

**East Lindsey Local Plan
Issues and Options Paper
June 2021**

Habitat Regulations Assessment

East Lindsey Local Plan Review

Stage 1 Habitat Regulations Assessment

The Local Plan Review

1. The East Lindsey Local Plan, which was adopted in July 2018, was subject to Habitat Regulations Assessment throughout its preparation. That Plan is now undergoing a partial review and the various stages of that review will also be subject to HRA.
2. The Review of the Plan contains options that were not pursued as part of the adopted Plan and therefore these need to be considered here.

The Regulations

3. The EC Habitats Directive (92/43/EEC) and its implementation in the UK under the Conservation (Natural Habitats &c.) Regulations 1994 (known as the 'Habitats Regulations') is required for a plan or project, which either alone or in combination with other plans or projects, is likely to have a significant effect on a European site and which is not directly connected with the management of the site. A European site is either a Special Area of Conservation (SAC) or a Special Protection Area (SPA), and form part of an EU wide suite of such sites referred to as the Natura 2000 network; along with sites designated under the Ramsar Convention (Ramsar sites). Throughout this documents, European and Ramsar sites are collectively referred to as international sites.

The Habitat Regulations Assessment (HRA) Process

4. There are four stages to a HRA. The first stage is referred to as screening. This determines whether the plan is likely, alone or in combination with other plans and programmes, to have a significant effect on European sites. This will determine whether or not a full 'Appropriate Assessment' is needed. If it is deemed to have significant effects, Stage 2 (Appropriate Assessment) then determines whether, in view of the sites conservation objectives, the plan would have an adverse effect on the integrity of the site. This allows the plan to be fine tuned as it emerges to ensure significant effects on European sites are avoided. *If stages 1 and 2 are successful in avoiding any significant effects on the integrity of international sites, Stages 3 and 4 will become unnecessary.* Stage 3 is the Assessment of Alternative Solutions. Where the plan is considered to have an adverse effect on the integrity of a site or sites, there should be an examination of alternatives solutions to avoid negative impacts. Stage 4 is - Assessment where no alternative solutions remain and where adverse impacts remain. Where adverse effects remain, compensation measures are required, however, plans will only be permitted where the plan would be necessary for Imperative Reasons of Overriding Public Interest (IROPI).

5. This document represents the first stage in the process. The screening stage is to assess whether the plan or project - either alone or in combination with other plans or projects - is likely to have a significant impact on a European site. The screening process, should:

- i. Identify if there are any sites falling under the regulations, which may be affected by the proposals
- ii. Determine whether the plan is directly connected with or necessary to the management of the protected site – if it is, then no further assessment is necessary;
- iii. Describe the plan or project and other plans and projects that, 'in combination', have the potential to have significant effects on a European site;
- iv. Examine the conservation objectives for the site or sites;
- v. Identifying the potential effects on the European site in terms of magnitude, duration, location and extent; and
- vi. Assess the significance of any effects on the European site.

6. In the case of the Issues and Options document, the purpose of this document is to assess whether the any of the options put forward could lead to significant effects on the integrity of any internationally designated sites. As the review of the Local Plan is at an early stage in development the likely significant effects may be difficult to determine. It may only be through further iterations of the HRA as policy development becomes more detailed and specific information about the strategy is known, that significant effects on European sites can be ruled out or determined with any degree of certainty.

7. Throughout the preparation of the HRA, the precautionary principle is being applied. This means that, where any uncertainty or doubt remains regarding the potential for significant effects, a likely significant effect will be assumed and a conclusion of 'no significant effect' will only be reached where it is considered unlikely, that any option or policy being assessed will have any significant effects on a site or sites or international importance.

Screening

Identification and Description of International Sites

8. There are ten internationally designated sites along the coast:

- Humber Estuary Special Area of Conservation (SAC)
- Humber Estuary Special Protection Area (SPA) and Ramsar sites;
- Greater Wash SPA;
- Saltfleetby-Theddlethorpe Dunes and Gibraltar Point SAC;
- Gibraltar Point SPA and Ramsar;
- The Wash and North Norfolk Coast SAC; and

- The Wash SPA and Ramsar sites.

9. The Local Plan is not directly connected with or necessary to the management of any of these protected sites, therefore further assessment is required.

The Sites

The Humber

10. The Humber Estuary is a large estuary with a high tidal range. The high suspended sediment loads in the estuary feed a dynamic and rapidly changing system of accreting and eroding intertidal and sub-tidal mudflats and sandflats as well as saltmarsh and reedbeds. Other notable habitats include a range of sand dune types in the outer estuary, together with sub-tidal sandbanks and coastal lagoons. A number of developing managed realignment sites on the estuary also contribute to the wide variety of estuarine and wetland habitats. The estuary supports a full range of saline conditions from the open coast to the limit of saline intrusion. As salinity declines upstream tidal reedbeds and brackish saltmarsh communities fringe the estuary.

The Humber SAC

11. The Humber Estuary SAC extends about 70km from the mouth of the Humber, past the ports of Grimsby, Immingham, Hull and Goole and up to the limit of saline intrusion on the rivers Ouse and Trent, and along the East Lindsey coastline as far as Mablethorpe North End. The SAC is home to a significant breeding population of the grey seal. Intertidal mud on the Humber has high organic matter and the resulting food resource supports numerous SPA birds of international and national importance as well as juvenile flatfish. Littoral sands and muddy sands are a major component of the Humber Estuary mudflats and sandflats feature and cover large areas of the outer estuary, particularly on more sheltered shores and at the mouth of the estuary. The sediments of the north bank of the outer estuary are mainly sands and muddy sands, particularly from Cleethorpes to Donna Nook where conditions are relatively stable, while the sediments of the south bank of the outer estuary are predominantly sandy. These also provide large areas of habitat for numerous SPA birds of international and national importance. The high diversity of the species living within these sediments makes this habitat particularly important in terms of the food resource for birds, as well as for flatfish such as plaice and flounder.

Conservation objectives

12. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely
- The populations of qualifying species, and
- The distribution of qualifying species within the site.

Qualifying Features

- H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks
- H1130. Estuaries
- H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats
- H1150. Coastal lagoons*
- H1310. Salicornia and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand
- H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)
- H2110. Embryonic shifting dunes
- H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram
- H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*
- H2160. Dunes with *Hippophae rhamnoides*; Dunes with sea-buckthorn
- S1095. *Petromyzon marinus*; Sea lamprey
- S1099. *Lampetra fluviatilis*; River lamprey
- S1364. *Halichoerus grypus*; Grey seal

The Humber SPA and Ramsar Site

13. The Humber SPA and Ramsar sites also extend as far as North End Mablethorpe. On the north Lincolnshire coast, the saltmarsh is backed by low sand dunes with marshy slacks and brackish pools. Parts of the estuary are owned and managed by conservation organisations. The estuary supports important numbers of waterbirds (especially geese, ducks and waders) during the migration periods and in winter. In summer, it supports important breeding populations of bittern *Botaurus stellaris*, marsh harrier *Circus aeruginosus*, avocet *Recurvirostra avosetta* and little tern *Sterna albifrons*.

Conservation objectives

14. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying Features

- A021 *Botaurus stellaris*; Great bittern (Non-breeding)
- A021 *Botaurus stellaris*; Great bittern (Breeding)
- A048 *Tadorna tadorna*; Common shelduck (Non-breeding)
- A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding)
- A082 *Circus cyaneus*; Hen harrier (Non-breeding)
- A132 *Recurvirostra avosetta*; Pied avocet (Non-breeding)
- A132 *Recurvirostra avosetta*; Pied avocet (Breeding)
- A140 *Pluvialis apricaria*; European golden plover (Non-breeding)
- A143 *Calidris canutus*; Red knot (Non-breeding)
- A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
- A151 *Philomachus pugnax*; Ruff (Non-breeding)
- A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
- A157 *Limosa lapponica*; Bar-tailed godwit (Non-breeding)
- A162 *Tringa totanus*; Common redshank (Non-breeding)
- A195 *Sterna albifrons*; Little tern (Breeding)
- Waterbird assemblage

15. The Humber Estuary is an extremely dynamic estuarine system with a high sediment budget, which results in changing morphology, allowing the movement of the intertidal and subtidal habitats in response to physical and biological variables. The habitats within the estuary are interdependent and inextricably linked to the structure and functioning of one another and of the system as a whole.

16. It is subject to the impacts of human activities (past and present) as well as ongoing processes such as sea level rise and climate change. Key issues include coastal squeeze, impacts on the sediment budget, and changes to geomorphological structure and function of the estuary (due to sea level rise, flood defence works, dredging, and the construction, operation and maintenance of ports, pipelines and other infrastructure), changes in water quality and flows, pressure from additional built development, and damage and disturbance arising from access, recreation and other activities.

Greater Wash SPA

17. The Greater Wash SPA covers circa 3,536km² and is located in the mid-southern North Sea between Bridlington Bay in the north and the Outer Thames Estuary SPA in the south. It is a marine site and protects important areas of sea

used by waterbirds during the nonbreeding period, and for foraging terns in the breeding season. Breeding tern colonies along the coast are already protected by a number of existing classified SPAs: Humber Estuary, Gibraltar Point, North Norfolk Coast, Breydon Water and Great Yarmouth North Denes. The landward boundary of the site extends to the Mean High Water mark.

Conservation Objectives

18. The Conservation Objectives for the site are to ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features, and
- The distribution of the qualifying features within the site.

Qualifying Features:

- A001 *Gavia stellata*; Red-throated diver (Non-breeding);
- A065 *Melanitta nigra*; Common scoter (Non-breeding);
- A177 *Hydrocoloeus minutus*; Little gull (Non-breeding);
- A191 *Sterna sandvicensis*; Sandwich tern (Breeding);
- A193 *Sterna hirundo*; Common tern (Breeding); and
- A195 *Sternula albifrons*; Little tern (Breeding).

19. The Greater Wash SPA is a large, predominantly marine environment, and the East Lindsey coastline very much on its periphery. This part of the Lincolnshire Coast is heavily populated with tourism development and there are already thousands of visitors to this part of the coast at any given point over the summer months.

Saltfleetby – Theddlethorpe Dunes and Gibraltar Point SAC

20. This collection of sites is protected as a good example of shifting dunes within a complex site that exhibits a range of dune types. Within this dune complex there are extensive areas of fixed dune vegetation within largely intact geomorphologically-active systems. The lime-rich dunes support a rich and diverse flora. The fixed dunes are part of a successional transition, and the rapidly-accreting dunes on the seaward sand bars and shingle banks make this an important site for research into the processes of coastal development.

Conservation Objectives

21. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the qualifying natural habitats;
- The structure and function (including typical species) of the qualifying natural habitats; and,
- The supporting processes on which the qualifying natural habitats rely.
- The population of each of the qualifying features, and
- The distribution of the qualifying features within the site.

Qualifying Features

- Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes");
- "Fixed coastal dunes with herbaceous vegetation ("grey dunes");
- Dunes with *Hippophae rhamnoides*; and
- Humid dune slacks

22. The site is subject to a high number of visitors which require close management as many of the vegetation types supported by sand dunes are fragile and vulnerable to erosion from heavy trampling. It may be necessary to take steps to manage activities in vulnerable areas. Where recreation pressure is not severe, the impact of trampling can help to retain diversity on some sites – sandy tracks break up the vegetation sward and provide areas of bare sand thus increasing the diversity of habitats available.

Gibraltar Point SPA and Ramsar

23. Gibraltar Point SPA consists of an actively accreting sand-dune system, saltmarsh and extensive intertidal flats. All stages of dune development are represented with the older dunes extensively colonised by scrub. There are also small areas of freshwater marsh and open water. The site accommodates large numbers of overwintering birds and significant colonies of breeding terns. The terns feed outside the SPA in nearby waters. The site is also important for waders during the spring and autumn passage period.

24. Gibraltar Point is also a Ramsar site and was classified for breeding little tern and non-breeding bar-tailed godwit, sanderling and grey plover. These habitats provide important feeding and breeding sites for both birds and other wildlife. The coastal waters adjacent to the SPA provide a vital food source for the breeding tern populations by supporting large populations of small fish. The sand and shingle beaches in the SPA further support breeding little terns by providing important nesting areas. Additionally, both extensive areas of intertidal mud and sand support high densities of marine invertebrates, such as mud snails, providing a food source for internationally important populations of wading birds. Saltmarsh also provides key feeding and roosting habitats for important bird species within the site. The site is important throughout the year; during the spring and autumn passage periods and over winter the site is used by bar-tailed godwit, sanderling and grey plover that use the site for feeding and

roosting. During summer Gibraltar Point is used for breeding by little tern. As a Ramsar site, Gibraltar Point was designated on two criteria: criterion 1 the dune and saltmarsh habitats present on the site are representative of all the stages of colonisation and stabilisation, and criterion 2 it supports an assemblage of wetland invertebrate species of which eight species are listed as rare in the British Red Data Book and a further four species listed as vulnerable.

Conservation Objectives

25. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

Qualifying Features:

- Bar-tailed godwit (*Limosa lapponica*), Non-breeding
- Grey plover (*Pluvialis squatarola*), Non-breeding
- Little tern (*Sternula albifrons*), Breeding
- Sanderling (*Calidris alba*), Non-breeding

26. This site is sensitive to erosion from heavy trampling and high levels of recreational pressures may require steps to manage access or control activities in vulnerable areas. It may also be necessary to manage access to limit the impacts of disturbance on breeding birds, for example for dog walking, bait digging etc. Saltmarsh change including coastal erosion can result from coastal flood-defence works, rising sea-levels, variations in sediment deposition, and land claim for development. The location and extent of mud or sandflats is dependent on the extent to which the estuary or coast where they occur is constrained from responding to sea level rise and changing sediment regimes.

The Wash and North Norfolk Coast SAC

27. The Wash and North Norfolk Coast SAC forms one of the most important marine areas in the UK and European North Sea coast. It includes extensive areas of varying, but predominantly sandy, sediments subject to a range of conditions. Communities in the intertidal area include those characterised by large numbers of polychaetes, bivalve and crustaceans. Subtidal communities cover a diverse range from the shallow to the deeper parts of the embayments and include dense brittlestar beds and areas of an abundant reef-building worm ('ross worm') *Sabellaria spinulosa*. The embayment supports a variety of mobile

species, including a range of fish, otter *Lutra lutra* and common seal *Phoca vitulina*. The extensive intertidal flats provide ideal conditions for common seal breeding and hauling-out. Sandy sediments occupy most of the subtidal area, resulting in one of the largest expanses of subtidal sandbanks in the UK.

28. The subtidal sandbanks provide important nursery grounds for young commercial fish species, including plaice *Pleuronectes platessa*, cod *Gadus morhua* and sole *Solea solea*. The tide-swept approaches to the Wash include reefs which stand up to 30 cm proud of the seabed and which extend for hundreds of metres. The reefs are diverse and productive habitats which support many associated species that would not otherwise be found in predominantly sedimentary areas. Sandy flats predominate in the intertidal zone with some soft mudflats in the areas sheltered by barrier beaches and islands along the north Norfolk coast. The site contains the largest single area of saltmarsh in the UK and is one of the few areas in the UK where saltmarshes are generally accreting.

Conservation Objectives

29. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Qualifying Features

- Coastal lagoons
- Embryonic shifting dunes
- Fixed dunes with herbaceous vegetation ("Grey dunes")
- Humid dune slacks
- Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*)
- Otter (*Lutra lutra*)
- Perennial vegetation of stony banks
- Petalwort (*Petalophyllum ralfsii*)
- Shifting dunes along the shoreline with *Ammophila arenaria* ("White dunes")

30. The site is vulnerable to natural sea level rise, storm surges and changes in erosion patterns which are increasingly likely to affect the freshwater grazing

marsh and reedbed habitats. Increasing interest in abstraction of groundwater for irrigation of arable land may affect freshwater spring flows onto grazing marshes and would be addressed through application of provisions under the Habitat Regulations. The site is visited by a large number of tourists especially in the summer.

The Wash SPA and Ramsar

31. The Wash is the largest estuarine system in the UK and comprises very extensive saltmarshes, major intertidal banks of sand and mud, shallow waters and deep channels. The sheltered nature of The Wash creates suitable breeding conditions for shellfish which are important food sources for some waterbirds. The Wash is of outstanding importance for a large number of geese, ducks and waders, both in spring and autumn migration periods, as well as through the winter. The SPA is especially notable for supporting a very large proportion (over half) of the total population of Canada/Greenland breeding Knot *Calidris canutus islandica*. In summer, the Wash is an important breeding area for terns and as a feeding area for Marsh Harrier *Circus aeruginosus* that breed just outside the SPA. To the north, the coastal habitats of The Wash are continuous with Gibraltar Point SPA, whilst to the east The Wash adjoins the North Norfolk Coast SPA.

Conservation Objectives

32. The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- the extent and distribution of the habitats of the qualifying features;
- the structure and function of the habitats of the qualifying features;
- the supporting processes on which the habitats of the qualifying features rely;
- the populations of the qualifying features; and
- the distribution of the qualifying features within the site.

Qualifying Features

- Bar-tailed godwit (*Limosa lapponica*), Non-breeding
- Bewick's swan (*Cygnus columbianus bewickii*), Non-breeding
- Black-tailed godwit (*Limosa limosa islandica*), Non-breeding
- Common scoter (*Melanitta nigra*), Non-breeding
- Common tern (*Sterna hirundo*), Breeding
- Curlew (*Numenius arquata*), Non-breeding
- Dark-bellied brent goose (*Branta bernicla bernicla*), Non-breeding
- Dunlin (*Calidris alpina alpina*), Non-breeding
- Gadwall (*Mareca strepera*), Non-breeding

- Goldeneye (*Bucephala clangula*), Non-breeding
- Grey plover (*Pluvialis squatarola*), Non-breeding
- Knot (*Calidris canutus*), Non-breeding
- Little tern (*Sternula albifrons*), Breeding
- Oystercatcher (*Haematopus ostralegus*), Non-breeding
- Pink-footed goose (*Anser brachyrhynchus*), Non-breeding
- Pintail (*Anas acuta*), Non-breeding
- Redshank (*Tringa totanus*), Non-breeding
- Sanderling (*Calidris alba*), Non-breeding
- Shelduck (*Tadorna tadorna*), Non-breeding
- Turnstone (*Arenaria interpres*), Non-breeding
- Waterbird assemblage, Non-breeding
- Wigeon (*Mareca penelope*), Non-breeding

33. The biological richness of The Wash is largely dependent on the physical processes. The intertidal zone is vulnerable to coastal squeeze as a result of land-claim, coastal defence works, sea-level rise, and storm surges. Intertidal habitats are potentially affected by changes in sediment budget caused by dredging and coastal protection, construction of river training walls and flood defence works. The volume and quality of water entering The Wash is dependent on the use made of the surrounding rivers for water abstraction and agricultural and domestic effluents – such consents and licenses are managed under the provisions of the Habitats Regulations.

East Lindsey Local Plan Issues and Options 2021

34. East Lindsey District Council adopted its Local Plan in July 2018. Due to previous policies pursued in relation to flood risk on the East Lindsey coast, the Inspector determined, at the examination, that an early review of the Plan should take place. SP29 of the Plan sets out that the review be submitted for examination by April 2022 and the Issues and Options paper is the first part of that review.

35. The Issues and Options paper set out 15 potential options for growth over the remainder of the Plan period. However, the amount and precise location of any development coming forward through the individual options cannot be precisely known at this stage.

36. **Option C1** - have two distinct housing areas – one inland and one coastal

This option would result in the split between inland and coastal remaining. This would allow two separate approaches to be taken, which allows the special circumstances on the coast to be properly accounted for.

This scenario could be characterised by:

- 1) Housing dispersal could be different in inland and coastal areas;

- 2) A separate set of policies would support housing development on the coast, taking into account the issues faced there such as development costs and flood risk;
 - 3) A reduced amount of housing allocated inland due to the need to share this out across the coastal area as well.
37. **Option C2** – do not have a split and have a single housing strategy and set of policies that cover the whole District

This option would result in a single approach to housing across the whole District. This would lead to a single spatial strategy for the distribution of development.

This scenario could be characterised by:

- 1) A single strategy for housing across the whole District;
- 2) A single set of policies.

Split – Coastal Housing– if there is a split between coastal and inland, how will housing be distributed in the **coastal** areas?

The coastal area contains two towns – Mablethorpe and Skegness. In between these and either side to the north and south lie a host of other settlements. This includes large villages such as North Somercotes, Sutton on Sea, Chapel St Leonards and Ingoldmells. There are also a range of smaller villages and hamlets.

It is important to consider how the new housing development will be dispersed amongst them. There are a number of options of how we focus new development

38. **Option D1** – a strong focus on the main urban centres of Mablethorpe and Skegness, with restraint on housing elsewhere

This scenario provides a strong urban focus with rural restraint. This would have a tiered settlement hierarchy with urban extensions and strong rural restraint.

This would concentrate most development into the towns so as to build up the critical mass and subsequent economies of scale necessary to generate a wider range of community facilities, better public transport network, business and employment opportunities and wider retail offer. This could not only support their own populations but also spread benefits to the surrounding rural communities. The economies of scale could also help to spread out the costs of incorporating flood mitigation into development

If housing is to be built in settlements at risk of flooding as part of this scenario, there would be potential conflict with national policies that seek to locate new development away from areas of flood risk

In order to maximise these transferred benefits and to focus development into the towns, there would be strong restraints on non-essential development in the less sustainable villages and the countryside. The larger, more sustainable, villages could provide some housing and improved local services and facilities for a cluster of surrounding smaller villages. This scenario could be characterised by:

- 1) The majority of the Coastal housing allocation being directed to the two towns of Mablethorpe and Skegness;
- 2) Urban extensions on to greenfield sites;
- 3) 10% of the District's housing allocation being directed to the sustainable larger service villages;
- 4) Increased retail offer and viability in town centres;
- 5) Most affordable housing being provided in the towns with some "exceptions sites" in the larger villages;
- 6) Promotion of new employment opportunities in the towns;
- 7) Increased traffic in towns, especially in Skegness town centre and increased potential for more public transport provision;
- 8) Increased new housing and business development in the more sustainable villages (ie those with sufficient services and facilities to support themselves and surrounding smaller villages) sufficient to support their own service role and meet the needs of the smaller villages;
- 9) Only essential local-needs housing and employment opportunities essential to support the local rural economy in the less sustainable villages (ie those without sufficient services and facilities to support themselves);
- 10) Development in the countryside restricted to that which supports the local economy.

39. **Option D2** – Settlement Hierarchy led by the two main towns of Mablethorpe and Skegness

This would result in a settlement hierarchy led by two towns. This approach would consist of urban extensions to Mablethorpe and Skegness and some rural restraint.

Whilst promoting the most significant scale of development and growth opportunities in the two towns, this model would establish a hierarchy of sustainable settlements beneath where opportunities for development would be apportioned to the towns and larger and smaller villages, according to their status and role in the hierarchy.

For example, some 70% of the Coastal housing allocation could be directed to the two towns and 30% to the more sustainable villages. This should allow the larger villages to further develop their service role for supporting both themselves and their surrounding smaller communities. But it may also reduce the capacity-building capability of the towns to attract those larger, more specialised facilities and services that can spread benefits to the wider community.

This scenario could be characterised by:-

- 1) Significant urban extensions on to greenfield sites in and about Mablethorpe and Skegness;
- 2) Extensions to the two main towns' town centres and their retail offer;
- 3) Minor housing development in the large villages;
- 4) Development-led regeneration in Skegness and Mablethorpe;
- 5) Affordable housing focused primarily into the towns, with some exceptions in the more sustainable villages;
- 6) Increased new housing and business development in the more sustainable villages (i.e. those with sufficient services and facilities to support themselves and surrounding smaller villages) sufficient to support their own service role and meet the needs of the smaller villages;
- 7) Only essential local-needs housing and employment opportunities essential to support the local rural economy in the less sustainable villages (ie those without sufficient services and facilities to support themselves);
- 8) Development in the countryside restricted to that which supports the local economy.

40. **Option D3** – Unrestrained dispersal of development throughout all settlements in the coastal area

The scenario would result in a market-led approach. This scenario would allow development to occur in all settlements in response to market and community demand, and to be controlled primarily by Local Plan policies.

The District's housing allocation would be dispersed amongst the majority of settlements, including small villages in an attempt to restore their viability and vitality. This approach would challenge national sustainable development policies and an exceptional case would need to be presented to justify it.

This scenario could be characterised by:

- 1) The development of housing sites in smaller settlements where development has previously been restricted;
- 2) Speculative housing development in all villages;

- 3) Development in the countryside being restricted to satisfying essential need only;
- 4) Less developer interest in deprived areas with low values and returns; Settlement boundaries being set to limit housing development to within the District-wide allocation;
- 5) Strict phasing of development to prevent the housing allocation being "used up" too soon;
- 6) Increased reliance on the use of the car and the need for additional car parking in town centres;
- 7) Increased opportunities for small businesses in rural locations; Re-use of farm buildings for residential use;
- 8) Town centres being unlikely to expand;
- 9) Existing village facilities being retained.

It is likely that many villages would see considerable pressure for development and expansion whilst areas of particular need, be it for affordable housing, community facilities or employment opportunities may not be able to attract developer interest, particularly in the early stages. The allocation of housing land in the towns would be at much lower levels than at present and, consequently it is likely that there would be an increase of housing development in towns coming forwards as windfall development on greenfield and brownfield land.

More housing in villages where services are under threat could help to support and retain those services. It would allow local people the opportunity to stay in villages where they have family ties or grew up.

Less housing development in the towns could result in a failure to achieve the economies of scale necessary to attract the more specialist community facilities, variety of shopping or business start-ups that would serve the surrounding villages.

Housing in larger settlements would still trigger infrastructure payments such as towards Doctors surgeries and schools. However small-scale developments that were scattered throughout smaller villages would not trigger improvements such infrastructure.

41. **Option D4** – Restrained housing growth the meet natural population growth needs

This scenario would follow the similar path taken in the current Local Plan.

New market housing would be restricted to exception sites, for example as brownfield land, or as enabling development for affordable housing. No new allocations would be made in any of the coastal area. Whilst this would be compliant with national policy on flood risk, it has the potential

for social and economic decline if insufficient housing of suitable types and affordability come forwards from the existing commitments.

The projected housing need would be met by existing commitments that have already been approved in the coastal area.

This scenario could be characterised by:

- 1) Continued reduction in the number of existing permissions available. This will limit choice and likelihood of them coming forwards;
- 2) Limited new housing growth through market housing.
- 3) Affordable housing will still be provided;
- 4) Opportunities to promote growth through innovative housing types that mitigate flood risk;
- 5) Potential for speculative housing proposals being allowed on appeal due to the lack of allocated sites and difficulty demonstrating a 5 year supply.
- 6) Lack of strategy and influence over where new housing happens

42. **Option D5** – Creating a new town

This scenario would consist of a new settlement, possibly based on an existing village, developed to provide the role of a town. This radical option would probably stand up to scrutiny only if all other options struggled to provide enough housing. The main reason for this option is due to the challenges around dealing with high flood risk areas and may require some creative approaches.

This scenario could be characterised by:

- 1) Limited development in all other settlements, including the towns;
- 2) Re-prioritising the provision of infrastructure, including roads;
- 3) Re-assessment of the settlement hierarchy and the respective roles of the higher order settlements;
- 4) Accelerated inward population migration and relocation within the district, targeting the new town;
- 5) The opportunity for massive external investment;
- 6) Prolonged and continuous building programme in one locality;
- 7) The potential for new economies of scale to generate more specialised community services/facilities;
- 8) The potential to raise the national profile of the District;
- 9) A significant change to the local landscape;
- 10) The opportunity to invest in sustainable technologies and develop a prototype eco-town;

- 11) The provision of a higher proportion of affordable housing in new housing development in the new settlement;
- 12) Diversion of resources from other settlements.

Split – Inland Housing if there is a split between coastal and inland, how will housing be distributed in the **inland** areas?

The inland area contains 5 towns – Louth, Alford, Coningsby/Tattershall, Horncastle, and Spilsby. In between these and either side to the north and south lie a host of other settlements.

These towns are surrounded by a host of large, medium and small villages. These all contain a variety of services and facilities, but are generally reliant on the towns to fill in the gaps of that provision.

It is important to consider how the new housing development will be dispersed amongst them. There are a number of options of how we focus new development.

43. **Option E1** – a strong focus on the main urban centres of Louth, Alford, Spilsby and Horncastle, with restraint on housing elsewhere

This scenario provides a strong urban focus with rural restraint. This would have a tiered settlement hierarchy with urban extensions and strong rural restraint.

This would concentrate most development into the inland towns so as to build up the critical mass and subsequent economies of scale necessary to generate a wider range of community facilities, better public transport network, business and employment opportunities and wider retail offer. This could not only support their own populations but also spread benefits to the surrounding rural communities. The economies of scale could also help to spread out the costs of incorporating flood mitigation into development.

In order to maximise these transferred benefits and to focus development into the towns, there would be strong restraints on non-essential development in the less sustainable villages and the countryside. The larger, more sustainable, villages could provide some housing and improved local services and facilities for a cluster of surrounding smaller villages.

This scenario could be characterised by:

- 1) The majority of the inland housing allocation being directed to the four main towns of Louth, Alford, Spilsby and Horncastle.
- 2) Urban extensions on to greenfield sites;

- 3) 10% of the District's housing allocation being directed to the sustainable larger service villages;
- 4) Increased retail offer and viability in town centres;
- 5) Most affordable housing being provided in the towns with some "exceptions sites" in the larger villages;
- 6) Promotion of new employment opportunities in the towns;
- 7) Increased traffic in towns, but resulting in increased potential for more public transport provision from larger population;
- 8) Increased new housing and business development in the more sustainable villages (ie those with sufficient services and facilities to support themselves and surrounding smaller villages) sufficient to support their own service role and meet the needs of the smaller villages;
- 9) Only essential local-needs housing essential to support the local rural economy in the less sustainable villages (ie those without sufficient services and facilities to support themselves);
- 10) Development in the countryside restricted to that which supports the local economy.

44. **Option E2** - Settlement hierarchy led by the towns

This scenario would consist of a settlement hierarchy headed by the 5 towns of Louth, Alford, Coningsby/Tattershall, Horncastle, Spilsby. This would result in some urban extensions but less rural restraint than option E1.

Whilst promoting the most significant scale of development and growth opportunities in four towns, this model would establish a hierarchy of sustainable settlements beneath where opportunities for development would be apportioned to the towns and larger and smaller villages, according to their status and role in the hierarchy.

For example, some 70% of the District's housing allocation could be directed to the seven towns and 30% to the more sustainable villages. This should allow the larger villages to further develop their service role for supporting both themselves and their surrounding smaller communities. But it may also reduce the capacity-building capability of the towns to attract those larger, more specialised facilities and services that can spread benefits to the wider community.

This scenario could be characterised by:-

- 1) Significant urban extensions on to greenfield sites in and about Horncastle and Louth;
- 2) Extensions to the main towns' town centres and their retail offer;
- 3) Minor urban extensions to Alford and Coningsby/Tattershall (Spilsby already has an allocated urban extension);

- 4) Affordable housing focused primarily into the towns, with some exceptions in the more sustainable villages;
- 5) Increased new housing and business development in the more sustainable villages (i.e. those with sufficient services and facilities to support themselves and surrounding smaller villages) sufficient to support their own service role and meet the needs of the smaller villages;
- 6) Only essential local-needs housing and employment opportunities essential to support the local rural economy in the less sustainable villages (ie those without sufficient services and facilities to support themselves);
- 7) Development in the countryside restricted to that which supports the local economy.

45. **Option E3** – Unrestrained dispersal of development throughout all settlements in the inland area

The scenario would result in a market-led approach. This scenario would allow development to occur in all inland settlements in response to market and community demand, and to be controlled primarily by Local Plan policies.

The District's housing allocation would be dispersed amongst the majority of settlements, including small villages in an attempt to restore their viability and vitality. This approach would challenge national sustainable development policies and an exceptional case would need to be presented to justify it.

This scenario could be characterised by:

- 1) The development of housing sites in smaller settlements where development has previously been restricted;
- 2) Speculative housing development in all villages;
- 3) Development in the countryside being restricted to satisfying essential need only;
- 4) Less developer interest in deprived areas with low values and returns;
- 5) Strict phasing of development to prevent the housing allocation being "used up" too soon;
- 6) Increased reliance on the use of the car and the need for additional car parking in town centres;
- 7) Increased opportunities for small businesses in rural locations - Re-use of farm buildings for residential use;
- 8) More difficulty securing infrastructure improvements that are usually achieved through larger more strategic allocations;
- 9) Town centres being unlikely to expand;
- 10) More chance of existing village facilities being retained;

It is likely that many villages would see considerable pressure for development and expansion whilst areas of particular need, be it for affordable housing, community facilities or employment opportunities may not be able to attract developer interest, particularly in the early stages. The allocation of housing land in the towns would be at much lower levels than at present and, consequently it is likely that there would be an increase of housing development in towns coming forwards as windfall development on greenfield and brownfield land.

More housing in villages where services are under threat could help to support and retain those services. It would allow local people the opportunity to stay in villages where they have family ties or grew up. However increasing levels of housing growth could alter the character of those villages.

Less housing development in the towns could result in a failure to achieve the economies of scale necessary to attract the more specialist community facilities, variety of shopping or business start-ups that would serve the surrounding villages.

Housing in larger settlements would still trigger infrastructure payments such as towards Doctors surgeries and schools. However small-scale developments that were scattered throughout smaller villages would not trigger improvements such infrastructure.

46. **Option E4** - Creating a New Town

This scenario would consist of a new settlement, possibly based on an existing village, developed to provide the role of a town. This radical option would probably stand up to scrutiny only if all other options proved to be ineffective. The potential success of this scenario could be increased if the phased relocation of coastal communities under flood risk were to be pursued. Such a town would then need to be located in an inland area.

This scenario could be characterised by:

- 13) Limited development in all other settlements, including the towns; Re-prioritising the provision of infrastructure, including roads;
- 14) Re-assessment of the settlement hierarchy and the respective roles of the higher order settlements;
- 15) Accelerated inward population migration and relocation within the district, targeting the new town;
- 16) The opportunity for massive external investment; Prolonged and continuous building programme in one locality;
- 17) The potential for new economies of scale to generate more specialised community services/facilities;

- 18) The potential to raise the national profile of the District;
- 19) A significant change to the local landscape;
- 20) The opportunity to invest in sustainable technologies and develop a prototype eco-town;
- 21) The provision of a higher proportion of affordable housing in new housing development in the new settlement;
- 22) Diversion of resources from other settlements.

No Split – how will housing be distributed if there is a single housing strategy for the whole District?

The inland area contains 7 towns - Louth, Skegness, Alford, Coningsby/Tattershall, Horncastle, Mablethorpe/Sutton/Trusthorpe and Spilsby.

These towns are surrounded by a host of large, medium and small villages. These all contain a variety of services and facilities, but are generally reliant on the towns to fill in the gaps of that provision.

It is important to consider how the new housing development will be dispersed amongst them. There are a number of options of how we focus new development

47. **Option F1** – a strong focus on the main urban centres, with restraint on housing elsewhere.

This scenario provides a strong urban focus with rural restraint. This would have a tiered settlement hierarchy with urban extensions and strong rural restraint.

This would concentrate most development into the towns so as to build up the critical mass and subsequent economies of scale necessary to generate a wider range of community facilities, better public transport network, business and employment opportunities and wider retail offer that could not only support their own populations but also spread benefits to the surrounding rural communities.

If housing is to be built in settlements at risk of flooding as part of this scenario, there would be potential conflict with national policies that seek to locate new development away from areas of flood risk.

In order to maximise these transferred benefits and to focus development into the towns, there would be strong restraints on non-essential development in the less sustainable villages and the countryside. The larger, more sustainable, villages could provide some housing and improved local services and facilities for a cluster of surrounding smaller villages.

This scenario could be characterised by.

- 1) The majority of the housing allocation being directed to the towns of Louth, Alford, Coningsby/Tattershall, Horncastle, Spilsby, Mablethorpe/Sutton/Trusthorpe and Skegness;
- 2) Urban extensions on greenfield sites;
- 3) 10% of the District's housing allocation being directed to the sustainable larger service villages;
- 4) Increased retail offer and viability in town centres;
- 5) Most affordable housing being provided in the towns with some "exceptions sites" in the larger villages;
- 6) Promotion of new employment opportunities in the towns;
- 7) Increased traffic in towns, especially in Louth and Skegness town centres and increased potential for more public transport provision to access the towns;
- 8) Increased new housing and business development in the more sustainable villages (ie those with sufficient services and facilities to support themselves and surrounding smaller villages) sufficient to support their own service role and meet the needs of the smaller villages;
- 9) Only essential local-needs housing and employment opportunities essential to support the local rural economy in the less sustainable villages (ie those without sufficient services and facilities to support themselves);
- 10) Development in the countryside restricted to that which supports the local economy.

48. **Option F2** - Settlement hierarchy led by the towns

This scenario would consist of a settlement hierarchy headed by the 7 towns of Louth, Alford, Coningsby/Tattershall, Horncastle, Spilsby, Mablethorpe/Sutton/Trusthorpe and Skegness. This would result in some urban extensions but less rural restraint than option F1.

Whilst promoting the most significant scale of development and growth opportunities in four towns, this model would establish a hierarchy of sustainable settlements beneath where opportunities for development would be apportioned to the towns and larger and smaller villages, according to their status and role in the hierarchy.

For example, some 70% of the District's housing allocation could be directed to the seven towns and 30% to the more sustainable villages. This should allow the larger villages to further develop their service role for supporting both themselves and their surrounding smaller communities. But it may also reduce the capacity-building capability of the

towns to attract those larger, more specialised facilities and services that can spread benefits to the wider community.

This scenario could be characterised by:-

- 1) Significant urban extensions on to greenfield sites in and about Horncastle, Louth, Mablethorpe and Skegness;
- 2) Extensions to the four main towns' town centres and their retail offer;
- 3) Minor urban extensions to Alford and Coningsby/Tattershall (Spilsby already has an urban extension);
- 4) Development-led regeneration in Skegness and Mablethorpe;
- 5) Affordable housing focused primarily into the towns, with some exceptions in the more sustainable villages;
- 6) Increased new housing and business development in the more sustainable villages (i.e. those with sufficient services and facilities to support themselves and surrounding smaller villages) sufficient to support their own service role and meet the needs of the smaller villages;
- 7) Only essential local-needs housing and employment opportunities essential to support the local rural economy in the less sustainable villages (ie those without sufficient services and facilities to support themselves);
- 8) Development in the countryside restricted to that which supports the local economy.

49. **Option F3** - Settlement hierarchy with coastal regeneration

This model would reflect the settlement hierarchy approach of options F2 with the exception that accelerated growth be directed towards Mablethorpe and Skegness in order to combat the effects of deprivation and to kick-start the regeneration of the coastal strip.

This would marginally reduce the apportionment of growth opportunities to the other towns. Again, there would be potential conflict with national policies that seek to locate new development away from areas of flood risk.

This scenario could be characterised by:

- 1) Major new development-led regeneration in Skegness and Mablethorpe;

- 2) Increased flood risk alleviation and mitigation measures to accommodate residential development , especially in Mablethorpe;
- 3) Minor urban extensions to Louth, Horncastle, Alford, Spilsby and Coningsby/Tattershall;
- 4) Affordable housing focused primarily into the towns, with some exceptions in the more sustainable villages;
- 5) Increased new housing and business development in the more sustainable villages (ie those with sufficient services and facilities to support themselves and surrounding smaller villages) sufficient to support their own service role and meet the needs of the smaller villages.

50. **Option F4** – Unrestrained dispersal of development throughout all settlements

This scenario would allow development to occur in all settlements in response to market and community demand, and to be controlled primarily by the capacity of existing and planned infrastructure, development management policies and neighbourhood plans.

The District's allocation of housing would be dispersed amongst the majority of settlements, including small villages in an attempt to restore their viability and vitality. This approach would challenge national sustainable development policies and an exceptional case would need to be presented to justify it.

This scenario could be characterised by:

- 1) The development of housing sites in smaller settlements where development has previously been restricted to very small scale sites (up to 2 dwellings);
- 2) Speculative housing development in the all villages;
- 3) Development in the countryside being restricted to satisfying essential need only;
- 4) Less developer interest in deprived areas with low values and returns;
- 5) Strict phasing of development to prevent the housing allocation being "used up" too soon;
- 6) Increased reliance on the use of the car and the need for additional car parking in town centres;
- 7) Increased opportunities for small businesses in rural locations - Re-use of farm buildings for residential use;
- 8) Town centres being unlikely to expand;
- 9) Existing village facilities being retained.

It is likely that many villages would see considerable pressure for development and expansion whilst areas of particular need, be it for

affordable housing, community facilities or employment opportunities may not be able to attract developer interest, particularly in the early stages. The allocation of housing land in the towns would be at much lower levels than at present and, consequently most housing development in towns would come forwards as windfall development on greenfield and brownfield land.

More housing in villages where services are under threat could help to support and retain those services. It would allow local people the opportunity to stay in villages where they have family ties or grew up. However increasing levels of housing growth could alter the character of those villages.

Less housing development in the towns could result in a failure to achieve the economies of scale necessary to attract the more specialist community facilities, variety of shopping or business start-ups that would serve the surrounding villages.

Housing in larger settlements would still trigger infrastructure payments such as towards Doctors surgeries and schools. However small-scale developments that were scattered throughout smaller villages would not trigger improvements such as infrastructure, health and education.

51. **Option F5** - Creating a New Town

This scenario would consist of a new settlement, possibly based on an existing village, developed to provide the role of a town. This radical option would probably stand up to scrutiny only if all other options proved to be ineffective. But, it's potential could be increased if phased relocation of coastal communities under flood risk were to be pursued.

This scenario could be characterised by:-

- 1) Limited development in all other settlements, including the towns; Re-prioritising the provision of infrastructure, including roads;
- 2) Re-assessment of the settlement hierarchy and the respective roles of the higher order settlements;
- 3) Accelerated inward population migration and relocation within the district, targeting the new town;
- 4) The opportunity for massive external investment; Prolonged and continuous building programme in one locality;
- 5) The potential for new economies of scale to generate more specialised community services/facilities;
- 6) The potential to raise the national profile of the District;
- 7) A significant change to the local landscape;
- 8) The opportunity to invest in sustainable technologies and develop a prototype eco-town;

- 9) The provision of a higher proportion of affordable housing in new housing development in the new settlement;
- 10) Diversion of resources from other settlements.

Test of Likely Effects

Identify the potential effects on the European site

52. The HRA of the Local Plan identified the following issues as requiring consideration in assessing the likely effects of the Plan:

- Habitat Loss;
- Coastal Squeeze;
- Visual and Noise Disturbance;
- Physical Disturbance;
- Predation;
- Residential Disturbance;
- Water Resources;
- Water Quality; and
- Air Quality.

53. The impacts of the options have to be expressed in a manner that allows comparison. For consistency, the same reporting mechanism has been used as for the original Issues and Options HRA testing for the 2018 Local Plan. So the impacts are express in the following way:

Table 1

Those which can be said to certainly have a Likely Significant Effect (LSE)	Y
Those which are less certain to have LSE, but which have been included on the basis of their potential significant effect	P
Those which are not considered to have a likely significant effect	N

Options Assessment

Table 2

Option	Commentary	Likely Significant Effects
C1 – two distinct housing areas: inland and coastal	Having two distinct housing areas will lead to some increase in housing development coming forward on the Coast which was not assessed at the time of the 2018 Plan. The policy requirements will place some limitations on the amount of development coming forward, however, sites will be close to some of the areas protected at the highest level for biodiversity. The nature and degree of the impact will depend on the volume and location of development. There are likely to be effects on internationally protected sites, however, it is uncertain at this stage if they will be significant.	P
C2 – single housing strategy	A single housing strategy across the District means that there is likely to be a significant increase in housing development coming forward on the coast, which was not assessed in the 2018 Plan. Some of this coastal development will abut sites protected at the highest level for biodiversity, and the remainder of the development will be close to these sites. The nature and degree of the impact will depend on the volume and location of development and without appropriate mitigation, there is the potential for significant effects to take place.	P
Split		
D1 - strong focus Mablethorpe and Skegness, restraint on housing elsewhere	Focusing growth on Mablethorpe and Skegness is likely to lead to an increase in housing and other forms of development coming forward close to some of the sites protected at the highest level for biodiversity. The nature and degree of the impact will depend on the volume and location of development. However, if the entire focus of coastal development is on Mablethorpe and Skegness, which abut sites of international importance for biodiversity, it is likely that there will be significant impact without appropriate mitigation. Placing all the coastal development in these locations could create opportunities for habitat creation/ expansion, but this would have to form part of any mitigation and this has to be considered against any harm caused.	Y
D2 - Settlement Hierarchy led by the two main towns of Mablethorpe and Skegness	Establishing a hierarchy for the coast, albeit with a large focus on growth in Mablethorpe and Skegness, will spread pressure on the internationally designated sites across a larger area of coastline. Some of the settlements in the coastal area are inland from the protected sites and, although these still have potential to create impacts, they may reduce some of the direct	P

	impacts. How the growth is distributed will affect the degree of impact of development. Without knowing the volume of development and location of sites the effects cannot be quantified but they will be negative without suitable mitigation.	
D3 - Unrestrained dispersal of development throughout all settlements in the coastal area	Unlike situations where the location and scale of development is shaped by a strategy which has been assessed, if development is unrestrained, a large number of applications will be coming forward in an unplanned manner. Although each application will be judged against the biodiversity policy in the Plan, there will not be the opportunity to manage the cumulative effects of development on the protection sites along the coast.	P
D4 – Restrained housing growth to meet natural population growth needs	This option does not make any allocations for housing. Instead housing will brought forward through affordable housing, redevelopment of brownfield land and existing commitments. There is currently no indication of the amount of previously developed land or sites for affordable housing that may come forward under this option and any development would come forward in an unplanned way. Previously developed sites are more likely to come forward in the towns, due to historic development, but there is no certainty that this will happen. Similarly, with affordable housing as the numbers requiring such housing is likely to be in the towns and the economies of scale to provide it are more likely in larger settlements. However, this is not certain and the impacts on sites protected for their biodiversity importance are not know at this time.	P
D5 – New Town	The location of any possible New Town is currently unknown. The impacts will vary considerably dependent upon its scale and location: e.g. is the site previously used land or greenfield land, how close is it to any sites for protected for their biodiversity. However, the option would be introducing sufficient development to be deemed a town, within close proximity to international sites. There are likely to be impacts on biodiversity wherever such development is located, although the scale and degree of impact will vary between sites. Impacts could be mitigated though choice of site, net gain measures, creation of green infrastructure and other methods of mitigation, however, this has to be considered against any harm caused.	Y
E1 - strong focus on the main urban centres of Louth, Alford, Spilsby and Horncastle, with restraint on housing elsewhere	The four towns which would be the focus of development are located away from the internationally protected sites on the coast. Alford is the closest town at 8.3km; then Louth 12.8km, Spilsby 17km, and Horncastle 28.4km. Although there may be some impact from development in the form of increased numbers of people taking recreation on the coast from the inland development, this is unlikely to cause a significant effect. However, the effects would need assessing in so far as cumulative effects with the coastal option chosen.	P
E2 - Settlement hierarchy led by the towns	Similar to option E1, the focus of the majority of new development would be away from the internationally protected sites on the coast. However, some of the villages are closer to the coast than the towns and this includes large villages such as Grimoldby/Manby (8.5km) and	P

	Burgh le Marsh (5.8km), where growth will also be directed. This increases the potential for significant effects, especially when taken in combination with the growth that may come forward on the coast under options D1 – D4.	
E3 - Unrestrained dispersal of development throughout all settlements in the inland area	This option may have adverse cumulative effects in the longer term as development will not be coming forward as part of a strategy. Although each application will be judged against the biodiversity policy in the Plan, there will not be the opportunity to manage the cumulative effects of development. There are a number of villages, of varying size, close to the coastal area and they have the capability of adding to cumulative impact on the international sites on the coast.	P
E4 – New Town	Although the new town in this option would be sited outside of the coastal area, there is no indication of the possible location. It could be located on a site close to the coastal area or close enough to increase cumulative impacts on the internationally protected sites.	P
No Split		
F1 - strong focus on the main urban centres, restraint on housing elsewhere	This option will bring forward urban extension around the District's towns, including Mablethorpe and Skegness. These two towns abut sites protected at an international level for biodiversity. This is likely to have significant adverse effects without mitigation. The remaining towns which would be the focus of development are located away from the internationally protected sites on the coast. Alford is the closest town at 8.3km and then Louth 12.8km. Development in the nearby towns may contribute to cumulative impact on the coast but this needs further assessment.	Y
F2 - Settlement hierarchy led by the towns	Establishing a hierarchy for the District, albeit with focus on growth in the towns, will spread pressure on the internationally designated sites as development will not be so focused and will be distributed across some of the larger villages, and inland towns, as well as the coastal towns. How growth is distributed through this option will affect the impact of development. Without knowing the volume and location of development, the effects cannot be quantified but in all cases they are likely to be negative without mitigation; especially along the coast.	P
F3 - Settlement hierarchy with coastal regeneration	Very similar to option F1 but with more focus for growth in Mablethorpe and Skegness. This option may have increased adverse effects for the internationally designated sites; without significant mitigation. The extent and location of development under this option will be critical to outcomes. There would be opportunities for habitat creation/ expansion at a landscape scale with the economies of scale presented by urban extensions. However, this would have to form part of any mitigation and this has to be considered against any harm caused.	Y
F4 - Unrestrained dispersal of development throughout all settlements	Unlike situations where the location and scale of development is shaped by a strategy which has been assessed, if development is unrestrained, a large number of applications will be coming forward in an unplanned manner. Although each application will be judged against the biodiversity policy in the Plan, there will not be the opportunity to manage the cumulative	P

	effects of development on the protection sites along the coast.	
F5 – New Town	<p>The location of any potential New Town is currently unknown. The impacts will vary considerably dependent upon its scale and location: e.g. is the site previously used land or greenfield land, how close is it to any sites for protected for their biodiversity. However, the option would be introducing sufficient development to be deemed a town, and without information on the location, this could be in close proximity to internationally designated sites. Impacts could be mitigated though choice of site, net gain measures, creation of green infrastructure and other methods of mitigation, however, this has to be considered against any harm caused.</p>	P

54. The potential effects of the high level spatial options are largely uncertain at this early stage in the Local Plan's review, as details on the level of development and its location have not been determined. Therefore, the amount of land that could potentially be developed and its proximity to or links with internationally designated sites cannot be assessed with any certainty. The risk of significant effects may increase, or decrease, depending on the size and location of any development, especially in the coastal part of the district.

55. As a result, the options are largely identified as "Those which are less certain to have Likely Significant Effects, but which have been included on the basis of their potential significant effect", while the options that advocate a greater emphasis of development on the coast, D1, D4, F1 and F3 have been identified as "Those which can be said to certainly have a Likely Significant Effect".

56. The potential effects that could emerge as a result of the growth options include:

- Increased local population, potentially resulting in visual, noise or physical disturbance, damage or disruption to habitats and species as a result of increasing pressure for recreation space (including erosion/trampling);
- Predation by domestic cats on bird species;
- Coastal squeeze - whereby mudflats and saltmarsh habitats which form a gradual transition from open water to land become squeezed between rising sea levels and the presence of fixed coastal defences or other development;
- Increased emissions from transport, employment, tourism and housing, which could pollute land, air and/or water, which could affect designated sites;
- Increased demand for water abstraction and water treatment, which could affect designated sites or result in water pollution if there is insufficient capacity at sewage treatment works to accommodate growing demand;
- Changes in land use resulting in fragmentation of habitats and loss of connecting wildlife corridors;
- Increased levels of surface water runoff from new development which could lead to pollution at designated sites.

56. It is possible that potential significant effects on internationally designated sites could be mitigated through site selection, distribution of development and/or specific policies in the Plan. This will emerge as the review continues and further assessment is carried out of preferred options.

In combination Effects

57. The Habitats Regulations require the potential for 'in combination' effects are assessed to ensure that the integrity of sites is afforded full protection from the cumulative impacts of development and other policies. North-East Lincolnshire Council and Boston Borough Council and the two nearest planning authorities, also coastal authorities, immediately adjacent to East Lindsey. Between them, they largely encompass the same international sites as the East Lindsey coastline. The key policy documents of these authority are, respectively, the North East Lincolnshire Local Plan and South East Lincolnshire Local Plan. At this stage the policies contained within these documents have not been subject to detailed assessment as part of this HRA, but are identified as having potential to act in-combination. More detailed assessment will be undertaken as the appropriate assessment moves forward.

Next Steps

58. The Local Plan review is currently in its earliest stage and the spatial options are broad and have not yet been developed in detail. There is a lack of detail about the scale, design and site locations of any future development. Therefore, the likelihood of significant effects on internationally designated sites is difficult to predict with any degree of accuracy. As the options are developed further, future iterations of the HRA will be able to assess their likely effects with more certainty.

59. Using the 'precautionary principle' that lies at the heart of the HRA process, and the proximity of the internationally designated sites to potential development, no option can be assessed as "not considered to have a likely significant effect" and therefore all options being pursued will require further assessment.

60. This document will form part of the consultation on the Issues and Options paper and is subject to comment as part of that consultation. Once the responses to the consultation on the Issues and Options paper and accompanying documents have been received, they will be used to help inform the drawing up of the Council's Preferred Options. The HRA will also form part of this exercise. As new policies emerge, they will be subject to HRA, to try to seek the best balance for future planning policy strategy for East Lindsey. The final report will show how the assessment has been used to inform and influence policy choices and any mitigation that may have been introduced to ameliorate the potential impacts of the policies.