

## East Lindsay Core Strategy Examination

### Stage 2 Settlement Proposals DPD & Housing Land Supply Hearing Sessions

#### Matter 4 : Individual Settlement Proposals

Submission on behalf of Metacre Ltd

8<sup>th</sup> September 2017

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1. This submission is made for and on behalf of Metacre Ltd concerning Matter 4 (Individual Settlement Proposals). The submission is made with respect to the Examination in Public (EiP) revised *Inspector's Matters, Issues and Questions* (14<sup>th</sup> August 2017).

#### Question 2 : Burgh Le Marsh

2. As expanded upon in submissions on Stage 2 Matter 2, in addition to having a negative impact on sustainability objectives 2 (Landscape) and 6 (PDL / agricultural land), which is common across a lot of allocations, BLM310 and BLM320 are also identified in the SA as having negative impacts on biodiversity, access to key services and facilities, inclusive safe and vibrant communities, facilities for healthy lifestyles and minimising the effect on climate change. It is particularly noted that the SA refers to BLM320 as having a negative impact on the nature conservation value of a Local Wildlife Site and being detached from other development, with there being no footway or street lighting and little possibility of providing them. Similarly BLM310 is referred to as possessing sufficient interest to meet the criteria for a Local Wildlife Site, having no footpath or street lighting connecting the site to the village and it not being clear if a footpath can be connected as it would appear to have to cross private land. As expanded upon in Matter 2, it questioned why these are considered more sustainable than alternative options at Louth especially considering that the allocations at Burgh le Marsh result in growth 10% higher than its target.

### Questions 6 & 7 - Hogsthorpe

3. When considering whether sufficient infrastructure exists to serve the allocations it is relevant to note that the two allocations at Hogsthorpe result in the supply exceeding the target by 29%. Furthermore, both sites are located in the Flood Risk Zone and the SA confirms that they are partly in the orange zone of the flood hazard maps. Given NPPG paragraphs 100 and 101, together with the fact that Hogsthorpe only scores 64 points on the village facilities survey, it is questioned whether too much housing is being allocated at this village.

### Questions 12 and 13: Louth

4. Whilst the committed sites, allocated sites and any future windfall sites have / may make financial contributions towards education provision, it is understood that the education authority require land for the erection of a new primary school. Moreover they have confirmed in the consultation response to Metacre's planning application for LO306 that the preference is for this to be in the north of the settlement as this would be more sustainable given the existing facilities are heavily located in the south of Louth. The Settlement Proposals document currently makes no provision for a new primary school. The proposed allocation of site LO306 would not only enable the Education Authority to deliver this school at an early stage (it would be sited adjacent to the proposed southern site access), but due to the scale of the development a whole the residential element would naturally be phased over the plan period. It would however still contribute to the five year supply.
5. With regards to allocated gypsy and traveller site C at Louth, as set out in previous submissions, the fact that this site has not been brought forward in the 6 years since it was granted permission suggests that the site is not deliverable or suitable.

### Questions 15 and 16 – Mareham Le Fen

6. When considering whether sufficient infrastructure exists to serve the allocations it is relevant to note that the four allocations at Mareham Le Fen result in the supply exceeding the target by 59% (an additional 58 dwellings). Furthermore, the SA states that allocation MLF303 (43 dwellings) would have a negative impact on

the economy due to the loss of a current business use and has no prospect of the provision of a footpath and therefore the closeness of the site to services is negated by the lack of connectivity. It is therefore considered too much land is allocated at the village, particularly given it only scores 58 on the Village Facilities Survey and the availability of more sustainable sites such as LO306 at Louth.

#### Questions 17 to 19 - Marschapel

7. As expanded upon in submissions relating to Matter 2, bearing in mind the flood risk constraints and impacts on other sustainability objectives, it is questioned why the Council consider it sustainable to allocate housing at such a scale that this village exceeds its target supply by 21%. This is especially the case bearing in mind NPPF paragraphs 100 and 101, the village only scoring 67 on the village facilities survey and the availability of more sustainable sites at Louth.

#### Question 20 – North Thoresby

8. When considering the impact on heritage assets, it is relevant to note that the allocations at North Thoresby result in the supply exceeding the target by 63% (an additional 65 dwellings). This is despite the village only scoring 80 in the Village Facilities Survey and there being more sustainable sites available such as LO306 at Louth. Bearing in mind the SA also refers to NTH308 (130 dwellings) as potentially impacting on the historic Wolds/Marsh setting, having a significant impact on the view from the west towards the village and the site being some way from the centre of the village with safe pedestrian access being difficult, it is considered that too much housing is being allocated.

#### Questions 22 to 26 - Sibsey

9. It is relevant to note that the allocations at Sibsey result in the supply exceeding the target by 28% (an additional 56 dwellings). This is despite the village only scoring 67 in the Village Facilities Survey and there being more sustainable sites available such as LO306 at Louth. The SA also refers to SIB303 (200 dwellings) as having a negative impact on sustainability objective 2, being very visible in views into the village and having a “*significant impact on the setting*” of the Listed Sibsey House. It is therefore considered that too much housing is being allocated at the village.

### Questions 27 to 28 - Spilsby

10. In terms of the housing target for Spilsby, the evidence provided by the Council to Stage 1 Matter 6 included a table identifying the target as 301 dwellings. This was based on its household percentage (4.9%) times the target for the Inland Towns and Villages. However this table was out-of-date as it was based on the original Plan requirement of 7,768 dwellings rather than the updated requirement of 8,175 dwellings. Appendix 2 of Metacre's response to Stage 2 Matter 2 contains an updated table which shows that the target, based on the Council's methodology, would be 321 dwellings.
11. In terms of the amount of housing being directed to Spilsby the Council's Core Strategy, SPD and evidence base is somewhat unclear. Despite originally showing a number of individual allocations the Council's suggested amendments now appear to refer to the allocation on the eastern boundary simply as SPY310. However, despite this clearly being a development intended to deliver over 600 dwellings the Council only show its capacity as 390 dwellings on the grounds that this is the amount of development anticipated to come forward in the Plan period. It is considered that if the entire site is being allocated as is clearly the case then the full extent of the development should be referred to (600+ dwellings) and the sustainability appraisal should be based on the full extent of the development. The Plan can then clarify what proportion of the development is anticipated to come forward during the plan period.
12. In addition to this allocation there is separate allocation SPY302 (35 dwellings) which together with 73 existing commitments equates to a total supply of 708 dwellings. This means the supply being directed to the town is over twice its target of 321, with 387 more houses being allocated than required. To put this into context Louth, which is by far the most sustainable town in the District, is only receiving 104 dwellings more than its target (a 6% increase).
13. There is no clear and robust justification for why such a scale of allocation at Spilsby is considered more sustainable than alternative sites such as Metacre's LO306 at Louth. Firstly, neither the SPD nor Sustainability Appraisal actually assess the proposed 600+ dwelling allocation in its entirety. They instead consider sites SPY301, 303, 304, 305 and 306 individually and do not assess former

SPY310. This is despite acknowledging that if all the sites are developed, which is clearly the intention, there would be a potentially greater cumulative impact in respect of Landscape.

14. The allocated sites are identified in the SA as having the same negative impacts on the same sustainability objectives as LO306, but unlike LO306 it is noted that all of the Spilsby sites are designated in the adopted Local Plan as Areas of Great Landscape Value. With regards to this designation the Local Plan states that *“Whilst they are of lesser designated importance than AONBs, in the case of East Lindsey, they are landscapes whose significance and appearance often matches that of their neighbouring AONB. Together, they form a composite area of great landscape importance”* Whilst the Council may not be carrying this designation forward into the Core Strategy this land was clearly considered at some point to be of great landscape importance, which was not the case for site LO306. This is not reflected in the SA which makes limited comments on landscape impact other than accepting that there would be a negative impact.
15. Furthermore, the separate allocation SPY302 is also designated in the adopted Local Plan as protected open space subject to policy ENV20 ‘Protection of Habitats’ and where the SA acknowledges the potential of development to impact on species using the adjoining wildlife corridors.
16. As expanded upon in the submissions to Matter 2, it is considered that there is no transparent and robust justification for allocating such a large amount of housing to Spilsby when there are more sustainable locations such as LO306 at Louth.
17. It is also considered that the amount of housing anticipated to come from site SPY310 during the plan period is too high. The Council’s housing trajectory suggests that this site will start delivering housing by the start of the year 2018/19, i.e. in just 6 months time. This is unrealistic bearing in mind that an application has yet to even be submitted.