

Pre-Consultation Comments from East Lindsey District Council (ELDC)

The following comments were received from planning officers at ELDC shortly prior to the draft Neighbourhood Plan being published for Regulation 14 consultation.

In order to avoid delaying the consultation, these comments will be addressed by the Town Council alongside other comments received when the Regulation 14 consultation has concluded and prior to the final Neighbourhood Plan being submitted to the Local Planning Authority for examination. These comments are published below for transparency.

Plan Section (if relevant)	Comment Summary
References to affordable housing	One area I would draw your attention to however is the need to include reference to the newly introduced First Homes, unfortunately the plan does not fall under the current transitional arrangements and as it makes reference to affordable housing sites it will need to reference the fact that on sites at least 25% of all affordable housing units will be delivered through planning obligations at a minimum reduction of 30% below market value with a total first sale price capped at £250,000 after the discount has been applied.
Para 2.2	East Lindsey District Council (ELDC)
Para 3.3	Slightly confused para, residents ability to access the shops wouldn't be limited by wayfinding issues between the station and town centre surely this would only effect visitors
Policy E1	Change reference to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
Policy E1	Would B2 and especially B8 uses fit within stater business floorspace? B8 is for storage and distribution?
Policy E2	Also need to consider historic shop frontages/features would their loss be acceptable if new employment opportunities were created?
Policy E2	Change reference to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
Policy E2	Would a B2 or B8 use really be wanted in the town centre?
Policy E2	You have included reference to Policy SP11 but there is no historic references within the policy itself.
Policy E3	As per previous comments is 6 months sufficiently long? the LP asks for a period of 12 months
Policy E3	Does having two different marketing minimum periods in a policy potentially cause an area for confusion
Policy E3	Change reference to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
Para 7.5	In light of the changes made to the class use order this para 7.5 may need re looking at.
Policy V1	With the Coastal LDO being called in and currently at appeal reference to it was felt best removed by will need to be removed by the Assistant Director of Planning.

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Policy V2	Why is it 6 months advertising outside the service holiday area and 12 within this was an mistake within the LP it should have been 12 months across the board.
Policy V3	Still have concerns around this clause given the fact that for a large percentage of the serviced holiday accommodation area this opening up of sea views would not be possible. Would a refusal be forthcoming even though it is the defined area (same applies to new accommodation)?
Policy TC1	Change is likely to be difficult without the use of an Article 4 direction.
Policy TC1	Change references to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
Policy INF2	Is the need for this level of car parking provision evidenced? just concerned given earlier in the document it is stated that 1/3 of residents of Skegness do not drive.
Policy INF4	Given the plans desire to encourage more sustainable transport methods could this policy be counter productive in requiring a parking space for every room?
Policy INF5	<p>How is it expected that a town centre unit would meet these standards where they don't have a curtilage? There does not appear to be an exemption for such premises and it doesn't say it is for new build only. Therefore a change of use in the town centre from A3 to A1 would need to provide parking but if on the High Street or Lumley Road for example there is no opportunity to provide parking and meet the policy requirements.</p> <p>It is appreciated the policy as written states 'the applicant will need to demonstrate that the level of parking proposed would be appropriate for the site and end-user' it just as currently written adds to the burden upon the applicant. Some simple exemptions added to the policy would make it much clearer.</p>
Policy INF10	<p>Is it not a case with residential properties that owners would usually place their bikes within a garage, shed or spare room for example? Does this policy expect a covered cycle rack outside each new property?</p> <p>What problem are foreseen if new properties don't have a cycle rack and will having a cycle rack influence people going out and buying bicycles?</p>
Policy INF10	Does not appear to be any locational exemptions again businesses along the high street may struggle to meet these requirements.
Policy INF10	What would be deemed secure in the context of cycle provision for an A1 use for example where public access would be required?
Policy INF10	Are the 10 spaces visitor spaces? The main issues will be the viability of a scheme given the increased cost of developing in a high flood risk area already. The cost of providing cable

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	ducts etc will be considerably more on sites where spaces are spread around the development. Also has the visual appearance of charging points been considered or that possibly this policy will create parking courts on developments in an attempt to lower developer costs. Where will the long term maintenance responsibilities sit once the development is completed? The same responsibility concerns apply to non residential developments.
Policy INF12	Within the plans overall priorities it is stated that the plan will look to "Relocate car parking within the town to improve pedestrian circulation and create new development opportunities." however this policy looks to protect and retain existing provision of public car parking?
Policy H3	What is regarded as a comfortable walking distance?
Policy H3 (final bullet point)	Not sure this is reasonable given market forces.
Policy D1	No reference within this policy has been made to landscaping or green space a similar issue within the allocations themselves.
Policy D2	The question remain as to how will have long term maintenance of these signs the policy as drafted puts the emphasis on the applicant to demonstrate they are not feasible.
Para 12.11	Is there an assessment of those sites not included from the LP and reasoning for not including them? A clear assessment will be required when the plan is submitted to the independent examiner.
Policy D4	What would be regarded as special circumstances? Should the policy also seek new provision of green spaces where development is to take place not just the replacement of lost spaces under "special circumstances".
Policy NDP3	Would all forms of employment be suitable on this site?
Policy NDP4	Would all forms of employment be suitable on this site?