season 68% of the time¹⁴.</p> <p>Ultimately, this shows that our sea defences cope successfully with the current threat. This has been particularly well highlighted by the fact that the sea defences held during the 2013 Tidal Surge, which had bigger waves than the 1953 flood¹⁵ and the recent Tidal Surge threat on 2017. It was an EA report that stated over 99.98% of sea defences held during the 2013 Tidal Surge¹⁶; this figure, along with the Lincolnshire County Council estimate of a 0.5% chance¹⁷ of a tidal flood clearly show a flood risk, albeit present, is marginal. Preposterously, the ELDC have stated that the current flood risk is high, however, evidence above would show this statement is incorrect; I would argue 0.5% is decidedly low, perhaps another fear-mongering tactic from the ELDC to stop development and progress.</p> <p>Flood risk and climate change is developed to consider the longer term, over the next 100 years for example. The ELDC should</p>		
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			<p>consider helping their district with policies that consider the short term, the next 20 years for example and then reassessing and updating policies as we learn more about climate change over the next century.</p> <p>The ELDC have tried to compare Storm Xynthia that hit west coast of France with a possible scenario that could affect the East Lindsey coastal zone. However, through research I have found the evidence to suggest that Storm Xynthia is more comparable to the flood of 1953 that hit England. It is unreasonable to compare the effects of Storm Xynthia to a potential flood event on our own coast.</p> <p>Both the flood of 1953 and Storm Xynthia had similar circumstances; most notably poorly maintained flood defences. In 2010 in France, the sea defences were in a similar state, if not worse than those in the UK in 1953; "many of the coastal flood defences along the French Atlantic coast can date back to the Napoleonic era"¹⁸.</p> <p>Therefore, there is a huge difference between the condition of French sea defences and our own modern day defences, for example, the Environment Agency spend £6.5 million annually on beach re-nourishment between Mablethorpe and Skegness. Not to mention additional expenditure on the Sea Wall and other defences. Furthermore, in France the responsibility for fluvial and coastal flood risk management is fragmented¹⁹; whereas in England it is the responsibility of one organisation, the EA²⁰. The EA also operate and maintain</p>				

					<p>flood defences, raising awareness and communicating flood risk, flood risk forecasting and warning.</p> <p>Additionally, sea defences in France are currently owned by an eclectic range of communities, property owners and individuals, "most of whom do not have the necessary financial means to maintain them"²¹. Approximately 3000km of defences are classified as orphans by the French Government because their ownership is not known²². The lack of a shared responsibility and solidarity is a fundamental problem for the management and maintenance of flood defences in France. There is no centralised flood warning system in France²³.</p> <p>The sources credited to the evidence given in relation to Storm Xynthia show that any possible event on East Lindsey's coast is not comparable to the unfortunate events that happened in France in 2010. In the Council's response to the first consultation, they have argued that people died in this flood event.</p> <p>Although that is true, the Natural Hazards and Earth System Sciences report suggest there were only 2 fatalities related to "Others (e.g. caravans)"²⁴. As previously mentioned, the warning system in France was incredibly poor. It is thought many of the casualties could have been avoided if the warning system had been as sophisticated as the one used by the Environment Agency. This situation would have been different again in France, had their sea defences been to the</p>		
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					<p>current standards of Lincolnshire's protection.</p> <p>Various complaints in the consultation process lack substance, for example Hannah King wrote in on behalf of Lincolnshire East Clinical Commissioning Group to claim the tourism industry puts added strain on health care provision in East Lindsey. This however, is unfair to suggest it is only tourism that is responsible for the strain on health care provision; tourism it's not exactly a new phenomenon in the area.</p> <p>In a conversation with Miss King, she admitted that the ageing population, the above average retirement population in East Lindsey and the difficulty the NHS have in recruiting doctors to the area all play a role in the struggling health care provision. From meetings I have attended, residents have complained at the difficulty to get at appointment to see a doctor even in the winter. This complaint should be reconsidered as you cannot solely attribute the high volume of tourists to having a significant effect on health care provision in the area, there are obviously more factors.</p> <p>In conclusion, this plan does not set out any progressive solutions to combat the obvious and critical deprivation. Nor does it set out opportunities for the caravan industry to move forward. Skegness Town Council have stated that this Plan is contradictory in aim and ambition, which based on the inconsistency in the Plan, it's very hard to disagree with them. Moreover, the ELDC's Local Plan is at odds with other coastal authorities which will</p>		
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Blue Anchor Leisure Represented by Robert Doughty	SP19	p87	0		<p>give them the competitive edge over East Lindsey's resorts. In the long term it will lead to a spiral of decline as customers will go elsewhere, where they can get more for their money, resulting in less income for East Lindsey's resorts, therefore businesses will be less inclined to invest and leave the coastal zone with an ageing tourism product.</p> <p>Evidence the ELDC have used in referencing Storm Xynthia can be dismissed; as can a number of their statements in the consultation responses which lack proof, especially concerning the level of flood risk and whether caravans will be moved by flood water. Even some sources used by the ELDC to support the Local Plan, such as the Sheffield Hallam University report on hidden communities in caravans is suggestive, assumptive and largely dismissible. The ELDC even had the audacity to use the 2011 report from the Department for Communities and Local Government on 'England's Smaller Seaside Towns: a benchmarking study' which highlights 3 of East Lindsey's towns to be the most deprived in the country to try and support their argument. Unfortunately, however, they have ignored the grave facts about their towns in this report.</p>	<p>Policy SP19 should identify the importance of extending the season and converting day visitors to overnight stays. This will accord with other policies</p>		<p>Whilst the sea defences may be robust along the coast there have been two near misses for East Lindsey since 2013, one in December 2013 and on in January 2017, on the last occasion, the East Lindsey coastline missed a major event by only two hours due to a change in weather conditions. These two events occurred demonstrate that the winter</p>
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<p>who state on page 35 of the "Strategic Economic Plan 2016 Refresh" that "Significant growth (in the visitor economy) can be generated from extending the season and converting day visitors to overnight stays"</p> <p>The Local Plan, however, refers to the protection and increasing the level of accommodation within the area without providing a clear indication of the current level of supply and what level of growth would be deemed appropriate.</p> <p>The Steam report, published as evidence to support the Coastal Area part of the Local Plan, presents clear information regarding the number of beds, visitor days, employment etc, demonstrating the value (in terms of income and jobs). The report also concludes that the growth in bed space and, therefore, visitor numbers and income, is informed by a growth in number of new caravans and static properties, but it does not go on to develop a preferred strategy for the wider tourism industry, or to respond to changing trends in provision, as highlighted above. In order to deliver continued growth in the visitor economy to meet the aspirations of the GLEP Strategic Economic Plan of extending the tourist season and converting day visitors to overnight stays, a great reliance is placed on caravan based accommodation as the primary accommodation in the East Lindsey Coastal Area.</p> <p>The trends of holiday accommodation provision also change over time, leading to different spatial requirements for holiday accommodation, and this</p>	<p>in the plan (e.g. SP20) and the aims of the Greater Lincolnshire Local Enterprise Partnership, which will ensure a positive approach to policy and ensure an effective delivery of the wider objectives for the area. Provide baseline for key indicators, such as visitor days and bed numbers to allow for setting of appropriate targets, or at least to demonstrate an appropriate direction of travel</p> <p>Delete Section 4 of Policy LP19 relating to "protected open spaces" - and delete the plan showing these areas. No evidence has been provided to justify the use of such a designation and no assessment has been undertaken to demonstrate the suitability of the detailed site boundaries</p> <p>Delete last part of Section 5 of Policy SP19 (after "... adjoin or are in a town, large or</p>	<p>months are the most dangerous with regard to flood risk and its impacts. With climate change this situation could get worse with more frequent events and a greater volume of water behind the defences.</p> <p>Caravans are considered to be a vulnerable form of development and at the present time there is no proven means to ensure the safety of the occupiers of the caravan sites during the winter months.</p> <p>There is no legal way for the Council to ensure that site owners evacuate their sites during a major event, there are no conditions that the Council could impose or enforce in time to save lives if an event occurred during the winter months. There is no fair, transparent or legal way of limiting the number of sites that could be open or the numbers of people involved. This means that technically the numbers of those living and visiting the coast during the most dangerous period of the year could be on a par with the summer months. The issue of an increase in the numbers of people in the coast during the winter months with the existing population to also considered to be a key factor in determining whether it is safe to approve longer occupancy periods. Therefore at the present time the safety of the occupiers of the caravan sites and the existing residents must outweigh any economic benefit until such time as a way can be found to overcome the issues involved and have all partners signed up to a way forward. At the present time this is not the case.</p> <p>The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy, in that the occupancy period has been worked out with the Environment Agency as</p>
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<p>is clearly represented in Skegness, where the original accommodation was based around hotels and guest houses before the creation of the first Butlin's holiday camp and the subsequent development in static caravan and chalet based holiday camps and caravan parking. Newer holiday camps, however, are moving away from the high density, highly regimented layout, towards a lower density more varied layout, incorporating higher levels of landscaping. The Council policy needs to accept this change and accommodate new developments.</p> <p>Clearly the tourism based economy relies upon maintaining an attractive offer for holiday makers and the need to protect the beauty of the area should be balanced against the impact of increased levels of accommodation. This offer is informed by a number of factors, such as the ease of getting to the area, the natural beauty, proximity of the sea and beach and availability of entertainment. There is, however, a clear perception on behalf of the local authority that caravan parks, despite accommodating more visitors than any other sector and being the main area for growth, are inherently unattractive and there is a move to limit the amount of land take for such uses. This view appears to be based on the high density and regimented form of the older caravan parks.</p> <p>The Local Plan has correctly identified growth in tourist accommodation as a priority, but fails to design policies that will support the increased visitor</p>	<p>medium village."") to provide greater clarity and to avoid unnecessary duplication with other policies in the plan (SP10-Design) Provide an analysis of the inter-relationship between neighbouring settlements to allow for a full understanding of the operation of the tourism offer in the East Coast. Treating neighbouring settlements as freestanding is unjustified and will not give a full understanding of the visitor economy and how it operates in Coastal East Lindsey.</p> <p>- The time limit on accommodation of Caravan, Log cabin, chalet and camping and touring sites between the 3 1st of October and the 15th March in any year should be removed.</p>	<p>the period which covers both Easter and the October Half Term holidays. It does not cover Christmas because this lands right in the middle of the most dangerous period of the year.</p> <p>The Council does not wish to do this on a case by case basis because the end result will be the same with the same occupancy condition because it has been agreed with the Environment Agency.</p> <p>The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy. The reason for the protection of this area to the south of Chapel St Leonards is ensure that the two settlements do not coalesce and remain separate with their own individual separate identities. It is considered important to retain this green space as the last green area between the two settlements in what is otherwise a mono landscape of holiday accommodation.</p> <p>Planning is not just about economic growth but also about protecting, maintaining and enhancing the environment and society. Allowing development over all the green space along the coast on balance is not a positive action and means that the mono landscape of holiday accommodation that already exists along is perpetuated to the wider visual detriment of the area. The NPPF at para 114 states that local planning authorities should maintain the character of the undeveloped coast and this area falls into that. There are many other suitable locations for caravan development along the coast. There is no reason why sites cannot expand outside of this zone.</p> <p>With regard to infrastructure planning that the consultee discusses; leaving a green space between</p>
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<p>settlements would not prevent this, there is no highway route planned over this space, it per se is not required in itself, the consultee has not elaborated on what infrastructure they mean, so it is not possible for the Council to respond further.</p> <p>The Council has in its Economic Action Plan two projects to look at coastal housing and coastal caravans in connection with the occupancy period. Both these projects will run during the 5 year review of the Local Plan with an aim to work with the housing developers and caravan site owners, other key partners such as the Environment Agency, Anglian Water, the County Council and the Emergency Services to assess evidence, and try to formulate policy around these two key areas for the future of the coast going forward. By the time of the Examination of the Local Plan this work will have started.</p>		<p>numbers and allow the area to adapt to new trends in accommodation, therefore retaining the form of development that is unwelcomed by the Council and will be increasingly unpopular with holiday makers and less profitable for investors.</p> <p>The policy is clearly concerned at the impact large scale caravan parks have had on the character of the coastal area, and the settlements at the core of the holiday trade, such as Skegness and Mablethorpe, despite the fact caravan parks make the greatest contribution to the supply of holiday accommodation, but does not appear to assess the potential positive aspects of the newer trends in layout that may, on the one hand, lead to greater land take, but, on the other, have less drastic impact on the wider landscape due to the lower density, more varied layout and increased landscaping. These new trends in the layout and design of Caravan sites go way beyond the minimum spacing standards set out and required under the licensing regime. Nor is there any reference to the relationship between neighbouring settlements and the benefit of, for instance, concentrating development around clusters of settlements, such as Ingoldmells, Skegness and Chapel St Leonards, as the policy refers to each settlement individually without reference to the close physical and operational links between neighbouring settlements.</p> <p>As a result of the Council's established approach the plan</p>				
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seeks to limit further land take for these uses. It does this in two ways:

1. Section 5 of the policy, which supports new caravans, log cabins, chalets and camping and touring sites subject to the provision of landscaping and green infrastructure, etc, to mitigate the potential impact of the development, and then only if they do not extend out into the open countryside

2. The protection of specific "protected Open Spaces" between Ingoldmells and Chapel St Leonards and Ingoldmells and Addelethorpe,

The issue of landscape and connectivity to the existing settlements need not be referred to in Section 5 of Policy SP19 as these are already requirements set out in policy SPIO - Design. We, therefore, Object to the inclusion of the reference to these issues in Section 5 of the policy, which should now end with the phrase "adjoin or are in a town, large or medium village." This is an unnecessary duplication of policies and does nothing to make the policy more effective. There must also be an acceptance that new caravan parks will inevitably extend development into the open countryside around existing settlements.

With regard to the "protected Open Spaces", we note the original designation dates to the 1980's Lincolnshire Structure Plan, which is no longer in force, and no subsequent analysis has been undertaken to either justify the principle of the approach or

							<p>the detailed designation itself, this despite the fact the protected area has increased significantly. Although development forms a single unbroken whole along the coast the purpose of the "Protected Open Areas" appears to be to preserve the perception of individual settlements when viewed from the A52. No assessment appears to have been undertaken to assess the impact in the approach on the way that Skegness, Ingoldmells and Chapel St Leonards function together, or to assess the impact of the designation on the wider tourism market. Clearly each area has a different offer within the wider tourism market, although they all operate as a whole, with the services of each town supported by holiday makers from the neighbouring area. Provision of different centres within the coastal strip also reduces the need for holiday makers, residents and businesses to travel long distances to access services, reducing the need for shorter every day journeys, and to reduce the potential for congestion at a single hub: a policy approach that assumes they are free standing settlements is inappropriate and does not take full account of the tourism market in setting the spatial planning policies for the area.</p> <p>The impetus behind the policy approaches appears to be an assumption that all new caravan development will follow the same pattern of older established parks, when, in fact, modern trends are moving towards lower density, less regimented, layouts, with more landscaping and open space within the park.</p>		
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						<p>The "Protected Open Spaces" appears to be providing protection against a form of development that is increasingly unlikely to be promoted, but will counter the plan's overall objective to increase the amount of holiday accommodation. Without more land available for parks, the result will either be the maintenance of an outmoded form of layout, unpopular with the Local Planning Authority, or a reduction in the overall amount of holiday accommodation, either of which will be to the detriment of the holiday trade in key locations around Skegness and Ingoldmells. The approach, therefore, is not a positive one, and is not justified with appropriate background evidence.</p> <p>Clearly a number of options for supporting the tourism industry can be taken, from promoting growth of new holiday camps in new locations or concentrating growth in those existing well established areas that already benefit from infrastructure in the form of public transport, energy supply, and a close relationship to the wider provision of leisure activities, food and drink establishments and the beach, together with other services such as health and social care. The key priority must be to maintain and increase the number of visitors to the area, as, without this increase, the economy will decline.</p> <p>We object to the principle, as well as the detailed site boundaries, of the two protected areas of search near Ingoldmells.</p>		
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	<p>The plan's approach, therefore, needs to take a more positive approach to support positive and attractive development, because this is the most effective way to resist unattractive development and, therefore, to deliver the investment necessary to support the local economy.</p> <p>The land under the control of Blue Anchor Leisure at Trunch Road, Chapel St Leonards is well placed to accommodate new Caravan Park development. It meets the locational requirements of Policy SP19 and lies outside the protected open space. The development would allow for provision of new Caravan Park with a lower density of development and more varied layout and landscaping. Provision of more sites is necessary to ensure that the nature of the offer of caravan Parks can be amended to meet more modern requirements whilst also preserving and growing the overall number of bed spaces provided by this vital section of the tourism market on the east coast.</p>
	<p>We note that point five of Policy SP20 supports development in Sutton of Sea that lengthens the holiday season. This principle of extending the holiday season should apply across all the resorts and tourist facilities in the East Lindsey Coastal area. The importance of lengthening the tourist season is highlighted in the Greater Lincolnshire Local Enterprise Partnership's Strategic Economic Plan 2016 refresh which at page 35 states "significant growth (in the visitor economy) can be generated from extending the season and</p>

Coastfield Leisure Represented by Wheatman Planning	SP19	O	<p>converting day visitors to overnight stays". We note, however, that Policy SP19-Holiday Accommodation seeks to limit the Occupancy of Caravan, Log Cabin, Chalet and camping and touring sites between the 15th March and the 31st October in any one year, which would appear to act as a significant constraint on extending the holiday period, contrary to the aspirations of Policy SP20, especially as caravan and chalet parks provided the largest source of holiday accommodation on the east coast.</p> <p>This representation is provided on behalf of our clients, Coastfield Leisure Ltd, who operate a number of holiday parks in the Skegness and Mablethorpe area; including Grange Leisure Park, Mablethorpe, Coastfields, Ingoldmells, Merryfield and Sandfield, Chapel St Leonards, and Skegness Fields, North Shore and Roaches Farm, Skegness.</p> <p>Many of the existing caravan sites in the 1990s achieved planning permission for extended opening, typically 1 March to 5 January. This results in a mis-match in the operating environment between many competing sites. Our clients have in recent years across a number of their parks embarked on programmes of significant investment to update facilities and expand the accommodation base on offer. Each of these schemes result in significant improvements to the environment of the holiday park and hence the accommodation offer to the visitors to the District. However, the more recent planning consents have included the</p>	<p>Reward part 5 of the policy by deleting "will be limited to between 15th March to 31 October in any one year, or the following Sunday, if 31st does not fall on a Sunday."</p> <p>To be consistent with technical guidance to the NPPF, the Policy should be worded so that each application should be determined with reference to the flood risk assessment and the flood response plan (specific warning and evacuation plan). This will enable the policy to be responsive to site specific circumstances and impose an</p>	<p>Whilst the sea defences may be robust along the coast there have been two near misses for East Lindsey since 2013, one in December 2013 and on in January 2017, on the last occasion, the East Lindsey coastline missed a major event by only two hours due to a change in weather conditions. These two events occurred demonstrate that the winter months are the most dangerous with regard to flood risk and its impacts. With climate change this situation could get worse with more frequent events and a greater volume of water behind the defences.</p> <p>Caravans are considered to be a vulnerable form of development and at the present time there is no proven means to ensure the safety of the occupiers of the caravan sites during the winter months.</p> <p>There is no legal way for the Council to ensure that site owners evacuate their sites during a major event, there are no conditions that the Council could impose or enforce in time to save lives if an event occurred during the winter months. There is no fair, transparent or legal</p>
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					<p>way of limiting the number of sites that could be open or the numbers of people involved. This means that technically the numbers of those living and visiting the coast during the most dangerous period of the year could be on a par with the summer months. The issue of an increase in the numbers of people in the coast during the winter months with the existing population to also considered to be a key factor in determining whether it is safe to approve longer occupancy periods. Therefore at the present time the safety of the occupiers of the caravan sites and the existing residents must outweigh any economic benefit until such time as a way can be found to overcome the issues involved and have all partners signed up to a way forward. At the present time this is not the case.</p> <p>The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy, in that the occupancy period has been worked out with the Environment Agency as the period which covers both Easter and the October Half Term holidays. It does not cover Christmas because this lands right in the middle of the most dangerous period of the year.</p> <p>The Council does not wish to do this on a case by case basis because the end result will be the same with the same occupancy condition because it has been agreed with the Environment Agency.</p> <p>The Council has in its Economic Action Plan two projects to look at coastal housing and coastal caravans in connection with the occupancy period. Both these projects will run during the 5 year review of the Local Plan with an aim to work with the housing developers and caravan site owners, other key partners such as</p>
	<p>revised occupancy period of 15 March – 31 October.</p> <p>The impact of this shortened occupancy period is firstly the inability of the holiday parks to compete with other local holiday parks that benefit from longer occupancy periods. Either from the earlier grants of planning permission or those located in close proximity to the outer edge of the flood risk area (as is the case of Grange Leisure Park for example). The out-working of this situation is firstly the disincentive to continued investment into the holiday parks, and/or the scaling back of plans, particularly improvements to existing sites where the number of caravans would be reduced within the permitted area and therefore require expansion of the land area. A shorter occupancy period also reduces the length of employment for a considerable number of employees and lack of career paths; there is also a knock-on effect for the local economy.</p> <p>Balancing Flood Risk against Extended Occupancy</p> <p>The EA's Fact Sheet "Seasonal Occupancy Restrictions on the Lincolnshire Coast" provided as part of the evidence background notes visitors to the coastal strip are at the same level of risk in early March as during the permitted period for the latter half of March.</p> <p>Indeed, examining the graphs in this Factsheet shows that December is generally a month when the occurrence of tides over 4.2mODN (Fig. 1), the number of large offshore waves (Fig. 3) and the number of large inshore</p>	<p>appropriate condition for the period of occupancy rather than a blanket restriction.</p>			

					<p>the Environment Agency, Anglian Water, the County Council and the Emergency Services to assess evidence, and try to formulate policy around these two key areas for the future of the coast going forward. By the time of the Examination of the Local Plan this work will have started.</p>
		<p>waves (Fig. 4) are at levels less than the other winter months. The data used shows a possible trend across a number of indicators but the factors are not totally consistent from month to month. Likewise the time periods used for the data tend to inconsistent which can lead to statistically inaccurate results when combining data to demonstrate a trend. In our opinion the blanket use of an occupancy period within the areas liable to flood is not the most desirable method.</p>	<p>The Technical Guidance to the NPPF classifies holiday caravans within the third tier of categories, "More Vulnerable", and specifically to holiday caravans the Guidance specifies in Table 2 that the proposed developments should be "subject to specific warning and evacuation plan". (Residential caravans are classified in the second tier, "Highly Vulnerable".) It is clear from this guidance that the holiday caravans should be subject to examination of the risks and the appropriate mitigation measures where proposed.</p>	<p>Furthermore, in Table 3 of the Guidance identifies the "More Vulnerable" classification with Flood Zone 3a as being subject to the Exception Test; the guidance in this table does not prohibit "More Vulnerable" development in this Flood Zone.</p>	<p>The Government's guidance therefore set-out a clear basis on which applications for holiday caravans should be considered, having reference to the Exception Test and then consideration of the specific warning and evacuation</p>

			<p>plan. Policy SP19 as currently worded removes the ability to consider the site specific circumstances and the residual risks. Permitting an extended occupancy beyond that specified in SP19 could be appropriate in cases where perhaps the site location in relation of the landward edge of the flood risk area is a factor, a dry escape route, or where the significant period of time exists for evacuation of the site before flood waters have dissipated across the flood area and reach the site to such a depth to be considered a risk.</p> <p>In respect of development proposals at our clients' sites, the FRAs that accompanied the applications all established firstly that the locations were defended and the future plans were to maintain these defences. Secondly, a time period for a 1 in 200 year event of around 52 hours from warning to first breach/over-topping cycle; in practice the flood warning is given to the public around 8 hours before the anticipated event.</p> <p>There is a clear distinction between users of holiday caravans and occupiers of residential dwellings. The latter have no alternative location to evacuate to, other than local authority organised rest centres. The occupiers are also heavily reliant on local authority staff and emergency services to organise an evacuation. Whereas with holiday caravans, the advance warning of around 52 hours provides the site management sufficient lead time to effectively implement the flood response plan and for visitors staying on the</p>	
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			<p>holiday park to evacuate the site in an orderly manner; visitors would be able to leave the area at risk in safely within the flood forecasting window.</p> <p>Caravan occupiers have a high level of car ownership and hence the ability to evacuate (Sheffield Hallam – The Caravan Communities of the Lincolnshire Coast, 2011). Additionally, the vast majority of visitors would terminate their stay by return home and visitors known to planning to arrive at the site would be contacted. The need to accommodate visitors is unlikely to place any great demands on the emergency services, as is the case with local residents.</p> <p>The company is introducing robust Flood Warning and Evacuation Plan for their sites, firstly with the ones where planning permission has recently been granted. This sets out the roles and responsibilities of staff at the site, providing for a more effective response. This includes information packs for occupants at the site. For purchasers of static caravan pitches these packs are issued within the initial document pack and also on the annual pitch renewal, detailing their responsibilities during a flood event. These requirement for part of the enforceable site conditions.</p> <p>These factors introduce a more favourable scenario from residential properties where occupiers do not have alternative location for accommodation during evacuation.</p> <p>The issue is judging the planning balance of the benefits and flood risk management. In the experience of our clients, the</p>			

									<p>FRAAs provided with development proposals, some based on detailed 2D modelling, anticipated that there would be sufficient time to evacuate the site and consequently the threat to people taking a holiday on the site would be extremely modest. In these circumstances the execution of the evacuation plan would not impinge on third parties. Furthermore, the evacuation of visitors from a site would be undertaken before the event occurred.</p> <p>In the Wapshott Planning Inquiry, as discussed in the 2009 paper by Tunstall et al (Journey of Flood Risk Management) in respect of residential development, the Inspector concluded that whilst it was a concern that a dry escape route was not available, long leading times, a flood evacuation plan and gradual rise of flood water, would allow residents of a scheme for 173 dwellings to evacuate at an early stage. On the issue of safe access and egress from the site in time of flood, the Inspector thought that the EA's interpretation of 'protected access' as a dry escape route was not unreasonable and noted that this interpretation had been used by other Inspectors in appeal situations. However, he did not consider it to be 'the only possible interpretation'. The long warning lead time, the gradual rise of the flood waters would lessen the risk and would allow residents time to evacuate at an early stage. He also took into account the legal agreement that there should be a formal flood management and evacuation plan kept in place at all times. Therefore he concluded that 'the absence of a guaranteed dry escape route at all times</p>		
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							<p>during a flood event' was not sufficient reason to conclude that the residents would be put at excessive risk if the development proposals were to proceed.</p> <p>In the consideration of the planning balance, sustainability objectives can weigh very heavily against flood risk considerations in local planning decisions in England. The flexibility in planning and flood risk becomes apparent in policy implementation at the local level. This is exemplified by the requirement to provide a significant proportion of residential development on previously developed land, which is often riverside and flood plain land.</p> <p>The planning balance is an issue of the degree of risk to the visitors from flooding, against the social and economic benefits provided by longer periods of employment and increased visitor expenditure in the local economy. In particular, paragraph 28 of the NPPF relates to supporting a prosperous rural economy and states that local plans should "support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside".</p> <p>In our view, for many locations a detailed FRAs together with robust flood response plans can offer acceptable mitigate of the risks and provide a sustainable proposal. Each case needs to be considered on the individual circumstances applicable rather than a broad-brush restriction as currently operated.</p>		
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<p>Bourne Leisure Represented by Nathaniel Lichfield & Partners</p>	<p>SP19</p>	<p>O</p>	<p>Caravan Occupancy Period Policy SP19, bullet point 7</p> <p>Bourne Leisure Ltd. objects to the currently proposed restricted caravan occupancy period of between 15 March and 31 October (or the following Sunday) of each year, as outlined in draft policy SP19, bullet point 7.</p> <p>Within East Lindsey, Bourne Leisure operates Butlin's at Skegness, and Haven Golden Sands Holiday Park near Mablethorpe. Both holiday parks currently have site licences for caravan occupancy from 1 March to 30 November of each year.</p> <p>By way of background to Bourne Leisure's submission, it is noted that 'England - A Strategic Framework for Tourism 2010-2020', included within the evidence base for the East Lindsey Draft Core Strategy, points out that restrictions imposed by planning legislation are unresponsive to growth within the tourism sector (page 8). In short, a rigid and reduced occupancy period included within development plan policy will fail to maximise tourism's contribution to the local economy and employment within East Lindsey, and thereby detrimentally affect the national economy too.</p> <p>In reaching this conclusion, Bourne Leisure has also had regard to the East Lindsey Strategic Flood Risk Assessment (October 2016) which indicates that the locations of both of its</p>	<p>Bourne Leisure considers that bullet 7 should be deleted from the emerging Core Strategy.</p> <p>If, despite the evidence provided in response to Q3, the Council reaches the view that a specific occupancy period has to be stated in a policy within the Core Strategy, Bourne Leisure objects to bullet point 7 as currently drafted and considers that the occupancy period should be extended to at least be consistent with current site licences in the District and further, to reflect paragraph 3.64 of the Economic Baseline Study, as referred to above.</p> <p>As part of the Council's response to Bourne Leisure's previous representation, it acknowledges that some caravan sites are open during the winter without restrictions, including some without historic permissions. These would not change as result of Policy SP19. However, the introduction of an occupancy restriction as part of this policy would prove very problematic for any future development</p>	<p>Whilst the sea defences may be robust along the coast there have been two near misses for East Lindsey since 2013, one in December 2013 and on in January 2017, on the last occasion, the East Lindsey coastline missed a major event by only two hours due to a change in weather conditions. In December 2013 there was some damage but once again a last minute change in the weather averted a major event.</p> <p>With climate change this situation could get worse with more frequent events and a greater volume of water behind the defences. Caravans are considered to be a vulnerable form of development and at the present time there is no proven means to ensure the safety of the occupiers of the caravan sites during the winter months.</p> <p>There is no legal way for the Council to ensure that sites are evacuated during a major event, there are no conditions that the Council could impose or enforce in time to save lives if an event occurred during the winter months. There is no fair, transparent or legal way of limiting the number of sites that could be open or the numbers of people involved. This means that technically the numbers of those living and visiting the coast during the most dangerous period of the year could be on a par with the summer months. The issue of an increase in the numbers of people in the coast during the winter months with the existing population to also considered to be a key factor in determining whether it is safe to approve longer occupancy periods. Therefore at the present time the safety of the occupiers of the caravan sites and the existing residents must outweigh any economic benefit until such time as a way can be found to overcome the issues involved and have all</p>
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	<p>sites are on land defined as breaching the present day 1:1000 scenario of flooding. The Company accepts the significance of flood risk, and would always want to work with the Council to ensure that any risk is minimised. However, Bourne Leisure takes the view that this risk does not necessitate stringent occupancy period restrictions to be defined within local planning policy.</p> <p>The evidence and information discussed below demonstrate why draft policy SP19, bullet point 7 should not be retained in the document. Bourne Leisure's submissions highlight the importance of achieving a planning policy approach that ensures the Local Plan is sound, and that it does not unnecessarily restrict opportunities for growth within the tourism sector in the District. If the Council, however, concludes that an occupancy condition policy must be retained, then our submissions on behalf of Bourne Leisure support a longer occupancy period.</p> <p>Prior to making these representations, Bourne Leisure has also noted the Council's response to its comments in the Planning Policy Committee meeting of 11 October 2016. These comments were made as part of the previous stage of the local plan process. Bourne Leisure wishes to provide a response to the Council's comments while reiterating the points made previously</p>	<p>as part of existing sites, or extensions to them. If, in the future, it were Bourne Leisure's intention to expand or replace part of an existing park, the occupancy period of the new development would be different from that of the rest of the site, resulting in varying and inconsistent occupancy periods across a single park. If, however, East Lindsey were to impose occupancy period restrictions as part of planning permission conditions and/or site licences at individual sites, this would allow new development at existing sites to have consistent occupancy periods.</p> <p>Bourne Leisure therefore concludes that Bullet 7 should be removed and replaced with another, stating:</p> <ul style="list-style-type: none"> 'caravan occupancy conditions may be attached to planning permissions and site licences on a case-by-case basis, taking into account: <ul style="list-style-type: none"> o the location of the proposal and the level of flood risk – if the site is located within an area of higher flood risk, any proposed 	<p>partners signed up to a way forward. At the present time this is not the case.</p> <p>The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy, in that the occupancy period has been worked out with the Environment Agency as the period which covers both Easter and the October Half Term holidays. It does not cover Christmas because this lands right in the middle of the most dangerous period of the year.</p> <p>The Council does not wish to do this on a case by case basis because the end result will be the same with the same occupancy condition because it has been agreed with the Environment Agency.</p> <p>The Council has in its Economic Action Plan two projects to look at coastal housing and coastal caravans in connection with the occupancy period. Both these projects will run during the 5 year review of the Local Plan with an aim to work with the housing developers and caravan site owners, other key partners such as the Environment Agency, Anglian Water, the County Council and the Emergency Services to assess evidence, and try to formulate policy around these two key areas for the future of the coast going forward. By the time of the Examination of the Local Plan this work will have started.</p>
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	<p>In addition, Bourne Leisure is aware of the Council's formation of a Caravan Occupancy Period Working Group, whose aim is to analyse and assess requirements related to occupancy period restrictions. We understand that as of the end of 2016 the Group is not yet fully up and running, but Bourne Leisure looks forward to being a proactive and pragmatic member of the Group. It is also Bourne Leisure's view that the Council's detailed concerns regarding their approach to the risk of flooding in relation to longer occupancy periods - which currently require the incorporation of the overly onerous bullet point 7 - could be resolved by this Group's members. It is therefore suggested that the Group should be activated by the Council as soon as possible, so that parallel to the emerging Plan, and through direct consultation and discussion with owners and operators of sites, a sound policy approach can be devised that is not only appropriate to all of the levels of risk of coastal flooding in the local authority area but also one that allows operators to contribute fully to the local economy.</p> <p>Benefits of an extended tourism season</p> <p>Within the District, the wide-ranging benefits of an extended visitor season are already well-recognised within the evidence base for the emerging Core Strategy. The Economic Baseline Study concludes:</p>	<p>design, mitigation and emergency planning measures;</p> <ul style="list-style-type: none"> o the quality of the accommodation proposed; and o whether the site has the necessary and appropriate infrastructure and services for the proposed period(s) of occupation.' <p>Bourne Leisure considers that if the Council is insistent that such an occupancy period condition is retained, the wording of bullet point 7 should be amended to cover the period 1 March to 30 November as standard, with further in-principle support for additional periods at other times, such that it can facilitate not only a longer 'core' occupancy period (where there are no, or low potential impacts from flood risk), but also fully align the period to school holidays, and at the same time, reflect the economic benefits of having a longer and more year-round tourism season.</p> <p>The Company therefore considers that if bullet point 7 is retained, it should be amended to state:</p>
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	<p><i>"Extending the visitor season further into the 'shoulder' months of March/ April and November and increasing the number of visitors staying in serviced accommodation would increase levels of visitor spend and help the District economy."</i></p> <p>Bourne Leisure agrees with this conclusion.</p> <p>The Greater Lincolnshire Local Enterprise Partnership (LEP), which aims to create sustainable economic growth across Greater Lincolnshire, recognises within the Strategic Economic Plan 2014-2033 (amended 2016):</p> <p><i>"Significant growth can be generated from extending the season and converting day visitors to overnight stays."</i> (page 35)</p> <p>Both Golden Sands Holiday Park and Butlin's Skegness make a very significant contribution to both the local economy and the employment of local people. It is clear that the principle of an extended tourism season would bring additional benefits to the local economy, reduce the seasonality of employment opportunities, and allow better alignment to school holidays.</p> <p>Bourne Leisure and other caravan site operators often hold special events outside of the usual caravan occupancy period. By employing such a limitative policy as currently proposed, the Council is, in principle, restricting such events taking place. By instead considering each development</p>	<p><i>"Occupancy of caravan, log cabin, chalets, camping and touring sites will be limited to between 1 March and 30 November in any one year. Proposals for any additional weekends and holiday periods will be considered on their merits."</i></p> <p>The Local Plan should also then include supporting text, referring to any proposals for additional weekends and time periods to be considered on their merits, subject where necessary (e.g. in higher flood risk areas) to considerations relating to the specific proposal's location and its characteristics, the design of the proposed development, the probability of flood risk, taking into account proposed mitigation and emergency planning, and the quality of accommodation provided.</p> <p>An alternative approach to bullet point 7 could also be made. A response by the Council to a previous Bourne Leisure submission as to why a strategic policy is necessary over individual</p>	
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	<p>proposal coming forward in a planning application to be considered on its merits, and then introducing Site-by-site occupancy conditions attached to planning permissions, operators would be able to hold special events outside conventional occupancy periods.</p> <p>Draft Policy SP19 Bullet point 7 of draft Policy SP19 states:</p> <p><i>"Occupancy of caravan, log cabin, chalets, camping and touring sites will be limited to between 15th March and 31st October in any one year, or the following Sunday, if the 31st does not fall on a Sunday."</i></p> <p>As currently drafted, Policy SP19 is inconsistent with the findings of the Economic Baseline Study, the LEP's Strategic Economic Plan and the aims and objectives for the visitor economy of the emerging Core Strategy. It is also inconsistent with national policy in the National Planning Policy Framework, which supports the provision and expansion of tourist and visitor facilities in appropriate locations' (para. 28).</p> <p>Not only is the proposed operating period too short, the draft policy excludes the following core operating periods:</p> <ul style="list-style-type: none"> Any weekend commencing at noon on a Friday and ending at midnight on a Sunday; and Any Christmas holiday period commencing at noon on 	<p>planning conditions stated that without such a policy, it would be difficult for smaller caravan sites to pass the exception test, as they do not provide the wider community benefits like the larger sites do. According to the Council, the policy approach would make this process easier for smaller operators. While Bourne Leisure would not wish to prejudice smaller sites from coming forward, it is entirely possible for the policy to be amended in such a fashion as to satisfy its desire for occupancy period restrictions to be employed through planning permission conditions, as well as allow smaller sites to pass the exception test. If bullet point 7 of Policy SP19 were retained in its currently proposed form, it could be redrafted so that it referred to smaller sites only.</p> <p>This would allow larger sites, such as those operated by Bourne Leisure, to have occupancy periods set by condition and not policy. The threshold of number of units proposed at a site, which would determine what is considered to be</p>	
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<p>24 December and ending noon on 3 January.</p> <p>Whilst Bourne Leisure acknowledges that some holiday accommodation is not suitable for permanent occupation and that a period of closure is required to undertake necessary maintenance works, the Company considers that greater flexibility should be provided for a longer season and for these additional core operating periods, in order to ensure that the maximum visitors' spend can be attracted to the local area. Modern static and touring accommodation is designed to a high standard; caravans often incorporate insulation, double glazing and central heating. Such accommodation is suitable for extended and other periods of occupation, in particular, weekends during winter months.</p> <p>With the onset of climate change, it is the case that parts of the year traditionally thought of as being unsuitable for caravan occupation are now deemed acceptable. As such, it is considered that East Lindsey's proposed occupation restriction reflects out-of-date periods for acceptable usage of caravans. By extending the occupation period to the end of November, and not restricting weekend occupation at other times, this would reflect modern habits of caravan usage.</p> <p>Bourne Leisure considers that the Council does not have a sound evidence to justify including bullet point 7 of Policy SP19 in the emerging</p>					
				<p>'large' and 'small', could be decided by the Council. This could be based on its own criteria, in relation to the size of sites and their contribution of benefits to the local community.</p> <p>The Company considers therefore, that based on the above proposition, bullet point 7 alternatively could be amended to state:</p> <p><i>"For caravan, log cabin, chalet, camping, and touring sites of fewer than X units, their occupancy will be limited to between 15th March and 31st October in any one year, or the following Sunday, if the 31st does not fall on a Sunday. For sites with units more than X, occupancy period restrictions will be determined on a site-by-site basis, considered on their merits and with reference to:</i></p> <p><i>the location of the proposal and the level of flood risk – if the site is located within an area of higher flood risk, any proposed design, mitigation and emergency planning measures;</i></p>	

		<p>Local Plan, nor to deviate for the whole of the local authority area from saved policy T16 (page 102) of the East Lindsey Local Plan Alteration 1999, which states:</p> <p><i>"Normally, the maximum permitted period of seasonal occupancy of caravan sites, for either statics or tourers, will be March 1st to January 5th inclusive, provided all caravans on site have connections to main services. Where the impact on local residential amenity or local environmental conditions requires further control, the maximum permitted period of seasonal occupancy of a caravan site will be March 1st to November 30th; and in the case of touring sites, caravans may be required to be removed from sites outside the period of permitted occupancy. Development of permanent forms of holiday accommodation or caravan sites in exceptional circumstances will be subject to holiday occupancy planning conditions."</i></p> <p>Bourne Leisure considers that the emerging East Lindsey Local Plan should not include a detailed policy specifying a fixed occupation period. Rather, it should set out a general flood-risk related policy based on the National Planning Policy Framework and national Planning Practice Guidance (PPG). This would allow individual applications for caravans etc. to be considered on their merits and that their occupancy periods, subject to</p>	<ul style="list-style-type: none"> • <i>the quality of the accommodation proposed; and</i> • <i>whether the site has the necessary and appropriate infrastructure and services for the proposed period(s) of occupation.'</i> <p>The above composite solution would allow the Council's policy within the emerging local plan to apply only where necessary, allowing smaller sites to avoid having to undertake the exception test where appropriate, but not prejudice the operation of larger sites, which make a substantial contribution to the local economy.</p>	

		<p>this policy, can take into account mitigation, design, and emergency planning (via the submission of a Flood Risk Assessment (FRA) and Flood Evacuation Plan (FWEF), if located within a higher flood risk area. This approach would recognise that a particular operator may well have a suitable and effective monitoring and evacuation plan that should be taken into account.</p>			
		<p>Therefore to meet the test of soundness (effectiveness), draft Policy SP19, bullet point 7, should be omitted. The supporting text for a general flood risk- related policy should then only state that the occupancy period for caravans etc. may be controlled in higher risk flood areas by the use of planning conditions, taking into account the points set out above. This revised approach would</p>			
		<p>ensure that the potential growth of the tourism sector within East Lindsey is not unnecessarily inhibited, in turn reducing seasonality and creating additional, more year-round local job opportunities. All of these outcomes would help boost the wider economy too.</p>			
		<p>The use of site specific planning conditions is a common approach adopted by other local planning authorities (LPAs) around the country, to define the occupancy period of caravan parks for planning reasons, as discussed below.</p>			
		<p>Occupancy conditions</p>			

						<p>Occupancy periods are most often dealt with satisfactorily via condition attached to site licences and planning permissions, and not within development plan policy. This licencing and development management approach is more consistent with national planning policy and guidance, as it encourages a move towards year-round tourism via individual development proposals being considered on their merits (including assessing their potential for contributing to local employment and boosting local economies). Bourne Leisure is fully aware of how LPAs are required to balance the need to impose seasonal occupancy conditions with the wish to avoid exacerbating the seasonal nature of tourism within a locality and any possible adverse effects on their local economy.</p> <p>For example, Tendering District Council uses site occupancy conditions to define the Occupancy period for individual holiday parks. Within Tendering, Bourne Leisure operates the Orchards Holiday Park located on the Thames estuary. The Orchards Holiday Park is located within Flood Zone 3 and currently has planning permission and a licence to operate during the period 1 March to 30 November (inclusive), on all weekends (from noon on Fridays to midnight on Sundays), and during the Christmas and New Year period (from 24 December to 3 January</p>		
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						<p>Inclusive). The occupancy period was recently defined as part of a planning permission granted following a s73 application to amend the wording of an earlier condition which restricted the occupancy period to 1 March to 31 October. A Flood Risk Assessment and Flood Warning Evacuation Plan were Submitted as part of the application. The LPA's planning officer concluded that the Flood Warning Evacuation Plan was acceptable and considered the development to have a tolerable level of safety. On this basis and having regard to the increased contribution the extended occupancy period would deliver in terms of the local economy and job opportunities, the application was approved. For further details, see the Officer's Report included at Appendix 1.</p> <p>The above example demonstrates how site occupancy periods can be successfully dealt with in applications, on a case by case basis, whether for new or extended park applications, or within s73 applications.</p> <p>This approach to defining the occupancy period via planning conditions was retained within the Tendering Local Plan Preferred Options Consultation Document. The evidence base for the production of the Tendering Local Plan includes the Tendering Holiday Park Sector Review; the outcomes of this review are discussed below as they are also more widely applicable e.g. to East Lindsey.</p>		
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						<p>Tendering Holiday Park Sector Review</p> <p>The Tendering Holiday Park Sector Review undertaken by Hotel Solutions (2009) suggests that LPAs could attach conditions to planning permissions for holiday parks to ensure that they are used for holiday purposes only, but that with better caravan standards and the trend towards tourism as a year-round activity, authorities should give sympathetic consideration to applications to extend the opening period (page 23). The report also refers to conditions used by East Riding of Yorkshire Council to restrict the use of caravans to holiday purposes only, and suggests that planning policies should support the extension of the operating season to up to 11 months (in the Executive Summary).</p> <p>Bourne Leisure considers that the use of conditions to control holiday occupation on a site by site basis, depending on particular circumstances and character, is a more appropriate approach than a blanket policy restriction, as it allows individual circumstances to be taken into account including the level of flood risk. The recommendation within the Tendering Holiday Park Sector Review for LPAs to use 'holiday occupation conditions' and 'seasonal occupancy conditions' is an approach which should be endorsed and adopted by East Lindsey, to avoid exacerbating the seasonal nature of tourism within the locality by an overly</p>		
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					<p>restrictive 'blanket' policy, and ensure that any site specific circumstances</p> <p>Such as higher flood risk have been fully considered and reflected within the required occupancy period for any one operation.</p> <p>East Riding of Yorkshire, holiday accommodation 'model' planning conditions</p> <p>East Riding of Yorkshire Council undertook a review of its approach to holiday accommodation in mid-2005, which included setting up a working group with representatives from the British Holiday and Homes Parks Association Ltd., caravan manufacturers, park operators and their agents. This led to a report to the Council's Planning Committee in November 2005 when a new 'model' set of planning conditions were agreed. These conditions were quoted in previous Government guidance (DCLG's Good Practice Guide on Planning for Tourism, 2006, Annex B) as an example of good practice. The conditions expect:</p> <ol style="list-style-type: none"> 1. the accommodation is occupied for holiday purposes only; 2. the accommodation shall not be occupied as a person's sole or main place of residence, and; 3. The operator to maintain a register of the occupants' main place of residence, which is available for inspection. <p>These conditions were attached to planning permissions for</p>		
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					<p>holiday accommodation in East Riding from November 2005. Although DCLG's Good Practice Guide on Planning and Tourism, 2006 has been superseded by the PPG, the principle that planning conditions should be tailored specifically to individual cases, rather than standardised or used to impose unnecessary controls, is retained.</p> <p>By applying these policy principles and ensuring that the occupancy period is tailored to individual site circumstances, the achievement of the full range of benefits associated with the tourism industry within East Lindsey would be maximised.</p> <p>The Council had previously argued in response to the comparison of East Lindsey with Tendering that analogies could not be made between the two. It has been claimed that the reason for Tendering making use of occupancy conditions and not local plan policy is that the Thames Estuary is a fluvial flood plain and the danger from flood events is different from that of the open coast line. However, a review of the local plans of neighbouring planning authorities along relevant parts of the eastern English coast (North East Lincolnshire, Boston, South Holland, North Lincolnshire, and King's Lynn & West Norfolk councils) has demonstrated that East Lindsey is the only authority seeking to impose occupancy period restrictions as part of local plan policy. As such, it is reasonable to expect that as the other councils can make use of</p>

						<p>conditions on planning permissions to restrict occupancy periods, there does not seem to be a clear reason why East Lindsey cannot follow the same case-by-case approach.</p> <p>Summary Whilst Bourne Leisure understands and shares East Lindsey District Council's concern about flood risk, the Company does not consider the blanket approach of the draft policy is either appropriate or necessary. Other LPAs have taken more flexible approaches. East Lindsey's approach is one that could have serious unintended consequences to the local economy. A reduced (shorter) occupancy period will discourage investment. For example, an operator would be discouraged from seeking to improve a holiday park via expansion onto a new area and would be deterred from introducing revised/ lower density layouts within an existing area of the existing Park, if a new occupancy condition results in a shorter season. Without new investment, the standard and quality of accommodation and facilities can fall, resulting in decline. Given that customers do have choice, they may decide to visit other holiday parks (in other districts). In turn, this would result in less income for an operator and less available to invest. As will be appreciated, this is a spiral of decline.</p> <p>Because the approach being promoted by the Council is at odds with other coastal local</p>		
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		<p>authorities, there is a real risk that investment will take place elsewhere. That will, in turn, mean that East Lindsey fails to meet its potential and the aspirations set out by, for example, the LEP.</p> <p>Bourne Leisure also concludes that a shorter season in effect 'fixed' in policy will mean reduced employment - again an adverse consequence for the local economy. The Council will be aware that enhancing the skills of employees in The coastal communities is a pressing matter. To improve skills is already a Challenge for Bourne Leisure due to the seasonality of the tourism economy. A Reduced season will exacerbate this situation.</p> <p>Bourne Leisure recognises the importance of a well-trained workforce because this has a very direct impact on the quality of service provided to customers. If there is a reduced season, the opportunities to train and retain staff will decrease. This is another consequence that, overall, will harm the operation and quality of the tourism industry in East Lindsey.</p> <p>Overall, a more nuanced and sophisticated approach needs to be taken on a Case by case basis, to address the concerns of the District Council about the risk of flooding.</p> <p>Bourne Leisure therefore requests that East Lindsey District Council takes into account the evidence and information discussed above</p>					
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Environment Agency	SP19		S					<p>and affords significant weight to the opportunities presented through the use of occupancy conditions attached to planning permissions on a case-by-case basis, instead of including an overly-restrictive policy in the emerging Core Strategy. The Company requests that emerging Core Strategy policies do not unnecessarily restrict the tourism offer within East Lindsey and allow individual applications for caravans/ their occupancy to be fully considered on their individual merits, taking into account the quality of the accommodation provided. I proposed, whether the site has the necessary and appropriate infrastructure and services for the proposed period(s) of occupation; and whether the site is located within an area of higher flood risk and, if so, any proposed design, mitigation and emergency planning measures</p>		
							<p>We strongly support the Council's policy on holiday accommodation and its aspiration to provide a buoyant coastal economy. Having worked with East Lindsey and other partnership bodies, such as Lincolnshire County Council and adjacent coastal authorities, on its development over many years, it is our opinion that the approach to holiday accommodation gives appropriate consideration to flood risk.</p> <p>In particular, we have worked with the Council in respect of the caravans, park homes, camping sites and holiday chalet season. These types of holiday accommodation are considered to be highly</p>		The Council notes the support for the policy	

					<p>vulnerable development due to the nature of their construction. The instability of their structure places their occupants at special risk, particularly if they are occupied during periods when flood risk is likely to be higher. This is recognised through the vulnerability classifications included in the Planning Practice Guidance, Table 2, where those intended for permanent residential use are 'highly vulnerable' and as such should not be permitted in Flood Zone 3.</p> <p>We support the approach of the Council to manage residual flood risk to caravan and camping sites using a seasonal occupancy restrictions so that sites are closed when the risks are highest. The Lincolnshire Coastal Study provided a recommendation on the appropriate seasonal occupancy restriction for caravans and chalets. This recommended that they should only be occupied between May and September. Site owner's feedback was that this would have a detrimental economic impact. At the request of the Council, the Environment Agency reviewed historic data on tide levels, storm surges, waves heights etc and determined that the times of year when the components most likely to cause tidal inundation increase in occurrence between November and March. The Council determined that an open season, which included occupancy of caravans during the Easter and October half term holidays, could be considered appropriate and</p>

LCC Environmental Services	SP19	O			<p>residual risks managed. We, therefore, support the season included in point 7 of SP19. To extend the open season beyond this would, in our opinion, not be safe.</p> <p>We have also given consideration to areas of land (and caravan sites) on the inland edge of the high hazard zones in the climate change scenario, which are not at risk (hazard) in the current day scenario. We are supportive of the extension of the open season on such sites for a limited period of 20 years, following which a review of climate change impacts will be undertaken – this has been included, with our support, in point 8 of Policy SP19. The Environment Agency has also provided maps of this area, which are included in the Strategic Flood Risk Assessment.</p> <p>We are, therefore, supportive of this approach, which is clearly evidence based, demonstrating the plan is positively prepared, justified and consistent with National Policy.</p>			<p>The Council cannot place the maps in the Local Plan because they are too large for the document and signposting to the SFRA is considered to be an acceptable way of directing those wishing to develop. The SFRA is a key piece of evidence that the Council keeps up to date. The content of this part of the SFRA has been reviewed to ensure that the wording around the maps is clear.</p> <p>The Council formulated the section of the Policy SP19 with the assistance of</p>
					<p>SP 19 (8) is considered unsound for the following reasons:</p> <p>Transparency – the policy refers to the Council's SFRA for information on designated areas. There is inadequate signposting to the relevant maps (4 – 7 inclusive) and the information provided does not articulate clearly which parts of the mapped area are suitable for 12 month holiday occupation. It is assumed that the blue areas are suitable</p>	<p>SP 19 (8) should be rewritten as follows:</p> <p>" In designated areas set out in the Council's SFRA (see maps on pp xx), holiday occupation all year will be</p>		

	<p>the scope of the holiday facilities and attractions, with a strong focus on the established centres of Skegness and Mablethorpe.</p> <p>This investment will help maintain thriving local communities and extend the visitor economy. We note that point five supports development in Sutton on Sea that lengthens the holiday season. This principle of extending the holiday season should apply across all the resorts and tourist facilities in the East Lindsey Coastal area. The importance of lengthening the tourist season is highlighted in the Greater Lincolnshire Local Enterprise Partnership's Strategic Economic Plan 2016 refresh which, at page 35, states, "significant growth (in the visitor economy) can be generated from extending the season and converting day visitors to overnight stays". We note, however, that Policy SP19 - Holiday Accommodation seeks to limit the Occupancy of Caravan, Log Cabin, Chalet and camping and touring sites between the 15th March and the 31st October in any one year, which would appear to act as a significant constraint on extending the holiday period, contrary to the aspirations of Policy SP20, especially as caravan and chalet parks provide the largest source of holiday accommodation on the East Coast.</p> <p>The potential risk from Flooding, which appears to be the major driver of this policy approach, is a significant issue. Each site</p>	

Blue Anchor Leisure Represented by Robert Doughty	20				<p>varies from every other, however, depending on location, flood risk, form of accommodation, etc, and a more appropriate response to safeguard occupants would be to utilise site specific conditions based on the characteristics of each site. Suitable conditions may allow, for instance, for longer periods of occupation, or occupation of the site at weekends, or for defined holiday periods, such as Christmas and the February half term.</p>	<p>We support the principle of Policy SP20 - Visitor Economy, which supports investment in development which adds to, raises the quality of or widens the scope of the holiday facilities and attractions, with a strong focus on the established centres of Skegness and Mablethorpe.</p> <p>This investment will help maintain thriving local communities and extend the visitor economy. We note that point five supports development in Sutton of Sea that lengthens the holiday season. This principle of extending the holiday season should apply across all the resorts and tourist facilities in the East Lindsey Coastal area.</p> <p>The importance of lengthening the tourist season is highlighted in the Greater Lincolnshire Local Enterprise Partnership's Strategic Economic Plan 2016 refresh which, at page 35, states, "significant growth (in the visitor economy) can be generated from extending the season and converting day</p>	<p>Bullet point 7, which sets a occupancy condition, should be deleted and replaced with a condition to the following effect</p> <p>"caravan occupancy conditions may be attached to planning permissions on a case by case basis, taking into account</p> <p>The location of the proposal and the level of flood risk</p> <p>The quality of the accommodation proposed,</p> <p>together with any proposed flood mitigation and emergency planning measures</p> <p>Whether the site has the necessary and appropriate infrastructure and</p>	<p>Whilst the sea defences may be robust along the coast there have been two near misses for East Lindsey since 2013, one in December 2013 and on in January 2017, on the last occasion, the East Lindsey coastline missed a major event by only two hours due to a change in weather conditions. In December 2013 there was some damage but once again a last minute change in the weather averted a major event.</p> <p>With climate change this situation could get worse with more frequent events and a greater volume of water behind the defences. Caravans are considered to be a vulnerable form of development and at the present time there is no proven means to ensure the safety of the occupiers of the caravan sites during the winter months.</p> <p>There is no legal way for the Council to ensure that sites are evacuated during a major event, there are no conditions that the Council could impose or enforce in time to save lives if an event occurred during the winter months. There is no fair, transparent or legal way of limiting the number of sites that could be open or the numbers of people involved. This means that technically</p>
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	<p>visitors to overnight stays". We note, however, that Policy SP19</p> <ul style="list-style-type: none"> - Holiday Accommodation seeks to limit the Occupancy of Caravan, Log Cabin, Chalet and camping and touring sites between the 15th March and the 31st October in any one year, which would appear to act as a significant constraint on extending the holiday period, contrary to the aspirations of Policy SP20, especially as caravan and chalet parks provided the largest source of holiday accommodation on the East Coast. 	<p>services for the proposed period(s) of occupation".</p>	<p>the numbers of those living and visiting the coast during the most dangerous period of the year could be on a par with the summer months. The issue of an increase in the numbers of people in the coast during the winter months with the existing population to also considered to be a key factor in determining whether it is safe to approve longer occupancy periods. Therefore at the present time the safety of the occupiers of the caravan sites and the existing residents must outweigh any economic benefit until such time as a way can be found to overcome the issues involved and have all partners signed up to a way forward. At the present time this is not the case.</p> <p>The Council considers its approach to be a pragmatic, safe response to flood risk in conformity with national planning policy, in that the occupancy period has been worked out with the Environment Agency as the period which covers both Easter and the October Half Term holidays. It does not cover Christmas because this lands right in the middle of the most dangerous period of the year.</p> <p>The Council does not wish to do this on a case by case basis because the end result will be the same with the same occupancy condition because it has been agreed with the Environment Agency.</p> <p>The Council has in its Economic Action Plan two projects to look at coastal housing and coastal caravans in connection with the occupancy period. Both these projects will run during the 5 year review of the Local Plan with an aim to work with the housing developers and caravan site owners, other key partners such as the Environment Agency, Anglian Water, the County Council and the Emergency Services to assess</p>

											evidence, and try to formulate policy around these two key areas for the future of the coast going forward. By the time of the Examination of the Local Plan this work will have started.
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POLICY SP21 – COASTAL EMPLOYMENT												
Blue Anchor Leisure Represented by Robert Doughty	SP21	S									We support the principle of Policy SP21- Coastal Employment, which will help maintain thriving local communities alongside the visitor economy. A varied economy will ensure greater investment in the local area and support infrastructure and services necessary to maintain vibrant local communities all year round.	The Council notes the support for Policy SP21 from the consultee.
Hardys Farm Ltd Represented by Robert Doughty	SP21	S									We support the principle of Policy SP21 - Coastal Employment, which will help maintain thriving local communities alongside the visitor economy. A varied economy will ensure greater investment in the local area and support infrastructure and services necessary to maintain vibrant local communities all year round.	The Council notes the support for Policy SP21 from the consultee.

CHAPTER 11 – TRANSPORT AND ACCESSIBILITY

Name	Policy Number	Page Number, Text (para Number, Text)	Settlement Proposals Map or Site Number	Settlement Proposals Page Number	Evidence Document	Q3 Response	Q4 Change Sought	Response
POLICY SP22 – TRANSPORT AND ACCESSIBILITY								
Lenton AE (Holdings) Ltd Represented by Barton Wilmore	SP22					<p>We feel the spatial distribution allocations proposed is not in accord with Policy SP22, particularly points 1 and 2. Because of the good transport links to Friskney and the fact it is on a bus route and which immediately passes the edges of our client's property, this further illustrates the point that the allocation in Friskney should be greater than it is in some of the other villages where higher allocations and disproportionate allocations are proposed. The villages in question are mentioned above and in our commentary on the matters noted against page 23.</p>	<p>Give a greater allocation to Friskney and allocate the Sites 2, 4 and 5 in our representations dated 8th August 2016.</p>	<p>The consultee is discussing their points around the village of Friskney, which is a large village and therefore has a strategic allocation of growth. The consultee believes that their sites should be allocated. However as discussed elsewhere in the responses their sites were not considered to be suitable, therefore no matter how connected Friskney may or may not be, it would not make an unsuitable site for other reasons, suitable and the Council is unable to respond further on this point.</p>
KCS Developments Represented by Barton Wilmore	SP22					<p>Our Client continues to support the Policy.</p>		<p>The Council notes the support of the consultee</p>
Broadgate Homes	SP22					<p>3.20 The draft Plan recognises that the district, being essentially rural in character, makes those living in the towns and particularly the villages, car dependent. Therefore, encouragement of non-car models</p>	<p>5. Policy SP 22 Transport and Accessibility should require a minimum of two car spaces per dwelling.</p>	<p>The Council has chosen not to set rigid parking standards and is content with one space per dwelling as a minimum, this means that developers can choose to have more parking if they wish but they will have</p>

CPRE Lincolnshire	Chapter 12 SP23		S					<p>as a large or medium village. This is necessary to protect the landscape setting of the village in its AONB and comply with the requirements of Strategic Policy 23 (SP23) – Landscape, paragraphs 2 and 3.</p> <p>Lincolnshire Wolds</p> <p>The countryside and the natural environment is recognised as being a principle asset in East Lindsey's Core Strategy, but this should also be protected and enhanced. Whilst the Lincolnshire Wolds is being acknowledged as a delivery objective in the East Lindsey Core Strategy, and the special qualities of the Wolds is included a lot with Chapter 12 (Protecting and Enhancing the Natural Environment), these designations indicate national recognition of the landscape quality on a par with National Parks. Therefore, protection of these designated landscapes will be of prime importance and a strategic policy. To strike a balance between preserving and enhancing the quality and character of the countryside, in terms of the landscape and nature conservation, promoting a healthy, modern and sustainable rural economy and ensuring a high quality of life for rural communities, within the Areas Outstanding Natural Beauty (AONB), particular attention should also be paid to conserving the character and scenic quality of the landscape in East Lindsey. Therefore, development should generally be restricted to that essential to maintain the rural economy or desirable for the enjoyment of its amenities. Where development is acceptable in principle, special emphasis should be placed on scale, location and siting, and a particularly high standard of design and landscaping will be required.</p> <p>The AONB should also be conserved and enhanced to maximise special</p>		<p>Beauty; it is not necessary to have a line round a settlement for this to happen.</p> <p>Any Neighbourhood Plan produced within the District has to be in conformity with national planning policy and with the local plan. Both of these recognise the importance of the Area of Outstanding Natural Beauty (AONB). It is not necessary for the Neighbourhood Planning policy to make reference to the Lincolnshire Wolds AONB as this is covered elsewhere in the Plan. This would not be relevant to all Neighbourhood Plans (indeed no communities in the AONB have yet decided to produce a Neighbourhood Plan. Also, it is not there are other matters of national and local importance, such as flood risk or biodiversity that affect more communities, so it is inappropriate to pick out one policy are for special treatment.</p>
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Lincolnshire Wildlife Trust	SP23	S					<p>landscape qualities and natural beauty, and be protected from inappropriate development in East Lindsey. The national significance of the AONB will be afforded the highest level of protection and only proposals which can be sensitively incorporated into the area and which complement and enhance the character of the AONB will be considered. Also, all proposals should be considered against whether they:</p> <ul style="list-style-type: none"> - conserve and/or enhance the natural beauty and/or amenities of the area - conserve wildlife, historic objects or natural phenomena within it - promote its enjoyment by the community and visitors to the area - support the rural economy of the Lincolnshire Wolds area and provide or maintain public access to it. <p>Also, given that the AONB in East Lindsey is an area of distinctive landscape with special qualities which is of national importance, then this should also be acknowledged with your strategic policy for Neighbourhood Planning. A high degree of protection is given to the AONB by planning policy at all levels national, regional, county and local. The purpose is to conserve and enhance natural beauty, which includes wildlife as well as landscape features.</p> <p>Therefore, Strategic Policy 6 (SP6) – Neighbourhood Planning, should acknowledge the East Lindsey AONB as something that should also be acknowledged, where necessary.</p> <p>The Lincolnshire Wildlife Trust supports this policy as it ensures the protection and enhancement of the District's landscapes whilst also allowing them to be used and managed to allow for greater public access to the countryside and naturalistic coast</p>		The Council notes the support from the consultee
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POLICY SP24 – BIODIVERSITY AND GEODIVERSITY

<p>CPRE Lincolnshire</p>	<p>Chapter 12 SP24</p>	<p>O</p>			<p>Protecting East Lindsey's Setting and Character</p> <p>Whilst this is generally supported, the CPRE Lincolnshire would however like to see specific mention made in the Plan about the retention and management of existing hedgerows.</p> <p>Intensive farming methods and application of the CAP in the past have seen progressive denudation of habitat provided by hedgerows which perform an important function in both the ecology and appearance of the countryside. They also act as important screens to new development which reduces visual intrusion into an otherwise flat landscape.</p> <p>We believe that there should be a presumption in policy against the removal of established hedgerows and that management plans should be a conditioned to ensure their long term survival.</p>	<p>Paragraph 10 to SP24 already refers to the importance of hedgerows and states that "The Council will seek to retain natural features, including trees and hedgerows on site, wherever possible."</p>
<p>The Woodland Trust</p>	<p>SP24</p>	<p>O</p>			<p>We welcome the wording in para 9 on page 103, which sets out a good argument for the irreplaceable nature of ancient woodland and ancient/veteran trees and why they should be given the highest possible level of protection. We also welcome the reference to the Natural England Standing Advice document.</p> <p>Ancient woods are irreplaceable. They are our richest terrestrial wildlife habitats, with complex ecological communities that have developed over centuries, and contain a high proportion of rare and threatened species, many of which are dependent on the particular conditions that this habitat affords. For this reason, ancient woods are reservoirs of</p>	<p>The Council agrees with the consultee and proposes a minor modification to add the words 'in exceptional circumstances and "clearly" to criterion 5 of SP24, making the policy in conformity with the NPPF.</p>
					<p>I would amend the wording in para 5 of Policy SP24 as below, to reflect the strong protection given to ancient woodland and ancient trees in the supporting text at para 8 and to reflect the irreplaceable nature of these habitats.</p> <p>5. Planning permission will only be granted for development which directly or indirectly leads to loss or harm to ancient woodland or aged or veteran trees in exceptional circumstances and where the developer can demonstrate that the wider benefits of that loss clearly</p>	

Greater Lincs Nature Partnership	SP24	o				<p>biodiversity, but because the resource is limited and highly fragmented, they and their associated wildlife are particularly vulnerable.</p> <p>Their long continuity and lack of disturbance means ancient woods are often also living history books, preserving archaeological features and evidence of past land use, from earthworks to charcoal pits. They are also places of great aesthetic appeal, making them attractive for recreation and the many benefits this can bring in terms of health and well being.</p> <p>However, the policy wording on this subject in SP24, namely para 5, is disappointing, as it does not provide this high level of protection. It gives weaker protection than that given by para118 of the NPPF, as the word "clearly" is omitted from the wording used in Paragraph 118 bullet 5: "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss"</p> <p>We would prefer that you follow the logic of para 8 on page 103 and give ancient woodland and ancient trees the highest possible level of protection. This could be done by translating some of the wording from paragraph 2 of the policy into paragraph 5: ie: "Development, which could adversely affect such a site, will only be permitted in exceptional circumstances"</p> <p>The GLNP believes this policy is unsound as it does not contain a reference to Nature Improvement Areas (NIAs). Paragraphs 117 and 157 of the NPPF refer to NIAs with 157 stating that Local Plans should</p>	outweigh the protection of the trees	There are no Nature Improvement Areas in East Lindsey and this is why previous requests to include this were not acted upon. However, the
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Greater Lincs Nature Partnership					<p>"supporting Nature Improvement Areas where they have been identified". Processes for recognising NIAs are ongoing and it is anticipated that NIAs will be recognised in the ELDC area within the plan period.</p>	<p>•Where development is within a Nature Improvement Area (NIA) it should contribute to the aims and aspirations of the NIA</p>	<p>respondent believes that this is likely within the Plan period, so it is agreed to add to the end of paragraph 7 of the text to SP24: "At the time of writing the Plan, East Lindsey is not within a Nature Improvement Area (NIA) but work on this is ongoing. Where development is within a Nature Improvement Area (NIA) it should contribute to the aims and aspirations of the NIA."</p>
					<p>While the GLNP supports the inclusion of this paragraph we believe that this paragraph is confused, lacking clarity and could therefore be misleading. In addition it is inaccurate in the description of Local Sites as locally important. Defra guidance* on Local Sites states that these sites are actually of substantive nature conservation interest and that it is a comprehensive suite of sites to be determined locally according to national, regional and local biodiversity needs.</p> <p>To this end Local Sites may actually contain species or habitat of national, regional or local importance therefore it is incorrect to say they are of local importance for nature conservation. They are termed Local Sites as they are determined locally but their significance for nature conservation may be far greater because of their comprehensiveness.</p> <p>For comparison SSSIs are designated on a representative basis e.g. it is only necessary to designate a site representing one of each type of habitat. For Local Sites every site that meets the criteria is supposed to be designated and in this way Local Sites</p>	<p>The GLNP suggest the following changes:</p> <p>4. There are a number of sites recognised at a local level for their nature conservation or geological value. These sites have been identified for features including their rarity, diversity, fragility or their typicalness in the local biodiversity or geodiversity of the District. The Council will seek to protect these sites when assessing development proposals. A set of criteria for selecting Local Geological Sites (LGSS) for their physiological/geomorphological importance was published in 2009 and a similar exercise is being considered for these sites. Many sites recognised at a local level for their nature conservation or geological value have already been reviewed against the new criteria.. The locally important wildlife sites that meet the selection criteria published by the Greater Lincolnshire</p>	<p>It is agreed that the revised wording of paragraph 4 be included in the Plan. It will add correction and clarity.</p> <p>Reword paragraph 4 of SP24 to read: "4. There are a number of sites recognised at a local level for their nature conservation or geological value. These sites have been identified for features including their rarity, diversity, fragility or their typicalness in the local biodiversity or geodiversity of the District. The Council will seek to protect these sites when assessing development proposals. A set of criteria for selecting Local Geological Sites (LGSS) for their physiological/geomorphological importance was published in 2009 and a similar exercise is being considered for these sites. Many sites recognised at a local level for their nature conservation or geological value have already been reviewed against the new</p>

Lincolnshire Wildlife Trust	SP24	O				<p>'Fill the gap' in other designation systems.</p> <p>*Defra (2006) Local Sites: Guidance on their Identification, Selection and Management.</p> <p>In order to be effective this paragraph needs to be reworded.</p>	<p>Nature Partnership are called Local Wildlife Sites (LWSS) or Local Geological Sites (LGSs). There remain sites from the previous regime of designation, Sites of Nature Conservation Importance (SNCI) and Regionally Important Geological Sites (RIGS), which have not yet been tested against the new criteria published by the GLNP. Until such time as these sites have been resurveyed and an assessment made of their current ability to meet the criteria, these sites remain designated and this policy still applies to them."</p>	<p>criteria.. The locally important wildlife sites that meet the selection criteria published by the Greater Lincolnshire Nature Partnership are called Local Wildlife Sites (LWSS) or Local Geological Sites (LGSs). There remain sites from the previous regime of designation, Sites of Nature Conservation Importance (SNCI) and Regionally Important Geological Sites (RIGS), which have not yet been tested against the new criteria published by the GLNP. Until such time as these sites have been resurveyed and an assessment made of their current ability to meet the criteria, these sites remain designated and this policy still applies to them."</p> <p>See Greater Lincolnshire Nature Partnership change above.</p>
						<p>The Lincolnshire Wildlife Trust strongly supports this policy and we welcome the Council's commitment to adopt an approach that seeks to protect and enhance biodiversity and geodiversity and minimises fragmentation and maximises opportunities for habitat connections. We are pleased that some of the changes we suggested have been incorporated into the policy. However, we are disappointed that there is still no reference to Nature Improvement Areas (NIAs) either in this policy or the supporting text.</p> <p>Paragraph 1.57 of the NPPF requires Local Plans to support Nature Improvement Areas (NIAs) where they have been identified. NIAs are landscape-scale initiatives that aim to ensure land is used sustainably to achieve multiple benefits for people, wildlife and the local economy. At the present time the only NIA in Greater</p>	<p>To ensure that there is appropriate recognition within the Local Plan of Nature Improvement Areas (NIAs), as required by the NPPF, we would recommend that an additional bullet point is added to this policy to read: 'Where development is within a Nature Improvement Area (NIA) it should contribute to the aims and aspirations of the NIA'.</p> <p>If the Council is not minded to add the recommended text to the policy we would suggest that there should, as a minimum, be recognition within the supporting text of the need to have regard to Nature Improvement Areas that come forward in the future.</p>	

Lincolnshire Wildlife Trust		p101(4)	O					<p>Lincolnshire is the Humberhead Levels. However, it is important that there is reference to Nature Improvement Areas (NIA) in the Local Plan as additional NIAs will be selected locally within the period covered by this plan and a number of Living Landscape schemes, such as the Lincolnshire Wolds and Lincolnshire Limewoods, are candidates for selection as NIAs.</p> <p>Whilst we welcome this paragraph relating to Local Sites we would recommend that it is re-worded to ensure clarity and avoid repetition. It should be noted that Local Sites are not just of local importance and can be of national, regional or local importance for nature conservation.</p>	<p>We would suggest the addition of the bold text below and the removal of the underlined text in italics as follows:</p> <p>4. There are a number of sites recognised at a local level for their nature conservation or geological value. These sites have been identified for features including their rarity, diversity, fragility or their typicalness in the local biodiversity or geodiversity of the District. The Council will seek to protect these sites when assessing development proposals. A set of criteria for selecting Local Geological Sites (LGSs) for their physiological/geomorphological importance was published in 2009 and a similar exercise is being considered for these sites. Many sites recognised at a local level for their nature conservation or geological value have already been reviewed against the new criteria. The locally important wildlife sites that meet the selection criteria published by the Greater Lincolnshire Nature Partnership are called Local Wildlife Sites (LWSs) or Local Geological Sites (LGSs). There remain sites from the previous regime of</p>	<p>The Council has agreed to a similar wording to paragraph 4 above.</p>
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	<p>designation, Sites of Nature Conservation Importance (SNCI) and Regionally Important Geological Sites (RIGS), which have not yet been tested against the new criteria published by the GLNP. Until such time as these sites have been resurveyed and an assessment made of their current ability to meet the criteria, these sites remain designated and this policy still applies to them.</p>							
	<p>Paragraph 4 would then read:</p> <p>4. There are a number of sites recognised at a local level for their nature conservation or geological value. These sites have been identified for features including their rarity, diversity, fragility or their typicalness in the local biodiversity or geodiversity of the District. The Council will seek to protect these sites when assessing development proposals. The important sites that meet the selection criteria published by the Greater Lincolnshire Nature Partnership are called Local Wildlife Sites (LWSs) or Local Geological Sites (LGSs). There remain sites from the previous regime of designation, Sites of Nature Conservation Importance (SNCI) and Regionally Important Geological Sites (RIGS), which have not yet been tested against the criteria published by the GLNP. Until such time as these sites have been resurveyed and an assessment made of their current ability to meet the</p>							

			<p>consistent with national policy (National Planning Policy Framework (NPPF) Paragraphs 70, 73 and 74), Sport England is concerned about the evidence base being used to underpin the policy and the reference to generic standards.</p> <p>The 'Evidence' section refers to an 'Open space, recreational and sports facilities assessment' which is undated, but appears to be two audits (one for indoor and one for outdoor facilities) prepared in 2013. These documents are not judged to constitute robust and up to date assessments of need as required by NPPF Paragraph 73. They draw on information and sources dating back to 2002, refer to generic standards including the Fields in Trust 'six acre standard' and seek to apply some of Sport England tools and resources in a manner for which they were not intended.</p> <p>Of particular concern is the statement within the text of Chapter 12, that 'An audit and needs assessment of open spaces, recreational and sports facilities in the District has been recently undertaken. It has indicated no clear evidence of any significant quantitative deficiency in the level of indoor sports facility provision.' (Paragraph 4)</p> <p>Given that the audit work does not provide robust and up to date evidence, then it does not provide a suitable basis for underpinning Policy SP26, and for determining what sports provision is required to meet specific needs - informed by locally derived</p>	<p>Current reference to 'the local standards set within the open space, recreational and sports facilities assessment study' needs to be omitted from the policy wording. (Final sentence of Paragraph 2).</p> <p>The above points have been raised by Sport England in previous representations to the Council, along with an invitation to discuss any queries. The following link to Sport England guidance on how to assess the need for sports and recreation (referenced in national Planning Practice Guidance) has also been provided previously: https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p> <p>Sport England remains willing to discuss the above points with the Council with a view to identifying a positive way forward.</p>	<p>whole document. The Council do not believe the audit to be out of date as using the criteria published by Sport England on its own website the stated period before a study becomes out of date is five years.</p> <p>The Council do not feel the removal of reference to local standards set within the open space, recreational and sports facilities assessment study is required. The standards as proposed are relevant to the situation facing East Lindsey and alongside these the use of universally accepted Fields in Trust standards for example are felt justified as they provide an aspirational target for future provision.</p>
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		<p>quantitative and qualitative data (NPPF Paragraph 73).</p> <p>Both the safeguarding and delivery of new/enhanced provision strands of SP26 require the availability of a robust and up to date evidence base in order to be applied effectively.</p> <p>Paragraph 8 raises similar concerns to those highlighted in respect of Paragraph 4. Paragraph 8 also refers to 'Fields in Trust standards being used as a guide in assessing the level and type of need' for outdoor sport and other forms of open space. However, again this would not be consistent with the requirements of NPPF Paragraph 73 to plan for locally specific needs informed by evidence.</p> <p>In the final sentence of Paragraph 2 of the Policy SP26 wording, it is stated that contributions made by new and extended residential development towards the provision and improvement of sports and recreational facilities 'should be in accordance with local standards set within the open space, recreational and sports facilities assessment study (or subsequent approved revisions)'. For the reasons highlighted above, the evidence and standards within the 'assessment study' are not robust and are inconsistent with NPPF provisions.</p>					

CHAPTER 14 – RENEWABLE AND LOW CARBON ENERGY

Name	Policy Number	Page Number, Text (para Number)	Settlement Map or Site Number	Settlement Proposals	Evidence Document Page Number	Page Number, Text (para Number)	Q3 Response	Q4 Change Sought	Response

POLICY SP27 – RENEWABLE AND LOW CARBON ENERGY

National Grid Viking Link	SP27	3	0				<p>National Grid Viking link (NGVL), together with its development partner Energinet.dk, are proposing to develop an electricity interconnector between Great Britain and Denmark. The project is known as Viking Link and will enable Great Britain to trade energy as a commodity with European Energy Market.</p> <p>Viking Link will consist of approximately 760km of Onshore and Offshore cables connecting Great Britain's and Denmark's electricity networks. The cables carry High Voltage Direct Current (HVDC) and will have capacity equivalent to 1.3% of Great Britain's current usage.</p> <p>Permission for the Onshore Scheme, from Mean Low Water Springs (MLWS) at the landfall point at the Lincolnshire Coast to Bicker Fen substation, will be sought under the Town and Country Planning Act 1990 ("the 1990 Act").</p>	<p>NGVL consider removing the text, as struck through below, would result in the document being sound and compliant with NPPF. Policy SP27, page.112, supporting text paragraph 3;</p> <p>"Any development in the AONB, or which impacts upon it, or its setting, is carefully considered for its impact on the character of the landscape. Where those impacts are judged to be so significant that they outweigh the benefits, proposals will be rejected. The Council will support local communities and businesses in pursuing sources of low carbon energy generation. However, within the Lincolnshire Wolds where the following assessment the</p>	<p>The consultee has requested that the last sentence in paragraph 3 be deleted because it is not necessary. The Council agrees with the consultee and is proposing a minor modification with the deletion of the sentence "It is considered that any significant commercial energy infrastructure is likely to create an unacceptable impact with the Wolds"</p>
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consistent with the National Planning Policy Framework (NPPF) -that there is a presumption against development in the AONB unless certain tests are met and that this is the same for all infrastructure which will have an impact on the AONB. However, the final sentence of the supporting text (underlined above) singles out a particular type of infrastructure and sets out an assumption that the impact will be unacceptable. NGVL considers this sentence is not necessary as ELDC have already detailed that there is a presumption against permission being granted unless there are exceptional circumstances and the tests are met. NGVL consider all development should be subject to the same tests and there should be no such element of predetermination against specified schemes.

The Lincolnshire Wolds Management Plan (2013-2018) states "Planning pressures remain, including the possibility for future infrastructure schemes, both within or in close proximity to the AONB, for electricity, gas and water distribution. Future proposals will need to be assessed on a case by case basis by the relevant Local Planning Authority". This accords with policy SP27 assessing each development on a case by case basis rather than having a presumption against a specific type of development.

CHAPTER 15 – INFRASTRUCTURE AND S106 OBLIGATIONS

Name	Policy Number	Page Number, Text (para Number)	Settlement Proposals Map or Site Number	Settlement Proposals Page Number	Evidence Document	Page Number, Text (para Number)	Q3 Response	Q4 Change Sought	Response
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POLICY SP28 – INFRASTRUCTURE AND S106 OBLIGATIONS

Environment Agency	SP28	(8 to 11)	S				<p>The Environment Agency supports the inclusion of the policy and guidance on providing waste water infrastructure capacity prior to development coming forward.</p> <p>This approach accords with that advocated in the National Planning Policy Framework (paragraph 162), which requires local planning authorities to take account of the need for strategic infrastructure and to ensure the provision of such infrastructure is delivered (paragraph 156).</p> <p>This is essential to ensure that there is no detriment to the water environment/impacts on compliance in the context of River Basin Management Plans and the Water Framework Directive.</p>		<p>The Council notes the support for the policy from the consultee.</p>
Anglian Water Services Ltd	SP28		O				<p>Reference is made to infrastructure capacity being provided by utility providers to enable development to come forward.</p>	<p>It is therefore suggested that Policy SP28 should be amended as follows:</p>	<p>The Council notes the consultee's comments but the proposed wording as suggested by Anglian</p>

				<p>In relation to water supply and sewerage connection charges the view of government is that developers should bear the on-site costs that reflect the cost of their connections to, or adoption of, water and sewerage systems. Similarly developers are also expected to bear the costs needed to provide and augment the existing network infrastructure (on or off the development site) such that the network can meet the need associated with their connections to, or adoption of, water and sewerage systems.</p> <p>We therefore recommend that the Policy SP28 should refer to the need for applicants to evidence to demonstrate that there is available capacity within the existing water and water recycling infrastructure. Where there is insufficient capacity evidence should be provided by applicants to demonstrate how this will be addressed as part of the planning application process.</p> <p>No comments to make</p>	<p>The Council will only support proposals for development where it has been shown that adequate capacity is available or can be provided by the utility providers in time to meet the additional loads associated with serve the development.'</p>	<p>Water replicates that which is already contained within the Local Plan.</p>
National Grid	General comments				Noted	
James St. & Tasburgh Surgeries				<p>I represent 2 GP Practices in Louth and Woodhall Spa. Between the two there is no indication of how either of my surgeries could accommodate even a fraction of 352 Woodhall Spa developments or the proposed 1204 Louth dwellings. There is no NHS money to invest in surgeries and it is to this extent it is impossible to serve the additional patients each site will bring.</p> <p>Impact of new development on both GP practices: The development is proposing 1559 dwellings which based on 2.2 per dwelling for the East Lindsey District Local Authority (ELDC) Area may result in an increased patient population of</p>	<p>Investment in local infrastructure is an absolute necessity. Without allowing for the needs of the residents health care the whole plan will collapse. The NHS is already struggling to survive and Lincolnshire is massively underfunded and unable to recruit new GPs. This needs immediate attention and forethought</p>	<p>The Council recognises the importance of securing necessary infrastructure investment and will continue to work with NHS England and Lincolnshire East CCG to ensure this happens once an application has been received. Between the 1st of February 2016 and the 1st of February 2017 a total of £258,852 signed S106 agreements relating to health have been made. This funding will go toward health capital improvements as advised by the health service.</p>

3423.	<p>The calculation below shows the likely impact of new population in terms of number of additional consultations by clinicians. This is based on the Department of Health calculation in HBN11-01: Facilities for Primary and Community Care Services: Consulting room GP Proposed population 3423</p> <p>Access rate 5260 per 1000 patients Anticipated annual contacts 18'005 Assume 100% patient use of room 18'005</p> <p>Assume surgery open 50 weeks per year 18005/50 = 360.1 Appointment duration 15 mins Patient appointment time per week 360.1 x 15/60 = 90.02 hrs per week</p> <p>Treatment room Practice Nurse</p> <p>Proposed population 3423 Access rate 5260 per 1000 patients Anticipated annual contacts 18'005 Assume 20% patient use of room 18'005 x 20% = 3601 Assume surgery open 50 weeks per year 3601/50 = 72.02 Appointment duration 20 mins Patient appointment time per week 72.02 x 20/60 = 24 hrs per week</p> <p>Any future increase in population place constraints on existing premises, for example extra appointments lead to additional consulting/treatment room requirements.</p> <p>As the GP practice most likely to be affected by growth and therefore directly related to the housing development I apply on behalf of James Street Family Practice 49 James Street Louth and Tasburgh Lodge Surgery Woodhall Spa.</p> <p>It is necessary to make the development acceptable in planning</p>
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CPRE Lincolnshire	Chapter 15	<p>Health and Wellbeing</p> <p>CPRE Lincolnshire is aware that in parts of the Plan area primary medical services are at stretching point and the allocation of additional housing to those areas without a commensurate investment in such services will be detrimental to the communities as a whole.</p> <p>Infrastructure contributions from developers tend to be 'bricks and mortar' biased which are unlikely to resolve the shortfall in medical support as it is doctors and dentist practitioners that are needed rather than buildings. Health care is not a market driven resource, it is finite and the Plan or its supporting policies need to consider how development can contribute to new health care provision otherwise undue stress will be placed on communities</p>	<p>The Council recognises the importance of securing contributions for future investment for health facilities. Policy SP28 enables the Local Planning Authority to seek contributions from developers for the delivery of infrastructure necessary for development to proceed, this includes for that of health facilities. This approach is in line with the NPPF which states Local Plans should include strategic policies to deliver "the provision of health, security, community and cultural infrastructure and other local facilities". S106 funding can only be used for capital projects. Revenue funding towards on-going running costs such as staff is not available.</p>
CPRE Lincolnshire	Chapter 15	<p>Infrastructure and S106 Agreements</p> <p>The relatively low house prices and relatively high infrastructure costs in the Plan area, particularly for flood mitigation may well result in many developers seeking to negotiate away contributions on viability grounds.</p> <p>CPRE Lincolnshire consider that in these circumstances permission should be refused as the development will no longer be sustainable in itself or contribute to the continuing sustainability of the community which is a principal objective of the Plan. It will demonstrate that the land allocation in the Plan was erroneous as it was not capable of supporting sustainable development.</p>	<p>All site allocations have been made using the most up to date knowledge and information available to the Council. It is acknowledged that viability of sites will fluctuate with market conditions however the Council does not believe this renders the plan unsound or that the site allocations were erroneous.</p> <p>The Council do not feel the use of a hierarchy of contributions is a suitable approach to implement within East Lindsey as each settlement and even sites will have varying infrastructure needs that</p>

Wragby Parish Council					<p>1, 2 and 3a should be saved for the benefit of future generations.</p> <p><u>HealthandWellbeing</u></p> <p>Parish Councillors are aware that the Local Surgery is already under intense pressure to provide a sound service to the community and this is before the impact of the permitted development of some 200 dwellings. Planning Applications relating to the proposed development of a further 190 dwellings are currently being considered by the local Planning Authority.</p> <p>The document identifies further sites that could be the subject of proposed development and Parish Councillors believe that it is imperative that there needs to be investment in the Local Surgery commensurate with the allocation of this additional housing.</p>	<p>The Council recognises the importance of securing necessary infrastructure investment and will continue to work with NHS England and Lincolnshire East CCG to ensure this happens once an application has been received.</p> <p>Between the 1st of February 2016 and the 1st of February 2017 a total of £258,852 signed s106 agreements relating to health have been made.</p>
Wragby Parish Council					<p><u>HousingStandardsReview</u></p> <p>Parish Councillors are aware that the village is currently blessed with a fairly comprehensive infrastructure (Pre-School facility, Primary School, Swimming Pool, Sports Centre, Surgery, etc.) but it is well known that the Primary School is at capacity (an additional classroom is on the way) and the Surgery, as stated elsewhere, is under intense pressure. This pressure exists before the impact of the permitted development of some 200 dwellings. Planning Applications relating to the proposed development of a further 190 dwellings are currently being considered by the local Planning Authority.</p> <p>Parish Councillors support the view of the CPRE that the Local Planning Authority should have regard to the phasing of development to ensure that that the village's infrastructure</p>	<p>The Council recognise the importance of taking a phased approach to development where necessary as shown in paragraph 22 of Chapter 2.</p> <p>Paragraph 22 states that "it is important that housing growth occurs in line with infrastructure, the Council therefore wishes to see sites over 30 demonstrate how they are going to phase development if required in order for necessary infrastructure improvements to occur".</p> <p>The Council recognises the importance of securing contributions for future infrastructure investment whether it be for education, health or</p>

<p>Anglian Water Services Ltd</p>																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
<p>provision keeps pace with the planned developments.</p> <p><u>Managing Infrastructure and S106 Agreements</u></p> <p>Parish Councilors have obtained some reassurance that,</p>																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													

RESPONDENTS COMMENTS ON THE EVIDENCE OF THE LOCAL PLAN

Name	Policy Number	Page Number, Text (para Number, Text)	Settlement Proposals Map or Site Number	Settlement Proposals Page Number	Evidence Document	Page Number, Text (para Number, Text)	Q3 Response		Q4 Change Sought	Response
INFRASTRUCTURE DELIVERY PLAN										
Woodhall Spa PC								The Infrastructure Delivery Plan is not a plan, it is purely a report. It doesn't explain how infrastructure is going to be delivered over 15 years.		The Infrastructure Delivery Plan sets out what infrastructure could be needed to support growth and has been written in conjunction with the main providers including the County Council and Anglian Water.
HABITAT REGULATION ASSESSMENT										
Natural England					Habitats Regulations Assess			Natural England welcomes the updated Habitat Regulations Assessment (November 2016) and we agree with the Report's conclusions that the Core Strategy policies would not be likely to have a significant effect on the European Sites either alone or in combination with other plans or projects.		The Council notes the support of the consultee
RSPB					Habitats Assess			The plan has not satisfactorily demonstrated that the increase in population from housing allocations will not result in an adverse effect on European sites of nature conservation importance through increased visitor pressure. We disagree with the conclusion	We strongly recommend that a Strategic Monitoring and Mitigation Plan is included within the Local Plan to monitor and manage if necessary any increases in visitor pressure on European	The Council stands by the findings of the Habitat Regulations Assessment, which has been supported by Natural England. Due to flood risk, there is no strategic growth proposed within the coastal area, in which

						<p>all the internationally protected sites are located.</p>
			<p>reached in the Habitats Regulations Assessment (HRA) that there will be no likely significant effect on European sites from population increases resulting from housing allocations in the plan period. If the plan cannot prove that adverse effects can be avoided then it is not effective and fails to be legally compliant with the Habitats Regulations.</p> <p>We support the Green Infrastructure (GI) policy and agree that appropriately sited GI near new development will reduce visitor pressure on existing sites, e.g. The Wash and Humber Special Protection Areas (SPAs). However, GI is not able to absorb all additional visitor pressure, and as such cannot be relied on to prove that adverse effects will be avoided. The HRA also suggests that there is limited access to coastal sites and that this will restrict any increases in disturbance. We are concerned at this argument for the following reasons:</p> <ul style="list-style-type: none"> the HRA does not appear to be supported by any baseline visitor pressure data, which would be needed to demonstrate which sites are vulnerable to future changes. For example, we note there is no reference in the HRA to the work carried out in recent years for the Humber Nature Partnership on visitor pressure issues on the SPA http://humburnature.co.uk/resources/reports.php No mention has been made of the England Coast Path project, which will create a new public path along the entire coastline of England, due for completion by 2020. This may change access to some areas significantly. 			<p>sites resulting from new housing allocations in the Plan. It should include measures to determine baseline visitor pressure conditions, monitor changes to visitor pressure resulting from the plan and provide suitable management if necessary to prevent adverse effects occurring on European sites as a result of increases in visitor pressure.</p> <p>This work need not be onerous, as many local authorities have already implemented similar approaches in their local plans and can be used as examples (for example, Breckland, Geat Yarmouth, King's Lynn & West Norfolk) and the work of the Norfolk Biodiversity and Humber Nature Partnerships, which have carried out visitor pressure studies, can be used to help inform any baseline work. Additionally, given sites such as the Humber Estuary and The Wash share multiple Local Authority boundaries, there is the opportunity to work with other Local Authorities to carry out any further work required, sharing costs and avoiding duplication of effort.</p> <p>If such a monitoring and mitigation plan is able to be provided as part of the Local Plan, demonstrating that potential adverse effects</p>

		<p><i>operate to deliver strategic priorities which include climate change."</i></p> <p><i>Sustainability Appraisal. Additionally, in accordance with the requirements of the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework 2012, the Council must carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of its Local Plan</i></p> <p><i>1) From the references above, Sustainability Appraisal needs to be carried out against the definition of sustainable development provided in NPPF. This has not been done in the current Sustainability Appraisal. For reference, the definition of Sustainable Development is given in Para 6 of NPPF.</i></p> <p><i>2) Instead, the sustainability appraisal has been carried out against a set of 13 metrics that the LPA have themselves developed, and which are largely unchanged from those produced by the LPA prior to the publication of NPPF. These metrics do not appear in NPPF, and are therefore wholly unsuitable to be used as a basis for assessment. The metrics have not been agreed by government, and have not been subject to rigorous suitably qualified third party assessment. This means that requirements of sustainable development were effectively unexamined. In addition aspects of sustainable development that were not intended to be covered by NPPF potentially were covered in the sustainability appraisal. These two factors are in themselves enough to disqualify the Sustainability</i></p>	<p>section entitled sustainable development, the NPPF quotes "International and national bodies have set out broad principles of sustainable development. Resolution 24/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy Securing the Future set out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly." Paragraph 6 of the NPPF states that "policies 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system." It is not possible for a Local Plan to be judged against 201 paragraphs of the NPPF so a series of slimmed down sustainability objectives are used for the assessment process.</p> <p>2. It is usual practise, indeed it is part of the SA process, for the assessment of Local Plan and associated documents to be based on locally defined sustainability objectives drawn from a range of relevant objectives from Government policy and guidance, and to the advice and protocols of non-governmental organisations which cover the strands of sustainable development. There</p>
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				<p>is no requirement (or indeed mechanism) to have these objectives signed off by national government. The objectives were created by consultants as part Scoping Report. Local workshops were carried out during their development which included representatives of organisations responsible for all three strands of sustainable development. The objectives were also subject to consultation. The Sustainability Appraisal has also been subject to consultation at every stage of the Plan's preparation. The objectives were reassessed in 2016 and found to be still relevant. The references to sustainable development in the NPPF do not deviate from the long established definitions from the Brundtland Report onwards and it was felt that the 13 Sustainability Objectives were still relevant and sound.</p> <p>3. When the Local Plan initially began preparation in 2007, the Council commissioned Faber Maunsell (now AECOM) to undertake the Sustainability Appraisal (incorporating SEA); including the preparation of a Scoping Report. However, once the contract ended, Elected Members made the decision that future Sustainability Appraisals should be carried out in-house. This was the case from the 2012 Plan. There are no formal qualifications in carrying out Sustainability Appraisal. Consultants engaged to carry out the work usually came from an</p>
	<p><i>Appraisal, and hence make the plan unsound.</i></p> <p><i>3) Thirdly, the sustainability assessment has been carried out by LPA officers who are unnamed. These officers took over from a suitably qualified external assessor at some point around the time of the publication of NPPF. No information is provided on their relevant qualifications or any other suitable expertise to assess sustainability. In the absence of such information it is impossible to judge the value of their assessment.</i></p> <p><i>4) Finally, the sustainability appraisal has been carried out by the officers who wrote the policies in the local plan. To repeat, the officers have both written the policies and also assessed the sustainability of those policies against metrics which they have also produced. In other words the obvious requirement for an independent and open minded assessment of the policies cannot be satisfied. The officers have effectively marked their own exams, having previously written their own exam questions by producing their own assessment metrics. The absence of an independent assessor guarantees that the process of examination will fail to identify additional opportunities to support sustainable development, and also guarantees that errors and failures in policies will be missed, hence failing the proactivity requirement with respect to climate change.</i></p> <p><i>5) Together these failings ensure the plan has simply not been subjected to an adequate sustainability appraisal. Any one of the above issues individually would be enough to make the local plan unsound.</i></p>			

<p>environmental science or planning background. The Officer that carried out the East Lindsey SA has over 26 years experience as a planning policy officer and has attended training at Oxford Brookes University specifically aimed at planners, consultants, statutory consultees, planning inspectors, academics and others involved in SEA/SAs, led by a leading professional in this area. The Council asked an independent firm of consultants act as a critical friend and carry out a high level review of the SA and its compliance with guidance, this was not a detailed review of the assessments, but rather was a review of the structure of the draft SA. The changes recommended through the review were put into practise.</p> <p>4. The methodology used started with the officer who was drafting the policy (or considering the site) carrying out an assessment against the SA objectives to enable them to identify any changes that needed to be made at the earliest stage. After that, the appraisal sheet was scrutinised by the officer leading on the SA, any changes required to the appraisal sheet were made and the officer responsible for the policy notified of any additional changes that may be required to the policy or consideration of the site. It is not uncommon for Council's to carry out in-house SA, nor is there anything in legislation or</p>		<p><i>In addition I have some less significant specific comments (these have been dealt with in relation to the policy they refer to as they are seeking changes to those policies and do not pertain to the Sustainability Appraisal).</i></p>	

North Somercotes Parish Council				Sustainability Appraisal	<p>3. Sustainability Appraisal Nov 2016</p> <p>3.1 The Parish Council believe a more rational methodology would have been to assess each settlement's requirement for housing, based on zero population growth, and then consider constraints and issues and whether that growth would or would not be included in the supply of strategic housing as part of the Local Plan Housing target. This would provide much needed certainty for residents and developers - who at present have stated to the Parish Council that they feel the coast is 'Closed for Business' as far as housing development is concerned, which is troubling. As the Parish Council turns its attention towards beginning the Neighbourhood Planning process, once its housing development is underway, this would also provide a guiding context for the future as work to overcome constraints and mitigate residual risk takes place.</p> <p>3.2 However ELDC have taken a different approach and consequently there is no mention of growth levels needed to maintain the viability and vitality of North Somercotes, one of the largest villages in Lincolnshire, a fact which the Parish Council finds unacceptable.</p> <p>3.3 By comparison on page 7 it states that in Hogsthorpe (population 908 in 2011, 1.6 miles from the sea on a diminishing coastline which experienced flooding in 2007 (see <i>East Lindsey Strategic Flood Risk Assessment (SFRA) - October 2016 - no page numbers</i>) there are two sites on</p>		<p>guidance that says that this is not permitted.</p> <p>The Sustainability Appraisal (SA) does not set the level of growth for each settlement so it is not the methodology of the SA that is referred to in 3.1. The SA of the Core Strategy coastal policies brought out the tensions that exist in policy formulation along the coast, between issues of flood risk and the needs of vibrant communities. The page numbers referred to in the response relate to the non-technical summary from the Settlement Proposals SA, which assesses the individual sites that have been put forward in locations where growth is taking place. It is not for the SA to undertake a comparison between one settlement and another or individual sites in those settlements. The SA would also not be expected to look into flood risk evacuation management for individual sites or settlements; rather it identifies and acknowledges if flood risk is a factor for a site. Much of this representation appears to be an objection to the strategy for coastal flood risk chosen by the Council and not at the methodology or assessment carried out in the Sustainability Appraisal.</p>
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		<p>higher ground outside the flood risk, but evacuation would present some issues as people would need to go through the flood risk zones. North Somercotes is 1.5 to 2 miles from the sea, on an accreting coastline with significant marshland, some intervening wooded land mass in excess of 8 metres high to the north east, and has never been flooded.</p>	
		<p>3.4 Similarly, for Grainthorpe, page 6<i>n</i> (which ELDC elsewhere state experienced flooding in 2007), it notes there are two sites but makes no mention of flood risk for evacuation in this document, although in the SFRA October 2016 it states that a severe event would compromise access to and from the village so people would still have to travel along areas in the orange and red zones to evacuate.</p>	
		<p>3.5 Therefore unlike North Somercotes, in the event of a flood event, these and other coastal settlements that have been reclassified as 'inland' would not be self-contained if they were cut off. Placing these housing allocations in smaller coastal settlements which will incur increased demand and use of finite resources, at a time when we should be looking for schemes which make a positive and significant contribution to low carbon living and improving resource efficiency, eg minimising travel, is counter-productive and flies in the face of the NPPF and The Climate Change Act 2008.</p>	
		<p>3.6 Smaller settlements do of course also need growth to remain viable; however, it is not acceptable that a settlement such as North Somercotes, which has facilities, services and identified</p>	

		<p>need for growth to retain its younger population and keep house prices within their reach has no such housing growth identified - strategic or otherwise to meet the existing population's needs. Yet strategic housing allocation is being made for these smaller coastal settlements, in places where there is no public transport apart from the Commuter bus, as in Grainthorpe to North Somercotes. So the number of car journeys to access services and facilities in North Somercotes or further afield would be increased, along with the potential to also increase the county council's bill for school transport. Similarly, residents of North Somercotes are increasingly picking up devolved costs of district and county services through the Parish Council. Acceptable if this settlement could also have its own growth so that the increasing precept costs are more widely shared.</p>					
		<p>3.7 The flood risk and evacuation concerns in the Coastal settlements of both Hogsthorpe and Grainthorpe are broadly similar to those at North Somercotes, which is double their size, with its own Coastguard Station and Fire station as well as the Parish Emergency Response team which has been successfully deployed in 2009 and 2010 (snow), and 2013 and 2017 (flood risk).</p>					
		<p>3.8 Most importantly, North Somercotes is protected by newly constructed sea defences at Donna Nook as part of the £8m+ Tetney to Saltfleet improvements, which to quote the Environment Agency (<i>Donna Nook Managed Realignment Scheme Design and</i></p>					

			<p>Access Statement – November 2009) are: <i>".... wider, stronger and more sheltered than the existing defences, greatly reducing the risk of them failing or being overtopped. The standard of protection (better than 1 in 200 years) provided to land and properties in the area against flooding from the sea will therefore be improved and will be well above the standard insurance companies require to continue full property insurance cover. ..</i></p> <p>3.9 Page 7 - Huttoft, population 585 in 2011, which is approximately 2 miles from the sea yet reclassified as inland, is listed with a zero allocation being made as the housing requirement can be met through existing planning commitments. This suggests that the housing requirement for Huttoft to remain viable, which is not given, was at least considered despite it being a similar distance from the coast and similarly challenged in terms of evacuation requirement regardless of part of the settlement being on higher ground.</p> <p>3.10 There is however no such evidence that any assessment has been made of what the housing requirement is in order to keep North Somercotes' existing population broadly stable and in line with the Zero population option ELDC have chosen. Not only does this fail to meet the NPPF requirement of growth to enhance or maintain the vitality of rural communities, but along with no assessment of growth, there has been no assessment of infrastructure which is also relevant if any of the extant</p>	
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	<p>permissions were now to be built out, or brownfield sites become available, yet ELDC are fully aware of identified issues with water and sewerage networks and latterly the unreliable state of broadband, as this has been raised both before and since 2012 on a regular basis.</p>						
	<p>3.11 Flood risk constraints can clearly be resolved; this has been amply demonstrated with recent affordable housing developments in the village, some of the tenants of which are often from outside the locality or district.</p>						
	<p>3.12 it is incomprehensible to the young professional people, and many others affected in this community, particularly those going back many generations or those who have lived/worked in the locality for many years ,how it is seen as quite reasonable and acceptable for someone who has never been part of this community to be able to arrive and live here in flood resilient housing, when those who have made a considerable contribution, have a vested interest and long term connection cannot. This is neither equitable nor justifiable and the impact of the proposed Coastal Policy simply exacerbates this inequity.</p>						
	<p>3.13 Once the maximum level of growth required over the plan period has been determined, the desirability of that level, the wishes of the community, and the implications of the flood risk and infrastructure constraints to achieving that level of growth should then be considered; together with what innovative policies may be required to achieve this, and how they can contribute to flood prevention</p>						

			<p>Plan (SEP) which includes economic development on the Coast, with effective water management, the contents of which supersede and update the Lincolnshire Coastal study. The SEP includes the provision of market housing, if it can be suitably mitigated, to meet the needs of existing local communities, tackling deprivation, managing water resources, and harnessing the potential of the coast to ensure economic prosperity for the future. This new focus embodied in the SEP which was published in 2014 and agreed by all partner organisations within Greater Lincolnshire, and which this community expects to benefit from, does not appear to be adequately reflected in the ELDC Local Plan in a way which will facilitate this.</p>	
			<p>3.17 Understandably, the broad aim of the NPPF is to guide development away from flood risk, but where a settlement is entirely at risk of flooding - so that development consistent with wider sustainability objectives is required and it is not possible to locate it in areas of lower probability of flooding - then development should still be permitted up to the growth level providing that the constraints can be mitigated and the Exception Test applied as required.</p>	
			<p>3.18 It is clear that affordable housing, and housing using previously developed and brownfield land in a flood risk area is acceptable if built with appropriate mitigation. It is also acceptable to put permanent Gypsy and Traveller sites in flood risk areas without Environment Agency objections.</p>	

						<p>3.19 It must therefore be the case in a fair and just society that a settlement's existing workers and residents should also be able to access market housing to meet their needs in the same way, via a fair and equitable policy environment. Why would the lifeblood of our community or those who have contributed throughout their working life receive less favourable treatment?</p> <p>3.20 The Coastal Study in any case established that notwithstanding flood risk, to sustain communities in the coastal zone and enable them to 'develop and have a viable and prosperous future'; it would be necessary to make provision for additional development including housing to meet changing demand. This means market and affordable housing.</p> <p>3.21 Security from flooding is a key infrastructure requirement, and having seen the investment of over £8m of public monies and loss of grade 1 and 2 agricultural land during 2009-2012 to ensure appropriate defences are in place along this coast from Tetney to Saltfleet, this community reasonably expects to derive some economic and social benefit from that improved infrastructure.</p> <p>3.22 A positively prepared plan should identify the constraints and provide ways for them to be proactively, imaginatively and intelligently managed, in a way that would contribute to positive solutions with multiple stakeholder benefits. For example, by the introduction of planning policies which enable the sequential and exception tests to be met in specific circumstances for those who live/work locally, to be able to</p>

				<p>access appropriate high quality, carbon efficient, environmentally sound, flood resilient/resistant housing, including for those people with a local connection who wish to self-build. The NPPF is quite clear that those already living/working in this community should be able to achieve this.</p> <p>3.23 Such a positive approach would be entirely consistent with that taken by both Greater Lincolnshire in the SEP, and the Central Lincolnshire team in their recently examined Submission for example, which allow for development proposals for market housing to meet the assessed local community need (and resultant economic growth and prosperity) to be identified first and then to be considered against the NPPF - including application of the sequential, and if necessary exception test to ensure that development is safe during its lifetime ,etc. (<i>Central Lincolnshire Proposed Submission Local Plan April 2016 Managing Water Resources and Flooding- Policy LP14</i>)</p> <p>3.24 Throughout the evidence it can be seen that the young adult professionals are being lost to the area, and there are low numbers of <50 year olds, and this includes from North Somercotes. Unless we find imaginative ways to provide appropriate development of market housing for those members of our local population that do not qualify for, or wish to be in, affordable housing but cannot afford the current house prices when they do become available, this trend will continue unabated and the population will become increasingly skewed - see Fig 1 below (<i>August 2016 market Statistics (home.co.uk) source ELDC Planning Policy Committee</i>)</p>		

Meeting Papers Appendix 8 24-11-2016).

Settlement	Median House Price	No of houses for sale	Time on the market
Chapel St Leonards	144,950	49	251
Ingoldmells	137,500	44	222
Mablethorpe	134,950	117	199
Skegness	150,000	357	224
North Somercotes	216,760j	20	43
Taken from Rightmove (Nov 2016)	Also land for sale for 7 houses		

Figure 1. August 2016 market Statistics (home.co.uk)

3.25 This must be positively tackled head on now, not in five years' time -at least five years have already elapsed since this was first flagged as an issue by the Parish Council and the response so far has to be a proposed Coastal Policy which has been inconsistently applied with a resulting in negative impact on the future of this community and its inhabitants, and very late in the day, a proposal for a lengthy project - which excludes those Parish Councils and stakeholders who arguably have most to contribute (it has never even been discussed with this Parish Council)

			<p>- and infers a reliance on the introduction of legislation which would inevitably take considerable time, even if feasible, when it should be possible to draft simple planning policies using existing legislative powers, such as the Community Infrastructure Levy (CIL), to address many of the negative outcomes of the present proposals, alongside the legislative process involved with precepting options.</p>	
			<p>3.26 Members of this community whom the Parish Council has engaged with would certainly prefer the option of say, £5k per plot payable into a Flood Defence Fund, rather than face the prospect of having to leave the village to obtain a high quality home to meet their needs. Yet at this time the Plan does not propose to introduce a Community Infrastructure Levy (CIL) on new developments which will be a profoundly missed opportunity. Just 20 homes in this settlement could contribute £100K, and with the phased introduction of a specific recent element for Flood Defence funds this community could be actively contributing to local sustainability as well as being of benefit to the wider community, thus meeting the requirements of the Exceptions Test.</p>	
			<p>3.27 The Government is actively encouraging house building to meet the needs of new households which will in turn boost the economy. This community has an above average record of home ownership and is actively seeking the development of starter homes and smaller type properties for 'downsizing' to meet the need of its existing population, not for in-migration. The Plan does not recognise or assist in meeting</p>	

<p>also 23 paragraphs in the National Planning Practice Guidance (NPPG) concerning the Duty. When determining if the Duty has been satisfied it is important to consider the outcomes arising from the process and the influence of these outcomes on the Development Plan Document (DPD). One required outcome of co-operation is the delivery of full objectively assessed housing needs (OAHN) for market and affordable housing in the housing market area (HMA) as set out in the NPPF (para 47) including the unmet needs of neighbouring authorities where it is reasonable to do so and consistent with sustainable development (para 182).</p> <p>The NPPF requires the Council to meet in full OAHN in the HMA. The NPPG defines a HMA as a geographical area reflecting the key functional linkages between places where people live and work. Although it has been determined that East Lindsey District is its own HMA and that full OAHN can be met within its own administrative area without recourse to neighbouring authorities East Lindsey District Council is not isolated. The Council has four neighbouring authorities namely North East Lincolnshire, West Lindsey, North Kesteven and Boston District Councils. It is noted that the Council's Statement of Co-operation indicates that the Council's position is accepted by neighbouring authorities and no requests for unmet housing needs from elsewhere have been received. However it also noted that Lincolnshire County Council have raised concerns about the length of the plan period and the impact of limitations on development in the Coastal Area.</p>	<p>Plan on the ground of a lack of the duty to co-operate. The reason they wish to extend the Plan period is to have more housing allocated in Horncastle to fund a bypass to which there is no package of evidence yet, they have not mentioned the impact on the coast in their comments with regard to housing.</p> <p>The Council have stated that as part of the 5 year review of the Local Plan work can be undertaken to assess the possibility of a bypass and this matter will be more debated during that period when work has been undertaken and consultation.</p>

STATEMENT OF COMMUNITY INVOLVEMENT

Stickford Parish Council				Statement of Community Involvement	<p>The local Plan is flawed due to the fact, many residents have been discriminated against because they do not have access to a computer, tablet, or mobile phone to read all the necessary paperwork associated with this plan.</p> <p>Closed local Access points have denied the public to get information on the local plan. Also, those residents who cannot leave their homes for various reasons, but would still like to take part in the consultation.</p>	<p><i>Question 3 says the reasons why the Local Plan is not legally compliant. ELDC should provide the answer of how they can rectify the situation.</i></p>	<p>The Parish Council was written to in the same way as everyone else and informed how they could engage in the consultation process. The Local Plan was available at the customer access points and if any member of the public had telephoned they could of arranged to either come into the Council offices to see the Plan or if they had disability issues and officer would have taken the plan out to them. The Council received no telephone calls about this matter during the consultation period from any resident in Stickford, nor any correspondence from the Parish Council asking for further assistance.</p>
North Somercotes Parish Council				Statement of Community Involvement	<p>2. Legal Compliance- Consultation - lack of community involvement and lack of adequate consultation</p> <p>2.1 The Parish Council has tried since before 2012 to engage with ELDC officers and members regarding the specific issues this community faces trying to balance the needs and potential of a large vibrant and sustainable service settlement in a flood risk area. The Parish Council's attempts to engage with ELDC have on the whole, with one exception, been met either with indifference, misinformation, and on one occasion ill-concealed prevention. Meaningful engagement and participation therefore falls short of the Parish Council's expectations and those it represents.</p> <p>2.2 Because of this unhelpful experience over a long period of time, North Somercotes perceives a distinct bias against its</p>		<p>The consultee is not clear how the Council has not engaged with them. They are on the list of consultees as one of District's Parish Councils and therefore would have been sent correspondence at the same time as everyone else. They clearly received that correspondence because they have replied to each round of consultation.</p> <p>The site owners names and addresses who put their land forward for consideration in the SHLAA in North Somercotes have been cross checked against the consultee list that the council holds and they are all on their and therefore they would have received letters every time the Local Plan went out for consultation and could have made representation, which some of them in fact did in past consultation exercises. The</p>

						<p>consultee was informed of this during the consultation period.</p> <p>The Council has consulted the consultee on every occasion but in this case the policies go in a direction that they do not favour. When the Council consults and people respond, it does a separate response and the matter is presented to the Planning Policy Committee of the Council, the consultee has attended those meetings so has also taken up the opportunity to hear the Members of the Council discuss their particular concerns. The consultees as parish council have also been invited to the wider parish council gatherings when the Local Plan has been discussed and has had an opportunity to put their point of view across. It is difficult to understand what else the Council could do to engage with the consultee, this appears to be a matter that the consultee does not agree with the policies in the Local Plan, which is discussed elsewhere in the responses.</p>
		<p>involvement, and communication and engagement has therefore been negatively affected as a result. This in turn has affected the ability of members of the local community to have their views heard via input from the Parish Council to/from ELDC as there has been no meaningful two-way communication process with this, or many other settlements who feel that their comments and input have largely been ignored.</p>				
		<p>2.3 For example, as a result of concerns expressed about the Coastal Policy and its inconsistent application and potential al for negative outcomes it appears that a Coastal Housing Working Group will be set up in the future but at no time has this been discussed with the Parish Council, nor has an invitation to be involved been mooted. As one of the largest villages in the district which has previously proposed the implementation of exemplar flood resilient/resistant housing alongside local planning policies which would enable immediate contributions to Flood Prevention Infrastructure, rather than lengthy legislation changes, this is deeply disappointing. The proposed project is a late and reactive response to the coastal community's feedback to the first draft, which many feel was ignored and therefore see little point commenting on the latest draft. Such a working group should have been set up in 2012 when the first draft plan was being put together and the Parish Council first attempted to engage with District Council colleagues over the crucial but not insurmountable issue of flood risk and sustainability.</p>				

			<p>2.4 In the earlier Plan preparation back in 2012 a number of sites were identified and put forward in this settlement. More recently the Parish Council has raised the fact of why these sites have not at least been included in an assessment of viability against identified need as indicated by the zero population calculation and were told that no sites had been put forward in North Somercotes either following the call for sites placed in the local press, or by ELDC from previous inclusion, or as a result of direct contact with all previous persons who had put forward sites in 2012.</p>		
			<p>2.5 On close examination there appear to be a number of anomalies and misinformation. Firstly, the Parish Council has evidence of at least one site that was put forward in 2016 which appears to have been discounted before even being objectively considered against the identified housing need and constraints - perhaps because no such objective analysis took place for this settlement or indeed our neighbour South Somercotes which barely gets a mention. Secondly, having requested a copy of the specific letters which it was alleged had been sent to all those who had previously put forward sites in North Somercotes themselves in 2012, or to owners of those sites which had been identified by ELDC as potentially suitable, the only letter that has been produced is a generic consultation letter about the Draft Plan, not a specific letter to each site owner asking to know about their potential site availability despite this having been previously stated as being carried out.</p>		

	<p>2.6 This leads the Parish Council to reluctantly conclude that ELDC have failed to make direct use of specific communication to potential site owners in this settlement regarding their site's availability. Therefore, the Parish Council believes that the open and unbiased consultation required to achieve legal compliance in this instance has not been complied with and when this has been queried it appears that misleading information has been supplied to the Parish Council. Had the Parish Council realised that none of the land owners or site owners on the 2012 SHLAA had been contacted then it would have done so itself.</p>			<p>2.7 This is all the more concerning when these identical issues had been raised in 2012 in the response which the Parish Council submitted on the SHLAA at that time- see <i>Appendix 1 - NSPC Response to ELDC 2012 Strategic Housing Land Availability Assessment</i>. This demonstrates, as far as this Parish Council is concerned, a lack of acceptable engagement and consultation over the future needs of this large service village.</p>	<p>2.8 While the Parish Council appreciates the costs involved, the large number - and lack of availability - of a set of hard copy documents for community consultation, unless they were paid for, has meant it has been practically impossible to engage the local community in a meaningful manner regarding what is being proposed. With unreliable Broadband service as low as 277kbs this has impaired the ability of the Parish Council to access and download documents and many members of the</p>	

		<p>community do not have access to a computer or reliable internet in any case so cannot get hold of digital copies, nor do they have easy access to Manby or a library to read a hard copy. A hard copy of the final publication documents as a minimum should have been made available for each Parish Council to make available for each community in order for consultation to have been thorough and effective.</p>		
		<p>2.9 It must also said, as it has been to ELDC, that the lack of rudimentary document control procedures has made it exceedingly difficult to ensure councillors and others are reading the most up to date versions of the various documents, especially when no page numbers, issue date, status, author, version control etc is included in the header or footer, and the PDF title of the document on the web page for downloading is different to that on the front page of the document itself and then not included in a header or footer. This has created significant problems when trying to ensure councillors and others have the correct version, or when downloading and printing large documents of over 100 pages with no page numbers and print errors occur. Printing documents for those councillors and others that either don't have internet access or cannot read on a screen has therefore incurred significant costs and impacted on availability, although it is appreciated that ELDC are under significant budgetary constraint. It also makes it practically impossible to quickly reference or coherently comment on specific sections when there are no page numbers to refer to (<i>eg East Lindsey</i>)</p>		

							<p><i>Strategic Flood Risk Assessment - October 2016).</i></p> <p>2.10 In short the Parish Council does not believe that the Plan is legally compliant as it cannot agree on behalf of this community that it has been positively prepared; the District Council's obligations to seek intelligent responses and proposals for meeting this community's needs and aspirations for future economic, social and environmental viability and sustainability appear to have been frustrated by the District Council's own failure to meaningfully engage with and respond to this Parish Council and other key stakeholders, such as local developers, to consider together those needs and aspirations and how they can be positively met in light of the potential, but not unsurmountable, constraints in a way that would engender both local community and national benefits.</p>		
GLOSSARY									
GLNP	Glossary						<p>The GLNP believe it is inconsistent to include Local Wildlife Sites in the Glossary and to omit Local Geological Sites. We recommend including a description of these sites.</p>	<p>The GLNP suggest the following wording: LGS: Areas designated for geology/geomorphology by the local authority and protected through the Local Plan. A newer designation and one of a number of designations under the umbrella term Local Sites.</p>	<p>The Council agrees with the proposal and would support a minor modification to the glossary of the Local Plan.</p>

SETTLEMENT PROPOSALS RESPONSES

Name	Policy Number	Page Number, Text (para Number)	Settlement Proposals Map or Site Number	Settlement Proposals Page Number	Evidence Document	Page Number, Text (para Number), Text	Q3 Response	Q4 Change Sought	Response
ALFORD									
Chestnut Homes			O	Alford			<p>A key town with focused growth within the Local Plan has been excluded from the settlement proposals development plan. As such we question the validity of the Local Plan to meet one of its basic requirements to allocate sites to promote development (Para 157 NPPF) in a key town.</p> <p>It appears an altered approach has been taken regarding Alford to other settlements in the district, allowing the Neighbourhood Plan process to take precedence over matters of strategic importance in the emerging Local Plan. As set out in Para 184 of the NPPF, the Neighbourhood Plan should be in conformity with the Local Plan, however in this instance the Neighbourhood Plan appears to replace the Local Plan.</p> <p>We believe that allocations for development should be made in this Local Plan.</p> <p>We have an existing development site in Alford known as Willoughby Chase.</p>		<p>The consultee comments are directed at the town of Alford where they wish to see an allocation in the Local Plan. At present the allocation is 161 houses. In December 2016 there were 97 commitments in Alford. Alford is one of the smallest towns in the District and is the only one working on a Neighbourhood Plan which includes site selection. This Plan is moving toward its final stages of consultation and submission. If the Alford Neighbourhood Plan does not come forward as stated by the Town Council they have signed a Memorandum of Understanding that the Council will Plan for the town within 6 months of the adoption of the Local Plan.</p>

<p>the same way as flood risk has been judged quite clearly East Lindsey has other suitable sustainable locations to put growth that would not have a wider impact on the AONB.</p> <p>Binbrook remains a large sustainable village with a range of services and facilities to support its residents and choosing not to make an allocation does not change its status in the Local Plan. This does not mean there is a blanket ban on housing in Binbrook it would be for individual site owners coming forward to evidence that they have passed the tests set out in National Policy to make them acceptable for delivery in a nationally designated area. The site could still come forward as a windfall development in the village and it would be for the applicant to demonstrate its suitability with regard to the impact on the AONB.</p>	<p>policies within the NPPF in their entirety.</p> <p>The 'blanket ban' approach appears especially illogical given the Authority's explicit recognition that the impacts of the development of BIN306 could be mitigated against. Indeed, we consider that a suitable modest development on this site has the potential to significantly enhance the existing edge to the village at this point and to enhance the setting of the village within the AONB landscape.</p> <p>Site BIN306 should be re-instated as a housing allocation in order to take advantage of the sustainability credentials of this large inland village which has a wide range of services and facilities. It is considered that modest planned growth is essential if the services and facilities within Binbrook are to be retained for the benefit of the community of the village itself and those smaller villages in the surrounding countryside.</p> <p>Simply applying a 'blanket ban' on development to support the village's services and facilities is not a positive</p>	<p>holistically and in the round and that those policies pertaining to the delivery of a significant boost in new housing, sustainable new housing and housing within rural areas also need to be significant weight.</p> <p>It is also our view that the reference to 'major' within paragraph 116 of the NPPF means significant development and that the intention is to guard against large scale developments which could have a profound impact on landscape quality. It should not be directly related to the definition of 'major development' for the purposes of categorising different types of planning applications. In any case, it must reasonably be agreed that a development of say nine very large detached houses (which would be a 'minor' development for application categorising purposes) could have a significantly greater impact than one for, say, two terraces of five small dwellings (which would be classed as 'major' for such purposes).</p> <p>Ultimately, it is what impact that a development would have that should be the determining factor and it is this that we consider paragraph 116 refers to when it seeks to resist to 'major' developments in designated areas.</p> <p>The Core Strategy refers to the District having a distinctive widespread settlement pattern as a legacy of a history of small farming communities with local markets. In recognition of this the Plan's Vision and Objectives seek a network of thriving and sustainable communities and the Strategic Policies indicate that new housing growth will reflect this and be distributed across the inland towns and inland large villages. Binbrook is explicitly defined</p>

	<p>approach. It is not justified (especially given the Authority's own conclusions about how development on this site can be mitigated) nor an effective long term plan for the village.</p>
<p>as one of these larger villages and is clearly inland, well away from the area at risk from coastal flooding.</p> <p>Binbrook is described in Chapter 3 of the Settlements Proposals DPD as the largest village in this part of the Wolds and as providing a number of key facilities. These facilities are listed as being two food shops, a primary school, a doctors' surgery, employment, a large employer, a public house, a pre-school facility, a post office, a community hall, a children's play area, four other shops, two bank ATMs and a place of worship. It is also noted that the village is on mains drainage and that it also has a sports facility and a cemetery.</p> <p>It is considered that, in rural Lincolnshire terms, the village has a very good range of services and facilities which serve both communities in the village itself and the smaller villages in its rural hinterland.</p> <p>Given this, it is our view that it is remiss to seek to impose what amounts to a 'blanket ban' on new housing allocations in the village and an opportunity missed to take advantage of this main village and its wide range of services and facilities. Paragraph 55 of the NPPF notes that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the viability of rural communities and that development in one village may support services in a village nearby.</p> <p>It is strongly contended that larger villages which contain a reasonable range of rural services and facilities need to be able to accommodate some level of growth if they are to be</p>	

able to evolve and retain the services and facilities that exist. The Settlement Proposals DPD notes that there is no brownfield land in the village. This being the case, it follows that a failure to accommodate planned growth in Binbrook will be tantamount to a moratorium on new housing in this large village. This will also ensure that the identified affordable housing need in the village has no realistic chance of being met. An inability to accommodate new housing will ultimately lead to stagnation and decline; it is important that planned growth is catered for if Binbrook is to maintain its place as a large village in the settlement hierarchy and to maintain the services and facilities which sustain the community of the village and smaller villages in the rural area around it. It is not enough, in our view, to merely state that the lack of a housing allocation will not change the village's status in the Local Plan.

The need to take advantage of this large village is compounded by the fact that 38 % of the District lies within the area at risk from coastal flooding, by the need to boost significantly the supply of new housing and the need to create choice and competition in the market for housing land. This latter point is considered to apply in rural areas as much as it does within urban areas, especially in largely rural districts such as East Lindsey.

BIN306 has previously been considered to be a site which is available, deliverable and suitable. This was confirmed in a letter from the Authority dated 2nd June 2015. The draft Local Plan, published in February 2016, identified two preferred housing sites in Binbrook

(BIN 306 and BIN307). It noted that both lie mainly below the eighty metre contour where their negative impact is limited to the loss of greenfield land and the potential loss of biodiversity. This is still the case. It also noted that as the two sites are on opposite sides of the village it is unlikely that their development will have a cumulative impact on the character of the area. It would appear logical, therefore, that if just one of these sites was brought forward it would not have an (adverse) impact on the character of the area.

The Site Assessment for BIN306 published in February 2016 noted that the development of the site will impact on the landscape to a degree but this can be mitigated against by a landscaping scheme and the retention of boundary trees. It further noted that it will not impact on the townscape or historic environment,

In summary, the February 2016 Site Assessment concluded that the site is located in a sustainable place within easy walking distance to the services and facilities in the village. There is an opportunity to use the band of flood risk which runs through the site as open space or for a SUDS scheme; this would ensure that there was a neutral loss of biodiversity. The site does not impact on heritage assets and any impact on the wider landscape could be mitigated against by a landscaping scheme.

We respectfully suggest that these conclusions should be reasonably held today; after all, the site is still largely below the eighty metre contour and it is still clearly in the same place.

The most up to date Site Assessment (which accompanies the Publication

Plan) continues to note that the development of the site will impact on the landscape to a degree but that this can be mitigated against. These are not our words, but the Authority's own conclusions, with which we agree. Given the conclusion reached that any landscape impacts can be mitigated against it seems almost perverse not to seek to take advantage of Binbrook's sustainability credentials, simply because it lies within the AONB.

This is especially so when detailed consideration is given to the physical nature and context of BIN306. The site itself is modest and is an unremarkable area of largely unmanaged grazing land. Adjacent to this, the settlement edge in this part of the village is atypical of the rest of the village. The housing estate immediately to the west (served by Meadow Drive, Chestnut Way, Sorrell Close and Rectory Close) is a pleasant residential area but it is very mundane in townscape terms and is very suburban in character. It presents a hard and abrupt edge to the village which is dominated by back gardens and mixed boundaries which present a cluttered appearance. This is absolutely uncharacteristic of the remainder of the village which has developed incrementally over time and which has a significantly softer outline where the village meets the surrounding countryside.

BIN306 provides an opportunity to significantly soften the settlement edge by providing a landscape buffer to the east. This can be of varying widths and be brought right into the development, rather than being merely a boundary screen. Such a landscape proposal could contain

							<p>elements found in the wider landscape, such as small woodland groups, grassed open areas and hawthorn hedges and would assimilate not only the new development but the existing hard and uncharacteristic urban edge into the wider landscape. There is an opportunity here to not merely mitigate but to enhance the village's landscape setting.</p> <p>The site is some distance from the Binbrook Conservation Area (which is focussed on the historic core of the village) and the listed Church of St Mary and St Gabriel. On heritage matters there are clear inconsistencies in the published Site Assessment of BIN306 and we do not agree with the main body of the Site Assessment that the site will impact on the townscape and historic environment; there is no inter-visibility between the site and the Conservation Area. We concur with the summary conclusion in this regard i.e. that the site does not impact on heritage assets; indeed, it is our view that a modest, well-designed and suitably landscaped development of BIN306 will enhance the setting of and the approach to the Conservation Area from the east.</p> <p>The Site Assessment has concluded that that the provision of open space and the use of SUDS would ensure a neutral biodiversity impact. An ecology report commissioned in 2016 concluded that there are no ecological constraints nor protected species or mitigation issues. We contend that a suitably designed landscaping scheme with native planting and areas of open space could actually lead to the creation of better habitat and an</p>		
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because it will safeguard the boundary treatment of the site, protecting existing biodiversity. Although there is no evidence of any existing biodiversity on the site the landowner's proposal would be limited by the PROW that crosses the site, and as such the boundary hedges to the south will be retained, and as such the proposed allocation has no advantage over the landowner's suggestion. Setting development back from the road frontage will allow for the retention of more of the existing hedge along the Station Road frontage, much of which would be lost to the individual drives of a frontage development. The landowner's proposal would therefore retain more habitat than the draft plan allocation. Furthermore, the proposed single access point has also been supported by Lincolnshire County Council Highways in the past

Setting the development back from the road frontage would also maintain more of an open aspect to Station Road than would a development along the road frontage. Current views from the road in effect end at the rear field boundary, with the perception of distance provided by the "large skies" of the fenland area. Setting development back from the road will safeguard more of this "large sky" experience than would a frontage development.

The SA also suggests that the site may be constrained by potential medieval remains, although the Lincolnshire County Archaeology Service has made no adverse comments.

An allocation of the form promoted since 2012, rather than the frontage development suggested in the draft local plan, would deliver a higher number of units, reinforcing the existing settlement pattern, whilst providing similar safeguards for

of the Council with regard to the frontage allocation of BLM318.

biodiversity and have a reduced impact on the landscape setting of the settlement and the immediate environs of Station Road. The form of development promoted by the landowner would appear to have more advantages, in terms of the issues identified in the Sustainability Appraisal, than the allocation included in the draft local plan. The increased allocation would therefore be a more effective, justifiable and efficient use of land than the proposed local plan allocation

We have comments on the other allocations in the settlement, which would indicate that the increased allocation at BLM318 would be more appropriate than the allocations set out in the local plan, although some of the other allocations will also be required to meet the identified growth.

The SA for site BLM305 states that the development will have little impact on the landscaping, due to existing site boundary treatment. Much of the hedge line along the site frontage, however, is broken and intermittent, and more will need to be removed to allow for development. That site will be prominent from Hall Lane and approaches to the settlement along Marsh Lane, a busy road leading, as it does, to the popular playing fields, and as such development would be a very prominent feature on the local landscape of the settlement and development would have a greater impact on the landscape setting of Burgh le Marsh than suggested by the SA.

Site BLM310 is in an area that does not benefit from street lighting or pedestrian rights of way, and as such its development would result in a significant change to the local area, through the introduction of street

<p>lighting and the removal of planting along the road frontage. The development of more housing on BLM318 would have a lesser impact on landscape and townscape character of the area and would be equally accessible to the services of Burgh Le Marsh. Development of BLM310 would raise more concerns regarding highway safety that BLM318.</p> <p>BLM313 is allocated seemingly because the frontage development already benefits from an approved planning consent, despite the significant impact on landscape setting identified in the SA and the fact that the extant consent has not yet been implemented. Development of the allocation beyond the extant planning permission would increase the impact on the landscape setting of Burgh le Marsh. There is no certainty, however, that the extant consent will be implemented and the increase of traffic onto Wild shed Lane, a single track road, raises a number of concerns regarding Highways Safety, concerns which would not arise with development of BLM318.</p> <p>BLM320 is allocated despite lying outside the settlement in a prominent location visible from Orby Road. Orby Road, which would provide the main access into Burgh le Marsh from the proposed development is unlit and unmarked and lacks a pedestrian footpath. Development would consequently be much more prominent than the development of BLM318 in a form promoted by the landowner and would lead to highways safety concerns without significant off site investment in public rights of way and street lighting.</p> <p>My comments relate to the selection of Site BLM320. This site is a poorly considered extension to the village envelope and should be deleted. To make the subsequent comments easier to understand I will refer to</p>		
<p>O BLM320</p>		<p>Site BLM320 should be deleted from the proposed Core Strategy.</p>
<p>█</p>		<p>The Council considers the site to be suitable. The site is not in an area of high flood risk. The site is a grazed agricultural field with hedging and trees for its boundary, sloping upwards gently towards the south. There is an access directly into the site but it is on a bend</p>

<p>in the lane so adjacent to an existing housing so provided access is taken through the site to the east which already has outline planning permission access should be able to be provided. The site fits in with the existing townscape but with regard to the historic environment care will have to be taken due to its location abutting the conservation area and therefore regard must be had to the setting of the conservation area, the retention of the tree belt along the southern boundary of the site will minimise harm to the setting. The site contains a pond in the north eastern corner which will reduce capacity. The same corner of the site also abuts the Burgh le Marsh Conservation Area and so it part of its setting. The site is located close to the village centre which can be accessed on foot via Pinfold Lane which runs along the eastern boundary of the adjacent site. The site is close to the open countryside to encourage healthy living.</p>	
<p>Site BM320 as Parcel A and the site for which planning consent was recently granted under S/023/01047/15 as Parcel B. Both sites are in common ownership and I argued during the application process for the latter that they should be treated as one because, by doing so, it would be possible to achieve a better physical result than if they are handled separately. The grant of consent for Parcel B was taken against the background of the Council's lack of a Five Year Housing Land Supply but it should not predetermine consideration for Parcel A, which should be subject to proper scrutiny.</p>	<p>The Council's comments upon Parcel A do not appear to be fully joined-up and give the appearance that they have been prepared by different authors who have not seen what the other has written and, taken together, give the impression that the Council has not given full and proper consideration of the way in which the site (if it is to be developed) can be built upon in a manner that benefits the village, residents of the site and adjoining residents. This is clearly highlighted by the "Settlement Proposals: Sustainability Appraisal" (November 2016) which clearly notes (p6) that development of Parcel A has negative impacts upon biodiversity, landscape and historic environment and access to services", however these issues are not then raised or discussed in the more detailed report on Parcel A in the "Settlement Proposals: Development Plan Document". It is a curious omission which is not explained.</p> <p>I have three particular points of concern relating to the inclusion of this site in the "Settlement Proposals":</p>

1. Access from the site to the village centre.
 The "Sustainability Appraisal" clearly states on a number of occasions that "Orby Road is a narrow lane with no footpaths or street lights and little prospect of creating footways. If footpaths were provided, it would change the character of Orby Lane". However, the "Settlement Proposals" makes no mention of such concerns and contains the incorrect statement that "the village centre can be accessed on foot via Pinfold Lane, which runs along the boundary for the adjacent site".

Pinfold Lane manifestly does not give access to the village centre – it actually leads away from the centre. The Market Place, shops and other facilities that comprise the "village centre" are reached along Orby Road which, as mentioned above, is "narrow" with "little prospect of creating footways". Whilst, Pinfold Lane might indeed provide the shortest distance to the doctors' surgery and the primary school, these are isolated facilities that are at some distance from the village centre itself. Furthermore the effectiveness of the route to them from Orby Road is compromised by the fact that Pinfold Lane is an unmade and unadopted narrow cinder track that is completely unsuitable for pushchairs and wheelchairs (ie precisely the types of people who might need to use it for access to the facilities for which use of the Lane might be the shortest route).

Fundamentally too, there is no condition within the consent for Parcel B to allow a connection through it onto Pinfold Lane, meaning that residents of Parcel A will have to walk through Parcel B before doubling back along the lane to reach their destination. There is therefore little, if any, opportunity for potential

					<p>residents of Parcel A to use Pinfold Lane in the unrestricted manner implied in the wording of the Settlement Proposals document. This situation could be alleviated to a certain extent if the owner of Parcels A and B were to upgrade Pinfold Lane to a proper surface and secure its adoption. This will, of course, depend upon ownership, but it is a way in which, had Parcels A and B been considered as one piece, a creative landowner and a creative Council working together and looking at the wider picture could have achieved a better planning solution than the one that could result.</p> <p>2. Landscape Appraisal The "Settlement Proposals" document states that Parcel A fits in with the existing townscape", which is manifestly incorrect. The only "townscape" as such is The Old Schoolhouse: the open fields to the north and west are not being proposed for development; the existing buildings to the south are some distance from the site and, whilst Parcel B has planning consent, there has been no application for Reserved Matters and the outline consent that was granted made it clear that the layout on the submitted plans was unacceptable, so there is no indication at all from the applicant regarding the form or layout of the proposed development. To all intents and purposes, Parcel A is a field in open countryside with no existing townscape, which is confirmed in para 13 of the entry relating to the site in Appendix 1 of the Site Assessment of the Core Strategy Sustainability Appraisal document: "The site...is detached from other development and is in effect in open countryside".</p> <p>3. Healthy Living The "Settlement Proposals" contains the curious statement that Parcel A</p>
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industrial expansion in the town. At Appendix Two we have included the site location plans for this area.

Chestnut Homes have interests in these sites and have done much of the pre-development work to ensure the sites are developable, with phase 4 and 5 coming forward to a planning application in 2017.

We believe these sites are the most appropriate sites for growth in the town as they are out of the flood risk area and are in close proximity to the existing services and infrastructure. The location provides connectivity to the town centre as well as the RAF base, with no real constraint to development.

Phase 4 and 5 total 6 hectares. Using a similar density to the previous 3 phases of development, a density of 33.33 dwellings per hectare is applied, which provides a capacity of around 200 dwellings for phases 4 and 5.

Chestnut Homes has been developing in Coningsby for the past 10 years and over that period has built up a sound knowledge of the local housing market. Demand has driven us to continue development in Coningsby seen on the first two phases. Phases 1 and 2 of the Kings Manor development have contributed to the town with affordable housing provision and contributions to local services such as education. Ensuring investment in the area will continue to socially and economically strengthen this sustainable location for housing growth.

FRISKNEY

Lenton AE
(Holdings)
Ltd
Represent
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Brown &
Co

SP11

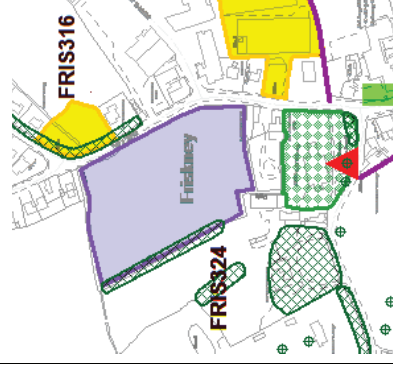
FRIS324

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It is our firm belief, contrary to comments seen, that the development of Site 4 will not cause material harm to the Heritage assets which we understand in this case is believed to be the Church. The Church is relatively well screened and further screening can be provided to safeguard the integrity of this asset. Also with a well-designed scheme, there will certainly not be substantial harm. We feel this and the mitigation that can be put in place would result in this being a more favourable site than others which have been proposed where there are other major Policy considerations and problems which need to be taken into consideration in the Planning process. Consistent with the NPPF it should be made clear that an element of materiality needs to be applied to harm. Anything can cause harm but it is a question of the materiality that should be taken into consideration and that is not sufficiently catered for within the current Policy – see para 132-134 of the NPPF. In this case there would be less than substantial harm and this, together with other benefits afforded by the allocation of this site in preference to others, would outweigh the limited harm and lack of Policy compliance of other sites proposed in the District and in particular those labelled as Sites 321 and 306 in the village of Friskney.

Allocate Sites 2, 4 and 5 on the plans attached to our representations attached and dated 8th August 2016.

Though the consultee has objected under policy SP11, this actually relates to the site FRIS324 which has not been allocated in Friskney. A map of the site is set out below for information.



The site lies on the west of The Avenue and is an open grassed field with mature boundary treatment along its rear boundary and northern boundary. The front and the boundary with the property to the south are open, especially the frontage. The site also lies within view of the listed church and building on the southern boundary though no listed is of historic interest. Development would have a significant impact on both these buildings and of the setting of the village at this point. It provides a wide open green space allowing for views of the listed church to be seen as you move southward along the Avenue set against a backdrop of trees and green field. The site is close to services and facilities with pavement access and is near to the school. An access could be formed from the Avenue. Therefore the Council believes it was correct in not allocating the site.

<p>Historic England</p>	<p>The updates to the Settlement Proposals Document for particular sites in respect of the historic environment following the previous consultation round are noted. It is also noted that archaeological assessments being undertaken prior to development are suggested within the revised text.</p> <p>However, it is not clear how such recommendations have linked through to the main Local Plan document. In addition there are a number of site allocations where it remains unclear how the impact of development on the historic environment has been assessed, what harm may occur, and whether any such harm could be mitigated against, and, if so, how this would be achieved bearing in mind that there are no site specific policies for allocation sites within the plan. Site allocations which Historic England remains concerned with are as follows:</p> <p>FRIS317 (previous comments under FRIS320) – impact on archaeology in particular the moated site;</p>	<p>In respect of the site allocations mentioned in Q3, Historic England recommends that further assessment work in respect of the historic environment be undertaken and added to the site information within the Settlement Proposals Document. This would assist with ensuring that the Local Plan approach to the historic environment conforms with Paragraph 132 of the NPPF in general.</p> <p>For example:</p> <p>FRIS317 – More robust text could be included to set out that a sensitive approach to site layout, and high quality design of development would be expected as part of a proposal to assist mitigate against any impact on the setting of the adjacent moated site. Would any layout/housing density be expected to feather out to the rear of the site to assist with this? If so, the Council's aspirations/expectations could be included within the text to inform any future developer. It could also be made clear that early engagement with the Council's heritage advisers (Conservation</p>	<p>The County Council Archaeologist made no comments on any of the sites in the Local Plan. It is unclear how the consultee believes that the recommendations in the allocations could link to the Core Strategy and they have made no attempt to suggest any wording.</p> <p>With regard to the comments made on FRIS317 the Council is proposing a minor modification which would mean the text would read</p> <p>"the site is adjoins a Scheduled Ancient Monument, though this is screened. A sensitive approach to site layout and high quality design of development would be expected as part of any proposal to Care will have to be taken through the design to reduce impact on its historic assets and good design should mitigate against any impact on the historic environment and given that the site would be set back from the road by virtue of its access there would be minimal harm to the setting of the listed building. This could be further mitigated against by planting the site and generally development will tidy it up."</p>
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									Officer and County Archaeology) in respect of the heritage assets and any development proposal would be expected;
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GRAINTHORPE

Grainthorp e PC		O	Chapter 3	p42				Description of Services – Grainthorpe does not have 1. Food shop; 2. Public house; 3. Bank cash point. The Parish Councillors do not feel they are suitably qualified to comment on whether the local plan is legally compliant.	The Council is unsure what the consultee is trying to say. Grainthorpe is a large village with services and facilities to support its residents. The points for the cash machine have been removed from scoring system taking the village to 48 points, 46 being the threshold for a large village. The public house is closed at the time of writing but the Council does not remove points until a facility is lost forever, as there is a history of such facilities changing ownership and reopening in the District and the Council has a policy to protect such facilities. Although very small, the café in the village has started up a small shop selling essentials
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HORNCASTLE

Lindum Homes Represent ed by R Doughty Consultanc y		O	Horncastle					We are concerned that the housing commitments in the forms of extant and deliverable planning permissions are not shown in the draft local plan for the Horncastle area. Failure to show the sites that form the apparent oversupply of potential housing development in the town leads to uncertainty regarding where development may be expected and will not help inform investment in the town. We are specifically concerned that land with the benefit of planning permission s/086/0660/14 is not shown on the Inset map. This site, off Wesley Way, is an extant consent for 23 units. The applicant is actively pursuing development options to implement the consented dwellings at	1 The land with the benefit of planning permission S/086 660/14 for 23 affordable dwellings on land off Wesley Way, Horncastle, should be shown as an allocation for residential development.	The Council has not shown all the housing commitments in the Local Plan because there are too many of them and the maps would become unreadable. There is no need to show them, if planning permission as already been granted then development can go ahead, the Council publishes a list of all housing sites with permission on its website on its position statement.
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								<p>the current time. The development of 23 dwellings will help meet the Councils shortfall in housing provision on land that helps deliver some of the aspirations of the "Made" Neighbourhood Plan (which came into being after permission was granted for the development) in the form of landscaping along the Thinker Drain. That part of HOR314 to the north of the Thinker Drain also has extant planning permission for 90 dwellings, including a proportion of affordable housing. These sites have good connectivity to the arterial routes into Horncastle and are close to the town centre. They offer the potential to deliver development that integrates well to the surrounding built up area and street network.</p> <p>The ability of the development to deliver the wider aspirations of the neighbourhood plan, in the form of crossings for the Thinker Drain and new open spaces, further supports the identification of this site as an allocation.</p> <p>The only negative point raised by the SA is the fact the land is Greenfield and would, therefore, not represent the redevelopment of brownfield land. In this case, it is similar to the majority of sites in East Lindsey.</p> <p>Allocation of those sites with extant planning permission that best meet the locational aspirations and other policy requirements of the Local Plan, and neighbourhood development plans where appropriate, will help direct investment to those sites in most sustainable and suitable locations in the longer term.</p>		
LEGBOURNE										
Historic England								LEG303 – impact on the setting of GI listed Church of All Saints;	LEG303 – The revised Settlement Proposals	This matter would be explored in more detail through the development management process

									Document and Local Plan information indicates that the capacity at this site has reduced from 66 units to 20 units. This could be explored more in respect of the historic environment, particularly with regard to any impact on the setting of the GI listed Church of All Saints, and also in relation to expectations for the potential layout of development at the site to ensure views to and from the listed Church are protected.	and the Council do not consider that any more text against the site would change the consideration as a suitable site for allocation.
LOUTH										
Metacre Ltd represented by De Pol Associates	Louth site LO305								For reasons set out in related representation to Core Strategy Policy SP3, the Core Strategy and Settlement Proposals DPD are considered to be 'unsound' as they are not: <ul style="list-style-type: none"> Positively prepared or consistent with national policy: NPPF paragraph 182 confirms that to be positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so. The NPPF specifically requires LPAs to ensure a sufficient supply of housing land is provided to meet the District's needs, including identifying sufficient deliverable sites to provide five years' worth of housing against their housing requirements. For reasons highlighted in the related representation to policy SP3 the Plan is not allocating enough housing land to provide sufficient flexibility to 	The consultee is proposing their site LO305 should be allocated with up to 500 dwellings. The Council would not support this proposal the site was discounted from consideration not because of its size but because it was considered to have an impact on the wider landscape. Even if the housing target were to be increased this is not a site that the Council would support coming forward when more appropriate ones can be considered in the District. The site is subject to a planning application which will be placed before Members in April 2017.

ensure that the housing requirement is delivered.

- Justified: there is no sound justification for not ensuring adequate housing allocations to provide sufficient flexibility to deliver the housing requirement

1. To be sound it is considered that the Settlement Proposals DPD should allocate additional land for housing development to provide sufficient flexibility to adapt to rapid change and ensure that the housing requirement is delivered. In particular it is considered that the existing proposed site allocation at Brackenborough Road, Louth (Ref: L0305) should be extended to include land to the east and south, which as highlighted below is a suitable and deliverable housing site.

2. The emerging Plan envisages Louth as accommodating a significant proportion of the District's housing need. Indeed the Settlement Proposals document states that as Louth is the largest inland settlement in the District it is reasonable to allocate more housing in this sustainable settlement to provide a fall back should other sites not come forward in the smaller settlements. The Core Strategy also confirms a clear need to allocate greenfield land formerly designated as countryside to meet the levels of housing growth required. It is therefore a settlement which the Local Plan acknowledges as being suitable to accommodate a significant level of additional housing growth.

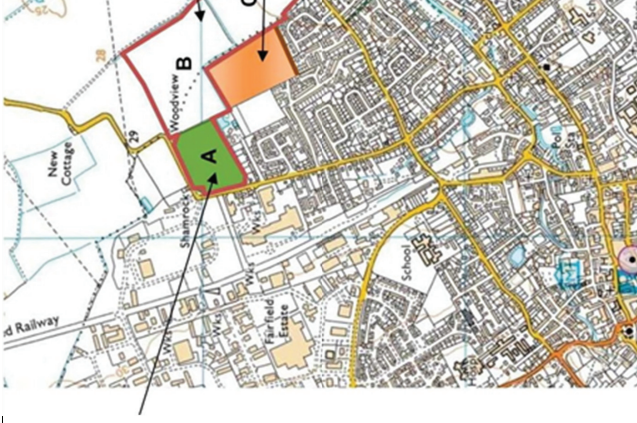
3. In this context it is appropriate for additional housing allocations to be directed to Louth as the main inland and most sustainable settlement. As expanded upon below

it is considered that the existing housing allocation off Brackenborough, Louth (Ref: L0305) should be increased to include adjacent land, as shown on the attached location plan. Indeed it should be noted that a planning application is currently pending determination for the erection of up to 500 dwellings on the land subject to this representation (Ref: N/092/01635/16). For clarity this application site includes the existing proposed housing allocation Ref: L0305 in the Settlement Proposals DPD.

Site Description

4. The proposed allocation (hereafter referred to as 'the site') comprises approximately 26.3 hectares of agricultural land situated towards the east of Louth.

The site comprises 3 fields of arable farmland which form an inverted L-shape and wrap around the edge of the built-up area of Louth, sited between Keddington Road I Alvingham Road to the south and Brackenborough Road to the north east. The fields are subdivided by a combination of drainage ditches and hedges and for the purposes of this Statement are referred to as fields A, Band C.



Field A is the north westerly field and Brackenborough Road runs along its western and northern boundaries due to a pronounced bend in the road. There are existing residential properties on three of the four field corners, where plots have been carved out of the field, i.e. Woodview, The Willows and no. 90 Brackenborough Road. The southern boundary to the field is defined by a dense hedgerow that abuts the rear gardens of houses on Willow Drive. To the west, on the opposite side of Brackenborough Road, are five residential properties (nos. 103-111), a builder's merchant and the Fairfield Industrial Estate. There is currently a pedestrian I cycle link connecting Brackenborough Road to the spine road within the Industrial Estate, although the vehicular access

to this Estate is via Grimsby Road (A6) which runs along the western side of Louth. Field A has an agricultural access off Brackenborough Road to the north, beyond which is agricultural land and a residential property opposite the north west corner of the site. The northern, western and eastern field boundaries are defined by hedgerows. This field is already identified as a housing allocation for approx. 129 dwellings in the Settlement Proposals DPD.

7. Field B lies to the east of field A and north of field C. To the north and east of this field is agricultural land and to the southwest is a site currently being developed for housing by Taylor Wimpey, where planning permission was granted on appeal in November 2013 for the erection of 149 dwellings (Council ref. NI105I01593I12). This development is currently under construction. There is a farm access to field B off Brackenborough Road to the north west corner of the site, adjacent to the aforementioned property known as Woodview. The field boundaries are defined by hedgerows and trees.

8. Field Cis sandwiched between field B to the north and Keddington Road I Alvingham Road to the south, from which the field can be accessed. The eastern field boundary is marked by tall field hedges and a distinctive stand of mature Scots pine trees, beyond which is agricultural land. To the south, on the opposite side of the road, is a residential property and further agricultural land. There are existing houses to the south west and the aforementioned Taylor Wimpey housing development to the north west.

9. There are no trees within the site which are the subject of Tree Preservation Orders (TPO) and most of the trees are located on the site boundaries, although there is a single hedgerow crossing the site in the north west section between fields A and B. There is a shallow ditch on the western site boundary, a dry ditch on the northern boundary of the site and a dry ditch bisecting the southern section of the site, between fields Band C.

10. The site in general is relatively flat. There are some level differences across the site which form a very gentle gradient, with the central section of the site being the highest point falling to its lowest point at Alvingham Road. There is no public access to the site and there are no public footpaths in the immediate vicinity; the closest public footpath is 590m to the north running along the drive to Brackenborough Hall. The closest other route with public access is Grange Lane, approximately 350m to the NE of the site.

Sustainability/ Accessibility

11. This section of the representation considers the accessibility of the site to local services and facilities and how the site would promote sustainable modes of travel for future residents of the site.

12. The Institution for Highways & Transportation (IHT) publication 'Guidelines for Providing for Journeys on Foot' outlines that the preferred maximum walking distance for commuting from an origin point by

		<p>persons without a mobility impairment is 2000m.</p> <p>13. Within a 2000m walk of the site pedestrians can reach two supermarkets, two primary schools and a secondary school. Residents located towards the southern end of the site would also be able to reach Louth town centre and the bus station. Based on the IHT's guidelines, services are quite clearly located an adequate distance from the site to be accessible on foot.</p> <p>14. The site is also within 400m of Fairfield Industrial Estate, one of the largest employment concentrations in the settlement.</p> <p>15. In respect of accessible public transport provision, guidance published by the IHT 'Planning for Public Transport in Developments' (1999) recommends that the maximum walking distance to a bus stop should be 400m. Additionally 'Providing for Journeys on Foot' (IHT) states that for people without a mobility impairment, 400m is a desirable walking distance whilst 800m is acceptable. There are bus stops within 800m of the site boundaries on Elm Drive and Jubilee Crescent. All bus stops in the vicinity of the site are identified in Figure 2 below.</p>								
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These bus stops provide regular services to a number of key service centres including Louth town centre, Skegness, Saltfleetby and Manby, as identified in the table below.

Service	Origin/Start Point	Destination	Daily Services	
			Weekdays	Weekends
10A	Louth	Skegness	8	9
10B	Skegness	Louth	1	1
10C	Manby	Louth	1	1
10D	Manby	Skegness	1	1

Furthermore, as part of the residential development of the site, there is the potential to provide either a new or extended bus service through the proposed site to allow improved access to bus services. It is considered that this could be achieved by locating bus stops along the main spine road of the development. This would ensure that all residents are served by bus stops within 400m of their properties in accordance with desirable walking distances.

18. The bus services also provide direct access to Louth bus station which provides access to a wide range of other key service centres in the district and beyond.

19. The location of the site is clearly sustainable as demonstrated by the proximity of important local facilities and employment opportunities as well as regular and accessible public transport services, which would be further improved as part of the development of the site.

Site Suitability

20. There are no known physical constraints on the site which would prohibit the potential for the site's development.

21. The site is located in Flood Zone 1 and as such there is a low possibility of risk from flooding.

An outline surface water drainage strategy has already been prepared for the site which confirms that the site can be developed without increasing existing greenfield run-off rates. The strategy confirms that the site can be developed without increasing flood risk on or off site. Indeed a wide range of technical survey work has already been undertaken as part of the submitted planning application which demonstrate that the development of the site would have no unacceptable impact in relation to landscape, highways, ecology, flood risk/drainage, pollution and infrastructure and that there is no reason why a high quality design cannot be achieved.

22. The site would be accessed from two adopted main carriageways, Bra ckenborough Road and Keddington Road/Alvingham Road.

Both carriageways currently serve residential development fronting, or served from, these carriageways. Brackenborough Road and Keddington Road/Aivingham both benefit from pedestrian footways on both sides of each carriageway. A robust highways assessment in conjunction with the local authority has already been undertaken which demonstrates that the highway network could accommodate the development subject to the implementation of mitigation measures including off-site highway improvements. The landowner/applicant is committed to the implementation of such measures.

23. Indeed the suitability of the wider site for residential development was previously acknowledged by East Lindsey District Council in previous versions of the Strategic Housing Land Assessment (SHLA), with the 2012 draft SHLA referring to site L0306 as being put forward for inclusion in the Local Plan review 2004 and for inclusion in the LDF.

24. It would appear that the only reason why site L0306 has been subsequently discounted as a proposed housing allocation is that the land is considered to have open flat views out to the wider countryside and that it would move built development closer to Keddington. However it is understood from the Council's planning officers that the site assessments which informed the Settlement Proposals document are just broad brush assessments which do not follow any national guidelines and that no actual landscape appraisals of the site

					<p>were undertaken to inform this opinion.</p> <p>25. In contrast a Landscape and Visual Impact Assessment (LVIA) has been undertaken and submitted with the planning application relating to this site. This LVIA has followed a methodology based on a synthesis of guidance offered by a range of 'good practice' sources, notably 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA), 'Landscape Character Assessment: Guidance for England and Scotland' together with 'An Approach to Landscape Character Assessment'. It also reflects guidance provided by Council planning officers who advised on the selection of publicly accessible local viewpoints for assessment. This LVIA demonstrates that the reason given for site L0306 being discounted for housing on landscape grounds is not sound.</p> <p>26. The supporting documents submitted with the planning application demonstrate that the landscape and visual effects from the housing development are typical of most new housing developments on similar green field sites. That the proposed development would not affect any landscapes defined as being highly sensitive; it will retain features which contribute to the local character whilst delivering significant on-site landscaping and open space to integrate the development into its surroundings and provide an attractive residential environment; and it would not unacceptably harm the character of the area or any important medium and long distance views.</p> <p>Deliverability</p>		
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27. The subject site (including allocation L305) is owned by two landowners, with the largest proportion of the site being within the ownership of promotional development company Metacre Ltd. The entire site is being promoted for allocation by Metacre Ltd.

28. Metacre is part of the same group of companies as Northern Trust Company Ltd, which was established in 1962 and is one of the UK's largest and most successful privately owned property investment, development and regeneration companies. Metacre has a history of bringing forward such schemes across the country and has the necessary experience and expertise to ensure that land off Brackenborough Road would be delivered.

29. It has been demonstrated in the application submissions that the site has the potential to accommodate up to 500 dwellings whilst making all necessary provision for public open space, ecological mitigation, SUDs features and highway infrastructure. This is illustrated in the illustrative masterplan already prepared for the site and appended to this representation.

30. It is anticipated that the site would be delivered by more than one house builder which is assisted by the fact the site can be accessed from two separate access points. The planning application relating to the site is now at an advanced stage and it is considered that the development of the site would make a significant

KCS Developments Represented by Barton Wilmore		S	Louth, LO311	<p>contribution towards the Council's five year housing land supply and overall housing requirement for the plan period.</p> <p>Conclusion</p> <p>31. In conjunction with other accompanying representations made on behalf of Metacre Ltd to Core Strategy Policy SP3, it is submitted that the Council need to allocate further land for residential development if their housing requirements are to be met in full and for the Plan to be sound.</p> <p>32. It is considered that the existing allocation L0305 should be extended to include this adjacent land, as identified on the attached site location plan,</p> <p>Site Reference L0311 - Land to the rear of Chestnut Drive, Louth. Our Client remains fully supportive of the proposal to allocate the site for residential purposes within the Settlement Proposals DPD.</p> <p>Following the submission of our previous representations to the Preferred Options Local Plan August 2016, an outline planning application for the development of the initial phase of the site for 100 dwellings has been approved by East Lindsey District Council subject to the completion of a Section 106 Agreement. The planning application reference number was N/092/01853/16 and it was approved at planning committee on 15th December 2016.</p> <p>It was established during the course of the application that there were no objections to the development from the following statutory consultees - Lincolnshire County Council (Highways, Lead Flood Authority, Historic Environment and Education),</p>		The Council notes the support from the consultee
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	<p>NHS England, Environment Agency, Anglian Water, Lindsey Marsh Drainage Board, as well as East Lindsey District Council's Housing officer and Environmental Health officer (noise and land contamination).</p> <p>A copy of our previous representations are attached, which provide clear evidence of how the site is suitable, achievable and available. During the course of the outline planning application mentioned above, additional work was undertaken and an update is provided below :</p> <p>Drainage - it has been agreed with Lincolnshire County Council Lead Flood Authority that surface water run-off rates will be restricted to 7 l/s which is a reduction on the existing greenfield run -off rates. It has also been confirmed that if infiltration is not possible on site, surface water can discharge to the combined public sewer located to the north of the site in Chestnut Drive.</p> <p>Archaeology & Heritage - the Geo-physical survey that had previously been undertaken had identified minor anomalies and following discussions with Lincolnshire County Council archaeology team, it was agreed that trial trenching would be undertaken prior to the determination of the outline planning application. Following the completion of these works it was confirmed that "while there is evidence of limited archaeology surviving on site it would not be reasonable to ask for further archaeological fieldwork in this instance"</p> <p>The reduction in the site capacity to 275 units as per our previous representations is welcomed, as is the acknowledgement that it is</p>	
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Cyden Homes – represented by Barton Willmore			Louth site LO313				unlikely that the entire site will be built out within 5 years.		The Council notes the support
							<p>Cyden homes supports the allocation of site LO313 for 280 dwellings in the Settlement Proposals DPD. Cyden Homes has undertaken pre application discussions with the Council and held a well-attended public exhibition in November 2016. Following the pre submission engagement, an outline planning application in relation to the site is imminent.</p> <p>Cyden Homes confirm that the site is deliverable and there are no known constraints which would affect the viability of the proposed development, therefore allocation of the site will enable its delivery in the early years of the plan period.</p> <p>The site is free from any environmental or infrastructure constraints that would preclude development and can comfortably accommodate up to 280 dwellings while providing large areas of interconnected open space and planting throughout the development.</p> <p>Development of the site is considered to represent sustainable development and would deliver a number of social, economic and environmental benefits. Therefore allocation of the site is considered to be justified, effective and consistent with national policy.</p>		

MARSHCHAPEL									
Historic England			MAR226				MAR226 – impact on archaeology in particular the post medieval field system and also any impact on the	MAR226 – It is not clear how Historic England's previous comments have been addressed in this	The site is not near any heritage assets, the nearest one is 250m away with a good boundary treatment and its set in a well treed area so it cannot be seen from the site.

Environment Agency					<p>setting of GI listed St Mary's Church and its associated Scheduled Monument;</p>	<p>iteration of the plan in relation to this site. It is recommended that further assessment work be undertaken and text included within the Settlement Proposals Document.</p>	<p>Therefore this is not a relevant consideration for this site. The County Council Archaeologist and the Council's Conservation Officer made no comments with regard to this site.</p>
		<p>O</p>	<p>Marshchapel</p>	<p>p100</p>	<p>Marshchapel lies within the coastal floodplain and is shown to be in flood zone 3 'high probability' of flooding on the Environment Agency's Flood Map for Planning.</p> <p>The Environment Agency's hazard mapping shows that although some parts of the settlement's centre is not likely to be impacted by flood water, it could be surrounded by flood water to a significant depth, should a breach of tidal defences occur. All of the sites being allocated in this settlement are, to some extent, likely to be impacted by flood water in the design event (tidal breach with a 0.5% chance of occurring in any year in 2115) please see hazard map attached as Appendix A.</p> <p>Strategic flood risk modelling of these sites demonstrates that the level of mitigation that will be required to manage the risks identified would (in our experience) be unlikely to result in development being unviable. However, the risks will need to be considered at planning application stage, in a site-specific Flood Risk Assessment, in order to ensure that adequate mitigation is incorporated into housing designs. The hazard categories recorded in the site allocations descriptions for MAR226 and MAR300 does not, in our opinion, accurately reflect the potential hazard/depth and we would, therefore, like to highlight that in order to bring forward proposals that can be considered 'safe' and pass the second part of the Exception Test, mitigation will be required to the</p>	<p>With regard to MAR217 - The Environment Agency have asked in their representation for additional text to be placed against this site. This text would add to the information about flood risk and therefore the Council is proposing a minor modification by adding into the text the following "This site could be impacted along its northern boundary where depths of up to 1.6m could be possible. A sequential approach to development should be applied and appropriate mitigation to design out the impacts of flooding"</p> <p>With regard to MAR226 - The Environment Agency have asked in their representation for additional text to be placed against this site. This text would add to the information about flood risk and therefore the Council is proposing a minor modification by adding into the text the following "but this site could be generally subject to flood depths of 250mm with an area to the south east corner up to 500mm. A sequential approach to development should be applied and appropriate mitigation to design out the impacts of flood risk"</p> <p>With regard to MAR300 - The Environment Agency have asked in their representation for additional text to be placed against this site. This text would add to the information about flood risk and therefore the Council is proposing a minor modification by adding into the text the following "This site could be generally subject to flood depths of 250mm with areas to the north west and south east corners up to 500mm. A sequential approach to development should be applied and appropriate mitigation to design out the impacts of flooding"</p> <p>With regard to MAR304 - The Environment Agency have asked in their representation for additional text to be placed against this site.</p>	

<p>This text would add to the information about flood risk and therefore the Council is proposing a minor modification by adding into the text the following "The northern and eastern boundaries of this site could be subject to flood depths of 250mm with a small area to the south east corner up to 500mm. A sequential approach to development should be applied and appropriate mitigation to design out the impacts of flooding"</p>	
<p>extent that it excludes flood water to the modelled depths as follows:</p> <p>MAR217 - this site could be impacted along its northern boundary where depths of up to 1.6m could be possible. A sequential approach to development should be applied and appropriate mitigation to design out the impacts of flooding.</p> <p>MAR226 - this site could be generally subject to flood depths of 250mm with an area to the south east corner up to 500mm. A sequential approach to development should be applied and appropriate mitigation to design out the impacts of flooding.</p> <p>MAR300 - this site could be generally subject to flood depths of 250mm with areas to the north west and south east corners up to 500mm. A sequential approach to development should be applied and appropriate mitigation to design out the impacts of flooding.</p> <p>MAR304 - the northern and eastern boundaries of this site could be subject to flood depths of 250mm with a small area to the south east corner up to Zoom. A sequential approach to development should be applied and appropriate mitigation to design out the impacts of flooding.</p> <p>Please note that the Environment Agency is not objecting to the allocation of these sites, but wishes to raise awareness of the mitigation that will be required so that those proposing development can make an assessment as to the viability and deliverability of the sites.</p> <p>Those proposing single storey development (i.e. bungalows) in these areas should use the extreme</p>	

									0.1°/o (1 in 1000) annual chance scenario map, attached as Appendix B, to inform mitigation levels due to the absence of any upstairs (first floor level) refuge.					
MANBY														
Grimoldby & Manby PC								S	Manby, MAN314 & 316		MAN314 supported - with green buffer zone included MAN316 supported – should be developed in tandem with adjoining site.	The Council notes the support from the consultee.		
MAREHAM LE FEN														
Represented by Clarity NS Ltd								O	MLF328	SHLAA	p98	<p>Since the last consultation was undertaken the site analysis in respect of the allocation of site MLF328 has been amended to state that "Development is possible with major drainage infrastructure changes". We dispute this statement, with the detail set out below, and request that the site analysis reverts back to that which was provided in the Strategic Housing Land Availability Assessment, that is that there are "No major Infrastructure constraints to the site". An outline planning application for 9 dwellings on phase 1 of this site has recently been granted planning permission and demonstrates that a sustainable drainage scheme can be achieved with no impact on the existing drainage infrastructure and that such maintenance as may be needed will be dealt with as part of phase 1. It follows that the development of the rest of this site can follow the same principles and be acceptable from a drainage and flood risk perspective.</p> <p>1. The paragraphs of these comments have been numbered for ease of reference.</p>	<p>In relation to MLF328 on page 98 of the Settlement Proposals document should revert to the wording at page 135 of Appendix 1 of the SHLAA (as set out at Q3 paragraph 2 above), i.e. Infrastructure - No major infrastructure constraints to the development of the site.:</p>	<p>The alteration to the wording for this site was recommended by the Witham 4th Drainage Board during the consultation on the Local Plan in June 2016. Whilst the site may have planning permission for 9 units there is the capacity for more housing on the site and therefore the issue of the impact on the drainage system still remains. The Council is not proposing to alter the wording, it would be for the development management process on any other application to show that the drainage on the site could be implemented.</p>

	<p>2. The SHLAA provided as follows in respect of MLF328 (at pages 134-135 of Appendix 1):</p> <p>Site Reference MLF328 Promoter: Owner is known to the Council</p> <p>Site Location Land on the south of Main Street, Mareham Le Fen</p> <p>Site Description Agricultural Land</p> <p>Site Area 2.01 ha No of Dwellings Capacity 37 reduced to 32</p> <p>Suitability of the site in Broad planning terms Yes, the site is suitable; The site is not in flood risk. The site is an open field with trees and hedges forming the boundary to the rear and the built environment to the east and west; the frontage is open. The site contains and is surrounded by drainage ditches which will provide opportunities for biodiversity which can be supported by landscaping of the site. Wider views out of the site to the east and south are blocked by the boundary treatment and development; there is some impact on the wider landscape to the south west where the site is very open. The site is prominent in views along Main Street, although this is somewhat restricted by adjacent development. The site forms a natural extension to the built environment on this side of the village and therefore would not impact on the townscape. There is no impact on the historic environment. The site is close to services and facilities, there is a footpath link on the other side of the road and there is the room to create a link on the side of the site. A vehicle access can be created onto Main Street. There were issues with drainage and possibly archaeology on</p>

this site a planning application was submitted but withdrawn because of issues. These issues appear to have now been resolved. Capacity reduced slightly because the site lies on the edge of the village and therefore should have a lower density.

Infrastructure No major infrastructure constraints to the development of the site.

Deliverability of the site The owner of the site has informed the Council that they are going to bring the site forward

Viability of the site - No indication of any constraints that could affect viability.

Phasing - The delivery of the site is expected within the first five years of the plan period, as indicated by the landowner.

3. In the Settlement Proposals, at page 98, that has been reproduced, but with the following change to "Infrastructure", which rather than reading "No major infrastructure constraints to the development of the site", now reads:

Infrastructure - The site has no direct connection to a managed surface water discharge point. The piped system on Fen Lane cannot cope with extreme events resulting in surface water flooding. The Witham 4th Drainage Board has recently adopted the open dyke on Fen Lane but major improvement would be required to the buried drains in the village to take surface water from development to this watercourse or the Board's watercourse at the junction With Moor side to the west. Development is possible with major drainage infrastructure changes.

						<p>4. That change to the Infrastructure paragraph, which was made without reference to or discussion with the owners of the MLF328, is not justified. The original wording was correct: there are no major infrastructure constraints to the development of this site.</p> <p>(a) Development is possible without its causing any increase in surface water to the Board's watercourse, and since the draft of the Local Plan was published for consultation (November 2016), planning permission has been granted for 9 dwellings on the northern part of MLF328 on that basis (on 16 December 2016, S/114/01959/16, attachment 1). No more water will flow down the "piped system" to the Board's watercourse than is currently the case. A similar sustainable drainage approach can be taken to the rest of MLF328 (i.e. the remaining 23 dwellings allocated in the draft Plan).</p> <p>(b) If the IDB considers that the piped system has been allowed to fall into such a condition that the proper flow of water is impeded (which the IDB has not clearly stated), the IDB should already be requiring the owners of the piped system to remedy its condition: there are at least 9 houses which will be flooded in such a case before MLF 328 is affected.</p> <p>(c) In short, contrary to the implication of the final sentence of the new paragraph, it is not the case that development is only possible with "major infrastructure changes".</p> <p>5. These points are briefly developed below.</p>		
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			<p>(a) No increase in "surface water from development to [the Board's] watercourse"</p> <p>6. The drainage scheme for the 9 dwellings on MLF328 for which permission was granted in December 2016 was devised in such a way that there will be no increase in post development discharge to the local drainage network and therefore no increase in flood risk. The drainage solution adopted incorporates sustainable drainage techniques and facilities as per the requirements of the national planning framework. Private drives and the access road into the site will be surfaced in permeable pavement. These facilities will convey and attenuate Runoff from roofs and hard areas to the ditch system at discharge rates that are no greater than existing greenfield runoff rates. The net effect on the local drainage network is neutral.</p>			
			<p>7. The report by Cole Easton Consultants submitted in support of that successful application in relation to the northern part of MLF328 confirms that similar sustainable drainage techniques could be applied to the entirety of MLF328, so that discharge to the IDB watercourse would be restricted to greenfield runoff rates: see para 2.3 of attachment 2:</p>		<p>"2.3 If allocated land to the south of this development (currently under the applicant's ownership) is developed in the future, then post development runoff from the entire allocation area will also be restricted to greenfield runoff rates for storms up to the 1:100 year+ 40% climate change event. ..."</p>	
						<p>8. The Planning Officer's report for the application on that northern part of MLF328, recommending approval</p>

(which was granted), advised (see attachment 3):

"7.22 . There is no evidence to suggest that a suitable drainage scheme cannot be achieved in accordance with planning policy requirements and safeguarding against increasing flood risk elsewhere.

7.23 The Environment Agency, Lead Local Flood Authority and Drainage Board all have no objections to the proposal. It is therefore considered that the application has demonstrated that the site can be suitably drained and safeguarding against increasing flood risk elsewhere."

(b) The condition of the piped system on Fen Lane

9. The report from Cole Easton Consultants in support of the recent successful application in relation to the northern part of MLF328 also advised as follows (emphasis added): "Downstream Culvert Condition

2.6 Before water from this site reaches the job's infrastructure, It passes through a downstream culvert (not owned by the applicant). In 2013 the IDB confirmed by putting dye in a manhole in Main Street that the highway contributes to the discharge into that culvert. At the PAD meeting held on 6 December [2016], while content with the capacity of the downstream culvert if in good condition, the IDB and LLFA raised concern regarding the risk of flooding to the development arising from the culvert if it ceased conveyance of flow due to poor condition (egg pipe collapse). In such an event, flooding may occur. The land at the upstream end of the culvert is some 300mm lower than the ground levels at the development site. It is s therefore possible that if the proper flow Of

water in the culvert is impeded flooding may occur at the development site, which would impact on the proposed dwellings. However, it is anticipated that prior to the proposed dwellings being flooded, at least 9 existing dwellings on lowlying land (fronting Fen Lane) in the vicinity of the upstream end of the culvert would be impacted by flooding first. Accordingly, if the IOB at any time considers that the condition of the culvert is such that there is a real risk of such flooding, we would expect it to exercise its statutory powers under s25 of the Land Drainage Act to require the landowners who control the culvert to remedy its condition, to protect those existing dwellings, irrespective of whether this application is granted. Imposition of a condition on this application in relation to the condition of the culvert does not therefore seem reasonable."

10. The new wording of the "Infrastructure" paragraph asserts that "the piped system on Fen Lane cannot cope with extreme events". The owners of MLF328 are aware of no report by the IDB to that effect (though the piped system is not on the owners' property) and it appears far more likely that the historic problems have been caused by:

(a) the historic failure of the owner of the open dyke on Fen Lane to clear and maintain it (a problem raised in Mareham Le Fen Village News for March 2014, attachment 4, now resolved by the dyke having been adopted by the IDB); and/or

(b) trash screen blockages on the entrances to the piped system, rather than a problem with the piped system itself. But if the IDB considers that the owners of the piped system have allowed it to fall into such a condition

<p>Represented by R Doughty Consultancy</p>						<p>Sustainability Appraisal</p>		<p>that the proper flow of water is impaired, then, given that at least 9 houses would be impacted by flooding before MLF328, the IDB should already be exercising its statutory powers under s25 of the Land Drainage Act to require the owners of the piped system to remedy its condition, as noted by Cole Easdon in the passage quoted above.</p> <p>(c) Conclusion</p> <p>11. The new "Infrastructure" paragraph is not justified and the wording should revert to that in the SHLAA, set out at paragraph 2 above. Since the Plan was published for consultation, ELDC has given planning permission for Phase 1 of 2 of the development MLF328 (9 dwellings on the northern part of the site) on the basis of, and with a condition relating to, a proposal that discharge rates will be restricted to greenfield run-off rates. Development of MLF328 will be neutral as regards the drainage needs of Mareham le Fen.</p> <p>We support the allocation of site MLF303 for residential development. Its development in association with MLF021 would provide a suitable site, allowing an appropriate drainage strategy for MLF021 and a suitable access through MLF021 to MLF303.</p> <p>We have some comments, however, on some of the conclusions drawn in the appraisal of the Site in the SA process.</p> <p>The SA concludes the site is in a prominent location visible from the approach road to the east of the settlement. The existing business unit and the established hedge lines, however, will screen the development from such view, which would in any event be set against the backdrop of</p>	<p>The Sustainability Appraisal of site MLF303 should be updated in order to better reflect the position with relations to Landscape Impact, Brown Field Land, Loss of Employment Land and Access to Services.</p>	<p>The Sustainability Appraisal does not say that the site is in a prominent location, it says that there may be a minor impact as part of the site would be visible in view from the approach road. The impact is set out overall as positive and the site has been allocated so it is not clear how this would improve the situation. Any design and landscaping issues will be dealt with at the planning application stage.</p> <p>The garage and the former Methodist Chapel do not form part of site MLF303. As the respondent states, there is a small area housing a building on the site but the majority of the site is greenfield. The personal circumstances of the operator were unknown at the time of writing and, in any case, are not a planning matter. The site has been put forward with the business use included, implying that this part of the site would be redeveloped for housing along with greenfield site. Should the business part of the site be maintained and the remainder developed for housing, this would</p>
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<p>change the outcome, but that is not the site that has been promoted to the Council. The site is assessed on the basis of the circumstances that the time of the assessment, and in any case, it has not stopped that site being allocated for development.</p> <p>As the site has been promoted with both a greenfield and brownfield element (approximately 20% s brownfield) the SA will be changed to have a negative/positive outcome for the brownfield land SA objective.</p> <p>The sustainability appraisal refers to the closeness of services and facilities, but states that this is negated by the lack of connectivity due to poor access. The settlement proposals refers to the need to work with neighbouring land owners to obtain a suitable access to the site.</p>				
<p>existing development within the settlement and adjacent to the allocation site, all of which combine to ensure that the development of the site would have a limited impact on the wider landscape.</p> <p>We accept that most of the site is greenfield, although there are some small areas of developed land that are associated with the site, including the former garage (MLF021) on the road frontage and the neighbouring Methodist chapel site, that has planning permission for conversion to a single dwelling. The site includes a well-maintained business unit run by the owner of MLF303. The long-term future of the unit is uncertain as the owner has no successor. In the event of MLF021 and MLF303 being allocated and sold the owner of MLF303 would probably close the business. What is clear, however, is that residential development would not be prejudiced either by the continued operation of the business, or the inclusion of the former business unit within the residential development.</p> <p>The SA marks the site as red because its development would lead to the loss of existing employment in the form of the existing business. The business unit forms a viable and thriving business and can be retained without prejudicing the wider development, including the neighbouring brownfield site (MLF021). The site should either be red because it leads to the loss of existing employment, or red because it is not Previously Developed Land. It should not be both.</p> <p>The SA also concludes that the site does not have access to the services and facilities in Mareham le Fen, although other sites in the settlement</p>				

Historic England						are scored Green, including MLF021, and as such we can only conclude that MLF303 is as well connected to the settlement as the other sites in "green" and not "red" in relation to access to services and facilities.	NTH308 – impact on various heritage assets and setting including archaeology - Cropmarks of a complex of rectilinear enclosures, including one which is double-ditched were noted on air photos. They are thought to be of a possible Iron Age/Roman date;	NTH308 – The revised Settlement Proposals Document and Local Plan information indicates that capacity at this site has reduced from 206 to 120 units. This could be explored more in respect of the historic environment and how such a reduction could potentially provide flexibility for any future development layout which might assist with mitigation of any impact on the historic environment taking into account Para.139 of the NPPF. It could also be made clear that early engagement with the Council's heritage advisers (Conservation Officer and County Archaeology) in respect of the heritage assets and any development proposal would be expected;	It would be for the development management process to go into the detail the consultee is discussing and therefore the Council is not proposing any changes.
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SIBSEY

Historic England						SIB303 – impact on various heritage assets and setting;	SIB303 – The revised Settlement Proposals Document and Local Plan information indicates that capacity at this site has reduced from 469 to some 200 units. This could be explored more in respect of the historic environment and how	SIB303 – The revised Settlement Proposals Document and Local Plan information indicates that capacity at this site has reduced from 469 to some 200 units. This could be explored more in respect of the historic environment and how	It would be for the development management process to go into the detail the consultee is discussing and therefore the Council is not proposing any changes.
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Historic England					SIB406 – impact on the setting of GI Sibsey Windmill;	such a reduction could potentially provide flexibility for any future development layout which might assist with mitigation of any impact on the historic environment. It could also be made clear that early engagement with the Council's heritage advisers (Conservation Officer and County Archaeology) in respect of the heritage assets and any development proposal would be expected;	
		SIB406			SIB406 – The GI listed Windmill is not referred to in the initial character information of Sibsey within the Settlement Proposals Document. It is considered that this is currently an omission and that it should be referenced within the preamble text since it is a Grade I listed heritage asset with setting which would need to be considered in relation to this site allocation. The assessment section sets out that there would be some impact on the heritage asset and its setting, but does not explain how significance or any degree of harm has been considered, or how any such harm could be minimised. Historic England maintains that further assessment and evaluation work in respect of the historic environment is required for this site for the Council to ensure that the	The Council does not consider that it is necessary to mention every listed building in each settlement in the Local Plan, this is not considered to be strategic as the preamble for the settlements is just a broad overview not a detailed breakdown. The mill is discussed in the individual site details which is the correct place for such text. The Council consulted its Conservation Officer again with regard to this site after the consultation in June 2016 and the words in the text are on this officers recommendation. The Council is proposing the following additional text as a minor modification which reads "Development would need to blend in with the surrounding areas" A sensitive approach to site layout and high quality design of development would be expected as part of any proposal to reduce impact on its historic assets and good design should mitigate against any impact on the historic environment	

Broadgate Homes Represented by Hume Planning Consultancy					<p>site it is putting forward for development is compatible with the Council's own policy for the protection of the historic environment as well as NPPF requirements to ensure the following:</p> <ul style="list-style-type: none"> - That the site put forward for development will deliver a "positive strategy for the historic environment" as is required by NPPF Paragraph 126; - That the site allocation will be likely to "contribute to protecting or enhancing the historic environment" as part of sustainable development delivery required by NPPF Paragraph 7; and, - That the site allocation is likely to "conserve heritage assets in a manner appropriate to their significance" and assist with delivery of the Government's objectives for the historic environment as per NPPF Paragraph 17. 	
		SIB303	<p>4.7 Broadgate has land interests at Sibsey (Site SIB302) shown on the accompanying plan. This site is not currently included as an allocation.</p> <p>4.8 These representations have shown that there is a need to allocate additional housing sites to allow a contingency for the non-implementation of several consented sites in the supply pipeline. Sibsey is a prime settlement contender to accommodate additional housing growth with the least environmental impact.</p>		<p>The Council consider SIB303 to be suitable. The Council disagrees with the consultee that the site is clearly visible from the north as you enter Sibsey, it is quite well screened with direct access onto the A16, and it has a footpath connection to the village centre and is large enough to provide comprehensive green space/open space. The site is also adjacent to the local school to the east and so could provide connectivity to this community facility. Overall the site is considered suitable and the developers have informed the Council that it is deliverable and is going to be promoted in due course. The capacity of the site has been confirmed by the proposed developer.</p>	

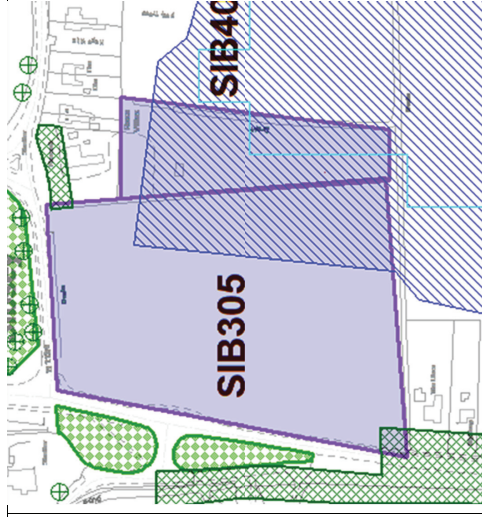
	<p>resolved by a more comprehensive approach to the development of the site.</p>	
	<p>4.11 These representations have highlighted the support for the provision of extra care Policy SPS and the evidence base to the local plan also identifies that there is a shortage of health surgery provision at Sibsey. As a local builder, Broadgate are prepared to work alongside the Council and other specialist agencies in helping to address this local need at the settlement which would be of benefit to the wider community. Extra care provision is a recognised employment generator and in this way the allocation of the site for open market housing which potentially could include specialist extra care provision would assist in meeting several Sustainability Assessment objectives including;</p>	
	<ul style="list-style-type: none"> • Supporting inclusive safe and vibrant communities • Ensuring local housing needs are met • And economically contributing to diversifying the rural economy 	
	<p>4.12 Part of this site was considered at appeal on the 25th August 2010 (Ref. APP/02510/N10/2127588) for the eleven affordable dwellings under the exception sites policy. The application was recommended by officers for permission, however the appeal was dismissed at this time, because in the absence of a recognised housing need the benefits of the proposal were outweighed by the effect on the character and appearance of Sibsey and the surrounding countryside. This conclusion, in part, stemmed from the Inspector's observation that there would be no shared boundary with the adjoining built area.</p>	

					<p>4.13 This conclusion from 2010 must be seen in the following current context;</p> <ol style="list-style-type: none"> 1 This was an exception site application where development would not normally be acceptable; 2 What is now being considered is a small planned urban extension in the context of a new dwelling requirement, a revised Core Strategy and the need for additional housing sites in the large villages, (of which Sibsey is favoured and which the draft Local Plan now allocates 239 dwellings to). 3 Along with two of the preferred sites for allocation i.e. SIB 406 and SIB 304, the Broadgate site would be an integral part of the village in that it would, in part, have a boundary contiguous with these sites. 4.14 The Broadgate site is noted as being suitable for development but not proposed to be allocated. When the site is compared to SIB 303 on the eastern side of the village, it would have development along its southern boundary and an urban land use in the form of the playing field, and two thirds of its eastern boundary would be contiguous with existing development, while the remainder would adjoin green space. This would place the site in a landscaped setting softening development and containing all new development to the west of the village. Additional landscaping would further reduce any impact development would have on the surrounding countryside, maintaining a strong but positive relationship between the settlement and countryside. 4.15 By contrast SIB 303 is not contiguous to existing development along its northern and eastern 		
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<p>Lark fleet Homes Represented by R Doughty Consultancy</p>					<p>boundaries with minimal development adjacent to the southern boundary. In that the Broadgate site is considered suitable for development these advantages should be recognised and along with SIB 304 and 406, it should be allocated for development in preference to SIB 303, which should be deleted.</p> <p>4.16 This, in turn, would enable the more efficient provision of infrastructure, water provision, drainage and highways potential benefits to enhance biodiversity, an objective of the Framework, and consolidate existing and new development to the west of Main Road through shared services and facilities.</p>		
			<p>O SIB303</p>		<p>We object to the allocation of SIB303 for housing. The SA appraisal is based on an assumed development of 200 dwellings, although the site was originally promoted for 469. We understand that the capacity has been reduced to meet the growth requirements for the settlement and the reduction in site size may also reduce the risk of odour issues on new development arising from the proximity to Sibsey Water Recycling plant.</p> <p>Construction of the site access, however, would necessitate the felling of a number of trees that have a significant positive impact on the visual amenity and habitat value of the area. The SA also assumes the proposed development would be screened by the existing frontage properties. However, the entire site is clearly visible when approaching from the north and would impact on the sense of entering Sibsey. Other sites, such as SIB305, represent a more effective and justified allocation.</p> <p>We have made separate representations regarding the design Policy (SP 10), but SIB303 would</p>	<p>SIB303 should be deleted as a proposed site allocation in favour of more appropriate sites, such as SIB305.</p>	<p>The Council consider SIB303 to be suitable. The Council disagrees with the consultee that the site is clearly visible from the north as you enter Sibsey, it is quite well screened with direct access onto the A16, and it has a footpath connection to the village centre and is large enough to provide comprehensive green space/open space. The site is also adjacent to the local school to the east and so could provide connectivity to this community facility. Overall the site is considered suitable and the developers have informed the Council that it is deliverable and is going to be promoted in due course. The capacity of the site has been confirmed by the proposed developer.</p> <p>The consultee has not identified why they believe their site SIB305, as shown below is more appropriate than SIB303.</p>

appear to be a "gateway" site, with little opportunity to add to the benefit of the settlement.
 We consider that the decision-making process regarding the allocation of sites in Sibsey is flawed, and makes the allocation process unsound.

The site is a very open agricultural field with a formal open style of tree planting and grassed verge along the A16. It has a drainage ditch along the southern boundary and a smaller one along Station Road, these will contain biodiversity. There are wide views across the site from the south and west through which can be seen the houses on Station Road and the church. The site was identified in the Sibsey Design Guide as of importance to the village and there would be an impact on the townscape because the site lies on the edge of the village and forms part of its countryside setting and the entrance to the village from the south, this is emphasised by the open boundaries. There would be a slight impact on the historic environment as the church can be seen in views across the site, but this can be mitigated. The site is close to services and facilities with a footpath to the centre of the village and close to bus stops. Given the site's size, development will be required to provide green space/open space. Access can be achieved onto Station Road. Overall the impact on the setting of the village and the wider landscape outweighs the fact that the site is close to services and facilities'.



Lark fleet Homes Represent ed by R Doughty			O	SIB406	We object to the allocation of SIB406 for housing. The SA appraisal is based on an assumed development of 34 dwellings and assumes the site is screened by the existing frontage	SIB406 should be deleted as a proposed site allocation in favour of more appropriate sites, such as SIB305.	The Council considers SIB406 to be suitable. The Council acknowledges that the site is open but it is large enough to provide green infrastructure and planting. The site has a connection to the village centre which is
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<p>Consultancy</p>					<p>properties. However, the entire site is clearly visible when approaching from the north and would impact on the sense of entering Sibsey. We have also made representations regarding the design Policy (SP 10) but SIB406 would appear to be a "gateway" site, with little opportunity to add to the benefit of the settlement. The blocking of views to the Sibsey Trader Windmill would clearly be a significant factor, and could not be mitigated as part of the design of the residential scheme.</p> <p>The site is also as far away from the services in the centre of the village (School, shop, pub, church) as it is possible to get, and as such will not promote inclusive communities and healthy lifestyle to the same extent as other sites, such as SIB305, which is much better related to the existing services.</p> <p>We consider the decision-making process regarding the allocation of sites in Sibsey to be flawed, and this makes the allocation process unsound.</p>		<p>walkable and the site has been promoted by the landowner and is considered to be deliverable. Overall the Council consider this site suitable and would wish to see it come forward. As set out above SIB305 was not considered suitable for a number of reasons.</p>
<p>Lark fleet Homes Represented by R Doughty Consultancy</p>			<p>O</p>	<p>SIB305</p>	<p>We object to the failure to allocate SIB305 for housing. The SA appraisal is based on an assumed development of 50 dwellings, although a recent planning application has promoted a development of 12 dwellings.</p> <p>Although the SA has concluded there would only be slight impact on the setting of the listed building The Church for a development of 50 dwellings, and not the 12 dwellings promoted in the planning application, the impact on the Listed Buildings has been used as a reason for refusal of the planning application. In this case the listed buildings were identified as The Avenue, Manor House and Waitsfield and not the Church.</p> <p>A further concern of the SA is the impact on the setting of the</p>	<p>Site SIB303 should be allocated for development of approximately 12 dwellings, in line with the recent Planning Application.</p>	<p>The consultee believes that their site SIB305 should be allocated in preference to those sites proposed in the Local Plan. The site is a very open agricultural field with a formal open style of tree planting and grassed verge along the A16. It has a drainage ditch along the southern boundary and a smaller one along Station Road, these will contain biodiversity. There are wide views across the site from the south and west through which can be seen the houses on Station Road and the church. The site was identified in the Sibsey Design Guide as of importance to the village and there would be an impact on the townscape because the site lies on the edge of the village and forms part of its countryside setting and the entrance to the village from the south, this is emphasised by the open boundaries. There would be a slight impact on the historic environment as the church can be seen in views across the site, but this can be mitigated. The site is close to services and facilities with a footpath to the</p>

Lark fleet Homes Represented by R Doughty Consultancy				<p>settlement. The application was refused on the grounds that development would constitute an expansion of an urbanising effect some 275 m into the open countryside. The SA is concerned at the loss of the avenue of trees along the A16 frontage. It is noted that a number of preferred allocation sites have reduced numbers to help respond to potential impact on the landscape and historic environment. The supporting material for the application demonstrates, however, that the scheme for 12 dwellings would retain the avenue and the significant open aspect of the views from the A16. The development would run between existing development Pine craft and its neighbours on Station Road, and the Lilacs and its neighbours on the A16, all of which screen views of the site, and provide some sense of containment.</p> <p>We consider the decision making process regarding the allocation of sites in Sibsey to be flawed, and this makes the allocation process unsound.</p> <p>We object to the allocation of SIB304 for housing. The SA appraisal is based on an assumed development of 5 dwellings, although the land can accommodate 40 dwellings. Development would lead to an inefficient use of land.</p> <p>As back land development, the new properties would have poor linkages to the neighbouring streets and properties, and, as such, would not promote inclusive communities or healthy lifestyles, although it would be near the services in the heart of the village. No justification has been provided to explain why such a low-density development should be accepted so close to the commercial hub of the settlement. Other sites, such as SIB305, represent a more</p>	<p>centre of the village and close to bus stops. Given the site's size, development will be required to provide green space/open space. Access can be achieved onto Station Road. Overall the impact on the setting of the village and the wider landscape outweighs the fact that the site is close to services and facilities'. The site has had two planning refusals, January 2016 and July 2016 both for 12 dwellings on the grounds of character harm, intrusion into the open countryside, and harm to the setting of two nearby listed buildings. Overall this is not considered a suitable site for allocation in the Local Plan.</p>	<p>The Council considers SIB304 to be suitable. The site has connectivity to the local services and village centre with a footpath and access can be provided onto the A16. The site forms a natural extension to the village and is not considered to have poor linkages. The capacity of the site has been indicated by the landowner as what they wish to bring forward. See above for the reasons SIB305 should not be considered for an allocation in the Local Plan.</p>
		O	SIB304	<p>SIB304 should be deleted as a proposed site allocation in favour of more appropriate sites, such as SIB305.</p>		

Chestnut Homes						<p>effective and justified use of land to meet the growth targets for Sibsey.</p> <p>We consider the decision-making process regarding the allocation of sites in Sibsey to be flawed and this makes the allocation process unsound.</p>	
S				<p>Chestnut Homes is actively promoting the residential development of SIB303 and supports the Local Authorities inclusion of the site within the site allocations documents.</p> <p>We have a history of developing in the village, having completed the Church Walk development adjacent to the school with a wide mix of housing. From the success of this development and understanding of the demand in the location, we have a desire to return to Sibsey to meet the Local Authorities plan for future growth in the village.</p> <p>Site SIB303 is in a prominent location at the heart of the village alongside the A16. Its location offers close proximity to existing local facilities and services including the primary school.</p> <p>As noted in our July 2016 consultation comments, part of the current allocation sits within flood zone 3. In our 2016 comments and again here, we propose an amendment to the site boundary to align the site with Appendix Three, discounting a proportion of the site as shown in figure 2. The adjustment leaves the majority of the site within flood zone 1 and excludes all zone 3 areas. Feasibility work has been undertaken and has not identified any significant constraints to development. Our Highways Consultant has confirmed a new access direct from the A16, south of the junction with Millers Gate, is feasible and will provide a safe and</p>		<p>The Council notes the support from the consultee. The consultee has submitted a further site location map and as a minor modification to the Settlement Proposals Document the Council is proposing to insert an updated map for Sibsey showing the correct location of the site.</p>	

							<p>adequate access for the new proposed development.</p> <p>A site specific Flood Risk Assessment and Drainage Strategy has been prepared confirming with minimal mitigation measures, the site can be safely developed from a flood risk perspective and will not adversely affect any surrounding areas.</p> <p>Both foul and surface water drainage can be dealt with within the existing systems, as confirmed by Anglian Water. Through the Masterplanning and detailed technical design processes, a Sustainable Urban Drainage system can be incorporated on the site, discharging to the adjacent Internal Drainage Board system.</p> <p>Archaeological and ecological site investigations have been undertaken and with appropriate mitigation measures will not constrain development. The setting of the listed building Sibsey House and other heritage assets in the vicinity of the site can be addressed as design issues as part of the Masterplanning process and will not prevent a deliverable development of this site.</p> <p>The site provides opportunity to incorporate landscaping and any expansion of the school that maybe required to accommodate additional pupils from the proposed site.</p> <p>In conclusion this site is deliverable and developable, providing a village close to the relevant infrastructure and services. A planning application for the site is imminent, anticipated for later this year.</p>		
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SPILSBY

<p>Historic England</p>				<p>SPY310 – impact on archaeology in relation to individual sites as per previous comments and the cumulative impact in relation to the overall SPY310 site.</p>	<p>SPY310 – Historic England’s previous comments are acknowledged in the Settlement Proposals Document but are addressed only through an indication that an archaeological assessment would be required prior to development. The information also sets out that the site would incorporate open space. It is considered that this could be explored more in respect of the historic environment and how the Council’s aspirations for green space could potentially provide flexibility for any future development layout which might assist with mitigation of any impact on the historic environment taking into account Para.139 of the NPPF. It could also be made clear that early engagement with the Council’s heritage advisers (Conservation Officer and County Archaeology) would be expected in respect of the heritage assets and any development proposal.</p>	<p>It would be for the development management process to go into the detail the consultee is discussing and therefore the Council is not proposing any changes.</p>
<p>Lumsden S</p>		<p>S Spilsby , SP310,30 3 & 306</p>		<p>I believe the plan is legally compliant and meets the four tests of Soundness. Spilsby being a small town provides services for the townsfolk themselves as well as local villagers and needs to increase in size to continue to be able to meet these requirements.</p>		<p>The Council notes the support from the consultee</p>

Lumsden CD			S	Spilsby , SP310,30 3 & 306	<p>Local businesses as well as the local schools need a town which attracts new residents as well as catering for an ageing population.</p> <p>In particular the provision of a new medical centre as part of the future development is vital with waiting times just to see a GP of over 3 weeks at present.</p> <p>The topography of the land to the north east and east of the existing town minimises flood risk as well as being close enough to enable pedestrian access.</p> <p>I believe the plan is legally compliant and meets the four tests of Soundness.</p> <p>Spilsby being a small town provides services for the townsfolk themselves as well as local villagers and needs to increase in size to continue to be able to meet these requirements.</p> <p>Local businesses as well as the local schools need a town which attracts new residents as well as catering for an ageing population.</p> <p>In particular the provision of a new medical centre as part of the future development is vital with waiting times just to see a GP of over 3 weeks at present.</p> <p>The topography of the land to the north east and east of the existing town minimises flood risk as well as being close enough to enable pedestrian access.</p>		The Council notes the support from the consultee
Gin Property Ltd Represent ed by R Doughty Consultanc y			S	SPY310	<p>We support the allocation of site SPY310 for residential development.</p> <p>The land to the east of Spilsby has long been identified, including in the saved Local Plan, as the most appropriate location for future growth of the town, due to the limited impact on the landscape, biodiversity and the historic environment, whilst still having good access to Halton Road to the south and Ashby Road to the North. Although there are no real</p>	The site allocation should be subject to a specific policy setting out the particular issues that need to be addressed over the development of the scheme, including access arrangements, drainage, open space and landscaping, archaeology, biodiversity, medical	The Council notes the support for the allocation of the site and would endorse this support. The site brings forward all the sites on the eastern side of Spilsby and provides a comprehensive package for the delivery of housing beyond the plan period. The site will also provide as set out by the consultee infrastructure for the town. The Council does not believe the site requires a separate policy as this would not achieve anything more than the results of the positive pre application discussions that are already going on.

	facilities and affordable housing.	
opportunities for new vehicular access into the town centre from the site, other than along Ashby Road and Halton Road, there are a number of existing footpaths and bridle ways which will facilitate direct pedestrian and cycle routes into the town centre and to other services across the town.		
The topography of the area, together with the existing built form of Spilsby, can ensure that a large scale of development can take place with only a limited impact on the landscape setting of the town. Even the number of existing properties with direct views of the site are limited, considering the size of the site and the length of the boundary with the existing built up area.		
Archaeological evidence would indicate the remains of a medieval field system to the east extremes of the site. Further surveys will be necessary to identify the extent of these remains. The proposed extent of development, however, would leave some of the eastern areas undeveloped, which should allow for protection of some of these potential features.		
The site also contains a number of features of landscape and biodiversity value. The promotion of a comprehensive allocation, incorporating a number of different land ownerships, will allow the eventual development to be designed to retain these features and maintain and enhance the value of these areas. The resulting development will be designed more flexibly to respond to the challenges and opportunities of the area than would be possible than if the sites came forward individually. The scale of the development will also allow, over time, for the delivery of: a new highways link between Ashby Road and Halton Road, which may release pressure on the road junctions		

in the town centre; a comprehensive drainage system, and; open space that reflects and improves the existing footpath network and builds on the existing watercourses. The scale of the development also offers the opportunity to incorporate a number of other features that may benefit the town. Discussions are underway with the Spilsby medical practice to explore the potential to relocate the practice on to the site into purpose built property, from their existing premises, which are heavily constrained and may not be appropriate to serve the future needs of Spilsby. Other discussions are ongoing regarding the potential to deliver purpose built accommodation for older people, meeting a specific need of Spilsby itself, and East Lindsey more generally. All these factors should be accommodated within the policy for this allocation.

The SHLAA analysis indicates that several of the sites included in the wider allocation to the east of Spilsby are incapable of being developed in isolation. Only in a single comprehensive development can the ultimate growth of Spilsby be delivered in a way that best meets the needs of the town and have any chance of accommodating potential elements including the highway link, relocation of the medical practice or the development of housing for older people. It is, therefore, essential that the various landownerships are brought forward within a single allocation, as promoted by the plan.

This is especially important because, as the allocation quite rightly states, not all the land to the east of Spilsby would be delivered in the plan period: it assumes only 300 new homes of the total development of around 600 homes would come forward in the plan period. The plan, however, fails to acknowledge the initial opening up

							<p>other sites will come forward to meet the shortfall in supply. Identifying potential allocations will provide some certainty for potential applicants to bring forward necessary sites in an appropriate location, and not be limited to undertaking "planning by appeal", or worse in that potential applicants do not have the confidence to bring forward necessary sites.</p> <p>Identifying preferred allocations will also give certainty for the future planning of flood defences and utility provision, giving confidence in the future economic development of Skegness and coastal Lincolnshire. Our clients' land to the south of the A158 on the western approaches to Skegness (SK 305, SK306 and SK321) and to the south of Warth Lane (SK307) are well related to the existing built form of Skegness, will have ready access to services and facilities and will be able to integrate closely with the existing road network. Neither the 2016 SHLAA and the SA do not assess any sites in Skegness, but the only issue of concern regarding our client's land highlighted in the 2012 SHLAA was the flood risk, which is common to all sites in and around Skegness, and as such we can conclude that the sites are in all other ways suitable and sustainable locations for growth</p>	<p>existing commitments fail to deliver the expected level of growth for the Coastal Area across the local plan period.</p>	<p>without increasing risk elsewhere. Local Plans should apply a sequential, risk-based approach to the location to development.</p> <p>The Council has done this by working out what the housing need would be in the coast with natural household formation of the existing population, this is the zero population scenario and then redistributed growth from the Coastal Zone into the inland towns and large villages. The Councils primary direction is to provide housing in the coast for local needs, in that local needs means the resident population and the formation of new households.</p> <p>There were as at February 2016 1308 housing commitments on the coast, with another 31 being granted permission up to December 2016. These commitments are located right across the coastal zone but are presently not being built out quickly. From the work done by Edge Analytics, housing to provide for the needs for the existing population (zero population growth scenario) means that the Council should be allocating 735 houses across the plan period, with commitments of 1308 this actually leaves a technical over supply of 573 home. This should provide an adequate buffer during the first five years of the Plan for this area of the District. Additional work carried out on the 2014 population projections using the same scenario shows a decline in the need to 630 homes over the plan period. The policy however is to remain at 735 homes.</p> <p>One of the consultees in the June 2016 consultation stated that they carry out 120 private property surveys a year and 90% of them are for people outside Lincolnshire who wish to come and retire. Extrapolating this figure out to the 1308 existing commitments in the Local Plan means that technically only 130 of them will be taken up by local residents. The Council do not consider it appropriate to build houses for what would be a growing population of in migrants into the District who are in the main older and therefore more vulnerable to the dangers of flood risk. It is considered important that there is enough housing for the existing resident population which the existing commitments should allow, this includes those already living in the coast and working in the</p>
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tourism industry. There will be support for housing development on brownfield land subject to criteria, the single plot exceptions policy and support for affordable housing and Specialised Housing For Older Persons. Also support will be given for housing for specialised vulnerable groups such as disabled local people.

The Council considers that its policy for coastal housing is in conformity with national planning policy. The Council understands that this is a radical new direction for policy on the coast and because of this above all other reasons there is a 5 year review of the Local Plan. It is essential that the Council monitors the coast to ensure that its policy is not going to start having a detrimental effect. The Council has set up a Coastal Housing Working Group to work with partners including interests from developers to look at impacts, and to try and see if at the end of the review period there is a way of bringing forward (if necessary) housing safely in this area of high flood risk with all partners agreement.

TETFORD

<p>██████████ ██████████</p>	<p>o</p>	<p>Tetford</p>	<p>p134/1 35</p>	<p>The narrative regarding Tetford set out on pages 134 and 135 of the Settlement Proposals Document repeats the errors regarding village facilities in the Strategic Policies, and therefore wrongly ascribes the village with a large village status.</p> <p>On page 135, in regard to Infrastructure, the "Access" section mistakenly ascribes a B Class route to the village. Access is wholly via C Class and unclassified routes, from the A158 approximately 4 miles away. There is no B Class route near to the village. Access to the village is not "quite poor" it is very poor.</p>		<p>The situation regarding the points has been dealt with under the respondent's objection to policy SP2.</p> <p>The Council propose a minor modification to the text to the Tetford map under Infrastructure to read "Road links to Tetford are via C Class routes," Also delete reference to pre-school facility from text – this comes from a objection to SP2.</p>
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WOODHALL SPA

<p>Anglian Water Services</p>			<p>WSP314</p>			<p>Reference should be made to this site being within close proximity to Woodhall Spa Water Recycling Centre and the need for an odour assessment to be prepared at planning application stage.</p>	<p>It is suggested that the following wording should be included in the Local Plan:</p> <p>‘Undertake a detailed odour assessment to demonstrate no adverse impact on future residents. To provide evidence to demonstrate that a suitable distance is provided from Woodhall Spa Water Recycling Centre and sensitive development (buildings which are regularly occupied) as part of the detailed masterplanning of the site</p>	<p>The Council agrees with the consultee that the site is near the Woodhall Spa Water Recycling Centre and is therefore proposing to insert the following as a minor modification as set out by the consultee.</p> <p>“Undertake a detailed odour assessment to demonstrate no adverse impact on future residents. To provide evidence to demonstrate that a suitable distance is provided from Woodhall Spa Water Recycling Centre and sensitive development (buildings which are regularly occupied) as part of any detailed planning application”</p>
<p>Broadgate Homes Represented by Hume Planning Consultancy</p>			<p>WSP3314</p>	<p>p154 p,155</p>		<p>4.1 Broadgate controls a land interest at Woodhall Spa represented as site allocation ref WSP 314 in the Settlement Proposals DPD. As a local housebuilder, following previous market research and assessment of the constraints and opportunities by the company this allocation is readily deliverable (notwithstanding the as yet unknown financial implications of the additional 10% burden of affordable housing from the wider district (non-coastal target) which for this site equates to an additional 30 affordable dwellings).</p> <p>4.2 Woodhall Spa is recognised as one of the larger villages in the district with a population of around 4,003 and containing some 1821 households. The Local Plan acknowledges this is a sustainable location and contains a range of services and facilities. The Sustainability Assessment also recognises the sustainable credentials of the settlement.</p>	<p>The allocation of site WSP 314 at Woodhall Spa is supported as the most logical extension to the settlement and is readily deliverable</p>	<p>The Council notes the support from the consultee</p>

		<p>4.3 The allocated Broadgate site (ref WSP314) itself is acknowledged to be well related to the settlement being surrounded by housing on 3 sides and will not compromise the woodland character of the village nor its heritage or landscape character. The site is also not affected by flooding and the LPA's conclusion based on the evidence base that this land represents a natural extension of the settlement is fully supported.</p> <p>4.4 Broadgate acknowledges that suitable access can be achieved and pedestrian/ cycleway link footpath connections via Witham Road can be provided to link with the centre of the village. The need for a green buffer to Green Lane which is consistent with draft Policy SP25 (Green Infrastructure) with no vehicular access to this highway is supported. A total of 290 dwellings is considered to reflect the realistic capacity of the site.</p> <p>4.5 Like the LPA, Broadgate assert that this site is the most logical opportunity for the sustainable growth of the village and is readily deliverable as an opportunity for high quality place making that will enhance the character of the settlement in line with the requirements of the design Policy SP10</p> <p>4.6 A site plan and a sketch master plan for Woodhall Spa is attached to these representations. Broadgate will shortly be arranging to meet with the LPA to discuss the main design principles that have been identified and how the delivery of this site may be accelerated.</p>								
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VARIETY OF SITES COMMENTS MADE BY GREATER LINCOLNSHIRE NATURE PARTNERSHIP AND LINGS WILDLIFE TRUST

Lincolnshire Wildlife Trust	<p>Burgh le Marsh, Coningsby</p> <p>Horncastle, Legbourne, Louth, Manby, Spilsby, Stickney, Tetney, Woodhall Spa, Chapel St Leonards, Mablethorpe, Saltfleetby, Skegness</p>		<p>As we commented in response to the previous version of the Local Plan there appear to be a number of designated nature conservation and geological sites missing from the settlement maps. It is very disappointing that this information has still not been added to the maps, especially as it states in paragraph 2.20 that 'The Plan also identifies local wildlife sites and sites of national importance where they fall within or around a settlement'.</p> <p>Local Sites are missing from the settlement maps for the following towns: Burgh-le-Marsh</p> <p>Coningsby</p> <p>Horncastle Legbourne Louth Manby Spilsby Stickney Tetney Woodhall Spa Chapel St Leonards Mablethorpe Saltfleetby Skegness</p> <p>It is important that the Site Allocations Document is based on up to date information as required by the National Planning Policy Framework. We would strongly recommend that Local Site information is obtained from the Greater Lincolnshire Nature Partnership (GLNP) and used to update the settlement maps. This should include Sites of Nature Conservation Importance (SNCI) and Regionally Important Geological Sites (RIGS) in addition to Local Wildlife Sites (LWS) and Local Geological Sites (LGS). It is currently misleading to imply in paragraph 2.20 that local wildlife sites are identified on the</p>	<p>In order to ensure the plan is sound and based on up to date information the settlement maps should be updated with all Local Sites, including LWSs, LGSS, SNCIs and RIGS (missing sites listed below). The key should also be updated accordingly.</p> <p><u>Local Sites missing from the Settlement Maps</u></p> <p>Burgh le Marsh Mill Hill Farm LWS The Hollies LWS</p> <p>Coningsby</p> <p>Tattershall Railway Cutting SNCI The Pingle SNCI (this is LNR on the map) Black Holt, Coningsby SNCI Coningsby Meadow SNCI</p> <p>Horncastle River Bain, Shearman's Wath Bridge to Horncastle SNCI Bowl Alley Lane, Horncastle SNCI Bowl Alley Lane Paddock SNCI Thornton Lodge to Horncastle Dismantled Railway SNCI Horncastle Canal Grassland LWS Woodhall Spa to Thornton Lodge Dismantled Railway SNCI Old River Bain Grassland SNCI</p>	<p>The Lincolnshire Wildlife Trust (The Lincolnshire Trust at the time) notified the Council of the sites to be protected as Sites of Nature Conservation Importance in 1993. This notification came in the form of two books of maps showing the sites. Although there was reference to other sites that the Trust held information on, these two books of maps were the only sites notified to Council and have formed the Council's list of SNCIs for the last 23 years. None of the sites referred to as SNCIs in this representation are in the books and so have never been considered under the SNCI policy by the Council. Should any of these sites been reassessed against the criteria for a Local Wildlife site, they will be considered accordingly.</p> <p>The respondent has queried a number of sites on the grounds that there is something marked on the plan but it is not clear what. In all cases, these are SNCIs which the Council has retained on the plan as it has not been notified that the site has passed through the panel as a LWS. Stickney Picnic Site was an SNCI resurveyed under a piece of work commissioned and paid for by the Council. It was slightly short of meeting the criteria for a LWS but additional work was required. For Woodhall Spa Meadow the last information the Council had was that the decision was deferred from the Panel on boundary grounds. At Roughton Moor there was an issue with the landowner which remained unresolved. At Saltfleet Warren Road Dunes, the site met the criteria but a final boundary had not been determined. The fact that this doesn't appear on the key needs addressing in the final document.</p> <p>In respect of the Local Wildlife Sites the Council has included on its maps any sites it has been notified have been considered successfully by the Wildlife Sites Panel. However, the Greater Lincolnshire Nature Partnership, who act as custodians of the data will not disclose the information without the Council either paying</p>
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<p>settlement maps when in some cases they are missing.</p>	<p>Legbourne Firsby to Louth Dismantled Railway SNCI Legbourne Dismantled Railway: Legbourne to Legbourne Wood SNCI Louth Firsby to Louth Dismantled Railway SNCI, Hubbard's Hills LWS and RIGS Manby Chapel Lane Ride SNCI Spilsby Toe H Plot SNCI (this is protected open space on the map) Six Acre Plantation, Spilsby SNCI Stickney West Fen Catchwater SNCI Stickney Picnic Site SNCI (there is something marked on the map at this location but it is not on the key) Tetney Tetney North End SNCI Woodhall Spa Bracken Wood SNCI Woodhall Spa to Horncastle Dismantled Railway SNCI Woodhall Spa Meadow SNCI (there is something marked on the map at</p>	<p>an annual subscription to join the Partnership or paying for individual site information as a developer would, and the Council has no budget for this. The Council has sought information on the location of sites but this was declined without payment. The payment would only cover one year, under the terms of any release of data, and the Council would not be allowed to use it beyond that year so it could not be included in the Plan. The Council has plotted the sites it is aware of, a significant number of which it paid for the survey work on in 2008/09.</p> <p>Hubbard's Hills LWS is shown on the inset map, but the site is also shown as Protected Open Space and the two notations do compete slightly.</p> <p>The Council is proposing a minor modification to the Local Plan in that it will list the sites in the text for each corresponding settlement in the Settlement Proposals part of the Plan so that developers are aware that they should contact the Greater Lincolnshire Nature Partnership for more information should they be considering proposals in those locations.</p>
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this location but it is not on the key)

Roughton Moor SNCI (there is something marked on the map at this location but it is not on the key)

Woodhall Spa to Thornton Lodge Dismantled Railway SNCI

Disused Railway Line - Woodhall Spa SNCI
Abbey Lane - Kirkstead
Disused Railway Line
SNCI Witham Way SNCI
Witham Way LWS

Chapel St Leonards
Chapel Point Dunes,
North LWS Chapel Point
Dunes, South LWS

Mablethorpe
Mablethorpe North Dunes
cLWS Sutton on Sea
Foreshore RIGS

Sutton on Sea Dunes,
Hillside Avenue to
Sandhurst Road cLWS

Saltfleetby

Warren Road Dunes LWS
(there is something marked on the map at this location but it is not on the key)

Saltfleetby to
Theddlethorpe Dunes
Nature Reserve LWS

Skegness North Shore
Golf Course cLWS Sea

Greater Lincs Nature Partnership						<p>The GLNP believe that a number of these maps are unsound as they do not include the most up to date evidence on Local Sites. The NPPF requires that Local Plans are based on up to date evidence (e.g. paragraphs 117, 165) as does the Planning and Compulsory Purchase Act (Section 13). In addition the NERC Act requires all public bodies to have regard for biodiversity, and we are unclear how ELDC can fulfil this duty without up to date evidence. Finally ELDC themselves have made a commitment in the emerging Core Strategy to "protect sites designated internationally, nationally or locally for their biodiversity and geodiversity importance, species populations and habitats identified in the Lincolnshire Biodiversity Action Plan and the Natural Environment and Rural Communities (NERC) Act 2006" (SP24) and it is unclear how ELDC will fulfil this policy without up to date evidence.</p> <p>As a point of clarity the settlement maps state that Local Wildlife Sites are included on the maps (paragraph 2.20). As some sites of LWS quality are missing this is misleading.</p> <p>As the GLNP responded to the previous consultation, Local Sites are missing from the settlement maps in the following areas:</p> <ul style="list-style-type: none"> • Burgh-le-Marsh • Coningsby • Horncastle • Legbourne • Louth • Manby • Spilsby • Stickney • Tetney • Woodhall Spa • Chapel St Leonards • Mablethorpe • Saltfleetby • Skegness 	View Walk, Skegness LWS Lagoon Walk Dunes, Skegness LWS	See response above for Lincolnshire Wildlife Trust
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