

# Conservative Policy Forum Skegness

## **East Lindsey Local Plan consultation**

This is the response of the Skegness group of the Conservative Policy Forum to the draft East Lindsey Local Plan.

## The Conservative Policy Forum

The Conservative Policy Forum provides an opportunity for Conservative members and supporters to discuss policy issues, both national and local. The Skegness group of the Forum held a special meeting to consider its response to the draft East Lindsey Local Plan. Those attending the meeting were local business people, including developers and caravan site owners, local councillors and Conservative Party officers and members.

In our report below, the group concentrates its comments on issues concerning Skegness and the surrounding area, including the coastal strip to the north of the town.

## Summary of the group's discussions

The group believes that the draft East Lindsey Local Plan is too restrictive on development and too complacent about the prospects for growth. The plan should be market-led, providing encouragement for economic growth, which will bring prosperity to the area, with more jobs and more profitable businesses.

There should be a presumption in favour of house building and developments to promote business, including tourism, not a passive acceptance that severe restrictions need to be imposed owing to the fears of flood risk.

There was a notable unanimity of view amongst those attending the special meeting in support of the views expressed in this report.

## Housing

The draft Local Plan allows very restricted housing growth in the coastal area, citing as important reasons limited housing need based on projected population growth and the threat of flooding. It states that as at 1<sup>st</sup> May, 2015, there were already 1308 housing commitments for the coast, "which represents a technical over-supply of approximately 573 dwellings, based against the target of 735".

Our group, however, considers that this level of provision will not allow for the housing growth which the area needs in order for its economy to expand at an acceptable rate.

A major reason for this shortfall is that many of the planning permissions already granted have not been taken up. The group recommends that there should be a real and significant over-supply of housing approvals in order to at least compensate for this lack of take-up. The aim should be to facilitate the building of more small scale housing developments during the Plan period. The Plan should also provide enough flexibility to allow housing development facilitated by possible future infrastructure improvements, for example the mooted Skegness Western Link Road. (The group favours new national legislation to give planning authorities the power to rescind planning permissions which have not been taken up within a prescribed period, such as five or ten years.)

With regards to Strategic Policy 5 (SP5), relating to Single Plot Exception in medium and small villages, the group considers that the proposed limits on the size of dwellings – 100sq m or 110sq m where flood risk mitigation is required – are far too restrictive.

With regard to flood risk, the group is concerned that the restrictions indicated in the draft Plan will lead to planning blight along the East Lindsey coast, having detrimental effects on the area's economy.

The group points out that in recent years significant improvements have been made to sea defences and that the defences have already proved to be effective. Rather than placing severe restrictions on housing development we believe that the emphasis should be on appropriate design of dwellings, for example putting main living spaces above ground floor level. Existing regulations already require building to be started one metre off the ground.

Strategic Policy 13 (SP13) – Coastal East Lindsey – states the council will support housing for specific identified vulnerable or minority groups and affordable housing within the Coastal Zone. Our group objects to the principle that this type of housing will be allowed in flood risk areas but not market housing. It leads to the perverse impression that it may be acceptable for people who are vulnerable or who have limited means to be subjected to flood risk but not those people who are able to afford more expensive housing.

Disproportionate provision of low cost housing compared with more expensive market housing will have undesirable demographic consequences for the area.

#### MAIN CONCLUSION

There should be a real and significant over-supply of housing approvals on the coast.

#### Caravans

The group is strongly opposed to the proposal that "occupancy of caravan, log cabin, chalet, camping and touring sites will be limited to between 15<sup>th</sup> March and 31<sup>st</sup> October in any one year, or the following Sunday, if the 31<sup>st</sup> does not fall on a Sunday".

A major objective of this policy is to reduce the vulnerability of caravan sites to flood risk. As we stated above in relation to housing provision, in recent years significant improvements have been made to sea defences and the defences have already proved to be effective.

There is considerable demand for an extension to the season. Caravan owners, for example, make a significant investment when they purchase high quality vans and desire to make the greatest possible use of them.

Site owners and many of those businesses which service them have the expense of providing infrastructure. Therefore the longer that sites are open the greater the returns to pay for that investment.

Longer seasons also offer the opportunity for sites not only to employ more staff but also to attract better quality employees for all-the-year-round work. More people in year-round employment means a boost to the local economy and fewer people on benefits.

The group does not wish to propose 52 weeks a year opening. It recognises the danger that undesirable "shanty towns" might result if caravans became all-year-round residences.

We propose that occupancy should be from 1<sup>st</sup> March to 5<sup>th</sup> January. A major advantage of this is that it would allow owners and holidaymakers to use the holiday homes at Christmas and New Year. Site owners are aware of a considerable demand for this from their customers. Locally, Butlins Holiday Centre provides evidence that Christmas and New Year opening is extremely popular.

Further afield Centreparcs provide a similar example.

Major local site operator Blue Anchor Leisure points out that it has to finance its business for 52 weeks a year, but, owing to the restrictions on occupancy, its sites are running at under-capacity. The company employs 253 people during the opening season, but only 98 through the winter.

Another advantage of our proposal, bearing in mind flood risk, is that the sites would be closed during the period of the winter when the high spring tides are most prevalent.

The group is not complacent about flood risk. It accepts that one of the main concerns relates to evacuation procedures in the event of flooding. We therefore propose that sites should be required to have a flood plan, a two-storey building on site as a refuge area, e.g. a site club premises, and an on-site flood warden.

The group does not support the preference expressed in the draft Plan for two-storey permanent buildings, such as brick built holiday lodges, and the proposal that such accommodation would not be subject to occupancy restrictions. Site owners have pointed out that high quality caravans are the "purchases of choice" for most customers.

The message is that allowing a longer season will enable site owners to provide a higher quality offer, with better infrastructure and bigger units.

The trend towards better and bigger vans means that more land is desperately needed for caravan sites, a need which is not reflected in the draft plan.

For example, to update Hardys' site on Sea Lane, Ingoldmells, would entail the loss of 21 static caravan pitches and 14 touring pitches. Therefore more land is needed just to maintain the current number of pitches. Using figures from the "Impact assessment of the Holiday Park Industry in Wales, British Holiday and Home Parks/Visit Wales Study", failing to meet this need would equate to a loss of 3.73 direct and indirect jobs. This is based on an area of eight acres: multiply this by the area of "old-type" parks in the area and it would represent a substantial financial loss to the area and jobs being lost.

#### MAIN CONCLUSION

The occupancy limit for caravan, log cabin, chalet, camping and touring sites should be between  $1^{st}$  March and  $5^{th}$  January.

## **Gypsy and traveller sites**

While accepting that the district council has a legal responsibility to provide gypsy and traveller sites, our group strongly opposes the option of using land at Holly Road/Hassall Road, Skegness, for one of those sites.

This location, in the Skegness Industrial Estate, would pose serious security problems for businesses on the estate. It would also have an adverse effect on the value of adjacent land. The fact that the possibility of using this site has been placed in the public domain has already damaged negotiations for adjacent land which has potential for commercial use and employment opportunities. We urge the district council to look for an alternative site.

#### MAIN CONCLUSION

Land at Holly Road/Hassall Road, Skegness, should not be used for a traveller or gypsy site.