

North Somercotes Parish Council

Examination of the East Lindsey Core Strategy and the East Lindsey Settlement Proposals Development Plan Inspector's Matters, Issues and Questions (MIQs) Stage 2 – Settlement Proposals DPD **and housing land supply**

Matter 1 – Structure of the Plan

Issue: *With its proposed content and structure, will the plan be effective in delivering the development required by the Core Strategy?*

Q2. *The DPD provides specific details of each of the housing sites proposed to be allocated, but no such detail is provided for any other type of allocation e.g. employment, Gypsy & Traveller; retail. Why is this? Should similar referencing and details be provided for these other types of allocation?*

PARISH COUNCIL RESPONSE:

A2. The Parish Council maintain that there is insufficient attention being given to the housing, employment and retail requirements of the National Planning Policy Framework (NPPF) as a whole for this settlement, and that too much concentration is being given to the single environmental issue of flood risk, at the expense and exclusion of the equally important social and economic issues. The Ministerial Foreword in the NPPF clearly states the following:

'Sustainable means ensuring that better lives for ourselves doesn't mean worse lives for future generations... Development means growth. We must house a rising population, which is living longer and wants to make new choices.' 'So sustainable development is about positive growth - making economic, environmental and social progress for this and future generations... The planning system is about making this happen'

Q3. *What is the status and purpose of the text in the analysis tables for each settlement? Is the text intended to be prescriptive, or is it for guidance? Should this be clarified by providing distinct "policies" and "supporting text/reasoned justification"? (Note that some of the text needs redrafting for clarity e.g. infrastructure section of analysis table for SIB303 in Sibsey). What is the purpose of the tables for the settlements in which no allocations are proposed e.g. Binbrook, Huttoft, Partney, Tetford, and some of the coastal settlements? If the tables are necessary for these settlements, why are they not also necessary for the medium and small villages?*

PARISH COUNCIL RESPONSE

A3. The Parish Council firmly believes that all settlements within East Lindsey regardless of size or location, should be listed, showing full details of all extant allocations or permissions being relied upon, as well as proposed allocations, including those settlements with no allocations. This will ensure that the Local Plan illustrates the complete picture for the District, for all settlements regardless of size - otherwise this information will not be adequately captured in one easily accessible document. It would be a serious omission if this comprehensive set of information was not readily available to reference in the Local Plan document.

Q4. *Paragraph 2.9 of the document explains why no housing allocations are proposed in Binbrook and Tetford (AONB), but not why none are proposed in Horncastle, Huttoft and Partney. Is the approach in these latter towns justified and, for clarity and completeness, should the paragraph be amended to explain it?*

PARISH COUNCIL RESPONSE

A4. As noted in 3 above, the Parish Council believes that a full explanation and details for all East Lindsey settlements, including those which do not have proposed allocations in the current plan and the reasons for this, should be included for completeness and so that this information is available in one comprehensive and fully explained document.

North Somercotes Parish Council

Matter 2 – Site Selection

Issue: Have the sites proposed to be allocated in the plan, particularly for housing and Gypsy & Traveller accommodation, been chosen on the basis of a robust assessment process?

Q2. Are the sites selected for housing and gypsy and traveller accommodation justified when compared to other reasonable alternatives? The Council should prepare a summary of the site selection process for each type of development. This should include:

¶¶How have the results of Sustainability Appraisal and infrastructure planning been taken into account?

PARISH COUNCIL RESPONSE

A2. The Parish Council are concerned that the apparent failure to undertake a sustainability and infrastructure analysis and to consider the specific needs of this community may constitute a material legal error. What evidence has been provided for the examination that has taken place to establish what North Somercotes' specific community housing, infrastructure and other needs are in the context of the Local Plan?

The needs of this community may be different to those of the wider district, and by simply classing this area as 'coastal' on the basis of some only recently disclosed criteria which the Parish Council had not previously seen and does not agree are reasonable, or correctly applied, without any prior analysis of the settlements sustainability and infrastructure requirements, would appear to be unsound. For example, the official Emergency Exit routes for this community are exactly the same official Emergency route as for those residing in Grainthorpe.

In any event, it is also far more likely that evacuees would go directly and immediately away from the coast via South Somercotes into Louth on a County Council Highways maintained gritting route which is also the main access road into Louth for this community and others nearby. This unofficial but more direct Emergency route would be quicker than evacuation from or via Grainthorpe, which would use roads closer to, and running parallel with, the coast and at exactly the same risk of flooding as land around North Somercotes. The land around Grainthorpe is far lower than the protective 5-12m higher land area of the Warren Woods which North Somercotes benefits from, and which would provide a significant barrier to encroaching water.

A close examination of the large scale maps now provided at ED027 and ED028 amply demonstrate these facts, and the Parish Council can see no objective reason for allowing housing allocations for Grainthorpe, or indeed Marshchapel on Flood Zone 3, when North Somercotes as a sustainable service village clearly has a demonstrable need for housing allocation and near identical parameters to those settlements being allowed housing which have far less sustainable infrastructure.

Because no sustainability appraisal and infrastructure assessment have been carried out for North Somercotes, no objective exercise has been undertaken in deciding whether the need for housing development on land within North Somercotes has an exceptional reason to overrule the Local Plan's proposed prohibition on development owing to flood risk in some 'coastal' areas; the basis for selection of which is still disputed by the Parish Council.

As such, the Parish Council vigorously challenges what it sees as the District Council's apparent disregard for firstly considering the social and economic needs of this local community and then considering the flood risk issues. The current approach of looking only at the flood risk issue and not considering first the wider requirements of maintaining a sustainable settlement results in a failure to properly take into account the full requirements of the NPPF as a whole.

North Somercotes Parish Council

Matter 3a – Housing Land Supply

Issue: Will the Core Strategy and Settlement Proposals DPD deliver the housing requirement for 2017 to 2031 (including for affordable housing) for the period 2017 to 2031? Do the plans meet the requirements of paragraph 47 of the NPPF in respect of housing delivery?; and paragraph 10 of the Planning Policy for Traveller Sites (PPTS) in respect of delivering the relevant development?

*In responding to the questions below, please have regard to the questions and answers for the Stage 1 Core Strategy, Matter 8. These concern what the five year supply requirement should be. Please also have regard to the Council's revised evidence on housing supply available as documents ED016 to ED033. **CHECK DOC NOS.***

Total Housing Supply for the plan period

1. Will the policies in both plans ensure that the overall housing requirement for 2017 to 2031 can be met, taking into account under-delivery since 2011?

What is the supply from coastal commitments, inland commitments and allocations as of 2017? Is there likely to be any supply from 'windfall' development, including for example through policies SP3 5 and SP4?

Q2. Is the supply of housing sufficient in both the inland and coastal areas to meet relevant plan targets?

PARISH COUNCIL RESPONSE

A2. Deliverable analysis of the five-year supply for North Somercotes according to ELDC is 42. The Parish Council's analysis of the position for current allocations and windfall permissions for North Somercotes is actually 11, as shown in Appendix A. Of the 42 which ELDC count as deliverable, only 25 maximum and not 33 have been agreed with the developer of the Sycamores site (incorrectly referred to as Woolpack); this would make 33 not 42. A further 4 will be lost from the Exchange Filling Station site which is now going forward as a retail development for the Cooperative (Manchester), so making 29. The developer of the Sycamores is currently undertaking projects elsewhere and whilst he intends to bring forward some housing on the Sycamores site, this is dependant on completion of projects elsewhere. Its inclusion in the 5 year supply should almost certainly not be 33 as stated.

The Parish Council's figure of 11 includes its own development of 6, which may not come forward in the next 5 years if the tender process and funding are delayed, so a worst-case scenario could be 5.

Q3. Should the shortfall in housing delivery between 2011 and 2017 be recovered over the next 5 years ('Sedgefield') or over the remaining plan lifetime ('Liverpool')?

PARISH COUNCIL RESPONSE

A3. The Parish Council believe that the shortfall should be recovered in the next 5 years, since there is an historic pattern of undersupply which will only be exacerbated if the recovery period is extended beyond the 5 years preferred by the Parish Council.

Five year supply of housing sites

Q5. No housing allocations are proposed to be made in Horncastle, Huttoft and Partney due to the number of existing commitments being adequate to meet the requirement. Should the maps for these settlements show the commitments to be relied upon (as appears to have been done in the coastal settlements)? Are these commitments listed somewhere? Would there be any benefit in allocating some or all of these sites in the plan?

North Somercotes Parish Council

PARISH COUNCIL RESPONSE

A5. As noted above, all settlements should be listed with a detailed analysis of existing commitments being relied upon, and any – or none – proposed allocations. In this way there will be one comprehensive single source of information for all settlements in East Lindsey going forward.

Supply of affordable housing

1. The Core Strategy sets a requirement for 2825 affordable dwellings to be delivered in the period 2016-2031. How many affordable dwellings will the plan deliver in this period against this requirement and from what sources?

As previously commented upon, the requirement to offer brownfield coastal sites for affordable housing prior to being able to consider it for market housing would be at odds with other policy statements whereby owing to deprivation on the coast, no affordable housing contribution is required. The costs of remedial work, in most if not all instances, for brownfield land will simply mean that such sites are not put forward by the land owners in the first place.

Matter 4 – Individual Settlement Proposals

Issue: Are the proposals for individual settlements, including certain specific sites, justified, effective and consistent with national policy?

COASTAL SETTLEMENTS (no Table A housing allocations)

PARISH COUNCIL RESPONSE

It is entirely possible and feasible to avoid flood risk for buildings in an area which has never flooded, but which may be in the future likely to flood, by building above the flood level and/or preventing floodwater from reaching the building by design of the site layout.

As long ago as May 2007, a Government Consortium led by the Department for Communities and Local Government and working with DEFRA produced a report called “Improving the flood performance of new buildings - Flood resilient construction. An extract from the Foreword (see Appendix B) clearly states:

“... Although planning policy avoids inappropriate new development in flood risk areas and directs development away from areas at highest risk, in order to maintain service or sustain communities, some development will be necessary in places that may flood. Planning deals with where to build. This guide explains how to build and describes how buildings should be constructed in order to minimise flood damage, as part of a package including flood awareness, warning and emergency planning.

This guide is the latest output in a series of information on flooding that has been published over the last 10 years, starting before the floods of autumn 2000. However, this project is different from earlier works in the UK and internationally in that it actually tested materials and assemblies in a hydraulics laboratory and subjected them to flooding for several days.

It is not always possible to provide defences to keep floodwater away from buildings and infrastructure, because they may not be the best option for people, wildlife or economically, and may increase flooding elsewhere. Increased demand for housing and limited available space means that in future it may be inevitable that properties will be built on sites that have some risk of flooding even after measures have been taken to reduce the risk. It is therefore important that these buildings are designed to be resistant or resilient to flooding.”

The document also states that departures from the sequential approach (the “Exception Test”) are only justified where it is necessary to meet the wider aim of sustainable development. The Parish

North Somercotes Parish Council

Council contends that such a departure is clearly called for in the case of market housing for North Somercotes, and that a proper appraisal of the community's sustainability needs and infrastructure must be undertaken to inform the housing and other needs in accordance with the requirements of both a sound Local Plan and the NPPF.

Furthermore, this publication (c.100 pages) and its very detailed advice on managing Residual Flood Risk (where defences do exist there is always a possibility that they will fail or be overtapped by severe flood (referred to as Residual risk)) which has been based on rigorous testing has been available now for some 10 years. Therefore, on what basis is a further period of 5 years being advocated in the Plan by ELDC to enable talks to take place with the Environment Agency on how to provide flood resilient/resistant housing along the coast; especially when the Parish Council have been consistently requesting and arguing the case for such housing, particularly for those with a local live/work connection, since 2012?

The report states that while Government policies in no way advocate the building of dwellings in flood risk areas, increased demand for housing and limited available space means that in future it may be inevitable that some properties will be built on sites where the residual risk is greater than elsewhere. The report goes on to detail the various measures to make sure that such buildings are designed to be more resistant and resilient to flooding to take account of this risk. ELDC have stated that social housing would be allowed, and built to these requirements and there is therefore no reasonable grounds for refusing market housing. This community has a right to continue to benefit both socially and economically, as well as environmentally, by the provision of safer, high quality homes in full accordance with the NPPF.

Our retained fire service is already struggling to recruit (village Communication Magazine recruitment advert July 2017 ("*The station is recruiting on call firefighters; the station is getting very short of cover and in order to maintain fire cover in your immediate area we need to recruit more fire fighters. You need to live or work within 5 minutes response time of the station (on Churchill Road), be over 18 years and of moderate fitness levels....*").). The parish council has a reasonable expectation that market housing aimed at the younger aged professionally active demographic should be allowed to ensure the future viability and sustainability of the settlement and its facilities and services.

With this in mind, if the District Council is going to maintain that there is already sufficient housing allocation for the future needs of North Somercotes in the proposed Local Plan, then the detailed analysis which has been undertaken of the housing numbers and infrastructure required, and how this need will be met, should be set out in detail. An examination can then be made of how the housing need number is arrived at for the settlement, and how this compares to the current housing allocation numbers which ELDC is relying upon to deliver the identified requirement. This is to ensure both accuracy and transparency and so that everyone in this community can have access to this information.

This is particularly important as the Parish Council is still unable to reconcile the figures presented by the District Council for this community, and all members of this community want to know what housing is in the plan to meet the identified needs, and see the corresponding allocation of how this identified need will be met.



Mr Stephen Brooks – Chairman
North Somercotes Parish Council

North Somercotes Parish Council

Appendix A – Parish Council Analysis of North Somercotes extant commitments

See separate Spreadsheet

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Appendix B – Improving the Flood Performance of New Buildings - May 2007



Improving the Flood Performance of New Buildings

Flood Resilient Construction



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Foreword

We are pleased to announce the publication of **Improving the flood performance of new buildings – Flood resilient construction**. This is the outcome of a joint research project between Communities and Local Government and the Environment Agency and has strong links to the Government's strategy for managing flood risk "Making space for water" that is co-ordinated by the Department for the Environment, Food and Rural Affairs. It is a true demonstration of joined-up Government on an important subject.

Flooding from rivers and coastal water or as a result of intense rainfall is a natural process that plays an important role in the shaping of the natural environment. However, flooding threatens life and causes substantial damage to property. Climate change over the next few decades is likely to mean milder wetter winters and hotter drier summers in the UK whilst sea levels will continue to rise. These factors will lead to increased and new risks of flooding within the lifetime of planned development.

Although planning policy avoids inappropriate new development in flood risk areas and directs development away from areas at highest risk, in order to maintain service or sustain communities, some development will be necessary in places that may flood. Planning deals with where to build. This guide explains how to build and describes how buildings should be constructed in order to minimise flood damage, as part of a package including flood awareness, warning and emergency planning.

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Most homes are intended to last over 60 years; many will still be here in a hundred years. In that time it is expected that there will be real changes in the climate that will affect the water environment and increase flood risk. Resilient construction is therefore an important area for investment and one which we hope designers, developers, planners and building control bodies will treat with the seriousness it deserves. Furthermore, this form of construction is one of the adaptation strategies discussed in the Stern Review.

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