



For and on behalf of  
**Skegness Town Council**

## **Skegness Neighbourhood Plan Public Consultation Statement**

**Prepared by  
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<b>CONTENTS</b>	<b>PAGE</b>
<b>1.0 Introduction.....</b>	<b>4</b>
<b>2.0 Consultation Process .....</b>	<b>5</b>
a) Initial Public Consultation.....	5
b) Draft Vision and Objectives Consultation .....	6
c) Regulation 14 Consultation.....	7
<b>3.0 Regulation 14 Consultation Responses.....</b>	<b>10</b>
<b>4.0 Regulation 14 Consultation Outcomes .....</b>	<b>63</b>

#### **APPENDICES (Attached Separately)**

APPENDIX 1 Community Consultation Report (Natter Matters, December 2017) .....	64
APPENDIX 2 Objectives Survey Report (Natter Matters, January 2019).....	64
APPENDIX 3 Evidence of Consultation Publicity Online and via Social Media .....	64
APPENDIX 4 List of Regulation 14 Consultees.....	64
APPENDIX 5 Regulation 14 Consultation Comments Form.....	64
APPENDIX 6 Regulation 14 Consultation Leaflet.....	64
APPENDIX 7 Consultation Webinar Slides .....	64
APPENDIX 8 Email from ELDC Officers Regarding HRA (14 <sup>th</sup> April 2021).....	64

## 1.0 INTRODUCTION

- 1.1 Community engagement and consultation is necessary at all stages of the plan-making process for the Skegness Neighbourhood Plan. It enables communities to articulate their own concerns and identify the appropriate responses and solutions to problems that affect them. If done well, community consultation can empower community members by strengthening their personal capacities and the capacity of their communities as a whole.
- 1.2 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning (General) Regulations 2012. Section 15(2), part 5 of the Regulations states that a Consultation Statement should:
- a) Contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - b) Explain how they were consulted;
  - c) Summarise the main issues and concerns raised by the persons consulted; and
  - d) Describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
- 1.3 In developing the Skegness Neighbourhood Plan, several rounds of consultation were undertaken at various stages of the neighbourhood plan process as follows:
1. **Initial public consultation** was undertaken in 2017 to raise awareness of what a neighbourhood plan is, how it could benefit Skegness and identify key issues within Skegness including what is important to the people of Skegness and what they like and dislike about the town and how it could be improved. The responses from this consultation were then used to inform the draft vision and objectives for the Neighbourhood Plan. A summary of the findings from this consultation exercise are outlined in Section 2 of this report with further detail provided in the Community Consultation Report (December 2017) which is attached at **Appendix 1**.
  2. **Consultation on the draft vision and objectives** was undertaken in early 2019 in the form of a public survey and 'pop up' exhibition event. The findings of this consultation were used to finalise the Vision and Objectives as well as further informing the scope of the policies within the Draft Neighbourhood Plan. A summary of the findings from this consultation are outlined in Section 2 of this report with further detail provided in the Objectives Survey Report (January 2019) which is attached at **Appendix 2**.
  3. **Regulation 14 consultation on the Draft Neighbourhood Plan** was undertaken in September – October 2021 in order to provide opportunity for members of the public and other stakeholders to comment on the proposed policies and site allocations prior to its submission to the local planning authority for examination. The outcomes of this consultation are detailed in Section 3 of this report.
- 1.4 The timings of the consultations were carefully considered to maximise potential interest and responses.

## 2.0 CONSULTATION PROCESS

### a) Initial Public Consultation

- 2.1 Natter Matters Limited was commissioned to undertake a public consultation with the aim of the consultation being to acquire the views of the residents of Skegness on their attitudes to Skegness and its facilities. The consultation process started with a teaser campaign on Instagram and Twitter with the aim of this initial phase to raise awareness of the campaign and its hashtag which would later be linked to a Facebook chat group.
- 2.2 After the initial teaser campaign a Facebook chat group was launched and advertised on both traditional and social media. A targeted advert for the chat group was published on Facebook. This advert was seen by over 7,800 people living in Skegness. Once a sizeable number of members had been reached members were invited to tell us their views of Skegness, encouraging comments and open discussions about the town. Once the conversation was in full flow, a number of specific questions were asked, directed by Skegness Council and DLP Planning.
- 2.3 The Facebook chat group gained around 500 members over the course of the consultation period which ran from 13<sup>th</sup> September 2017 until 17<sup>th</sup> November 2017. This consultation identified key issues and covered a variety of topics.
- 2.4 As part of this initial consultation, a “pop-up” consultation event took place on Thursday 2<sup>nd</sup> November 2017. The event included banners which gave a brief explanation of the Neighbourhood Plan process and asked for the public’s views via a questionnaire. Members of the Natter team, along with Town Councillors, were available to further explain the process and assist with the questionnaires.
- 2.5 The questions in the questionnaire were:
1. What do you like best about Skegness?
  2. What do you like least about Skegness?
  3. What should Skegness be like in the future?
  4. Is the right type of housing available for you and your family?
  5. What should be done with the B&Bs if there is no market?
  6. How easy is it to get about? What transport do you use?
  7. What is parking like in the town?
  8. Do you use the parks and green spaces in Skegness? What would you change about them?
  9. Do the shops and services in Skegness meet your needs?
  10. Is Tourism in Skegness well planned and promoted?
  11. Do parts of the town need redevelopment? Where would you like to see redeveloped most?
  12. What are the most important considerations for new development in Skegness?
  13. What should new development focus on?
  14. What business facilities are missing from the town?
  15. Which buildings, open spaces or views should be protected?
- 2.6 As set out in the Community Consultation Report (attached at **Appendix 1**), it was found that the recreational spaces, retail offer, leisure and entertainment venues and bus services were positively spoken about. Specific areas high on the list of positives were Tower Gardens and Fairy Dell. Fresh air, cleanliness and low crime were all given as ‘likes’ by a number of respondents. Shopping and entertainment were also high on the list.

- 2.7 The negative issues that were raised related to anti-social issues, poor accessibility, large amounts of traffic, lack of parking facilities, lack of entertainment facilities, a perception that there are too many caravan parks and HMOs as well as limited train services.
- 2.8 The general state of the roads, mainly the number of potholes, the general state of pavements and the streetlights being turned off at night were also identified as key issues. "Too many charity shops" stood out as a dominant answer along with too many arcades. Derelict and scruffy buildings along with individual complaints about the sewerage system, disabled access and general lack of investment were also raised.
- 2.9 The biggest complaint was the lack of facilities all year round with the impression given that most of the entertainment and leisure facilities close over winter.
- 2.10 The outputs from this consultation were fed into a Steering Group workshop in which the draft vision statement and objectives for the plan were developed. The suggested draft objectives for the Neighbourhood Plan were split into three key themes; economy, social and retail, leisure and tourism.

**b) Draft Vision and Objectives Consultation**

- 2.11 Natter Limited were commissioned to undertake a public survey exercise on behalf of Skegness Town Council to help gauge the support for the Skegness Town Neighbourhood Development Plan's proposed Draft Vision Statement and Objectives.
- 2.12 A 'pop-up' exhibition event was undertaken in early 2019 which took place over two days in Hildreds Shopping Centre and involved members of the team, along with a number of Town Councillors. The exhibition consisted of four display banners outlining the proposed Vision Statement and the draft Objectives.
- 2.13 Over the course of the two days 58 surveys were completed and one further survey was completed online on the Town Council website. In addition to this, conversations were held with members of the public who declined to complete a survey.
- 2.14 The proposed Objectives were grouped into three sections plus the Vision Statement and people were asked if they were happy with the proposals.
- 2.15 The full collection of comments from respondents are outlined in the Skegness Neighbourhood Plan Objectives Survey Report by Natter Matters (**Appendix 2**). A summary of responses to each of the consultation questions is provided below.

*Question 1 - Having read the proposed Vision Statement, do you feel it reflects your vision for the future of Skegness?*

- 2.16 54 respondents answered yes to this question, with 4 answering no and 1 not being sure. Some of the comments made relating to this question were that plans were not very detailed, there were too many caravan sites, the vision statement needs to consider the needs of residents as well as tourists, more affordable housing is needed, more tourism development is needed and better access is required through improved road conditions.

*Question 2 - Having read the proposed objectives relating to the Skegness economy, do you believe these cover the main areas that need to be addressed in the proposed Neighbourhood Development Plan?*

- 2.17 49 respondents answered yes, with 4 answering no and 6 not being sure. Some of the comments were that there should be no new homes until we have enough doctors, teachers and services to look after existing population and those who live in caravans for the majority of the year, better roads are needed, the one-way traffic system needs revising, lower business rates, regular bus services are needed, the need for more year round employment and the need for a transport hub by the bus depot.

*Question 3 - Having read the proposed objectives relating to social matters in Skegness, do you believe these cover the main areas that need to be addressed in the proposed Neighbourhood Development Plan?*

- 2.18 51 respondents answered yes to this question, with 3 answering no and 5 not being sure. Some comments relating to this question were that all the empty rooms above shops in town centre could be accommodation, more infrastructure is needed, more elderly housing provision is required and out of town retail development should be prevented.

*Question 4 - Having read the proposed objectives relating to Retail, Leisure and Tourism in Skegness, do you believe these cover the main areas that need to be addressed in the proposed Neighbourhood Development Plan?*

- 2.19 51 respondents answered yes, 4 answered no and 4 were not sure. Some of the comments raised were for more independent local businesses in small unit lets, bigger shops needed, a multi-storey car park is needed, electronic signs, more attractions within town, the improvement of roads. There were some objections to the pedestrianisation of Lumley Road.
- 2.20 The findings from this consultation exercise were used to inform the final Vision and Objectives that were contained within the Skegness Neighbourhood Plan (Reg. 14 consultation version).

### c) Regulation 14 Consultation

- 2.21 The Neighbourhood Planning (General) Regulations 2012 require the proposed plan to be the subject of a 6-week (minimum) consultation before it is submitted to the local authority for independent examination.
- 2.22 The requirement, as set out at regulation 14, includes the following:
- Publicise the plan in a manner which brings it to the attention of people who live, work or run businesses in the neighbourhood area. This should include details of the proposed Neighbourhood Plan, details of where and when it may be viewed, details on how to make comments on the plan and the date by which comments must be received (at least 6 weeks from the date on which it is first publicised).
  - Consult statutory consultation bodies whose interests may be affected by the plan.
  - Send a copy of the proposed plan to the local authority.
- 2.23 The Skegness Neighbourhood Development Plan consultation ran for a period of six weeks from Monday 6<sup>th</sup> September 2021 to Monday 18<sup>th</sup> October 2021.
- 2.24 The consultation was advertised on social media including the Town Council's Facebook page (including paid post boosts), Instagram and Twitter. The consultation was also publicised via Town Council and community group meetings, the Town Council Newsletter, East Lindsey District Council's website, along with advertisements in the Skegness Standard and on [www.lincolnshireworld.com](http://www.lincolnshireworld.com).
- 2.25 Evidence of how the Draft Neighbourhood Plan consultation was publicised online and on social media is contained in **Appendix 3**.
- 2.26 Posters were displayed in windows and noticeboards including those in the Tower Gardens Pavilion café and reception, town centre, Tower Gardens and Hildreds Shopping Centre.
- 2.27 A stall was set up in the Tower Gardens Pavilion café in order to target visitors and community groups that use the hall, as shown in Figure 1 below.

Figure 1. Consultation Display Board, Tower Gardens Pavilion



- 2.28 Notifications were sent via email to statutory and other consultees, as well as those on the Council's mailing list (a full list of individuals and organisations who were consulted is contained within **Appendix 4**).
- 2.29 The consultation consisted of a consultation comments form including options for providing online and paper responses (a copy of this comments form is contained at **Appendix 5**).
- 2.30 A consultation leaflet (a copy of which is contained at **Appendix 6**) was also prepared which summarised the policies contained within the Draft Neighbourhood Plan and set out details of how consultees could comment on the draft plan, including where copies of the plan could be viewed.
- 2.31 Copies of the consultation leaflet were available in the Town Council reception and café. Copies were also given to Town Councillors for distribution.
- 2.32 The Draft Neighbourhood Plan and other supporting documents were available to view throughout the consultation period on the Skegness Town Council webpage. Hard copies of the plan were also available to view at Tower Gardens Pavilion (Reception and Community Café) and Skegness Library.
- 2.33 Respondents were given the option of contributing their views on any aspect of the Draft



Neighbourhood Plan and its supporting documents by either completing and returning a paper copy of the consultation comments form, completing an online version of the comments form, or emailing comments to Skegness Town Council.

- 2.34 A consultation webinar was also held on the evening of 9<sup>th</sup> September 2021. The webinar was open to all and was advertised on the Town Council's webpage, social media and via the Town Council's mailing list. The consultation webinar consisted of a presentation by members of the Neighbourhood Plan Steering Group and DLP Planning, which set out details of the context for the Neighbourhood Plan and summarised details of the plan's policies and site allocations. This was followed by an opportunity for attendees to ask questions.
- 2.35 Ten people signed up to attend the webinar, of which seven attended. A recording of the webinar was made available to view on the Town Council's website following the event. This enabled anyone who was unable to attend the webinar to view the presentation. A copy of the presentation slides from the webinar are contained at **Appendix 7**.

### **3.0 REGULATION 14 CONSULTATION RESPONSES**

- 3.1 A total of 22 consultation responses were received. This included 13 responses from statutory consultees and 9 responses from members of the public and landowners.
- 3.2 Table 1 sets out the consultation responses to the draft Skegness Neighbourhood Plan and the policies and sections of the draft Neighbourhood Plan to which each of the comments relates. Skegness Town Council's responses to the comments are also set out in the table.

**Table 1. Consultation Responses**

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
<b>Statutory Consultees</b>				
001	East Lindsey District Council	Replace ELDC with East Lindsey District Council (ELDC)	Section 2 – Skegness in Context Paragraph 2.2	Reference amended
		Slightly confused paragraph, 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.	Section 3 – Opportunities & Constraints Paragraph 3.3	Reference to visitors added
		Within Policy E1 itself replace reference to The Town and Country Planning (Use Classes) Order 1987 as amended and replace it with: The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020	Policy E1 – Starter Business Floorspace	Reference amended
		Would B2 and especially B8 uses fit within stater business floorspace? B8 is for storage and distribution?	Policy E1 – Starter Business Floorspace	Reference to B8 uses removed.
		Within Policy E2 itself there is a need to consider historic shop frontages/features would their loss be acceptable if new employment opportunities were created?	Policy E2 – New Employment Floorspace	This is addressed in Policy TC3 – no change required
		Replace reference to The Town and Country Planning (Use Classes) Order 1987 as amended and replace it with: The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020	Policy E2 – New Employment Floorspace	Reference amended

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		Would a B2 or B8 use really be wanted in the town centre?	Policy E2 – New Employment Floorspace	This policy is relevant to the whole NDP area – no change required
		You have included reference to Policy SP11 of the East Lindsey Local Plan but there is no historic references within policy E2 itself.	Policy E2 – New Employment Floorspace	Reference to Policy SP11 removed
		As per previously made comments is 6 months sufficiently long in terms of marketing? the Local Plan asks for a period of 12 months. It may also be useful to state marketed at an appropriate market value within the policy itself.	Policy E3 – Redevelopment of Employment Sites for Other Uses	6 months considered sufficient for sites not currently in active employment use – no change required. Reference to marketing at appropriate market value added to policy wording.
		Does having two different marketing minimum periods in a policy potentially cause an area for confusion.	Policy E3 – Redevelopment of Employment Sites for Other Uses	Different marketing periods apply to sites currently in and not in active employment use. Bold text added to policy to highlight this difference.
		Replace reference to The Town and Country Planning (Use Classes) Order 1987 as amended and replace it with: The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020	Policy E3 – Redevelopment of Employment Sites for Other Uses	Reference amended
		In light of the changes made to the class use order this paragraph will require looking at.	Policy V1 – Tourism and Visitor Economy Paragraph 7.5	This is a direct quotation from ELDC Local Plan Policy SP20 – no change required
		Within policy V1 itself reference to the Coastal LDO should be removed.	Policy V1 – Tourism and Visitor Economy	Policy wording amended to ' <i>...restricted in accordance with the requirements of ELDC Core Strategy Policy SP19 'Holiday Accommodation' or any successor strategic policy or Local</i>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
				<i>Development Order</i> ".
		Why is it 6 months advertising outside the service holiday area and 12 within this was a mistake within the Local Plan, it was always intended that it should be 12 months across the whole plan.	Policy V2 – Loss of Visitor Accommodation	Adopted policy states 6 months – no change needed to avoid non-conformity with adopted strategic policy
		Still have concerns around clause b 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 V3 – Applications for Overnight Visitor Accommodation	Policy wording states " <i>where possible</i> " therefore this is not a requirement for all developments – no change required
		Changes to non-class E uses will be very difficult to resist without the implementation of a Article 4 direction.	Policy TC1 – Active Frontages in the Town Centre	Policy wording states changes to " <i>non-class E uses will be resisted</i> " which are not covered by permitted development, so Article 4 would not be required – no change needed
		Within Policy TC1 itself replace both references to The Town and Country Planning (Use Classes) Order 1987 as amended and replace it with: The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020	Policy TC1 – Active Frontages in the Town Centre	Reference amended
		Within policy INF2 - Is there a need for this level of car parking provision and can it be evidenced? Just concerned given earlier in the plan itself it is stated that 1/3 of residents of Skegness do not drive.	Policy INF2 – Car Parking Standards for New Residential Development (Use Class C3)	Caveat added to policy wording which states " <i>...unless it can be demonstrated through a Transport Assessment and agreed by the Highway Authority that these minimum parking standards are not required. Where parking provision is being proposed below the minimum standards, and the site is in a highly</i>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
				<i>accessible location, the applicant should submit evidence to demonstrate that the level of parking is adequate and will not have a detrimental impact upon the local highway network. Such instances will be judged on a case by case basis”.</i>
		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 INF4 – Parking Standards for New Hotels, Guest Houses and B&Bs (Use Class C1)	<i>Caveat added to policy wording which states “...unless it can be demonstrated through a Transport Assessment and agreed by the Highway Authority that these minimum parking standards are not required. Where parking provision is being proposed below the minimum standards, and the site is in a highly accessible location, the applicant should submit evidence to demonstrate that the level of parking is adequate and will not have a detrimental impact upon the local highway network. Such instances will be judged on a case by case basis”.</i>
		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 E(b) to E(a) would need to provide parking. If a change of use for example were to occur on the High Street or Lumley Road there is no	Policy INF5 – Car Parking Standards for Non-Residential Development	<i>Caveat added into policy wording to exempt town centre sites and additional text added to policy wording stating: “Where parking provision is being proposed below the minimum standards, and the site is in a highly accessible location, the applicant should submit evidence to demonstrate that the level of parking is adequate and will not have a detrimental impact</i>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>opportunity to provide the required level of parking and therefore 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>		<p><i>upon the local highway network. Such instances will be judged on a case by case basis."</i></p>
		<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 problems 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> <p>With regard to cycle storage provision and new business premises there does not appear to be any locational exemptions within the policy. Businesses along the high street for example may struggle to meet the requirements of this policy.</p> <p>What would be deemed secure in the context of cycle provision for an E(a) use for example where public access would be required?</p>	<p>Policy INF10 – Cycle Parking Standards for New Developments</p>	<p>In respect of residential uses, a garage or shed could be used as cycle parking and comply with the requirements of this policy as long as it is conveniently located and secure, as per the current policy wording. A spare room would not be considered suitable cycle parking. Caveat added into policy wording to exempt town centre sites and additional text added to policy wording stating: <i>"For non-residential land uses, the need for long term and short term cycle parking may be determined on a case by case basis. However, the key objective of this policy is to reduce dependence on the private motor vehicle."</i></p>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>Are these 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 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.</p>	<p>Policy INF11 – Ultra Low Emission Vehicles (ULEV) Parking Standards and Future Provision</p>	<p>Given climate targets there is a need to ensure ULEV parking provision is increased.</p> <p>Policy wording to be clarified as follows: <i>“For houses, 1 passive charge point per dwelling required. For flatted residential developments with unallocated parking, 2 EV charging points per 10 spaces to be provided. For flatted residential development with allocated spaces, all spaces to have charge points where practical. Cabling to all spaces where practical to allow for future installation of charging points and of sufficient capacity to enable as a minimum Mode 3 at 3.7 kW (16A) or 7.4kW (32A).”</i></p>
		<p>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 Policy INF12 looks to protect and retain existing provision of public car parking?</p>	<p>Policy INF12 – Public Car Parking Provision</p>	<p>Policy states <i>“unless suitable alternative provision is made”</i> therefore policy is considered to support plan objective – no change required Objective amended to state <i>“<u>Where feasible</u>, relocate car parking within the town...”</i></p>
		<p>Within clause 1 of Policy H1 what is regarded as a comfortable walking distance?</p>	<p>Policy H1 – Redevelopment of Existing Buildings for Affordable Residential Use</p>	<p>This will be a matter of planning judgment depending upon the type of accommodation being proposed – no change required</p>



Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		With regards to clause 4 of Policy H1 I am not sure this is reasonable given market forces.	Policy H1 – Redevelopment of Existing Buildings for Affordable Residential Use	The requirement to demonstrate a local need for the scale and type of accommodation proposed is considered to be a reasonable policy requirement – no change needed
		No reference within Policy D1 has been made to landscaping or green space a similar issue within the allocations themselves.	Policy D1 – Design in New Developments	Reference to landscaping / green space added to policy wording
		With regards to clause C of Policy D2 the question remains as to who will ensure the long term maintenance of these signs, the policy as drafted puts the emphasis on the applicant to demonstrate they are not feasible.	Policy D2 – Design of New Car Parking	The applicant is required to demonstrate where this is not feasible – no change required
		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 – Local Green Spaces Paragraph 12.11	Justification statement to be submitted with Neighbourhood Plan
		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 D4 – Local Green Spaces	Special circumstances are defined by national policy – no change required
		Would all forms of employment use be suitable on this site?	Site Allocation NDP3 – Land north of Wainfleet Road	All employment uses considered potentially suitable subject to compliance with other policy requirements – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		Would all form of employment use be suitable on this site?	Site Allocation NDP4 – Skegness Household Waste Recycling Centre, Warth Lane	All employment uses considered potentially suitable subject to compliance with other policy requirements – no change required
		As the plan unfortunately does not fall under the current transitional arrangements for the newly introduced First Homes, and 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.	Whole Plan	Reference to First Homes added
002	Environment Agency	We object to the reference to the Coastal Zone Local Development Order (LDO) and ask that it is removed from this policy. The Secretary of State has issued a 'minded to revoke' letter to the council, stating his view that the LDO is not consistent with Government policies for meeting the challenge of climate change, flooding and coastal change. Although the council has requested a hearing in respect of the 'minded to revoke' position until this matter is resolved it should not be promoted in the Neighbourhood Plan.	Policy V1: Tourism and Visitor Economy	Policy wording amended to ' <i>...restricted in accordance with the requirements of ELDC Core Strategy Policy SP19 'Holiday Accommodation' or any successor strategic policy or Local Development Order</i> '. Policy no longer refers to specific Coastal Zone LDO but generic LDO reference retained should a LDO be established in the future.
		We suggest a glossary of terms is included in the plan which clarifies the	General Comments	Relevant definitions added, including reference to definition of Affordable

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>meaning of some of the terms used. For example, we consider that a clear definition of what is meant by the terms 'local housing need' and 'affordable residential use' would help users of the plan. We understand that this is as defined in Annex 1 of the ELDC Core Strategy Local Plan (2018), as identified in Policy V2, criteria f.</p>		<p>Housing in National Planning Policy Framework (NPPF).</p>
		<p>We welcome the clarity of the plan in drawing direct links to the existing Local Plan policies. However, we note that reference is made to 'successor' policies of the Local Plan in Policy E2, V1, V3, TC3, H1, H2, NDP1 following review. We suggest that this may lead to confusion if policies of the Local Plan are not directly replaced.</p> <p>Instead we suggest that an overarching statement is made in the plan that any references and links to existing Local Plan policies and definitions will need to be reviewed if those policies or definitions are amended by any future Local Plan Review. This will ensure that the Neighbourhood Plan remains in conformity with the Local Plan in the event that any policies are amended in a way which does not lead to a direct successor policy.</p>	<p>General Comments – Conformity with Local Plan Policies</p>	<p>Reference to 'successor' policies is considered appropriate to ensure that the Neighbourhood Plan policies remain in conformity with new ELDC Local Plan. Section 15(b) sets out details of Neighbourhood Plan review process including paragraph 15.9 which refers to a review to take into account changes to other components of the Development Plan (which would include the adoption of a new ELDC Local Plan) – no change required</p>
		<p>We would also welcome the note that a Flood Risk Assessment to demonstrate that the Sequential and Exception test is</p>	<p>General Comments</p>	<p>Comment noted – no change required</p>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		needed in relation to development supported by Policy H2. As a general note, this requirement will be relevant to many other developments in the area, but we are satisfied that existing Local Plan and National policies make this clear.		
		Similarly we welcome the connections to specific Local Plan policies throughout the Neighbourhood Plan. We note that any proposals should be in accordance with all relevant development plan policies, whether specifically identified or not. We suggest that a statement to this effect would be useful in paragraph 1.9. Ad hoc references such as in Policy C2 could then be removed.	General Comments	Reference added to compliance with <i>"all development plan policies"</i> added to paragraph 1.9.
		We note and welcome the references in several policies of the plan to ensure that development does not have an adverse effect on flood defences. As a general point we would note that any works within 16 metres of a sea defence will require a permit or exemption under the Environmental Permitting (England and Wales) Regulations (2016) in addition to any planning requirements.	General comment – Environmental permit requirements	Comment noted – no change required
		Under the Social subheading we suggest amending the wording '...to meet locally identified needs' to '...to meet identified local needs'. The first suggests that the needs would be identified locally rather than being a need which exists locally.	Page 18 – Skegness Neighbourhood Plan Objectives	Wording of objective amended for clarity

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>We welcome the recognition that impacts on existing flood defences should be avoided. However, we ask that the policy is amended to make it clear that any adverse effect will need to be avoided, including any adverse effect on the ability to access the defences.</p> <p>We ask that the policy is amended to make this clear by removing the wording: ‘...or existing flood defences’ from the first bullet point and including the following wording drawn from Policy V1 as a further bullet point: ‘and Avoid any adverse effects on existing flood defences or access to them’</p>	Policy E2: New Employment Floorspace	Policy worded amended in line with comment
		<p>We also note that Policy E2 states that it relates to ‘business uses including...’. This indicates that the policy will apply to all business uses, and not just those indicated. If the policy is intended to not apply to any business use classes other than those stated, the words ‘...business uses including...’ may need to be replaced with ‘...use...’.</p>	Policy E2: New Employment Floorspace	Policy is intended to apply to applications for all business uses – no change required
		<p>We also note that this policy has the wording ‘...business premises including...’, and it raises the same issue as above.</p>	Policy E3: Redevelopment of Employment Sites or Other Uses	Policy is intended to apply to all business premises – no change required
		<p>We ask that the policy clarifies that the creation of new dwellings on upper floors</p>	Policy TC2: Town Centre Upper Floor Developments	Reference to Policy SP18 added to ‘Related ELDC Policies’

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		will be required to conform to Policy SP18 of the Local Plan.		
		We are unclear what this sentence means. We suggest that some more context and explanation would be useful.	Paragraph 10.7	Clarification added to paragraph 10.7
		We have no objection to the allocation of the sites, subject applications meeting the requirements of other relevant Local Plan policies. We would note that attention should be given to the historic uses of sites (particularly NDP2 and 4) and development proposals should consider the potential for land contamination at the earliest stages.	Site allocations	Comment noted – no change required
003	Historic England	The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area. If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings,	General comments	Comments noted – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (<a href="http://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a>). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.</p> <p>Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained.</p> <p>You may also find the advice in “Planning for the Environment at the Neighbourhood Level” useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information.</p> <p>If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, “Housing Allocations in Local Plans” as this relates equally to neighbourhood planning.</p>		
004	Lincolnshire County Council – Education Services	Confirmed they had no comments to make on the Draft Neighbourhood Plan	N/A	Response noted – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
005	Lincolnshire County Council – Strategic Planning	<p>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.</p> <p>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.</p>	Policies INF2 to INF4	<p>Caveat added to policy wording which states “...unless it can be demonstrated through a Transport Assessment and agreed by the Highway Authority that these minimum parking standards are not required. Where parking provision is being proposed below the minimum standards, and the site is in a highly accessible location, the applicant should submit evidence to demonstrate that the level of parking is adequate and will not have a detrimental impact upon the local highway network. Such instances will be judged on a case by case basis”.</p>
		<p>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.</p>	Policy INF5 and INF6	<p>Policy INF5 states that “Notwithstanding this, the applicant will need to demonstrate that the level of parking proposed would be appropriate for the characteristics / circumstances of the site and end-user, where known”.</p> <p>Therefore it may be appropriate for a pub in a town centre location to require fewer parking spaces.</p> <p>Additional text added to policy wording stating: “Where parking provision is being proposed below the minimum standards, and the site is in a highly accessible location, the applicant should submit evidence to demonstrate</p>



Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
				<i>that the level of parking is adequate and will not have a detrimental impact upon the local highway network. Such instances will be judged on a case by case basis."</i>
		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.	Paragraph 9.15	Reference to required use of Lambeth Methodology removed. Text added stating: <i>"The methodology for undertaking any parking surveys should be agreed with the Local Highway Authority prior to surveys being undertaken"</i> .
		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.	Site allocation NDP3	Site NDP3 removed from Neighbourhood Plan at request of landowner as this is being promoted as part of wider Skegness Gateway development.
		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	Policy D3	Reference added to policy wording to encourage enhanced walking routes linking gateway sites with wider countryside and town centre / foreshore / coastal path.

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>routes linking potential gateway development sites to the wider countryside or to the town centre and Foreshore.</p> <p>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.</p> <p>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</p>		
		<p>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.</p>	General comment	Biodiversity Net Gain is national legislative requirement that will be a requirement of all relevant planning applications – no change required
006	Lindsey Marsh Drainage Board	<p>The Board is primarily concerned with the rate of flow and volume of water to our network of maintained watercourses, therefore the Board supports the preference for sustainable drainage systems (SUDS) and recommends that SUDS are incorporated into all developments where feasible. SUDS should be designed to mimic the pre development 'greenfield' surface water regime and must be agreed with the Lead Local Flood Authority.</p>	Site allocations	<p>Text added into site allocations policies stating that <i>“drainage design needs to take into account climate change by allowing for an expected increase in the volume of rainfall, when assessing the storage and conveyance requirements for potential development sites.”</i></p>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		The Board recommends including in this section that drainage design needs to take into account climate change by allowing for an expected increase in the volume of rainfall, when assessing the storage and conveyance requirements for potential development sites.		
		The site lies within the Board's district, there are no Board assets in close proximity.	Site NDP1 (ELDC Offices North Parade)	Comment noted – no change required
		The site lies within the Board's district, there are no Board assets in close proximity. However, the Board maintained Water Tower Drain (a culverted watercourse) exists approximately 300m to the Northwest of the site. The Board's consent will be required prior to any increases in surface water discharge from the site being made to any watercourse, other than a designated main river.	Site NDP2 (Skegness Fire Station and Firemen Houses, Churchill Avenue)	Comment noted – no change required
		The site lies within the Board's district. The site is bounded to the North by the Board maintained Winthorpe drain and to the Northern half of the Western boundary by the Board maintained Winthorpe Drain Branch Number 1. The Board's consent will be required prior to any works in, under, over or within 9 metres of the bank top of these watercourses. The Board requires an easement strip along Board maintained watercourses in order to allow for continued maintenance and future	Site NDP3 (Land North of Wainfleet Road)	Comment noted – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		works. The Board's consent will be required prior to any increases in surface water discharge from the site being made to any watercourse, other than a designated main river. Furthermore, riparian watercourses exist to the Southern section of the Western Boundary and through the site. The Boards consent will be required for any culverting of these watercourses.		
		The site lies within the Board's district, the Board maintained Mowbrays Drain (a culverted watercourse) exists to the West of the site. The Board's consent will be required prior to any increases in surface water discharge from the site being made to any watercourse, other than a designated main river. A riparian watercourse exists to the Western Boundary of the site. The Boards consent will be required for any culverting of this watercourse.	Site NDP4 (Skegness Household Waste Recycling Centre, Warth Lane)	Comment noted – no change required
007	Marine Management Organisation	Comments set out suggested policies from the East Inshore and East Offshore Marine Plans that we feel are most relevant to your Neighbourhood Plan. The suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest	General comments	Comments and policies noted – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		your own interpretation of the East Marine Plans is completed.		
		On page 9 you refer to b) Wider Policy Context, we would also recommend you mention the East Inshore and East Offshore Marine Plans	Page 9 – Wider Policy Context	This section refers specifically to wider planning policy context – heading changed to ‘Wider Planning Policy Context’.
008	Ministry of Defence	<p>Having reviewed the supporting documentation in respect of the draft Skegness Neighbourhood Plan there is one area of interest for the MOD. DIO safeguarding have an area of interest in RAF Holbeach. The authority area of Skegness Town Council encompasses areas within the Statutory Range Safeguarding Zone surrounding the Air Weapon Range at RAF Holbeach, which is approximately 3.3KM to the South of Skegness Town Council’s Authority Area. Air Weapon Range Safeguarding Zones serve to regulate developments that could introduce or support populations of large and, or, flocking birds hazardous to aircraft. In addition, these zones serve to monitor the development of new micro-light/leisure flying sites in the vicinity of air weapon ranges.</p> <p>For context the Skegness Town Council Neighbourhood Plan proposes to allocate four sites for development, ELDC Council Offices, North Parade (Site Ref. NDP1), Skegness Fire Station and 8no. ‘Firemen’ Houses, Churchill Avenue (Site Ref.</p>	General comment	ELDC will consult MOD on relevant proposed development schemes as part of the planning application process – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>NDP2) , Land North of Wainfleet Road (Site Ref. NDP3) ,Skegness Household Waste Recycling Centre, Warth Lane (Site Ref. NDP4) within the Statutory Range Safeguarding Zone surrounding the Air Weapon Range at RAF Holbeach. In addition, where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Examples of this type of development are the installation of renewable energy generation systems and their associated infrastructure. The MOD has, in principle, no issue or objection to renewable energy development though some methods of renewable energy generation, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace encompassing military aerodromes, and impede the operation of safeguarded defence technical installations. In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of</p>		

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>these types of installations with associated impacts upon aviation safety and operational capability. Planning Practice Guidance published on the Gov.uk website acknowledges the potential effect of wind turbine generators and directs developers and Local Planning Authorities to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.</p> <p>In summary, the MOD would wish to be consulted within the Skegness Town Council Neighbourhood Plan on any potential development within the Air Weapon Range Safeguarding zone surrounding RAF Holbeach which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation.</p>		
009	National Grid	We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.	N/A	Comments noted – no change required
010	Natural England	Stage 1 (screening) of the HRA has concluded that the SDNP should undergo Stage 2 (Appropriate Assessment). Natural England agrees the SDNP warrants further assessment, and, in these circumstances, a full appropriate assessment should be carried out.	Habitat Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA)	Following the Stage 1 HRA screening Policy E2 was amended prior to Regulation 14 consultation in order to address the specific concerns raised in the Stage 1 HRA Screening. The wording of Policy E2 in the NDP was revised to remove its application to the Foreshore area (so it now applies only

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>Given the potential that there will be significant environmental effects arising from the SNDP we agree with the screening opinion that a full SEA should also be undertaken.</p>		<p>to the Town Centre) and included reference to the need to ensure that new developments avoid adverse impacts on environmental designations. Policy E2 was the only policy identified in ELDC's Stage 1 HRA Screening Assessment as warranting further assessment (concluding paragraph 55) and following these amendments to the policy wording we believe this rules out significant effects on designated sites, as confirmed by email from ELDC Planning Officers (dated 14<sup>th</sup> April 2021, see copy at <b>Appendix 8</b>). A full SEA has been completed and was published for consultation alongside the Draft Neighbourhood Plan as part of the Regulation 14 consultation.</p>
011	NHS Property Services	<p>Policy C3 fails to address the need for flexibility within the NHS estate. NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed.</p>	Policy C3	<p>The existing policy wording states that "<i>Applications involving the loss of community health facilities for which there continues to be an established need will be resisted unless adequate alternative provision is or will be made available in a location supported by the local community within an appropriate and agreed timescale</i>". In this context, 'adequate alternative provision' may include that provided through a wider public service transformation plan. We do not think it is necessary to specify this explicitly in the policy wording – no</p>



Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>The NPPF is clear in stating that Local Plans should adopt policies that “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community” (Paragraph 93b). The policy currently fails to consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services. Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use. With this in mind, we are keen to encourage that a greater level of flexibility be granted to the NHS via modification of the wording of Policy C3. This will ensure that the NHS can promptly and efficiently respond to the healthcare needs of the residents as they arise.</p>		change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>We would suggest the inclusion of additional wording (in blue) be included in Policy C3 to make this policy more robust:</p> <p>“Applications involving the loss of community health facilities for which there continues to be an established need will be resisted unless adequate alternative provision is or will be made available in a location supported by the local community within an appropriate and agreed timescale. Development (including change of use) that involves the loss or replacement of existing community facilities/services will be permitted where the loss or partial loss of a facility or site arises from a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities. Applications for new community health facilities or improvements to existing community health facilities will be supported subject to the following criteria:</p> <p>A. The location is accessible or can be made accessible through improved opportunities for walking, cycling and access by public transport; and            B. The new development is compatible with its surroundings; and</p>		

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		C. Adequate provision can be made to meet the requirements for additional parking generated by users of the facility without significant adverse impact on the environment and highway safety in the local area, in accordance with relevant policies outlined in Chapter 9 of this Neighbourhood Plan; and D. Applications for major development are supported by a Health Impact Assessment commensurate with the size and nature of the development proposed.”		
012	West Lindsey District Council	Your plan is well presented and wide-ranging. We have no other comments to make.	N/A	Comments noted – no change required
013	Theatres Trust	The Trust is supportive of this policy, which provides a strong framework to protect valued facilities in Skegness from unnecessary loss. This policy should include the town's cultural venues such as its two theatres - Embassy and Neverland - and its cinema. The introduction/justification text would benefit from making this clear. Cultural facilities are grouped with community facilities within the NPPF.	Policy C1	Reference to cultural venues added to policy introductory text.
<b>Non-Statutory Consultees</b>				
014	Croftmarsh Limited and The Earl of	The Neighbourhood Plan should take into account the change in circumstances that	General comment	Comment noted – we have been liaising closely with ELDC Planning Officers throughout the NDP process to

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
	Scarborough	will arise through the Local Plan review process.		ensure the plan is in conformity with the adopted development plan – no change required.
		We would expect the Neighbourhood Plan to work together with the Towns Fund as a key delivery tool to meet the aspirations of the Neighbourhood Plan. The current consultation draft of the Neighbourhood Plan, however, makes no reference to the Towns Fund.	General comment	Reference to Towns Fund added to 'implementation' section of Neighbourhood Plan (section 14).
		<p>In parallel with the Towns Fund, the Executive Board for East Lindsey District Council authorised the preparation for a Local Development Order (LDO) in relation to the "Skegness Gateway Project".</p> <p>The Skegness Gateway Project will be a development of approximately 1,000 dwellings, business, commercial, industrial and retail development, a Further Education college and open space. We note the Neighbourhood Plan also fails to reference the proposed LDO. The Neighbourhood Plan, in its current form, would fail to deliver the aims of the Towns Fund.</p> <p>The Neighbourhood Plan should, therefore, be revised to build links to the Towns Fund project and to facilitate delivery of the Skegness Gateway Project.</p>	General comment	The LDO has not yet been approved so it is not considered appropriate to include reference to it at this stage.

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>The introduction to the Neighbourhood Plan covers a wide range of issues and describes the town and many of its challenges.</p> <p>The introduction, however, bases itself on the adopted East Lindsey Local Plan (2017).</p> <p>This plan set out an innovative approach to the coastal area, including Skegness, which sought to restrict development to meet “natural growth” as part of a desire to restrict development in an area at potential risk of flooding from the sea.</p> <p>The Local Plan Inspector, whilst accepting the challenges, and not wishing to reject the policy approach, did have reservations about the approach and insisted on close monitoring of the “Coastal Polices” to be followed by the submission of a revised Local Plan by April 2022 (Local Plan Policy 29), seven months after the end of the current consultation on the Neighbourhood Plan.</p> <p>An Issues and Options consultation on the Local Plan was undertaken earlier in 2021 and this raised the prospect of increased housing figures and a change to the approach to the Coastal Policy. The outcome of this process could significantly change the policy context for the Neighbourhood Plan, from the level of growth to be accommodated in the district, to the distribution of this growth</p>	<p>Section 1 – Introduction</p>	<p>The NDP is required to be in conformity with the strategic policies in the currently adopted Local Development Plan, which is the East Lindsey Local Plan (2017). We have engaged with Planning Officers at ELDC in the preparation of the NDP to ensure it meets these requirements. There is currently no housing requirement target set for the Skegness Neighbourhood Plan Area due to its location within the coastal zone – no change required. Reference to Towns Fund has been added to ‘Implementation’ section of the NDP.</p>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>across the main towns in the district, including Skegness.</p> <p>The most recent Strategic Housing Market Assessment suggests a reduction in the annual growth target. This approach, however, is based on the 2014 household projections. Although the 2014 projections are the recommended basis for calculating the housing need for an area, allowances can be made for changes in circumstance. Although the reduced figures derived from the 2016 projection have been discounted, the later projections, which will have addressed the apparent flaws in the 2016 projections must represent a key factor.</p> <p>Since that time, in addition to National Government increased pressure to deliver more new homes the most recent household projections for the area identify a growth of 6,744 new homes between 2018 and 2028. This is significantly in excess of the 5,600 dwellings provided for a similar period by the adopted Local Plan.</p> <p>As time passes, and the existing commitments in the coastal zone are built out, provision will need to be made for the future growth of the coastal area, including the main towns of Skegness and Mablethorpe.</p> <p>The Towns Fund for Skegness and Mablethorpe includes funding towards</p>		

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>delivery of the college campus within the Skegness Gateway scheme in addition to enhancements to the foreshore, the railway station and theatre in Skegness. The Towns fund should also be referenced in the introduction to the Neighbourhood Plan, to ensure the Neighbourhood Plan and Towns Fund work together to deliver the desired investment in the town.</p> <p>In September 2020, the Executive Board for East Lindsey District Council authorised the preparation for a Local Development Order (LDO) to promote the “Skegness Gateway”. The gateway will be a development of approximately 1,000 dwellings, business, commercial, industrial and retail development, an FE college and open space.</p> <p>National Government and the District and County Councils have a clear commitment to investment in Skegness, including the delivery of many of the aspirations contained within the Neighbourhood Plan, particularly the college campus. Although the Gateway is not subject to a formal LDO or allocation in the Local Plan, the commitment to the scheme is clear. The introduction to the Neighbourhood Plan should include a clear reference to the Towns Fund and proposed LDO.</p> <p>The Neighbourhood Plan should recognise this changing context to ensure</p>		

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>the plan responds to the reality of growth aspirations and co-ordinates with the wider needs for the town and the other developments that will be happening in and around the town. This is especially important to ensure sufficient housing growth can be delivered and to acknowledge the ability of the Gateway to deliver some of the key aspirations of the draft Neighbourhood Plan, including the delivery of the FE college subject to policy E4: New Education Uses of the Neighbourhood Plan and to ensure the employment development promoted in the Gateway would provide units for start-up businesses.</p>		
		<p>Skegness, together with Mablethorpe, is a focus of the Towns Fund, a major commitment of public and private sector funds. The allocation of funds represents commitment of government funding in development and must be taken into consideration when preparing planning policy for an area. The Towns Fund project accords with many of the aspirations of the Neighbourhood Plan and other broader strategies, including the Coastal Highway.</p> <p>This New Towns Fund provides as much context for Skegness as the adopted Local Plan and as such should be reflected in the Neighbourhood Plan.</p>	<p>Section 2 –                      Skegness in Context</p>	<p>Reference to Towns Fund has been added to 'Implementation' section of the NDP.</p>



Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>Many of the constraints and opportunities identified in Section 3 of the NP are the same that have driven the promotion of the Skegness Gateway LDO and the Towns Fund project. In addition to providing a site for the college, new homes, care for the elderly and economic development, the Gateway scheme will enable the delivery of the Skegness Link road, as part of the wider Coastal Highways project.</p>	<p>Section 3 – Opportunities and Constraints</p>	<p>Comments noted – no change required</p>
		<p>The Neighbourhood Plan vision accords with the aspirations of the Skegness Gateway development. The vision, however, does not reflect the demands on the town for new growth, in terms of housing, employment, education and the tourism offer. These issues are set out in the new Towns Fund schemes.</p>	<p>Section 4 – Vision</p>	<p>The vision reflects the aspiration to build upon the town’s leisure and tourism offer by embracing opportunities to further diversify the economy. The NDP vision has been developed through consultation with the local community – no change required.</p>
		<p>The themes identified in Section 4 are all acceptable in principle, however, the objectives are not quantifiable. Specific targets should be provided – what level of employment land is required and how will success of emerging sectors be measured? What role will the pedestrianisation of Lumley Road serve? How will caravan development needs be met in a sustainable way? The plan could benefit from an elaboration of “New Sectors” to understand the specific demands that may be generated</p>	<p>Section 4 – Objectives</p>	<p>The NDP objectives are intended to be broad statements that were developed through consultation with the local community and informed the development of the neighbourhood plan policies – no change required.</p>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		for new floor space in terms of size, location, workforce, form of units and transportation needs.		
		Providing support for starter and small businesses is supported. This sector is often an area of “market failure”, despite units generally being very popular when they are provided. The range of uses seems appropriate, especially as they are introduced with the word “including”. In our experience such units are also attractive to other businesses, including local tradespeople (plumbers, builders, engineers etc) and courier services. All these allow for local businesses to thrive, or provide employment opportunities, whilst also supporting the wider business and domestic communities.	Policy E1	Comments noted – no change required
		Policy E2 is a useful policy. This policy, however, together with E1 does not provide sufficient ambition to allow for development of new industries to expand the local economy and to support tourism and industry development. The scale of required floorspace is represented in the proposals for the Skegness Gateway LDO and the New Towns Fund.	Policy E2	Policies E1 and E2 seek to support applications that deliver new employment floorspace (subject to certain criteria being met). There is no limit placed on the amount of new employment floorspace within the NDP area – no change required.
		The aspiration for New Education Uses is welcome. Discussions are advancing to ensure delivery of a new FE college as part of the Skegness Gateway. Funding to	Policy E4	Comments noted – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>deliver a campus within the Skegness Gateway Scheme has been provided through the Towns Fund project. There are limited opportunities to provide an FE college within town other than the site within the Skegness Gateway.</p> <p>The Gateway, together with the longer term aspirations for the Link road, would ensure provision of a college of suitable scale which will support Skegness and a wider hinterland to train young people and provide continuous development for employees of existing businesses, as well as providing training for new industries.</p>		
		<p>The proposal to support the tourist/holiday trade is welcome. Focussing hotels and Bed and Breakfast in central locations is a sensible measure. To broaden appeal and to extend the season attention should be given to expanding the self-catering/holiday cottage market. Self-catering is not mentioned in the Neighbourhood Plan. Although the caravan and chalet provision is significant, there may be an opportunity to grow the market to include “bricks and mortar” type accommodation outside larger holiday camps and in addition to the hotels and guest houses.</p>	Policy V1	Applications for non-serviced tourist accommodation (including self-catering holiday lets) are referenced in Policy V3 – no change required.
		<p>Support the aspirations for Sustainable transport. Provision of the new college campus and extending existing employment areas as part of the</p>	Policy INF1	Comments noted – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>Skegness Gateway will provide a focus for sustainable transport, including cycling and pedestrian routes, providing connections to the railway station and across the town.</p> <p>The Gateway scheme will also enable the longer term aspiration to deliver the Skegness Link road which will allow traffic to avoid the town centre and improve circulation around and within the town, including access to the town centre.</p>		
		<p>Provision of detailed parking standards is welcome. The Local Plan policy, however, requires one space per dwelling, regardless of the size of that dwelling. The Neighbourhood Plan indicates that more spaces will be provided for each new dwelling, particularly 3 and 4 bedroom houses. There does not appear to be any evidence to justify the variation from the adopted Local Plan, without which the policy proposal is not justified. The Neighbourhood Plan should only include parking standards that can be justified.</p>	Policy INF2	Evidence provided in Parking Standards Background Report (April 2020) that was published as part of the Regulation 14 consultation – no change required
		<p>Clarification on parking standards for hotels is welcomed.</p> <p>The details for the provision of an extra coach space, however, is not clear. Small hotels, that cannot accommodate a coach load of residents, should not be required to make such a provision.</p>	Policy INF4	Policy wording clarified to state <i>“For hotels, an additional coach space should also be provided where practicable and feasible to do so. Such a requirement would be considered on a case by case basis.”</i>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>In larger hotels where rooms are taken up by a coach load, there will be a lower demand for car parking spaces. Coach provision should be able to utilise those vacant spaces and not be in addition to parking spaces that would be otherwise unused.</p>		
		<p>Setting out parking standards to encourage provision of cycle parking is welcome in principle. The standards appear to be more onerous than other neighbouring authorities (see the South East Lincolnshire Local Plan). The Neighbourhood Plan should include evidence to justify the use of specific standards.</p>	<p>Policy INF10</p>	<p>Evidence provided in Parking Standards Background Report (April 2020) that was published as part of the Regulation 14 consultation. Additional text added to policy wording stating: <i>“For non-residential land uses, the need for long term and short term cycle parking may be determined on a case by case basis. However, the key objective of this policy is to reduce dependence on the private motor vehicle.”</i></p>
		<p>The Government consultation on provision of ULEV indicated that each dwelling would be provided with one charging point. The Policy indicates that all spaces in communal parking in residential developments should be wired up as charging points, although the parking standards indicates flats can be required to have two spaces. Providing each space with a charge point would exceed government proposals and is not justified.</p>	<p>Policy INF11</p>	<p>Evidence provided in Parking Standards Background Report (April 2020) that was published as part of the Regulation 14 consultation. Policy wording to be clarified as follows: <i>“For houses, 1 passive charge point per dwelling required. For flatted residential developments with unallocated parking, 2 EV charging points per 10 spaces to be provided. For flatted residential development with allocated spaces, all spaces to have charge points where practical.</i></p>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
				<i>Cabling to all spaces where practical to allow for future installation of charging points and of sufficient capacity to enable as a minimum Mode 3 at 3.7 kW (16A) or 7.4kW (32A)."</i>
		<p>This policy is in conflict with Policy SP18 of the Local Plan, which allows for the provision of market housing on brownfield sites within settlement, not just the town centre. Development is not restricted to Affordable Dwellings.</p> <p>Restricting development to affordable housing in the town centre and only on redevelopment of existing buildings has not been justified.</p> <p>In addition to the specific restrictions outlined above, the emerging Local Plan also indicates the need to allow for delivery of more housing growth in coastal settlements. The Neighbourhood Plan is overly restrictive and does not make sufficient provision for further housing growth in accordance with the adopted Local Plan, let alone the likely increased growth target expected to be included in the revised Local Plan as indicated by the growth covered in the Towns Fund.</p> <p>The National Planning Practice Guidance states "Neighbourhood Plans should consider providing indicative delivery timetables and allocating reserve sites to ensure that emerging evidence of housing need is addressed." (Paragraph:009</p>	Policy H1	<p>This policy does not restrict delivery of market housing on brownfield sites but instead provides explicit support for delivery of affordable housing on such sites. Policy H1 is considered to be in conformity with Policy SP18 of the ELDC Core Strategy – no change required.</p>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>Reference ID:41-009-20190509). This suggests neighbourhood plans should provide for greater levels of growth than the target set in the Local Plan in order to ensure growth targets are met. Policy Theme 5 should include policies to accommodate the level of growth potentially required through the emerging local plan process and the commitment to the “Skegness Gateway” Local Development Order. The restriction of new development to be Affordable Housing should also be removed from the policy.</p>		
		<p>The facility to allow infill development of market housing is welcomed, although we note the policy echoes SP19 of the adopted Local Plan, whilst adding other restrictions that are unjustified, notably the limit of developments to a maximum of 9 dwellings. The need for the Neighbourhood Plan to include a policy that repeats policies in the adopted Local Plan should be reviewed carefully. At the very least, proposals to impose restrictions on existing policies should be removed unless they can be properly justified.</p>	Policy H2	As currently drafted the NP provides no guidance on infill sites that accommodate more than 9 dwellings. It would be contrary to national guidance to have a policy restricting infill to 9 units or below. Recommend that reference to 9 units is removed.
		<p>The commitment to support the provision of Older Persons Accommodation is welcomed. The policy, however, repeats existing provisions in the adopted Local</p>	Policy H3	Clarification on design standards added to policy wording.

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>Plan. Again, the need to repeat Local Plan policies should be reviewed, as they are not necessary.</p> <p>The policy also introduces unclear and unjustified assessment criteria. The second bullet point, for instance, requires “the accommodation (to) provide the highest standards of accessible and inclusive design”. These standards must be clarified – what are the accessibility and Inclusivity standards?</p> <p>If details cannot be provided and justified, the clauses should be left out of the policy.</p>		
		<p>Although laudable, this policy is superfluous. There is a legal right to apply to identify a site or building as an Asset of Community Value and it does not need encapsulating in a Neighbourhood Plan policy.</p> <p>The government has aspirations to ensure the development plan is short and straightforward. Including lengthy policies and restating a legal right and process only lengthens and complicates the document.</p>	Policy C1	Reference to supporting Assets of Community Value removed from policy wording and included in introductory text.
		<p>This policy again repeats elements of the adopted Local Plan and the NPPF (eg. SP10 and SP11) without adding any local context or requirement.</p> <p>Duplicate policies should not be included in the plan.</p>	Policy D1	This policy contains locally-specific design requirements such as enhancing legibility and wayfinding in Skegness Town Centre – no change required.



Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>The quest for quality design of car parking is laudable. The policy, however, does not define what high standard means in the case of each car park, in terms of landscaping, design or security. Nor has the requirement been justified to support the potential imposition of further costs on development.</p>	Policy D2	Aspects of design that should be adhered to are set out in the policy wording – no change required
		<p>The policy needs to define what is meant by Gateway sites and explain how these sites would “deliver enhancements and improvements to the visual approaches and main arrival points of the town.” In most cases a “gateway” site is expected to make a statement in the form of a striking and notable feature. As such, reading of the first paragraph of the policy would indicate provision of prominent development, yet the second paragraph requires development to reduce the significance of any adverse effect on the landscape setting. Paragraph 3 goes on to say visual impact of new development on views of the countryside and on sea views should be minimised”, implying that significant statement development should neither be prominent nor impact on views of the countryside or of the sea. The policy would appear to be contradictory – providing a prominent gateway feature is contrary to limiting the impact on the wider landscape.</p>	Policy D3	Examples of gateway locations are provided in the policy text. The policy does not state that gateway sites are expected ‘to make a statement in the form of a striking and notable feature’ therefore the policy wording is not considered to be contradictory – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>Topography also ensures there are few, if any, views of the sea from approach roads and gateways to the town. The key issue, therefore, is to reinforce the sense of arrival at a major tourist destination on the coast.</p>		
		<p>The site is promoted for employment use and/or a park and ride – but is shown as tourism in the Skegness Gateway masterplan. The allocation will also surround an area of caravan holiday accommodation – enclosing holiday accommodation with employment use does not appear to be in accordance with tourism policies V1 and V3 or the design policies D2 (Car Park) and D3 (Gateway and Edge of Settlement development). The emerging masterplan for Skegness Gateway proposed this area for low density tourism accommodation in accordance with Policy SP19 part 5. An extension to the existing employment estate already benefits from planning permission. The Skegness Gateway masterplan proposes an extension to the approved site to focus employment development in a location that allows businesses to build relationships with each other due to proximity, and to focus highway improvements. Site Allocation NDP3 should be deleted, in favour of land promoted in the draft</p>	Site NDP3	<p>It is acknowledged that Site NDP3 may conflict with the delivery of the wider Skegness Gateway site. It is not possible to allocate the wider site at this stage of the NDP process without undertaking further public consultation – it is also considered to be a strategic site that should be brought forward through the Local Plan process. Site NDP3 has therefore been deleted from the Neighbourhood Plan and the remaining site allocations renumbered accordingly.</p>

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		<p>Masterplan for the Skegness Gateway LDO. The land should be allocated for holiday accommodation.</p> <p>Policy requires proposals to demonstrate passing the sequential test, but by being designated in a part of the development plan this test would be passed. The exception test would still need to be applied to sites which have not been allocated.</p>		
015	Mr Danny Brooks	I have concerns that the housing plan is not cascading I believe it should be so our residents children get a chance to get housing.	General comment	Policies H1 and V2 support new affordable housing being provided to those with a local connection (as defined by Annex 1 of the ELDC Core Strategy Local Plan) which would include children of local residents – no change required
016	Ms Judy Chapman	Clearly some older style guest houses and hotels when no longer fit for use will need to be redeveloped. Whilst its clear the EA will be opposed to residential on the ground floor ( a policy I disagree with) I do think you should consider the option for conversion to flats on the upper floors with the ground floor reserved for spaces for cycle storage, air source heat pump equipment, vehicle charging pods, laundry rooms etc;. Please do not rule out apartments where the design can be effective. I am concerned that hard working former guest house owners be trapped in their oversized and unaffordable properties into their old age	Policy H1 / V2	Policy V2 would support the conversion of guest houses to flats where it provides affordable housing or accommodation for older people.

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		with no prospect of being able to dispose of the property into the development market. At the same time young people would appreciate apartment living.		
017	Mr Colin Donson	Fine, seems a complex but important document.	Section 1 - Introduction	Comments noted – no change required
		Useful info for the future	Section 2 – Skegness in Context	Comments noted – no change required
		Signposting and parking needs improve	Section 3 – Opportunities and Constraints	Policy D2 supports applications for new, well-design car parking, including appropriate signage – no change required
		Agree with vision especially job creation	Section 4 – Vision	Comments noted – no change required
		Transport hub location will be difficult to find. I agree with restricting HMOs.	Section 4 – Objectives	Comments noted – no change required
		Supported	Policy V3	Comments noted – no change required
		Needed	Policies INF2 to INF5	Comments noted – no change required
		Redevelopment needed. Old age retirement flats.	Site NDP1	Policy NDP1 provides support for affordable residential uses on this site – no change required
018	Mr Andrew David Ellison	Pavements should not be obstructed so as to cause inconvenience to disabled people and others with mobility problems.	Policies TC1, INF2 – INF7,	Comments noted. Policy D2 ensures that parking design and layouts must not allow vehicles to block footpaths and cycleways – no change required.
		It would appear you wish to close this site and build on it. The report claims this will have little or no effect on recycling. I find this hard to understand. There is a vague	Site NDP4	It is understood that the site is being relocated – confirmation of this from LCC has been sought.

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		reference to LCC providing an alternative but no assurance this will be in Skegness or that an acceptable alternative will be provided before the Warth Lane site is closed.		
019	Mr Steve Kirk	I have looked at this out of interest and can see why nobody is filling it in.	Section 1 - Introduction	Comments noted – no change required
020	Mrs Christine Robinson	It seems to say that the Skegness Plan conforms to ELDC and National planning policies, which begs the question - what if these policies do not offer the best way forward for Skegness	Section 1 - Introduction	It is a requirement of neighbourhood plans that they are in conformity with National Planning Policy and the strategic policies in the adopted Local Development Plan – no change required
		Population figures are 10 years out of date. Appreciate that the national census for 2021 are not currently available, but has any allowance been built into the plan for any changes in demographics that may occur e.g increase in the number of residents in caravans.	Section 2 – Skegness in Context	It is acknowledged that the 2021 Census data is not yet available. When the neighbourhood plan is reviewed, these up-to-date figures should be available and can be incorporated – no change required.
		Skegness currently struggles with significant congestion, and it is difficult to see how it could cope with additional traffic. Park and Drive may help in this respect but unless the quality and variety of retail is increased there is little to attract people from out of town. Improvements in public transport are essential for both visitors and residents and whilst many people may take holidays in this country post-pandemic quick solutions are needed	Section 3 – Opportunities and Constraints	Comments noted – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		to ensure that the staycation become a holiday of choice.		
		Agree with the vision, but there needs to be the infrastructure to support it.	Section 4 – Vision	Comments noted – no change required
		Agree in general with the objectives of the plan. However the pedestrianisation of Lumley Road will only divert traffic to surrounding roads leading to increased congestion and further deterioration of many roads that are already in a poor, even dangerous condition. Needs additional opportunities and support for the older generation that form a large part of the town's residents and visitors, and who have the spending power to ensure the continued improvement in the town's economy e.g. cheaper parking for permanent residents.	Section 4 – Objectives	Objective states this would be subject to necessary transport assessments and traffic management surveys being undertaken, so it would only be supported if considered appropriate. The cost of parking is not an issue that can be addressed through neighbourhood plan policies – no change required.
		Agreed	Policies E1 to E4	Comments noted – no change required
		Consideration needs to be given to the provision of supporting services such as doctors. Concerned about the additional traffic and the impact this will have on congestion in the area.	Policy V1: Tourism and Visitor Economy	Policy C3 supports the development of new health facilities. Policies INF5 and INF6 set out standards and provisions to ensure the impacts of new tourist related development upon parking provision are adequately addressed. Reference added to Policy V1 which supports applications for tourism-related development where it can be demonstrated that they do not have negative impact upon local highway network (as demonstrated through

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
				appropriate Transport Assessment).
		Is there enough resources within the Council to police this?	Policy V2: Loss of Visitor Accommodation	Where planning consent for change of use is required, these applications will be assessed against the requirements set out in this (and other) Neighbourhood Plan policies as part of the planning application process – no change required.
		Need to encourage Quality as well as quantity.	Policy V3: Applications for Overnight Visitor Accommodation	Policy V3 supports developments that demonstrate principles of good design – no change required
		Agree	Policies TC1 to TC3	Comments noted – no change required
		Agree	Policies INF1 to INF5	Comments noted – no change required
		Unless traffic can be diverted out of town this will cause problems for traffic flow through the town especially if traffic is diverted away from Lumley Road.	Policy INF6: Parking on Public Highways (Non-Residential and Serviced Tourist Accommodation Uses)	NDP objective states that pedestrianisation of Lumley Road would be subject to necessary transport assessments and traffic management surveys being undertaken, so it would only be supported if considered appropriate – no change required
		Agree	Policies INF7 to INF10	Comments noted – no change required
		Is this sufficient bearing in mind the governments policy on electric vehicles?	Policy INF11: Ultra Low Emission Vehicles (ULEV) Parking Standards and Future Provision	The standards are considered to be in accordance with government objectives to reduce dependence on non-electric vehicles. For new non-residential uses, the requirement for 1 EV charge point for every 5 parking spaces is deemed sufficient – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		Agree	Policy INF12	Comments noted – no change required
		Agree	Policies H1 to H3	Comments noted – no change required
		Who decides?	Policy C1	Compliance with this policy will be assessed through the planning application process – no change required
		Agree	Policy C2	Comments noted – no change required
		Community Health Facilities need to be increased for the existing population.	Policy C3	Policy C3 supports applications for new and enhanced community health facilities – no change required
		Agree	Policy D1 to D3	Comments noted – no change required
		Agree - essential that the level of provision is retained	Policy D4	Comments noted – no change required
		What is the definition of affordable?	Site NDP1	Relevant definitions added, including reference to definition of Affordable Housing in National Planning Policy Framework (NPPF).
		Where would the fire station be relocated ?? Facility must be retained in a central location.	Site NDP2	The site is confirmed by LCC as being available for development. Confirmation from LCC sought regarding future fire station provision – no change required.
		Essential that this facility is retained - where would it be relocated?	Site NDP4	The site is confirmed by LCC as being available for development. Confirmation from LCC sought regarding replacement provision – no change required.
		While the aims of the plan are laudable. Without major infrastructure improvement.	General comment	Contributions towards infrastructure provision will be addressed through the planning application / S106 process –



Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		especially to roads, these proposals may be unachievable.		no change required
021	Mrs Margaret Taylor	<p>More quality retail outlets are needed alot of items have to be sourced either online or out of town especially clothes and shoes. We have alot of charity shops but need a good retail park and something like Springfields at Spalding would attract shoppers as holiiday makers It would provide job opportunities as well. I was head of hospitality when both Skegness and ELDC had a FE facility for training hospitality students. This was well attended and was not running at at loss. However it was handed over to a charity funded provider and the facilities ceased. There is the need and I was very sad to see the facility go. Needs to be though out again its along journey everyday to Boston or Lincoln for young people especially in the winter months. We need something local thats practical training for these people to learn the skills they need. Its a practical industry and needs practical training. these skills not covered in school so we will continue with skills shortages unless something is done.</p>	Section 3 – Opportunities and Constraints	The end-users of retail units cannot be specified through Neighbourhood Plan policies. Policy E4 provides support for new education uses – no change required.
		Car parking needs sorting we have lost the seafront car parks over the last few years and this year has shown the chaos we now have with traffic trying to find a	Section 4 – Neighbourhood Plan Objectives	Policy INF12 provides support for retention of existing public car parking provision and new provision where demand is identified – no change required.

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		space to park we urgently need a new even multi story car park		
		New businesses are needed for new job opportunities but Skegness residents need to have the decision as to whats needed etc.	Policy E1: Starter Business Floorspace	Local residents will be consulted on applications for new development through the planning application process – no change required
		Skegness town and businesses should decide whats needed in discussion with education providers	Policy E4: Education Uses	Comments noted – no change required
		Car parking is a total disaster at present We have lost 3 big car parks over time- the lawn, grand parade and pier field and no alternatives have been provided. At a time when more visitors come by car we urgently need to address car parking	Policy INF12: Public Car Parking Provision	Policy INF12 provides support for retention of existing public car parking provision and new provision where demand is identified – no change required.
		Needs to be Skegness council making these decisions they have local knowledge and local residents have elected them to make decisions on their behalf	Policy H1 to H3	The Town Council will continue to be a statutory consultee on planning applications however planning decisions will continue to be made by ELDC – no change required
		Many of our facilities are being lost We need open spaces etc and again L firmly believe these should be local decisions.	Policy C1: Existing Community Facilities (non-health related) and Public Open Spaces	Policy C1 provides support for development of new public open spaces. The Town Council will continue to be a statutory consultee on planning applications however planning decisions will continue to be made by ELDC – no change required
		New facilities need to meet need and be accessible	Policy C2: New Community Facilities (non-health related) and	Policy C2 provides support for development of new community facilities – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
			Public Spaces	
		Local decisions by Skegness councillors	Policy D1: Design in New Developments	The Town Council will continue to be a statutory consultee on planning applications however planning decisions will continue to be made by ELDC – no change required
		We urgently need car parks its a must before next summer	Policy D2: Design of New Car Parking	Policy INF12 provides support for retention of existing public car parking provision and new provision where demand is identified – no change required.
022	Mr Anthony Tye	Very long-winded, not good for residents	Section 1 - Introduction	We have tried to keep the Neighbourhood Plan as clear and concise as possible – no change required
		It's very difficult to keep up standards of B/Bs and hotels if the owners have not kept on top of them throughout the season.	Policy V2	Comments noted – no change required
		The problem Skegness has slipped on quality over the past 20 years and needs to get new owners to bring back the service to the B/Bs.	Policy V3	Comments noted – no change required
		Needs upgrading and bringing up to a good standard.	Policy TC1	Policy TC3 provides support for applications that provide improvements to the visual character of the town centre – no change required
		Too many of our shops have rooms above on our main shopping area and do not let them out. This is a total loss of floorspace.	Policy TC2	Comments noted – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		Very poor signage throughout Skegness and roads coming in.	Policy TC3	Policy TC3 relates specifically to shop front signage rather than highway signage – no change required
		Better bus timetables are needed.	Policy INF1	This is not an issue that can be addressed through the neighbourhood plan. Comments noted – no change required
		One space per person are needed.	Policy INF2	Evidence provided in Parking Standards Background Report (April 2020) – no change required
		I personally think Skegness has enough Houses of Multiple Occupancy. We have more than the rest of Lincolnshire.	Policy INF3	Comments noted – no change required
		We are only short of public car parking space about 6 times per year, all Bank Holidays and odd days in the season.	Policy INF12	Policy INF12 states that new provision will only be supported where it can be demonstrated that it is required – no change required
		I believe we are going in the correct direction, allowing empty B/Bs to be returned to residential.	Policy H1	Comments noted – no change required
		Possibly not enough, as we get more retired people moving to Skegness for the improved air quality.	Policy H3	Comments noted – no change required
		We do not have enough open spaces, but on saying that, we do have the beach.	Policy C1	Policy C1 provides support for the protection of existing open spaces – no change required
		Not enough	Policy C3	Policy C3 provides support for the development of new community health facilities – no change required

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
		We should have more say on the design of developments.	Policy D1	Comments noted – no change required
		All hotels should have 1 space per room (new build)	Policy INF4	Evidence provided in Parking Standards Background Report (April 2020) – no change required
		Parking on our streets and roads is a huge problem, as our season starts with tourists parking freely on our streets.	Policy INF6	Comments noted – no change required
		Needs better policing	Policy INF7	Comments noted – no change required
		A few more spaces would be needed.	Policy INF8	Policy INF8 seeks to increase disabled parking provision where appropriate – no change required
		Unsure that we have enough spaces around the town.	Policy INF9	Policy INF9 seeks to increase motorcycle parking provision where appropriate – no change required
		More cycle lock-up places are needed.	Policy INF10	Policy INF10 seeks to increase secure bicycle parking provision where appropriate – no change required
		We need more electric charging points around the town.	Policy INF11	Policy INF11 seeks to increase ULEV charging point provision for new non-residential applications where appropriate – no change required
		Bigger spaces within all car parks as cars appear to for bigger.	Policy D2	The dimensions of parking spaces are set by the Local Highway Authority design guidance. These are typically a minimum of 2.4 x 4.8 metres – no change required
		All property should be on cascade basis. Skegness residents to have first refusal.	Policy D3	Policies H1 and V2 support new affordable housing being provided to those with a local connection (as

Ref.	Consultee Name	Consultee Comments Summary	Relevant Policy / Section	Skegness Town Council Response
				defined by Annex 1 of the ELDC Core Strategy Local Plan) – no change required
		Apartments should be on a cascade basis.	Site NDP1	Policies H1 and V2 support new affordable housing being provided to those with a local connection (as defined by Annex 1 of the ELDC Core Strategy Local Plan) – no change required
		Should be closed and moved further out. The area should be sold for new houses.	Site NDP4	Policy NDP4 supports the redevelopment of this site for affordable housing.

#### **4.0 REGULATION 14 CONSULTATION OUTCOMES**

- 4.1 Following review of all responses received to the Regulation 14 consultation, the Skegness Neighbourhood Plan was amended in accordance with the Town Council responses outlined in the final column of Table 1 above.
- 4.2 The revised Skegness Neighbourhood Plan is the version that has been submitted to East Lindsey District Council for examination.

**APPENDICES (ATTACHED SEPARATELY)**

- APPENDIX 1 COMMUNITY CONSULTATION REPORT (NATTER MATTERS, DECEMBER 2017)**
- APPENDIX 2 OBJECTIVES SURVEY REPORT (NATTER MATTERS, JANUARY 2019)**
- APPENDIX 3 EVIDENCE OF CONSULTATION PUBLICITY ONLINE AND VIA SOCIAL MEDIA**
- APPENDIX 4 LIST OF REGULATION 14 CONSULTEES**
- APPENDIX 5 REGULATION 14 CONSULTATION COMMENTS FORM**
- APPENDIX 6 REGULATION 14 CONSULTATION LEAFLET**
- APPENDIX 7 CONSULTATION WEBINAR SLIDES**
- APPENDIX 8 EMAIL FROM ELDC OFFICERS REGARDING HRA (14<sup>TH</sup> APRIL 2021)**





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