**EAST LINDSEY DISTRICT COUNCIL LOCAL PLAN**

Pre-Submission publication stage

**REPRESENTATION FORM**

**Personal Details:**

<table>
<thead>
<tr>
<th>Title</th>
<th>Mr</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name</td>
<td>Stephen</td>
</tr>
<tr>
<td>Surname</td>
<td>Brooks</td>
</tr>
<tr>
<td>Job Title (where relevant)</td>
<td>Chairman</td>
</tr>
<tr>
<td>Organisation (where relevant)</td>
<td>North Somercotes Parish Council</td>
</tr>
<tr>
<td>If you are an Agent, who are you representing (where relevant)</td>
<td></td>
</tr>
<tr>
<td>If this representation is made on behalf of a number of people who share the same view, please give details of numbers and how those views have been authorised (where relevant)</td>
<td>At the Parish Council meeting held on 23rd January 2017 it was Resolved to submit this response from the Parish Council to the District Council on behalf of the residents and other numerous stakeholders of the North Somercotes Community whom the Parish Council represent.</td>
</tr>
</tbody>
</table>

**Address:**

- Line 1: Arden House
- Line 2: Keeling St
- Line 3: North Somercotes
- Line 4: Louth

**Post code:** LN11 7QU

**Telephone Number:** 01507 359282

**e-mail address (where relevant):** nspcpearce@btinternet.com

**Representation Details:**

**Q1  Do you consider the Local Plan to be…..**

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legally compliant</td>
<td>✓</td>
</tr>
<tr>
<td>Sound</td>
<td>✓</td>
</tr>
</tbody>
</table>

**Q2  If you consider the Local Plan to be unsound, which of the following ‘tests’ of soundness do you think it fails to meet... Please mark all that you think apply**

<table>
<thead>
<tr>
<th>Positively Prepared</th>
<th>✓</th>
</tr>
</thead>
<tbody>
<tr>
<td>Justified</td>
<td>✓</td>
</tr>
<tr>
<td>Effective</td>
<td>✓</td>
</tr>
<tr>
<td>Consistent with National Policy</td>
<td>✓</td>
</tr>
</tbody>
</table>
Q3 Please provide comments if you wish to support the legal compliance or soundness of the Local Plan or provide details of why you consider the Local Plan is not legally compliant or unsound. Please use a separate form for each section and be as precise as possible.

To which part of the Local Plan does this representation relate? **Overall Impact**

1. Preamble:
At the outset the Parish Council should say that it appreciates the vast amount of work and effort that has gone into the collection, collation and analysis of evidence and production of the documents for publication as part of the Local Plan. Unfortunately, however some of this evidence appears to be inaccurate and some appears to result in a distinctly negative outcome for North Somercotes, particularly when compared to other smaller less sustainable settlements such as Grainthorpe and Hogsthorpe which are also in the Coastal East Lincolnshire area.

North Somercotes, population C1800 (1732 - 2011 census), is a large service village on the strategic road network some 1.5/2 miles from the coast, adjacent to the coastal conservation zone. The settlement is largely self-sufficient, minimising the need to travel but with a commuter bus service, and is 20-30 minutes by car to Mablethorpe, Louth and Grimsby, and 45mins/1 hour to Skegness and Lincoln on County Council maintained highways/ gritting routes. It provides a range of smaller communities along the coastal strip and inland with employment, retail and key services and facilities as well as supporting a growing tourist trade both in summer and winter (C.60,000 visitors Nov-Jan during Seal viewing season). People are attracted to the area to live and for leisure time, because of the high quality of the area and the accessibility of essential services and other facilities. Current grant funded initiatives by the County Council to support local businesses are aimed at improving the range of cultural and other business opportunities available, rather than just tourism, as well as extending the tourist season beyond the current 10 months to one that is ‘all year-round’.

1.2 The wide range of services and facilities include 3 convenience shops – one with extended hours post-office, farm shop, butchers, two public houses, 5 restaurant/take-aways, 2 community/village halls, junior and senior football clubs, playing field and sports pavilion, pre-school nursery/playgroup, Rainbows, Brownies, army cadets, youth club, primary school and secondary school, over-60s club, private meals-on-wheels service, Church, Cemetery, Public Toilets, small industrial unit, Fire Station, Coast Guard station, Doctors surgery with dispensary, dentist, service garage and bus depot. There is a wide opportunity for leisure activities including horse riding, tennis court, leisure club with pool and gym, billiards and snooker club, WI, yoga and bowls. There are over 60 businesses listed in the parish ranging from small businesses and self-employed home-based enterprises to large employers, including Lakeside Park Holiday centre, various B&B establishments, Fishing Lakes and camping sites, which also provide a source of local employment in tourism.

1.3 By any measure this is a significant rural settlement and the Local Plan should facilitate the maintenance and enhancement of these services in order to sustain the vibrant quality of life for those that live and work here. This settlement now represents, in terms of wider sustainability criteria, one of the most sustainable locations for future development on the coast. The Parish Council and District and County Council colleagues must therefore ensure that there is a fair and appropriate balance struck which ensures the right level of sustainable development for our resident population, by way of an inclusive, positive and proactive Core Strategy and Local Plan which mitigates the flood risk constraints and turns them to advantage. Unfortunately, at present this will not be possible with the Strategy as applied or the Plan as written.
1.5 Reluctantly, the Parish Council has reached the conclusion that there is no alternative but to state that it believes that the failure to make even a preliminary assessment of this community’s growth needs, and the resultant negative outcomes from some of the underlying policy proposals, do not therefore fulfil the requirement for the Local Plan to be positively prepared, justified, effective, or consistent with national policy. The reasons for this conclusion are detailed below.

2. Legal Compliance – Consultation – lack of community involvement and lack of adequate consultation

2.1 The Parish Council has tried since before 2012 to engage with ELDC officers and members regarding the specific issues this community faces trying to balance the needs and potential of a large vibrant and sustainable service settlement in a flood risk area. The Parish Council’s attempts to engage with ELDC have on the whole, with one exception, been met either with indifference, misinformation, and on one occasion ill-concealed prevention. Meaningful engagement and participation therefore falls short of the Parish Council’s expectations and those it represents.

2.2 Because of this unhelpful experience over a long period of time, North Somercotes perceives a distinct bias against its involvement, and communication and engagement has therefore been negatively affected as a result. This in turn has affected the ability of members of the local community to have their views heard via input from the Parish Council to/from ELDC as there has been no meaningful two-way communication process with this, or many other settlements who feel that their comments and input have largely been ignored.

2.3 For example, as a result of concerns expressed about the Coastal Policy and its inconsistent application and potential for negative outcomes it appears that a Coastal Housing Working Group will be set up in the future but at no time has this been discussed with the Parish Council, nor has an invitation to be involved been mooted. As one of the largest villages in the district which has previously proposed the implementation of exemplar flood resilient/resistant housing alongside local planning policies which would enable immediate contributions to Flood Prevention Infrastructure, rather than lengthy legislation changes, this is deeply disappointing. The proposed project is a late and reactive response to the coastal community’s feedback to the first draft, which many feel was ignored and therefore see little point commenting on the latest draft. Such a working group should have been set up in 2012 when the first draft plan was being put together and the Parish Council first attempted to engage with District Council colleagues over the crucial but not insurmountable issue of flood risk and sustainability.

2.4 In the earlier Plan preparation back in 2012 a number of sites were identified and put forward in this settlement. More recently the Parish Council has raised the fact of why these sites have not at least been included in an assessment of viability against identified need as indicated by the zero population calculation and were told that no sites had been put forward in North Somercotes either following the call for sites placed in the local press, or by ELDC from previous inclusion, or as a result of direct contact with all previous persons who had put forward sites in 2012.

2.5 On close examination there appear to be a number of anomalies and misinformation. Firstly, the Parish Council has evidence of at least one site that was put forward in 2016 which appears to have been discounted before even being objectively considered against the identified housing need and constraints – perhaps because no such objective analysis took place for this settlement or indeed our neighbour South Somercotes which barely gets a mention. Secondly, having requested a copy of the specific letters which it was alleged had been sent to all those who had previously put forward sites in North Somercotes themselves in 2012, or to owners of those sites which had been identified by ELDC as potentially suitable, the only letter that has been produced is a generic consultation letter about the Draft Plan, not a specific letter to each site owner asking to know about their potential site availability despite this having been previously stated as being carried out.

2.6 This leads the Parish Council to reluctantly conclude that ELDC have failed to make direct use of specific communication to potential site owners in this settlement regarding their site’s
availability. Therefore, the Parish Council believes that the open and unbiased consultation required to achieve legal compliance in this instance has not been complied with and when this has been queried it appears that misleading information has been supplied to the Parish Council. Had the Parish Council realised that none of the land owners or site owners on the 2012 SHLAA had been contacted then it would have done so itself.

2.7 This is all the more concerning when these identical issues had been raised in 2012 in the response which the Parish Council submitted on the SHLAA at that time – see Appendix 1 – NSPC Response to ELDC 2012 Strategic Housing Land Availability Assessment. This demonstrates, as far as this Parish Council is concerned, a lack of acceptable engagement and consultation over the future needs of this large service village.

2.8 While the Parish Council appreciates the costs involved, the large number - and lack of availability - of a set of hard copy documents for community consultation, unless they were paid for, has meant it has been practically impossible to engage the local community in a meaningful manner regarding what is being proposed. With unreliable Broadband service as low as 277kbs this has impaired the ability of the Parish Council to access and download documents and many members of the community do not have access to a computer or reliable internet in any case so cannot get hold of digital copies, nor do they have easy access to Manby or a library to read a hard copy. A hard copy of the final publication documents as a minimum should have been made available for each Parish Council to make available for each community in order for consultation to have been thorough and effective.

2.9 It must also said, as it has been to ELDC, that the lack of rudimentary document control procedures has made it exceedingly difficult to ensure councillors and others are reading the most up to date versions of the various documents, especially when no page numbers, issue date, status, author, version control etc is included in the header or footer, and the PDF title of the document on the web page for downloading is different to that on the front page of the document itself and then not included in a header or footer. This has created significant problems when trying to ensure councillors and others have the correct version, or when downloading and printing large documents of over 100 pages with no page numbers and print errors occur. Printing documents for those councillors and others that either don’t have internet access or cannot read on a screen has therefore incurred significant costs and impacted on availability, although it is appreciated that ELDC are under significant budgetary constraint. It also makes it practically impossible to quickly reference or coherently comment on specific sections when there are no page numbers to refer to (eg East Lindsey Strategic Flood Risk Assessment – October 2016).

2.10 In short the Parish Council does not believe that the Plan is legally compliant as it cannot agree on behalf of this community that it has been positively prepared; the District Council’s obligations to seek intelligent responses and proposals for meeting this community’s needs and aspirations for future economic, social and environmental viability and sustainability appear to have been frustrated by the District Council’s own failure to meaningfully engage with and respond to this Parish Council and other key stakeholders, such as local developers, to consider together those needs and aspirations and how they can be positively met in light of the potential, but not unsurmountable, constraints in a way that would engender both local community and national benefits.

Continue on a separate sheet if necessary. Mark any additional pages with your name/organisation.

3.1 The Parish Council believe a more rational methodology would have been to assess each settlement’s requirement for housing, based on zero population growth, and then consider constraints and issues and whether that growth would or would not be included in the supply of strategic housing as part of the Local Plan Housing target. This would provide much needed certainty for residents and developers – who at present have stated to the Parish Council that they feel the coast is ‘Closed for Business’ as far as housing development is concerned, which is troubling. As the Parish Council turns its attention towards beginning the Neighbourhood Planning process, once its housing development is underway, this would also provide a guiding context for the future as work to overcome constraints and mitigate residual risk takes place.

3.2 However ELDC have taken a different approach and consequently there is no mention of growth levels needed to maintain the viability and vitality of North Somercotes, one of the largest villages in Lincolnshire, a fact which the Parish Council finds unacceptable.

3.3 By comparison on page 7 it states that in Hogsthorpe (population 908 in 2011, 1.6 miles from the sea on a diminishing coastline which experienced flooding in 2007 (see East Lindsey Strategic Flood Risk Assessment (SFRA) – October 2016 – no page numbers) there are two sites on higher ground outside the flood risk, but evacuation would present some issues as people would need to go through the flood risk zones. North Somercotes is 1.5 to 2 miles from the sea, on an accreting coastline with significant marshland, some intervening wooded land mass in excess of 8 metres high to the north east, and has never been flooded.

3.4 Similarly, for Grainthorpe, page 6/7 (which ELDC elsewhere state experienced flooding in 2007), it notes there are two sites but makes no mention of flood risk for evacuation in this document, although in the SFRA October 2016 it states that a severe event would compromise access to and from the village so people would still have to travel along areas in the orange and red zones to evacuate.

3.5 Therefore unlike North Somercotes, in the event of a flood event, these and other coastal settlements that have been reclassified as ‘inland’ would not be self-contained if they were cut off. Placing these housing allocations in smaller coastal settlements which will incur increased demand and use of finite resources, at a time when we should be looking for schemes which make a positive and significant contribution to low carbon living and improving resource efficiency, eg minimising travel, is counter-productive and flies in the face of the NPPF and The Climate Change Act 2008.

3.6 Smaller settlements do of course also need growth to remain viable; however, it is not acceptable that a settlement such as North Somercotes, which has facilities, services and identified need for growth to retain its younger population and keep house prices within their reach has no such housing growth identified – strategic or otherwise - to meet the existing population’s needs. Yet strategic housing allocation is being made for these smaller coastal settlements, in places where there is no public transport apart from the Commuter bus, as in Grainthorpe to North Somercotes. So the number of car journeys to access services and facilities in North Somercotes or further afield would be increased, along with the potential to also increase the county council’s bill for school transport. Similarly, residents of North Somercotes are increasingly picking up devolved costs of district and county services through the Parish Council precept, whilst others using those services are precepted in another settlement. This would be
acceptable if this settlement could also have its own growth so that the increasing precept costs are more widely shared.

3.7 The flood risk and evacuation concerns in the Coastal settlements of both Hogsthorpe and Grainthorpe are broadly similar to those at North Somercotes, which is double their size, with its own Coastguard Station and Fire station as well as the Parish Emergency Response team which has been successfully deployed in 2009 and 2010 (snow), and 2013 and 2017 (flood risk).

3.8 Most importantly, North Somercotes is protected by newly constructed sea defences at Donna Nook as part of the £8m+ Tetney to Saltfleet improvements, which to quote the Environment Agency (Donna Nook Managed Realignment Scheme Design and Access Statement - November 2009) are:

“…. wider, stronger and more sheltered than the existing defences, greatly reducing the risk of them failing or being overtopped. The standard of protection (better than 1 in 200 years) provided to land and properties in the area against flooding from the sea will therefore be improved and will be well above the standard insurance companies require to continue full property insurance cover. …”

3.9 Page 7 – Huttoft, population 585 in 2011, which is approximately 2 miles from the sea yet reclassified as inland, is listed with a zero allocation being made as the housing requirement can be met through existing planning commitments. This suggests that the housing requirement for Huttoft to remain viable, which is not given, was at least considered despite it being a similar distance from the coast and similarly challenged in terms of evacuation requirement regardless of part of the settlement being on higher ground.

3.10 There is however no such evidence that any assessment has been made of what the housing requirement is in order to keep North Somercotes’ existing population broadly stable and in line with the Zero population option ELDC have chosen. Not only does this fail to meet the NPPF requirement of growth to enhance or maintain the vitality of rural communities, but along with no assessment of growth, there has been no assessment of infrastructure which is also relevant if any of the extant permissions were now to be built out, or brownfield sites become available, yet ELDC are fully aware of identified issues with water and sewerage networks and latterly the unreliable state of broadband, as this has been raised both before and since 2012 on a regular basis.

3.11 Flood risk constraints can clearly be resolved; this has been amply demonstrated with recent affordable housing developments in the village, some of the tenants of which are often from outside the locality or district.

3.12 it is incomprehensible to the young professional people, and many others affected in this community, particularly those going back many generations or those who have lived/worked in the locality for many years, how it is seen as quite reasonable and acceptable for someone who has never been part of this community to be able to arrive and live here in flood resilient housing, when those who have made a considerable contribution, have a vested interest and long term connection cannot. This is neither equitable nor justifiable and the impact of the proposed Coastal Policy simply exacerbates this inequity.

3.13 Once the maximum level of growth required over the plan period has been determined, the desirability of that level, the wishes of the community, and the implications of the flood risk and infrastructure constraints to achieving that level of growth should then be considered; together with what innovative policies may be required to achieve this, and how they can contribute to flood prevention/maintenance funds which will in turn mitigate the flood risk.

3.14 A realistic and accurate consideration of the deliverability of the currently overstated extant permissions is required (see Appendix 2 – North Somercotes corrected allocated and windfall sites 25-1-16), together with an assessment of the potential for windfall sites, as part of meeting the desired level of growth. It would then be possible to see if any of this growth would be able to
contribute to the strategic housing allocation, or simply be the anticipated level of growth for this settlement over and above that in the Plan.

3.15 The Parish Council believes that the rigid approach to flood risk which is being promoted for settlements on the coast – apart from where reclassified as inland - with no apparent objective consideration of the detailed specifics of that location, how it can be mitigated, or the potential negative impact of this rigid approach on the need to maintain this settlement as a sustainable location, is in conflict with the NPPF. Growth to meet the needs of such a thriving and viable community is not inappropriate, it is essential. The community does not wish to expand exponentially or encourage excessive in-migration, it simply wants to be able to offer its residents access to appropriate, modern, high quality housing to suit their needs, as is being done for those in social or affordable housing.

3.16 This rigid approach also appears to ignore the current strategy contained in the Greater Lincolnshire Strategic Economic Plan (SEP) which includes economic development on the Coast, with effective water management, the contents of which supersede and update the Lincolnshire Coastal study. The SEP includes the provision of market housing, if it can be suitably mitigated, to meet the needs of existing local communities, tackling deprivation, managing water resources, and harnessing the potential of the coast to ensure economic prosperity for the future. This new focus embodied in the SEP which was published in 2014 and agreed by all partner organisations within Greater Lincolnshire, and which this community expects to benefit from, does not appear to be adequately reflected in the ELDC Local Plan in a way which will facilitate this.

3.17 Understandably, the broad aim of the NPPF is to guide development away from flood risk, but where a settlement is entirely at risk of flooding - so that development consistent with wider sustainability objectives is required and it is not possible to locate it in areas of lower probability of flooding – then development should still be permitted up to the growth level providing that the constraints can be mitigated and the Exception Test applied as required.

3.18 It is clear that affordable housing, and housing using previously developed and brownfield land in a flood risk area is acceptable if built with appropriate mitigation. It is also acceptable to put permanent Gypsy and Traveller sites in flood risk areas without Environment Agency objections.

3.19 It must therefore be the case in a fair and just society that a settlement’s existing workers and residents should also be able to access market housing to meet their needs in the same way, via a fair and equitable policy environment. Why would the lifeblood of our community or those who have contributed throughout their working life receive less favourable treatment?

3.20 The Coastal Study in any case established that notwithstanding flood risk, to sustain communities in the coastal zone and enable them to ‘develop and have a viable and prosperous future’; it would be necessary to make provision for additional development including housing to meet changing demand. This means market and affordable housing.

3.21 Security from flooding is a key infrastructure requirement, and having seen the investment of over £8m of public monies and loss of grade 1 and 2 agricultural land during 2009-2012 to ensure appropriate defences are in place along this coast from Tetney to Saltfleet, this community reasonably expects to derive some economic and social benefit from that improved infrastructure.

3.22 A positively prepared plan should identify the constraints and provide ways for them to be proactively, imaginatively and intelligently managed, in a way that would contribute to positive solutions with multiple stakeholder benefits. For example, by the introduction of planning policies which enable the sequential and exception tests to be met in specific circumstances for those who live/work locally, to be able to access appropriate high quality, carbon efficient, environmentally sound, flood resilient/resistant housing, including for those people with a local connection who wish to self-build. The NPPF is quite clear that those already living/working in this community should be able to achieve this.
3.23 Such a positive approach would be entirely consistent with that taken by both Greater Lincolnshire in the SEP, and the Central Lincolnshire team in their recently examined Submission for example, which allow for development proposals for market housing to meet the assessed local community need (and resultant economic growth and prosperity) to be identified first and then to be considered against the NPPF - including application of the sequential, and if necessary exception test to ensure that development is safe during its lifetime, etc. (Central Lincolnshire Proposed Submission Local Plan April 2016 Managing Water Resources and Flooding - Policy LP14).

3.24 Throughout the evidence it can be seen that the young adult professionals are being lost to the area, and there are low numbers of <50 year olds, and this includes from North Somercotes. Unless we find imaginative ways to provide appropriate development of market housing for those members of our local population that do not qualify for, or wish to be in, affordable housing but cannot afford the current house prices when they do become available, this trend will continue unabated and the population will become increasingly skewed – see Fig 1 below (August 2016 market Statistics (home.co.uk) source ELDC Planning Policy Committee Meeting Papers Appendix B 24-11-2016).

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Median House Price</th>
<th>No of houses for Sale</th>
<th>Time on the market</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chapel St Leonards</td>
<td>144,950</td>
<td>49</td>
<td>251</td>
</tr>
<tr>
<td>Ingoldmells</td>
<td>137,500</td>
<td>44</td>
<td>222</td>
</tr>
<tr>
<td>Mablethorpe</td>
<td>134,950</td>
<td>117</td>
<td>199</td>
</tr>
<tr>
<td>Skegness</td>
<td>150,000</td>
<td>357</td>
<td>224</td>
</tr>
<tr>
<td>North Somercotes (taken from Rightmove Nov 2016)</td>
<td><strong>216,760</strong> Also land for sale for 7 houses</td>
<td><strong>20</strong></td>
<td><strong>43</strong></td>
</tr>
</tbody>
</table>

Figure 1 - August 2016 market Statistics (home.co.uk)

3.25 This must be positively tackled head on now, not in five years’ time – at least five years have already elapsed since this was first flagged as an issue by the Parish Council and the response so far has to been a proposed Coastal Policy which has been inconsistently applied with a resulting in negative impact on the future of this community and its inhabitants, and very late in the day, a proposal for a lengthy project – which excludes those Parish Councils and stakeholders who arguably have most to contribute (it has never even been discussed with this Parish Council) - and infers a reliance on the introduction of legislation which would inevitably take considerable time, even if feasible, when it should be possible to draft simple planning policies using existing legislative powers, such as the Community Infrastructure Levy (CIL), to address many of the negative outcomes of the present proposals, alongside the legislative process involved with precepting options.

3.26 Members of this community whom the Parish Council has engaged with would certainly prefer the option of say, £5k per plot payable into a Flood Defence Fund, rather than face the prospect of having to leave the village to obtain a high quality home to meet their needs. Yet at this time the Plan does not propose to introduce a Community Infrastructure Levy (CIL) on new developments which will be a profoundly missed opportunity. Just 20 homes in this settlement could contribute £100K, and with the phased introduction of a specific precept element for Flood
Defence funds this community could be actively contributing to local sustainability as well as being of benefit to the wider community, thus meeting the requirements of the Exceptions Test.

3.27 The Government is actively encouraging house building to meet the needs of new households which will in turn boost the economy. This community has an above average record of home ownership and is actively seeking the development of starter homes and smaller type properties for ‘downsizing’ to meet the need of its existing population, not for in-migration. The Plan does not recognise or assist in meeting these local needs, or exploit their potential to contribute to resolution of the flood risk constraints faced by the wider community.

3.28 The Government is also encouraging self-build as a method of meeting un-met need and simultaneously boosting the economy. Yet ELDC’s register for Self-Build actively prevents those living and/or working locally to register for suitable plots in coastal locations, so ELDC has no way of identifying the unmet need for plots for potential self-builders, which is contrary to the government’s intention. Currently there are at least 6 resident/working families who want to self-build, and who have access to land for self-build in this community. Yet despite the potential of the self-build sector to contribute to meeting the growth needs of this settlement, it does not receive a mention; in fact, the coastal policy appears to be designed to actively work against this community continuing to thrive and flourish. This is neither justified nor equitable.

<table>
<thead>
<tr>
<th>Chapter 1 – Introduction, Chapter 2 Settlement Proposals and site Selection</th>
<th>Policy and Paragraphs Page 6 para 1.2 bullet points, Housing page 10</th>
<th>East Lindsey Settlement Proposals – Development Plan Doc 2016-2031</th>
<th>Key Diagram/Appendices</th>
</tr>
</thead>
</table>

4. Development Plan document 2016 - 2031

4.1 The Parish Council fundamentally disagrees with the proposals for the differential treatment of some coastal settlements and the punitive impact on North Somercotes. The negative impact of this approach and policy must be carefully considered at the settlement level in order to achieve a balance between the needs of the community to thrive set against the real, but low, risk of flooding.

4.2 As previously noted, no analysis appears to have been done of the number of households which would be needed to keep the population of North Somercotes broadly stable, allowing for the provision of high quality homes for the existing live/work population; young adults – which are being lost to the community – expanding families, and older residents wishing to downsize.

4.3 Therefore, this number does not feature in the surveys or assessments which were carried out and by failing to apply its own stated policy of zero population calculation for North Somercotes and simply aggregating all the extant Coastal permissions together, then saying this will fulfil each settlement’s requirements, ELDC has failed to identify this settlement’s needs first, and then consider the constraints second. The distribution of these permissions does not relate to the growth figure for North Somercotes as previously noted.

4.4 The Parish Council consider this to be a gross over-simplification to deal with what is undeniably a difficult and complex situation, which results in unjustified and negative effects for individual communities. The negative impact of this approach for North Somercotes is illustrated below:

4.5 On Page 160 Development Plan document 2016 - 2031– for North Somercotes it lists 55 existing commitments in Allocations and windfall sites – Appendix 2 refers. However, a close
examination of this number indicates there are a number of anomalies, which have previously been drawn to the attention of ELDC, but remain unchanged.

4.6 The Woolpack Development of 42 houses was finished some years ago. The allocated site listed LR569/68 with 33 houses refers to land which shares a boundary with the Woolpack Development but is at the rear of The Sycamores on Keeling St. This site which was granted back in 1968 has been discussed with the local developer who informed the Parish Council that he never agreed to 33 homes, his preference was always for 19, and he confirmed that he has no intention at present of bringing the site forward in the next 5 years nor with 33 houses.

4.7 The 33 are unrealistic and it is suggested the number should therefore be corrected to 19, and on the basis of stated non-delivery by the developer in the next 5 years, should in any case be discounted.

4.8 ELDC appear to have omitted or for some reason not listed a windfall site on Churchill Road, N/132/0004/06 previously N132/00419/04 which is for 2 x detached houses, 2 x detached bungalows and 1 pair semi-detached bungalows. This plot has been on the market for some time (most latterly put back on in 2015) and currently shows no sign of movement. Therefore, with no developer identified so no developer statement of intention to build in the next 5 years realistically it should be discounted.

4.9. This makes a total of 48 as a starting point. However, where there is no developer identified or a confirmed lack of intention to build these out in the next five years, they should be discounted. This includes the 2 with outline permission leaving a more realistic total of 20 and a maximum of 28 if you put back the 2 outline and 6 unknown developer intention.

4.10 The full planning permission for the Parish Council’s own development of housing for rental by local people, where there is already a waiting list of 9 for the 6 two and three bed properties, will be submitted in February following receipt of a further tranche of funding just received from the Homes and Communities agency which has provided support to this innovative project.

4.11 Para 1.2 page 6 bullet points 6 and 7 - When a query was raised with ELDC staff during the 2016 consultation why none of the 2012 sites put forward for North Somercotes has been assessed against the criteria and a sustainability appraisal done for each site, the Parish Council was told initially that because of flood risk no coastal sites had been looked at. When asked why no figures were given anywhere for the number of houses that would be required to keep the population for North Somercotes stable, the response was that the Plan would only show those sites needed to deliver the Plan in the next 5 years realistically it should be discounted.

4.12 Extant coastal permissions are being factored in to the Plan, albeit the delivery of 55 for North Somercotes is in some doubt, which will impact upon the Plan as a whole, and the Parish Council can see no justification for the exclusion of the zero population growth figure for North Somercotes at the start of the exercise. Residents and stakeholders in this community other than the Parish Council, have remarked upon the fact that this omission is unacceptable, a view which the Parish Council strongly endorses, and which amply illustrates the earlier statement regarding lack of engagement and meaningful consultation.

4.13 It has been stated by ELDC (email 24 November 2016) that if North Somercotes was to be considered as an inland town (like Grainthorpe, Huttoft and Hogsthorpe despite them clearly being in the Coastal area) then using the example of Huttoft, (population 585 in 2011), their zero population calculation had come to 53 as a starting point. The ELDC officer, seemingly unaware of the actual population noted that as North Somercotes was a lower population than Huttoft, the 55 extant permissions would mean that like Horncastle and Huttoft, this settlement’s housing needs would have been met and therefore no allocation would have been given anyway even if it was to be reclassified as ‘inland’. 
4.14 This is disturbing for a number of reasons. Firstly, Huttoft at 585 is obviously around a third the size of North Somercotes and using the same percentage applied to Huttoft (approx 9%) would give a housing need to keep this population stable of 155 over the plan period. Whilst the community would not wish to increase to this level, nor have the infrastructure to assimilate it, it is vastly different to the notional 55 let alone the more realistic and objective assessment of c28 extant permissions likely to get built out.

4.15 Secondly, and despite the main local developer in this settlement not having had any correspondence from or discussion with ELDC regarding his intentions for several years, it is understood that ELDC - having apparently recently researched developers’ intentions (according to the ELDC Local Plan Review of Evidence and Project Plan) – are confident that only 43% of extant permissions are deliverable. This confirms the Parish Council’s own analysis which that only 20-28 of the stated 55 permissions are likely to be built out in the next 5 years. This fails far short of the number of houses required to maintain this settlement at zero population growth pushing it into an unacceptable ‘no growth’ scenario, and the potential for lack of supply to meet local demand, and a further increase in house prices – fig 1 refers.

4.16 Also of concern, the Parish Council is aware of at least one site that was put forward in response to ELDC’s call for land on 9-2-14, and which specifically included land in North Somercotes. Yet despite the Leader of the Council’s statement that “All land identified to us will be assessed for suitability” the Parish Council has been unable to locate any such objective assessment against this settlement’s identified need anywhere in the supporting papers. Similarly, site NS0201 capacity 22 on the Old Camp Ground (Coxen’s Yard) Keeling St, is available and has remained so since it was first identified in 2012, yet the owner received no enquiry regarding its availability and this would appear to be the same for the 27 various other plots in the Parish that were identified at that time.

4.17 page 13, para 2.8 – no notional housing need has ever been put forward for or discussed with North Somercotes – why is this?

4.18 page 13, para 2.12 – how does the extant commitments map out against the identified need for each settlement, and how realistic are these numbers if the analysis undertaken by North Somercotes is a benchmark?

4.19 page 15, para 2.21 - no infrastructure assessment has been carried out for this large village, which the Parish Council believe cannot be objectively justified.
5. Settlement Proposals map page 4 and site selections

5.1 The foregoing has already detailed a number of anomalies and inaccuracies, including the incorrect details for Grainthorpe, and the actual position of North Somercotes in terms of its wide range of facilities and services detailed in section 1 above.

5.2 The artificial separation of Coastal and Inland is a recipe for confusion, particularly when bizarrely a number of those settlements on the coast are then reclassified as ‘inland’. ‘Coastal’ is merely a descriptive geographical term, it is not an accepted classification for denoting any other shared characteristics or homogeneity. This settlement does not recall asking for a separate coastal policy and certainly does not support the implementation in its current form or the unjustified results.

5.3 A more logical approach is a Water Management and Flood Risk Policy. This would apply to all settlements regardless of their geographic location, being only concerned with their flood risk characteristics and constraints, and how this needs to be managed to achieve the right balance between sustainable communities and the management of risk.

5.4 The Parish Council does not and cannot support such a divisive and unfairly exclusive policy or outcomes in its current form.

6. Page 21 – the stated preference to locate housing in areas which offer a range of community facilities and have good access to jobs, key services and infrastructure, away from areas of all types of flood risk is laudable, but it cannot be done at the exclusion of an existing and thriving settlement as previously noted.

6.1 This is particularly the case when the specifics of the settlement have not been taken into account in the same way as other large villages, and that no growth figures or other infrastructure constraints have been looked at.

6.2 For example, unlike some of the other settlements in the district which shelter behind the sea wall that protects from the high tides of the North Sea, North Somercotes is between 1.5 and 2 miles from the sea with an intervening heavily wooded land mass over 8m high in places.

6.3 ELDC state that evidence of past events will guide new housing away from areas of greatest risk – North Somercotes would agree entirely with this principle since the village has never been flooded, not even during the extreme events of 1953, nor in 2013 or 2017 – see Appendix 3 and
Appendix 4. Coastal locations should benefit from the same strategy as inland, according to flood risk at the site specific location, which in many instances is actually less than a large proportion of Louth for example where extreme ‘localised’ events have a higher occurrence rate.

6.4 Page 31-32 – SP5 - Specialist Housing for elderly People – page 31 para 4 – our young population are arguably just as much if not more in need of housing as already noted, so should also be able to benefit from suitable housing. To do otherwise will perpetuate an ageing population and an increasing dependency on council services

6.5 Neighbourhood Planning page 33 – it seems that the Parish Council will have to bring forward its application for Neighbourhood Planning to achieve any semblance of a positive and proactive future for this community, using specific evidence rather than rigid approaches, which it had intended to do once the Chapel Fields Housing Development was underway.

<table>
<thead>
<tr>
<th>Chapter 3 Affordable housing</th>
<th>East Lindsey Core Strategy Publication Version February 2016-2031</th>
<th>Key Diagram/Appendices</th>
</tr>
</thead>
<tbody>
<tr>
<td>Page 37 - 40</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

7. Page 37 – para 12 - The need for starter homes and houses for downsizing is very important in rural areas, which is recognised in the NPPF. The development of such housing for those who fulfil the local connection criteria but who do not qualify for or want affordable/social housing should also be supported. This includes in this settlement where flood risk is an issue but not insurmountable. The small scale development on Woolpack Meadows was very popular and property for sale on there is usually sold within a matter of weeks of it coming on to the market.

7.1 Demand is also clearly there for private rental properties, as the Parish Council already has a waiting list of 9 families with local connections for its 6 properties, but affordable housing developer contributions in this area are what has stalled many developments in the past. Starter homes using Right to Buy schemes, and serviced self-build plots should be supported as these are more likely to be taken up in this settlement where home ownership is higher than the district average, and young professional people and small families want to stay in the area. These prospective home owners are also most likely to be in a position economically to afford the suggested £5k CIL contribution for being able to build in the area, and an ongoing additional precept amount per annum, towards Flood Defence and Maintenance. Most would see this as a small price to pay to remain where they have grown up and wish to remain close to family and friends.

7.2 Page 38 – SP8 – Rural Exceptions – why would this not also apply to large villages, where need was proven?

7.3 page 40 – Single Plot Exceptions – This is a welcome policy but has never, to the Parish Council’s knowledge, been used. This is believed to be because of the restrictions over and above that which the NPPF provides for. The Parish Council supports a policy that is more likely to actually be used which means:

- Ability to prove local connection against an objectively set criteria
- Property to remain ‘affordable’ for 5 years and any sale during that time to be at 80% of market value
- Site is in or adjoining the settlement and does not constitute isolated or sporadic development

However, it is difficult to see any justification for the subjective criteria such as – the applicant demonstrating that they are unable to afford a suitable home currently available in the parish – and in fact this negates the purpose of the self-build regulations. Also how is the affordability of the dwelling to be measured relative to the applicant or successors? Furthermore, in a flood risk
area where we should be encouraging innovative housing solutions, such as live/work dwellings, or living upstairs with all ancillary accommodation downstairs, then the site size of 0.1 hectare may be sufficient land but the internal floor space is insufficient and it is not clear why this is being limited, over and above what might be desirable to ensure the proper use, or reuse of land as a finite resource. The national figures should instead be used - £250k value, 80%, 5 years – as being quite sufficient and more likely to encourage take up, for example for self-build.

<table>
<thead>
<tr>
<th>Chapter 6 Employment</th>
<th>Page 59</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Lindsey Core Strategy Publication Version February 2016-2031</td>
<td>Key Diagram/Appendices</td>
</tr>
</tbody>
</table>

8. **Page 59 – Employment.** There is a small industrial estate in North Somercotes with potential capacity to extend, but the Parish Council are not aware that this has been examined for potential to contribute to the economy in the same way that no growth target has been established for the community.

<table>
<thead>
<tr>
<th>Chapter 10 – Coastal East Lindsey 79-84</th>
<th>SP17 Coastal East Lindsey page 79, Sp18 Coastal Housing page 84</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Lindsey Core Strategy Publication Version February 2016-2031</td>
<td>Key Diagram/Appendices</td>
</tr>
</tbody>
</table>

9. **Coastal East Lindsey** – the Parish council has already noted above the various anomalies and inconsistencies which arise from the application of this policy and, in its opinion, the unjustified negative results of treating coastal communities in this way. On the one hand it is stated that housing growth doesn’t equal protection of services, yet elsewhere this is given as a reason for allocating growth in less than ideal settlements, ie 100 houses in Hogsthorpe.

9.1 If the coast is to be a vibrant place where people want to live, invest, visit and work and if it is to have a strong, diverse and growing economy and business sector, then the development of good quality flood resilient housing that takes account of the site specifics of a location, not just a broad-brush generic approach that labels everywhere on the coast ‘high risk’ without taking cognisance of the specific factors, is essential to allow these stated aims to be achieved and consistent with the Greater Lincolnshire SEP vision and objectives.

9.2 The current EA data is still being modelled using statistics from 2006, including the now discredited 1953 EA Flood Extent Map data, which showed the whole settlement underwater. The redrawn EA 1953 map which was revised in 2012 at the instigation of the Parish Council working with the EA to take direct witness evidence and photographs is attached – Appendix 3 - which shows no flooding of the main area of the village.

9.3 Since this data is significantly out of date by some 10 years, it does not take into account the considerable accretion along this coastline since 2006 nor the multimillion pound improvement works to the Tetney to Saltfleet sea defences, which started in 2009. As an example, the new sea defence height at Donna Nook and Red Farm (where the 1953 breach occurred owing to rabbit activity in the sea bank) is now some 6.25m above ordnance datum (aod), where previously 2006 levels have this at 5m aod or below in some areas.

9.4 The EA say that work to process and rerun the data using the new heights and vastly improved defences following the recent works, as well as factoring in climate change figures and other relevant data will take up to another 2 years.
9.5 The Environment Agency Flood warning system covers this area and the Parish Council has
two volunteer flood wardens who work as a key part of the Emergency Response Team that has
been successfully deployed both in 2013 and 2017 - although no risk from flooding occurred,
some sand bags were required to prevent overtopping in 2013 owing to the access route over the
sea bank being below 4m and which the Parish Council had requested the EA to repair some
considerable time prior to the event.

9.6 The Parish Council is currently working on the draft of a new Emergency Response Plan
together with colleagues in Lincolnshire County Council as well as other agencies, including the
EA, Police and Coastguard, medical staff, local farmers and various village organisations.

9.7 Those parts of Coastal Lincolnshire in Flood Zone 3 that are most likely to be flooded were
identified during the recent event on 13 January 2017, and are shown on the EA Flood Alert and
Flood Warning maps that were on the EA.gov site. These show North Somercotes village unlikely
to be affected, and it wasn’t, and are at Appendix 4. They show the situation for the coastal
community as a whole and this community specifically. From this it can be seen that treating this
settlement differently to Grainthorpe or Hogsthorpe for example is clearly unreasonable. Whilst
the breach locations modelled may be different on another occasion, what is relevant is that the
risk to this community is not commensurably different to that of the smaller settlements
reclassified as inland, and this community is larger and probably better able to cope in terms of its
facilities and preparedness, being largely self-sustaining in the unlikely event of being cut off from
all three points of exit inland.

9.8 This community now has exceptionally well protected coastal defences, which the County
Council and other partners have committed to maintaining as a key feature of their Strategic
Economic Plan. Water management in this area is a national priority, not simply a local one, as a
significant proportion of the UK’s food security relies upon Greater Lincolnshire’s agriculture,
horticulture and food manufacturing industries.

9.9 This generic approach of ‘no development’ is also in marked contrast to the evidence and
importance of the economic benefit which housing would bring to the area, which as noted above
is contained in the Lincolnshire Enterprise Partnership Strategic Economic Plan. This is also
readily recognised and planned for by the Joint Lincolnshire Flood Risk and Drainage
Management Partnership (JLFRDMP) in their Strategy and Strategic Vision, which sits alongside
the Humber Coastal Management Strategy.

9.10 The Parish council firmly believes that taking account of flood risk and coastal change does
not mean a cessation of development and fully expects a more positive and more proactive
approach commensurate with the potential and aspirations of this large service village, in line with
the SEP and the NPPF.

9.11 These proposals do not adequately support this settlement’s resident’s current needs or
aspirations and there is also no valid contemporaneous evidence base or risk assessment of the
potential negative social and economic impact which could result if a ‘no growth’ housing strategy
is allowed to happen by default.

9.12 The five-year review proposed is too long – market housing growth, suitably mitigated, that
meets the needs of this community should be permitted. Once the EA revised figures are
available this can then be reassessed. In the meantime, risks can be mitigated for in the same
way as they are currently for affordable housing, using the old figures until such time as the new
ones are available.

9.13 Similarly, there is no reason why a watching brief cannot be kept on the building-out of
extent permissions, and the allowance of new developments brought forward accordingly after
analysis in any 12-month period.
Q4 Please set out below what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified in Q2 where your comment relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

ELDC should:

10.1 Undertake an immediate full and meaningful consultation with the Parish Council and public and other stakeholders regarding the housing and infrastructure needs of this community to ensure its long term vitality and viability to agree a growth target, whether or not this is part of the strategic housing allocation or an agreed notional growth allocation – this is to meet the requirement to have positively engaged with consultees and stakeholders.

10.2 Re-examine the application and impact of the Coastal Policy, particularly given the inconsistent way some communities are then reclassified as ‘inland’ and the potential for negative effect, and preferably recast this as a Flood Risk Policy based on identified risk, actual flood events, community ability to respond, etc. – this is to avoid inconsistencies in approach and meet the requirement for a positively prepared proactive plan.

10.3 Include the Parish Council as a key member of the Working Group looking at future housing design for flood risk areas

10.4 Amend the self-build Register to include the ability for those already living and working in the coastal areas to indicate their preference for these areas so that they can continue to live/work there, and so that ELDC can capture the un-met need this register represents – currently it says “The Council is unable to support open market housing in areas of high flood risk or in locations without services and facilities.” This is clearly out-with the purpose of the Self-Build legislation and the NPPF for those with a local connection in sustainable communities irrespective of geographic location.

10.5 Agree that the Sequential Test is met within the confines of this settlement for those with a local connection and actively promote the introduction of CIL payments now for those in flood risk areas on the coast to enable them to fulfil the Exceptions test while contributing to wider community benefit that will be consistent with other elements of the plan, meet NPPF requirements and promote sustainability.

10.6 Using the Community Infrastructure Levy (CIL) process, 155 houses could generate at least £775K at £5k per property as a contribution to local Flood Prevention Infrastructure Schemes, together with an amount per annum towards such infrastructure. For example the 22 houses alone on site NS0201 off Keeling St, centrally located for schools, shops and services, could generate £110K and provide perfectly safe high quality homes. It is clearly possible to build affordable housing with mitigation that meets EA requirements, so there is no reason why this same mitigation cannot be afforded to market housing for local people, including starter homes and self-build plots, for example.

10.7 Permission for such housing could also be conditioned to ensure take-up of renewables, minimisation of energy and water use in design, construction and use, and the requirement to have flood resilience/resistance and meet lifetime home standards, for example. Such building methods and systems are already widely in use in the UK, as well as flood prone areas in Europe.

10.8 Given that most of the areas within and around the coastal settlements are already in “danger for most” and “danger for all”, a balance must be struck between the risks and ensuring the continued sustainability of the settlements is not being compromised. The Parish Council are clear that this must explicitly include North Somercotes, whether or not housing growth is
considered Strategic or notional. Where the lowest risk is the lower of the hazard zones — eg, ‘danger to some’, or ‘danger to most’, or even if necessary ‘danger to all’ — this then needs to be considered alongside innovative solutions that will generate revenue for Flood Defences, provide community and wider sustainability benefits, minimise the use of scarce resources, while securing high quality, innovative homes.

10.9 The Exceptions policy should not just be for affordable homes, it should include right to buy and self-build, with the same criteria as NPPF with the goal being to ensure that everyone has the opportunity to live in a decent home, which they can afford, in a community where they want to live, taking account of climate change and flood risk constraints.

10.10 Account should be taken of the Property Flood Resilience Action Plan – DEFRA 9/2016, by ensuring the use of:

A. Planning Conditions for properties at risk from flooding, whatever the source, to include:
   - Flood resilience measures proactively built in as standard for those potentially exposed to the flood risk
   - Mandatory Flood Action Plan and sign up to EA Flood Lines

B. Building Regulations which require the property to be flood resilient and resistant, with construction tailored to the need of the properties in the area defined at risk with focus on methods which speed post-flood recovery

C. Funding for district wide protection by way of CIL contribution per development and precepting the whole district – immediately for new properties and gradual introduction for existing properties in flood risk areas.

D. Provision of funding advice for householders in flood risk areas to install identified measures, via Government loans and access to technical advice on measures/costs and benefits

E. The Exception Test can then be met as a result of the wider community benefit derived from the CIL, and by precepting, and further enhanced by a requirement for each property to demonstrate an agreed minimum contribution by utilising a range of climate change/low carbon initiatives:
   - High quality flood resilient/resistant design
   - Reduced demand on resources – for construction and in use
   - Use of sustainable materials
   - Renewable energy sources
   - Recycling
   - Green roof, rainwater harvesting, etc

Some of these are particularly important given the deprivation and fuel poverty experienced in our rural areas.

*Continue on a separate sheet if necessary. Mark any additional pages with your name/organisation.*
Q5  If your representation is seeking a change, do you consider it necessary to participate in the oral part of the Examination in Public?

<table>
<thead>
<tr>
<th>No - I do not wish to participate in the oral part of the Examination In Public</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes - I wish to participate in the oral part of the Examination In Public</td>
<td>✔</td>
</tr>
</tbody>
</table>

Q6  If you wish to participate in the oral part of the Examination in Public, please outline why you consider this to be necessary. *Please note that the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in the examination.*

The Parish Council have been trying since 2012 to engage with ELDC to discuss how to ensure the future sustainability, vitality and long term future of this community and its inhabitants by proactively and safely managing the risks while enjoying the benefits. The Parish Council feels that the needs and aspirations of this community have been ignored and would appreciate the input of the Inspector on the matters raised.

Q7  Do you wish to be notified of any of the following? Please mark all that apply. We will contact you using the details you have given above unless you specify an alternative address.

| When the Local Plan has been submitted for independent examination | ✔ |
| When the Inspectors report is published | ✔ |
| When the Council adopts the Local Plan | ✔ |

Do you wish to be removed from our mailing list?

Signature  
SBC  
Date  
25 January 2016
QUESTIONNAIRE RESPONSES:
Question 1 – Suitability - site no NS0214
Yes, this site is in a low risk area according to the Environment Agency, as is site NS0213 yet you have that down as orange, and site NS0302 is in a moderate risk area according to the Environment agency. Site NS0214 has previously had planning permission and the Parish Council is currently considering if it will set up a Community Land Trust to look at developing this site, and possibly others, within the village.

The necessary mitigation factors for Environment Agency approval can all be met. This site in particular is within the high point in the village on Keeling St, as is 0213 – the blanket approach which seems to have been adopted in deducing the flood risk status of sites within the village appears to be at odds with the Environment Agency’s own website information and current stance. The District Council appears to be continuing the approach adopted in 2005. Significant work has been done this year with the EA which proves that the 1953 floods for example did not reach beyond Marsh Lane, and the millions now being spent on flood defences along the coast and flood warning schemes all mean that the village is better protected than ever. If 0213 and many other sites are also orange on what basis is this site suitable subject to flood mitigation when the others are not? Similarly sites in other villages such as Marshchapel are considered suitable yet in the same category of risk?

The Parish Council believes that Principle 1 on page 30 of the Demographic projections confirms that development to meet local housing needs must continue, subject to mitigation of risk through design and emergency planning; a zero growth scenario is not feasible or realistic. Both market and social housing is required to retain a balanced and sustainable community - this cannot be achieved if no market housing development is permitted. Neither can the ‘flood risk’ be used as a stop on development of market housing if it is acceptable to mitigate for social housing then it must be acceptable to mitigate for other properties to enable a mix of housing, as set out by the Homes and Community Agency.

Question 2 Availability
The Council notes that the availability is stated as ‘unknown’. Please note that at no time has the Parish Council – as owners of this land for some years – been approached by anyone to ask about the availability of this plot, so how it can be ‘unknown’ is unclear. This begs the question of what work was undertaken regarding any of the sites which are classed as ‘unknown’ before being discounted? The Parish Council has never been asked to identify owners or availability for any of the identified, or other potential plots, within the village. If this site is suitable, then others with the same flood risk rating and no other noted disadvantages should also not be discounted.

Question 3 Viability
As noted above, the Council are currently considering the viability of setting up a community land trust to potentially develop this plot for affordable housing, rather than proceed with the car park project. The Council is concerned also regarding the inconsistencies and inaccuracies in the SHLA and will be writing separately to outline these points with a view to seeking a meeting with the District Council to discuss these at length. The Parish Council would wish to work with the district Council to enhance the viability of North Somercotes as an important service village, with improved identification of local need and a sustainable strategy which does not allow the ghettoisation or stagnation of the village over time.
### Analysis of North Somercotes Allocated and Windfall Sites

#### ALLOCATED SITES

*The LPA has incorrectly allocated a plot behind Sycamore House, which is not within the boundary of the Woolpack site. This is a separate allocation.*

<table>
<thead>
<tr>
<th>Parish</th>
<th>Planning App No.</th>
<th>Location</th>
<th>New build starts</th>
<th>New build CS</th>
<th>New build PP</th>
<th>State</th>
<th>Site Type</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Somercotes</td>
<td>L/R089/68</td>
<td>Sycamores, Keeleg Street</td>
<td>0</td>
<td>19</td>
<td></td>
<td>19</td>
<td>19</td>
<td>LPA count of 23 but developer has no intention of bringing the site to market.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/1374/06</td>
<td>Adj. to Hawthorne Cottage, Jubilee Road</td>
<td>1</td>
<td>3</td>
<td></td>
<td>3</td>
<td>dorner bungalow</td>
<td>Now being built, 10 years since PP.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/2560/06</td>
<td>Land at Henley Cottage, Crossway Road</td>
<td>1</td>
<td>3</td>
<td></td>
<td>3</td>
<td>dorner bungalow</td>
<td>Partially built, awaiting sale of house at front, 11 years since PP.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/1951/06</td>
<td>Former Exchange Filling Station, Crosshame Road</td>
<td>1</td>
<td>3</td>
<td>2</td>
<td>4</td>
<td>detached bungalows</td>
<td>10 years since PP granted, not currently being marketed.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/2155/13</td>
<td>Reamford, Keeleg Street</td>
<td>1</td>
<td>2</td>
<td>2/3</td>
<td>1</td>
<td>dorner bungalow</td>
<td>Developer has no plans to build in next 5 years.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/0241/14</td>
<td>Jubilee House, Jubilee Road</td>
<td>2</td>
<td>3</td>
<td></td>
<td>2</td>
<td>dorner bungalow</td>
<td>Recently started.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/2469/13</td>
<td>Land off Keeling Street</td>
<td>1</td>
<td>5/6 detached house and stabling</td>
<td>1</td>
<td>5/6 detached house and stabling</td>
<td>Not started.</td>
<td></td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/1032/14</td>
<td>Lilac House, Keeling Street</td>
<td>2</td>
<td>3</td>
<td></td>
<td>2</td>
<td>dorner bungalow</td>
<td>Currently on market for £150k - £175k per plot.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/1160/14</td>
<td>Land west of Alison House, Keeling Street</td>
<td>6</td>
<td>2/3</td>
<td></td>
<td>6</td>
<td>one pair semi-detached house with 3 bedrooms, block of four 2 bed detached houses</td>
<td>Parish council development for local authority rental, 9 on waiting list, full PP being applied for in February.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/1756/14</td>
<td>Little Paddocks, Crosshame Road</td>
<td>1</td>
<td>4</td>
<td></td>
<td>1</td>
<td>detached house</td>
<td>Built and sold.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/2264/14</td>
<td>Sunnymead, Crosshame Road</td>
<td>1</td>
<td>3</td>
<td></td>
<td>1</td>
<td>dorner bungalow</td>
<td>House and plot on market for £225k and £115k respectively - unlikely to sell at this price.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/122/0630/16</td>
<td>Land at Weylake, Churchhill Road</td>
<td>1</td>
<td>3</td>
<td></td>
<td>1</td>
<td>detached house</td>
<td>Under offer.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/0631/16</td>
<td>Land at Churchhill Road</td>
<td>2</td>
<td>2</td>
<td></td>
<td>2</td>
<td>detached houses</td>
<td>Under offer.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/0004/06</td>
<td>Aramore Churchill Road, previously N132/0041/04</td>
<td>0</td>
<td>6</td>
<td>mixed</td>
<td>6</td>
<td>2 x detached houses, 2 x detached bungalows, 1 pair semi-detached bungalows</td>
<td>Not on ELDC list; unlikely to be built out given plot price of £350k.</td>
</tr>
</tbody>
</table>

#### WINDFALL SITES

<table>
<thead>
<tr>
<th>Parish</th>
<th>Location</th>
<th>New build starts</th>
<th>New build CS</th>
<th>New build PP</th>
<th>State</th>
<th>Site Type</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Somercotes</td>
<td>N/132/0241/14</td>
<td>Jubilee House, Jubilee Road</td>
<td>2</td>
<td>3</td>
<td></td>
<td>2</td>
<td>dorner bungalow</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/2469/13</td>
<td>Land off Keeling Street</td>
<td>1</td>
<td>5/6 detached house and stabling</td>
<td>1</td>
<td>5/6 detached house and stabling</td>
<td>Not started.</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/1032/14</td>
<td>Lilac House, Keeling Street</td>
<td>2</td>
<td>3</td>
<td></td>
<td>2</td>
<td>dorner bungalow</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/1160/14</td>
<td>Land west of Alison House, Keeling Street</td>
<td>6</td>
<td>2/3</td>
<td></td>
<td>6</td>
<td>one pair semi-detached house with 3 bedrooms, block of four 2 bed detached houses</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/1756/14</td>
<td>Little Paddocks, Crosshame Road</td>
<td>1</td>
<td>4</td>
<td></td>
<td>1</td>
<td>detached house</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/2264/14</td>
<td>Sunnymead, Crosshame Road</td>
<td>1</td>
<td>3</td>
<td></td>
<td>1</td>
<td>dorner bungalow</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/122/0630/16</td>
<td>Land at Weylake, Churchhill Road</td>
<td>1</td>
<td>3</td>
<td></td>
<td>1</td>
<td>detached house</td>
</tr>
<tr>
<td>North Somercotes</td>
<td>N/132/0631/16</td>
<td>Land at Churchhill Road</td>
<td>2</td>
<td>2</td>
<td></td>
<td>2</td>
<td>detached houses</td>
</tr>
</tbody>
</table>

#### Total

- **42** sites allocated
- **10** sites windfall

#### 2011 population of North Somercotes
- Total: 1752
- Growth: 4.9%
- Net: 155
Appendix 3
Environment Agency 2012 Revised 1953 Flood Extent Map
Appendix 4
Environment Agency Flood Warning Maps 13 January 2017

Coastal East Lindsey Red Flood Warning 13-1-17.gov website