

INDEPENDENT EXAMINATION OF THE SKEGNESS NEIGHBOURHOOD DEVELOPMENT PLAN

INDEPENDENT EXAMINER:
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To East Lindsey District Council and Skegness Town Council

By email to Simon Milson, Planning Policy and Research Service Manager, East Lindsey District Council, and Steve Larnar, Clerk, Skegness Town Council. Copy to Alex Murphy, Senior Planning Policy Officer, East Lindsey District Council

Dated 14 July 2022

Dear Steve and Simon

Skegness Neighbourhood Development Plan Independent Examination – Examiner Letter Seeking Clarification of Matters

Further to my initial letter of 30 June 2022 I am writing to seek clarification of the following matters:

Regulation 16 Representation

1. The representation of Lincolnshire County Council which is undated and which carries the subject heading “Reg 14 Consultation” appears to include content that is not relevant to the Submission Version Neighbourhood Plan. Please confirm the date this representation was received by the District Council?

Policy E3

2. Please direct me to the evidence that supports the adoption of the “at least six month” advertising period in bullet point one.

Policy V1

3. Please explain the meaning of the term “support the coherent use of spaces”

Policy V2

4. Please direct me to the evidence that supports the adoption of the “a minimum period of 6 months” advertising period in part b.
5. In the final paragraph of the policy the term “contribute towards” is imprecise and could be satisfied by for example one dwelling. I am mindful to recommend a modification to insert the word “significant” which, although also imprecise, does provide an indication to an applicant that a contribution should not be minimal. I invite comment on my intended approach.

Policy V3

6. In both the first part b, and the second part b, is the reference to opportunities for views of the beach and the sea, or opportunities for use?
7. Part e may represent a burdensome obligation on an applicant for a relatively small-scale proposal. I am mindful to recommend deletion of the words “will be necessary to demonstrate that the proposed development would”. This would have the implication that the Local Planning Authority would need to take a view on the issue, however, this would not prevent an applicant seeking to influence the Local Planning Authority decision by voluntarily providing supporting analysis and information.

Policy TC3

8. The term “trade-out space” is a term that may not be familiar to some readers of the Neighbourhood Plan. Please provide brief explanatory text that can be inserted either in the policy itself, or in supporting text.

Policies INF2 – INF9

9. Paragraph 9.5 of the Neighbourhood Plan states the parking standards reflect evidence-led local circumstances. I have read the Parking Standards Background Report dated April 2020 which includes both relevant general information in parts 1-3, and proposed parking standards that are very precise in part 4, for example 1 space per 20 sqm retail (non-food). The transition from general information to precise standards is not explained. Could you please direct me to the existing evidence that concludes each of the precise parking standards proposed in Policies INF2 to INF9 are necessary in terms of evidence-led local circumstances.
10. Policies INF2 and INF3 appear to relate to new built development and not changes of use. Please confirm this is the intention. Is it intended Policy INF5 should also be limited to new built development?
11. Paragraph 4.3 of the Parking Standards - Background Report states parking provisions may be requested additional to the standards, and paragraph 4.4 of that document states that, if appropriate evidence is produced, lower parking provisions may be accepted. Policies INF2, INF4, INF5 each have a final paragraph that includes provision for an applicant to submit evidence to demonstrate that a level of parking provision below the minimum standards is adequate. In the case of a relatively minor proposal, for example, for a new two-bedroom house with one parking space, or for a new small-scale non-food shop with no parking space, what evidence is it envisaged must be produced by an applicant? The requirements of Policy INF6 appear to also apply in respect of proposals within the scope of Policies INF4 and INF5 that do not meet the stated standards? In the case of the examples I query, that is, a new single two-bedroom house or a new small-scale non-food shop what is the anticipated geographical and temporal coverage of a required parking survey?
12. Paragraph 113 of the National Planning Policy Framework refers to Transport Assessments in the context of all developments that will generate significant amounts of movement. Please explain how the requirements for Transport

Assessments referred to in the Neighbourhood Plan have sufficient regard for national policy in this respect.

Policy H3

13. Please define “comfortable walking distance”

Policy C1

14. Is the reference in part b. to road safety or personal safety, or both?

Policy D1

15. Please explain the term “positively contribute towards enhancing legibility and wayfinding”

16. Please explain the term “intended views”

Allocation NDP3

17. The allocation states employment use. This includes general industrial uses and open-air storage uses that may well be inappropriate on the site which has residential properties in close proximity. I am mindful to recommend a modification to limit employment uses to Use Class E(g) which by definition can be carried out in a residential area without detriment to its amenity. I invite comment on this intention.

I request any response to these matters is agreed as a joint response of the Town and District Councils wherever possible. This request for clarification and any response should be published on the District Council website.

In order to maintain the momentum of the Independent Examination I would be grateful if any reply could be sent to me by 12.00 Noon on Thursday 28 July 2022.

For the avoidance of doubt recommendations of modification of the Neighbourhood Plan that may be contained in my report of Independent Examination will not be limited to those matters in respect of which I have requested clarification.

I should be grateful if the District Council and the Town Council could acknowledge receipt of this email.

Best regards

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