

Please accept the following comments on behalf of Lincolnshire County Council:

LCC does not support the prescriptive approach to car parking provision set out in Policies INF2 – INF4. These requirements for minimum standards do not offer flexibility for developments which seek to promote sustainable transport as set out in Policy INF1. For example, a residential development could include the use of car hire scheme which means that the minimum standards set out in Policy INF 2 are not necessary and compliance with Policy INF 2 would actually be conflicting with Policy INF 1.

LCC consider that parking ratios should be provided as guidance, but that each application should be considered on its own merits as to whether it meets Policy INF1 in promoting sustainable modes.

Policy INF5 and Policy INF 6 are also considered inappropriate. For example, Policy INF 5 would require a new pub in Skegness of 300 sq m to have 42 car parking spaces, and if these could not be provided on site, then undertake surveys and demonstrate available space on street. Pubs should not be required to cater for large numbers of visitors by car in town centre location, these Policies seem flawed in terms of transport safety and sustainable targets. The use of the Lambeth Parking Survey methodology is not considered appropriate to a Lincolnshire tourist seaside town, this methodology suggests surveys should be done outside of holidays, however in Skegness most of the high vehicle and parking demand occurs in the Summer tourist holiday period.

LCC notes that allocation NDP3 – Land North of Wainfleet Road is proposed for Park and Ride or Employment use in the Plan. It is our understanding that this site is being separately promoted for the Skegness Gateway development, supported by ELDC, for housing. There would appear to be a conflict here.

From an access perspective, whilst there is a brief mention for ensuring that there are access links to the wider countryside and the protection of specific assets such as Vine Walk, Coronation Walk, Croft Walk and King George V walk) there is no mention of the need to protect the existing recorded rights of way should there be development proposals affecting them, nor any mention of the opportunity of new routes linking potential gateway development sites to the wider countryside or to the town centre and Foreshore.

It is also slightly disappointing to note that there is no mention at all of the opportunities the National Trail (England Coast Path) may bring in terms of visitors to the town.

Links to the Wolds and Gibraltar Point are discussed but there is no mention of the Coastal

Country Park and future National Trust Facility within reasonable distance at Sandilands (Sutton on Sea) / Chapel St Leonards

There is also no mention of the potential for Biodiversity Net Gain as part of development proposals at Gateway sites to ensure that this is enhanced in the area.

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