

Representor	Agent	Policy	Comments
St Andrews Healthcare (Land West of Park Lane)	Turley	-	<p>We write on behalf of our client, St Andrew’s Healthcare, in response to the Alford Neighbourhood Plan (“NP”) Regulation 16 public consultation and in the context of our clients significant land interests to the west of Park Lane, Alford (hereafter referred to as “the site”).</p> <p>Introduction</p> <p>The site is not subject to an allocation in the NP, but has been designated as a Local Green Space. However, it is the view of St Andrew’s Healthcare that the site represents a sustainable and deliverable residential land opportunity for allocation in the NP.</p> <p>St Andrew’s Healthcare has previously engaged with Alford Town Council in discussions related to their other land interests at land south of Tothby Lane, Alford and have made representations to the Alford Neighbourhood Plan (Regulation 14) consultation in May 2017 in the context of the spatial strategy for Alford.</p> <p>The revised National Planning Policy Framework (July 2018)</p> <p>Annex 1 of the revised National Planning Policy Framework (“the revised NPPF”) sets out its implementation arrangements. Paragraph 212 of the revised NPPF explains that its policies are material considerations which should be taken into account in dealing with applications from the day of its publication.</p> <p>However, paragraph 214 of the revised NPPF sets out that the policies in the previous Framework, published on 27 March 2012, will apply for the purposes of examining plans where those plans are submitted on or before 24 January 2019. This is the case for the Alford Neighbourhood Plan.</p> <p>Accordingly, comments made within these representations refer to the National Planning Policy Framework (“the NPPF”) published in March 2012.</p> <p>The Alford Neighbourhood Plan (Regulation 16)</p> <p>A Vision Statement for Alford</p> <p>St Andrew’s Healthcare supports the key principles of the vision as outlined at section 4.1 of the NP, which includes reference to new housing development being connected to and supporting the main retail centre. Despite the above, St Andrew’s Healthcare would recommend that the vision is more positively worded to better reflect the strong emphasis, which is embodied in the NPPF, on the social and economic role of plan-making particularly on the need to boost significantly the supply of housing through this process.</p> <p>The vision should give greater emphasis to where Alford lies in the settlement hierarchy (i.e. a first tier settlement) and its inland location, recognising that this is a settlement where housing growth will be distributed towards, consistent with the East Lindsey Core Strategy (July 2018) at Policy SP3.</p> <p>As set out at paragraph 184 of the NPPF, it is the duty of the neighbourhood plan to align with the strategic</p>

			<p>needs and priorities of the Core Strategy. It is therefore recommended that the vision is amended to include a clear principle on housing growth, such as:</p> <p><i>“Alford will have supported new housing growth in sustainable locations, within or adjacent to its settlement boundary that provides a wide choice of high quality homes creating inclusive and mixed communities.”</i></p> <p>The recommended change sets a positive social and economic context for the NP as a whole and accords with the social and economic dimensions to sustainable development. This will set a context to ensure that sufficient land of the right type is available in the right places to support growth; and to provide the supply of housing required to meet the needs of present and future generations.</p> <p>Core objectives</p> <p>St Andrew’s Healthcare acknowledges the extensive list of core objectives which have been identified against key headlines such as location, housing, economy and transport, which are all interrelated and which are intended to ensure the vision of the NP is met.</p> <p>St Andrew’s Healthcare note that there are five objectives listed under the headline of ‘Housing’, some of which appear to be duplicated under different headings. Reviewing the five objectives it appears there is no reference to affordable housing or the integration of new housing to existing infrastructure, which are both important provisions of delivering sustainable housing development.</p> <p>To ensure the objectives of the NP is in general conformity with the strategic policies of the East Lindsey Core Strategy it is suggested that two additional objectives are inserted, which would be worded as follows:</p> <ul style="list-style-type: none"> • provide a greater range of affordable housing • ensure new housing is integrated into existing infrastructure
St Andrews Healthcare (Land West of Park Lane)	Turley	1 – Site Allocation	<p>Policy 1: Site Allocation</p> <p>Policy 1 does not generally conform to Strategic Policy 3 of the East Lindsey Core Strategy as the allocation of 43 new homes in the NP does not correspond with the allocation of housing (i.e. 66 new homes) set out in Table B of the East Lindsey Core Strategy, which also states:</p> <p><i>“This housing will be allocated in the Alford Neighbourhood Plan; this is a minimum amount of housing that should be allocated in that Plan.”</i></p> <p>Strategic Policy 3 of the East Lindsey Core Strategy sets out that there is an inland minimum housing requirement of 6562 homes; which supports the overall housing requirement across the District, which amounts to 7,819 new homes between 2017 and 2031 – this is also described as a <i>“minimum figure not a ceiling”</i>.</p>

			Therefore, if the NP is to generally conform to the strategic policies of the East Lindsey Core Strategy, wording should be inserted into Policy 1 of the NP, which sets out that the allocation of 66 homes to Alford is a minimum. This change will be in accordance with paragraph 14 of the NPPF, which states that plan-making should meet objectively assessed needs with sufficient flexibility to adapt to rapid change.
St Andrews Healthcare (Land West of Park Lane)	Turley	3 – Residential Development	<p>Policy 3: Residential Development</p> <p>Policy 3 does not generally conform to the strategic policies of the East Lindsey Core Strategy, particularly Strategic Policy 2 and Strategic Policy 3. Paragraph 2.13 of the East Lindsey Core Strategy states the following:</p> <p><i>“The Council considers the purpose of planning is to achieve the delivery of positive sustainable development. This direction of travel will assist the District to grow as a place with all the social implications this involves, ensure our natural and historic environment is respected and looked after and also importantly ensuring our economy both rural and urban is encouraged to grow and flourish.”</i></p> <p>St Andrew’s Healthcare is concerned with the principles listed at Section 2 which adds an extra layer of restriction to the location of housing growth adjoining the settlement boundary of Alford and would contribute to the delivery of unsustainable development. This discussed in further detail below:</p> <p>a) The site is “brownfield”, according to the definition of the National Planning Policy Framework</p> <p>Whilst it is recognised within the NPPF that planning policies and decisions should encourage the effective use of land by re-using land that has been previously development (i.e. brownfield land), the Neighbourhood Plan Group should note that such land could also be required for employment development and/or environmental uses instead of residential purposes.</p> <p>In addition, as there is only a limited supply of brownfield land within or adjacent to the settlement boundary of Alford, it needs to be determined through the plan-making process which brownfield land is suitable for residential use taking account of ground conditions from former activities, such as pollution arising from previous uses and any proposals for mitigation including land remediation, which has implications on the surrounding natural environment. There does not appear to be any evidence supporting the NP which demonstrates the deliverability of brownfield sites.</p>
St Andrews Healthcare (Land West of Park Lane)	Turley	7 – Local Green Space	<p>Policy 7: Local Green Space</p> <p>St Andrew’s Healthcare notes that land west of Park Lane has been designated as Local Green Space within Policy 7 under the site name ‘Bull Fair Field’. The NP justifies the proposed designation on the basis that the site has been identified in the supporting Local Green Space Assessment and is in accordance with the definition in the NPPF at paragraph 76.</p> <p>The implications of Policy 7 (2) would be that:</p> <p><i>“Applications for development that would adversely affect the function of a Local Green Space will not be</i></p>

		<p><i>permitted other than in very special circumstances as specified in the NPPF</i>".</p> <p>Whilst St Andrew's Healthcare acknowledge paragraph 12.25 of the East Lindsey Core Strategy, which states the District Council will "<i>support projects by the community or other local groups to create accessible green space</i>", it is considered that the proposed designation is inconsistent with paragraph 77 of the NPPF. Paragraph 77 of the NPPF, sets out that the designation should only be used:</p> <p>(a) where the green space is in reasonably close proximity to the community it serves;</p> <p>(b) where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <p>(c) where the green area concerned is local in character and is not an extensive tract of land.</p> <p>St Andrew's Healthcare acknowledges that the first principle of paragraph 77 of the NPPF is satisfied given that the site lies within close proximity to Alford town centre and adjacent to residential properties to the east and west.</p> <p>However, it cannot be accepted that both of criterion (b) and (c) have been satisfied, which is explored in greater detail below. For clarification, the NPPF guidance above is clear that it is not sufficient to rely on just one of these attributes.</p> <p>Criterion (b)</p> <p>It appears that the conclusions of the Local Green Space Assessment have not been produced by a chartered author / body and is instead 'public opinion'. This is considered to be highly inappropriate and applies an onerous prioritisation, in the absence of a robust and credible evidence base. Indeed, the NPPF provides no endorsement to public opinion alone determining the designation of land.</p> <p>Whilst it is acknowledged at paragraph 76 of the NPPF that local communities through neighbourhood plans should be able to identify for special protection green areas of particular importance to them, it is imperative that such identification is supported by a robust evidence base. Therefore, to put forward sites in light of criterion (b), the NP should be informed by the following evidence base, which is currently insufficient or absent:</p> <ul style="list-style-type: none"> • a landscape character assessment to demonstrate the landscape value (i.e. its beauty / tranquillity); • a heritage impact assessment to demonstrate its historic significance; • an outdoor sports and play facilities quality assessment to determine the potential recreation value; and • a preliminary ecological appraisal to identify the baseline ecological conditions.
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			<p>St Andrew's Healthcare consider, as landowners, that the site has no historic significance, is not of any particular beauty in relation to the surrounding open spaces and countryside, nor does it have any particular richness in wildlife or recreational value.</p> <p>The designation does not fully accord with the second criterion in paragraph 77 and should be omitted from the NP.</p> <p>Criterion (c)</p> <p>Policy 7 and its explanatory text is silent on how much Local Green Space is required for designation within or adjacent to Alford, whether this be a requirement determined by East Lindsey District Council or Alford Town Council.</p> <p>A review of the Local Green Space Assessment identifies that a total of approximately 5.47 hectares of land within or adjoining Alford has been designated as Local Green Space. It is concerning that approximately 3.6 hectares of the total designation is identified at land west of Park Lane, which represents approximately 66% of the total area designated for Local Green Space at Alford.</p> <p>Such an extensive and disproportionate designation of Local Green Space at the site is unjustified and offers an unsustainable skew towards the northern extent of Alford when a significant amount of the town's population live to the west and south. In comparison to the other proposed designated Local Green Spaces, land west of Park Lane is 2.2 hectares larger than 'Fishing Lake & Sunken Garden' and is 45 times larger than 'Chaunty Close Highway Verge'.</p> <p>The extensiveness of the designation is recognised in the NP at Appendix A, which states the following: <i>"This is a typical area of ancient grassland reduced in size by the Park Lane road frontage development, on the west side, carried out by the former Alford Urban District Council in the late 1950's. Even though the site is quite large in terms of hectares, in the context of the town centre it does not 'feel' like an extensive tract of land, and it rather has the size appropriate to a typical town centre park."</i></p> <p>St Andrew's Healthcare strongly objects to the above statement and seek clarification on how the grassland has been qualified as 'ancient'. In addition, the assessment of the 'feel' of the site is inappropriate, onerous and is inconsistent with the NPPF, which provides no guidance that 'feel' should determine the designation of land. The comparison to other <i>"typical town centre park"</i> is also inaccurate given that every town within the District and/or across the country vary in scale, form and character and the definition of 'typical' is very subjective.</p> <p>Furthermore, the site has no special or unique characteristics and is not prominent in terms of views as it is largely hidden from public view through neighbouring residential properties to the east and west and the Manor House to the south.</p>
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			In light of the above, St Andrew's Healthcare considers that the site represents an extensive tract of land and its designation is unjust and does not accord with the third criterion as set out at paragraph 77 of the NPPF.
St Andrews Healthcare (Land West of Park Lane)	Turley		<p>The Development Opportunity The site is deliverable for residential development and it is set out below how the site is available now, offers a suitable location for development now, and is achievable with a realistic prospect that housing will be delivered on the site within five years.</p> <p>Availability The site is located 200m to the north-west of Alford town centre, which includes a number of local facilities and services. The site comprises grazing agricultural land and is bound by Park Lane to the east; Alford Manor House to the south; and the rear garden of residential properties along Commercial Road and Christopher Road. The site is available now with St Andrew's Healthcare keen to promote the land through the neighbourhood planning process and agree with the Town Council a programme for delivering the site. St Andrew's Healthcare would welcome the opportunity to meet with the Town Council in this respect. The site is within single landownership and is controlled by St Andrew's Healthcare who have an excellent track record for promoting and delivering development sites.</p> <p>Suitable The site is well served by the local road network including Park Lane, which can provide access to the site. Pedestrian access can also be achieved through the adjacent West Road. The nearby bus stop lies to the south of the site on West Road and is served by bus routes No. 7, 8, 10 and 96 offering services to Skegness and Louth. A review of the Environment Agency's Flood Map for Planning confirms that the majority of the site falls wholly within Flood Zone 1, which indicates that there is a less than 0.1 per cent (1 in 1000) chance of flooding occurring each year. However, the site does contain areas of Flood Zone 3 to the western and northern extent, which will need to be mitigated as part of any future development proposals. The site is not subject to any environmental designations including: Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar site. The site is also located outside of the Area of Outstanding Natural Beauty (AONB).</p> <p>Achievable The residential development of the site is capable of being achieved within the plan period. It is our view the site can deliver market and affordable housing within the first five years of the plan period.</p>

			<p>Conclusion</p> <p>East Lindsey District Council does not seek to allocate any Local Green Space at Alford and delegates the power of designation to the Alford Neighbourhood Plan.</p> <p>In line with paragraph 77 of the NPPF, St Andrew’s Healthcare considers that the Local Green Space designation will not be appropriate for land west of Park Lane. This is because it cannot be robustly demonstrated that the land is either special to the local community or holds a particular local significance or indeed that both of these requirements are satisfied, as is required.</p> <p>In addition, the designation is not based on sound evidence which considers whether or not the site is local in character and it is also relevant that the site, given its size, represents an extensive tract of land.</p> <p>St Andrew’s Healthcare trust the information provided within these representations will be considered by the District Council and welcome the opportunity to discuss these representations in further detail.</p>
St Andrews Healthcare (Land South of Tothby Lane)	Turley		<p>We write on behalf of our client, St Andrew’s Healthcare, in response to the Alford Neighbourhood Plan (“NP”) Regulation 16 public consultation and in the context of our clients significant land interests to the south of Tothby Lane, Alford (hereafter referred to as “the site”).</p> <p>Introduction</p> <p>The site is not subject to an allocation in the NP; however it is the view of St Andrew’s Healthcare that the site represents a sustainable and deliverable residential land opportunity for promotion through the NP as a broad location for windfall development.</p> <p>St Andrew’s has previously engaged with Alford Town Council in discussions related to their land interests at land south of Tothby Lane, Alford and have made representations to the East Lindsey Draft Core Strategy (June 2016), Core Strategy Pre-Submission Draft (January 2017) and to the Examination in Public in May 2017 in the context of the spatial strategy for Alford.</p> <p>It should also be noted that representations were made to the Alford Neighbourhood Plan (Regulation 14) consultation.</p> <p>The revised National Planning Policy Framework (July 2018)</p> <p>Annex 1 of the revised National Planning Policy Framework (“the revised NPPF”) sets out its implementation arrangements. Paragraph 212 of the revised NPPF explains that its policies are material considerations which should be taken into account in dealing with applications from the day of its publication.</p> <p>However, paragraph 214 of the revised NPPF sets out that the policies in the previous Framework, published on 27 March 2012, will apply for the purposes of examining plans where those plans are submitted on or before 24 January 2019. This is the case for the Alford Neighbourhood Plan.</p>

		<p>Accordingly, comments made within these representations refer to the National Planning Policy Framework (“the NPPF”) published in March 2012.</p> <p>The Alford Neighbourhood Plan (Regulation 16)</p> <p><i>A Vision Statement for Alford</i></p> <p>St Andrew’s Healthcare supports the key principles of the vision as outlined at section 4.1 of the NP, which includes reference to new housing development being connected to and supporting the main retail centre. Despite the above, St Andrew’s Healthcare would recommend that the vision is more positively worded to better reflect the strong emphasis, which is embodied in the NPPF, on the social and economic role of plan-making particularly on the need to boost significantly the supply of housing through this process.</p> <p>The vision should give greater emphasis to where Alford lies in the settlement hierarchy (i.e. a first tier settlement) and its inland location, recognising that this is a settlement where housing growth will be distributed towards, consistent with the East Lindsey Core Strategy (July 2018) at Policy SP3.</p> <p>As set out at paragraph 184 of the NPPF, it is the duty of the neighbourhood plan to align with the strategic needs and priorities of the Core Strategy. It is therefore recommended that the vision is amended to include a clear principle on housing growth, such as:</p> <p><i>“Alford will have supported new housing growth in sustainable locations, within or adjacent to its settlement boundary that provides a wide choice of high quality homes creating inclusive and mixed communities.”</i></p> <p>The recommended change sets a positive social and economic context for the NP as a whole and accords with the social and economic dimensions to sustainable development. This will set a context to ensure that sufficient land of the right type is available in the right places to support growth; and to provide the supply of housing required to meet the needs of present and future generations.</p> <p><i>Core objectives</i></p> <p>St Andrew’s Healthcare acknowledges the extensive list of core objectives which have been identified against key headlines such as location, housing, economy and transport, which are all interrelated and which are intended to ensure the vision of the NP is met.</p> <p>St Andrew’s Healthcare note that there are five objectives listed under the headline of ‘Housing’, some of which appear to be duplicated under different headings. Reviewing the five objectives it appears there is no reference to affordable housing or the integration of new housing to existing infrastructure, which are both important provisions of delivering sustainable housing development.</p> <p>To ensure the objectives of the NP is in general conformity with the strategic policies of the East Lindsey Core Strategy it is suggested that two additional objectives are inserted, which would be worded as follows:</p>
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St Andrews Healthcare (Land South of Tothby Lane)	Turley	1 – Site Allocation	<p>Policy 1: Site Allocation</p> <p>Policy 1 does not generally conform to Strategic Policy 3 of the East Lindsey Core Strategy as the allocation of 43 new homes in the NP does not correspond with the allocation of housing (i.e. 66 new homes) set out in Table B of the East Lindsey Core Strategy, which also states:</p> <p><i>“This housing will be allocated in the Alford Neighbourhood Plan; this is a minimum amount of housing that should be allocated in that Plan.”</i></p> <p>Strategic Policy 3 of the East Lindsey Core Strategy sets out that there is an inland minimum housing requirement of 6562 homes; which supports the overall housing requirement across the District, which amounts to 7,819 new homes between 2017 and 2031 – this is also described as a “minimum figure not a ceiling”.</p> <p>Therefore, if the NP is to generally conform to the strategic policies of the East Lindsey Core Strategy, wording should be inserted into Policy 1 of the NP, which sets out that the allocation of 66 homes to Alford is a minimum. This change will be in accordance with paragraph 14 of the NPPF, which states that plan-making should meet objectively assessed needs with sufficient flexibility to adapt to rapid change.</p>
St Andrews Healthcare (Land South of Tothby Lane)	Turley	3 – Residential Development	<p>Policy 3: Residential Development</p> <p>Policy 3 does not generally conform to the strategic policies of the East Lindsey Core Strategy, particularly Strategic Policy 2 and Strategic Policy 3. Paragraph 2.13 of the East Lindsey Core Strategy states the following:</p> <p><i>“The Council considers the purpose of planning is to achieve the delivery of positive sustainable development. This direction of travel will assist the District to grow as a place with all the social implications this involves, ensure our natural and historic environment is respected and looked after and also importantly ensuring our economy both rural and urban is encouraged to grow and flourish.”</i></p> <p>To this end, St Andrew’s Healthcare is concerned with the criteria set out at Section 1 (c), which states <i>“the site is within reasonable walking distance of the Town Centre”</i> and which defines ‘reasonable’ walking distance as a maximum of approximately 800 (or 10 minutes) walk from the Market Place. For the purpose of acting as guidance , this is considered to be unreasonably onerous given there are other local services and amenities that do not fall within the Town Centre such as places of worship, schools and medical centres.</p>

		<p>With regards to the acceptable distances, the Institute of Highways and Transport (“IHT”) Guide ‘<i>Providing for Journeys on Foot</i>’ (2000) includes suggested acceptable walking distances as detailed in the table below and recommends a preferred maximum of 2km for schools / commuting.</p>												
<p>St Andrews Healthcare (Land South of Tothby Lane)</p>	<p>Turley</p>	<p>Institute of Highways & Transport Walking Distances</p> <table border="1" data-bbox="875 411 2161 560"> <thead> <tr> <th></th> <th>Town Centres (m)</th> <th>Commuting / School / Sight-seeing (m)</th> <th>Elsewhere (m)</th> </tr> </thead> <tbody> <tr> <td>Acceptable</td> <td>400</td> <td>1,000</td> <td>800</td> </tr> <tr> <td>Preferred Maximum</td> <td>800</td> <td>2,000</td> <td>1,200</td> </tr> </tbody> </table> <p>The principles of PPG 13 on transport though now superseded by the current PPG can still be applied and aligns with the above, which state:</p> <ul style="list-style-type: none"> • Walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2km. • Cycling also has potential to substitute for short car trips, particularly those less than 5 km. <p>These distances are supported by recent planning appeal decisions where 5-6km cycling distances have been deemed acceptable and, in our view should be better reflected in Policy 3 if the NP is committed to pursuing such prescriptive principles.</p> <p>Furthermore, St Andrew’s Healthcare is concerned with the principles listed at Section 2 which adds an extra layer of restriction to the location of housing growth adjoining the settlement boundary of Alford and would contribute to the delivery of unsustainable development. This discussed in further detail below:</p> <p>a) The site is “brownfield”, according to the definition of the National Planning Policy Framework Whilst it is recognised within the NPPF that planning policies and decisions should encourage the effective use of land by re-using land that has been previously development (i.e. brownfield land), the Neighbourhood Plan Group should note that such land could also be required for employment development and/or environmental uses instead of residential purposes.</p> <p>In addition, as there is only a limited supply of brownfield land within or adjacent to the settlement boundary of Alford, it needs to be determined through the plan-making process which brownfield land is suitable for residential use taking account of ground conditions from former activities, such as pollution</p>		Town Centres (m)	Commuting / School / Sight-seeing (m)	Elsewhere (m)	Acceptable	400	1,000	800	Preferred Maximum	800	2,000	1,200
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			<p>arising from previous uses and any proposals for mitigation including land remediation, which has implications on the surrounding natural environment. There does not appear to be any evidence supporting the NP which demonstrates the deliverability of brownfield sites.</p> <p>b) The site helps to redress the geographical imbalance of the main body of the settlement, in that it is within or adjoining the eastern quarter of the town. Policy Diagram 3 provides an indicative location of the quarter</p> <p>St Andrew’s Healthcare considers that the indicative direction of growth towards the eastern quarter of the Town is not in general conformity with Strategic Policy 2 and Strategic Policy 3 of the East Lindsey Core Strategy given there are a number of significant constraints in this area, which include the following:</p> <ul style="list-style-type: none"> • Flood Risk: A review of the Environment Agency Flood Map for Planning illustrates that there are extensive areas of land within and/or adjacent to the indicative location of the eastern quarter which is subject to ‘high risk’ Flood Zone 3. This is defined as land having a 1 in 100 or greater annual probability of river flooding. <p>Paragraph 99 and 100 of the NPPF are clear that new development should be directed away from areas at highest risk of flooding to avoid increased vulnerability to the range of impacts arising from climate change. In addition, the indicative area of the eastern quarter does not generally conform to the criteria established in Strategic Policy 16(2) of the East Lindsey Core Strategy.</p> <ul style="list-style-type: none"> • Agricultural land: A review of the DEFRA online mapping tool ‘Magic Map’ illustrates that part of the indicative location of the eastern quarter is Grade 2 Agricultural Land, which is classed as the best and most versatile agricultural land. <p>In accordance with paragraph 112 of the NPPF, it is clear the NP has failed to take into account of the economic and environmental benefits of retaining the best and most versatile agricultural land. The same paragraph is clear that areas of poorer agricultural quality should be used in preference to that of a higher quality.</p> <p>It is considered that the indicative location of the eastern quarter does not generally conform to Strategic Policy 10 of the East Lindsey Core Strategy, which supports development seeking to use areas of poorer quality of agricultural land in preference to that of a higher quality. The NP fails to consider this as there are areas of lower quality agricultural land adjacent to Alford that have not been considered as being suitable as an indicative location for growth.</p> <ul style="list-style-type: none"> • Heritage: A review of Historic England’s online mapping facilities confirms there are a collection of Grade II and Grade II* Listed Buildings adjoining the indicative location of the eastern quarter, which is also
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		<p>adjacent to the Alford Conservation Area.</p> <p>The NP places great weight on the protection and maintenance of the Town’s heritage assets as set out at Policy 10 and within its explanatory text, and therefore St Andrew’s Healthcare considers that the indicative location of the eastern quarter conflicts with Policy 10 of the NP and does not conform with Strategic Policy 11 of the East Lindsey Core Strategy given the adjacent heritage constraints.</p> <p>The Neighbourhood Plan Group should note that the setting of local heritage assets impacts upon the opportunities for growth within Alford. The NPPF defines the setting of a heritage asset as: <i>“The surroundings in which a heritage asset is experience. Its extent is not fixed and may change as the asset and its surrounding evolve. Elements of a setting may make a positive or negative contribution to the significant of an asset, may affect the ability to appreciate that significant or may be neutral.”</i></p> <ul style="list-style-type: none">• Access: Section 1 (d) sets out that residential development of sites other than those identified in Policy 1 should have adequate road access infrastructure to serve the development. <p>St Andrew’s Healthcare is concerned that there is insufficient evidence of existing or potential opportunities for access to the indicative location of the eastern quarter, to cater for residential development, such that the prospects of this being feasible may be low.</p> <p>For example, and as illustrated by Figure 8 ‘Road Hierarchy’ of the Alford Character Assessment, there is limited secondary street access to the indicative location of the eastern quarter. This does not generally conform to the criteria set out at Strategic Policy 3(4) of the East Lindsey Core Strategy where an ‘appropriate location’ would <i>“be connected to the settlement by way of a footpath”</i>.</p> <p>It should also be noted that Figure 8 does not accurately reflect the extent of the road infrastructure along Dixon Drive and Robinson Avenue, which abuts the eastern boundary of land south of Tothby Lane.</p> <p>Conclusion</p> <p>It is considered that the ambition of the neighbourhood plan does not align with the strategic needs and priorities of the wider local area i.e. the East Lindsey District and there are neighbourhood planning policies, which are not in general conformity with the strategic policies of the East Lindsey Core Strategy.</p> <p>In order for the NP to reflect the strategic policies and positively plan to support them, in accordance with paragraph 184 of the NPPF, it is imperative the NP aligns with the minimum housing requirements distributed to Alford through the East Lindsey Core Strategy and identifies a sustainable broad location for windfall development, which St Andrew’s Healthcare consider is to the west of Alford.</p> <p>St Andrew’s Healthcare trust the information provided within these representations will be considered by the District Council and welcome the opportunity to discuss these representations in further detail.</p>
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			St Andrew's Healthcare confirms they wish to be notified of East Lindsey District Council's decision under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.
Anglian Water Services Limited		1 – Site Allocation	<p>It is noted that changes have been made in response para 1 b) of Policy 1 in response to comments made by Anglian Water which are welcomed.</p> <p>Anglian Water supports the requirement to demonstrate that residential development on allocated residential sites can demonstrate that there is adequate infrastructure including sewerage and drainage to serve the development</p> <p>ANP9: Hunts Depot – the Neighbourhood Plan includes a reference to an existing groundwater extraction site in Anglian Water's ownership. This source is no longer in use by Anglian Water and has been backfilled. It is therefore recommended that the following text be remove from the wording of Policy 1:</p> <p>'There is an existing groundwater extraction site (Alford Water supply works) in Anglian Water's ownership located adjacent to the above site. Development should ensure that it does not prejudice the continued operation of this site. Proposals should also not include soakaways on this site given the potential risk of pollution to the existing water source.'</p>
Anglian Water Services Limited		3 - Residential development	Anglian Water is supportive of the requirement to demonstrate that residential development on non-allocated sites can demonstrate that there is adequate infrastructure including sewerage and drainage to serve the development.
Anglian Water Services Limited		4 – Flood Risk	<p>It is noted that changes have been made in response para 3 of Policy 4 in response to comments made by Anglian Water which are welcomed.</p> <p>The implementation of Sustainable Drainage Systems (SuDS) as the preferred method of surface water disposal within the Parish is fully supported. We also welcome the reference to applicants following the surface water hierarchy as outlined in the National Planning Practice Guidance.</p>
Lincoln Diocesan	Savills UK Ltd (Rural Consultancy Services)	1 – Site Allocation	<p>The inclusion of site AL055 as an allocation for 3 houses is supported by the LDTBoF who own the site.</p> <p>The commentary which highlights that the site's development should be of a high quality in terms of</p>

Trust and Board of Finance			<p>design is acknowledged because of its proximity to heritage assets. The criteria within Policy 1 appear to be logical and sensible aspirations for housing development within Alford and are therefore supported by our client.</p>
Lincoln Diocesan Trust and Board of Finance	Savills UK Ltd (Rural Consultancy Services)	<p>Site pro forma document, page 8, Site Reference AL055</p>	<p>The assessment of the site is supported by the LDTBoF in general. In addition, it is considered that the development of the site could bring connectivity benefits because of its proximity to the centre of the town, encouraging future residents of the site to meet their day to day needs in Alford by foot. In addition, this is a recommendation in relation to the site within Policy 1.</p> <p>In relation to the impact on the Conservation Area, the assessment allocates this site a score of 0 which states <i>“Would have an unacceptably negative impact on Conservation Area, listed/important buildings and/or natural features”</i>. This statement is considered unnecessarily pessimistic. In developing the site, designs would be informed at the outset by the historic context, including the church, to ensure that impacts are minimised. Proposals would be developed that are sympathetic to the site’s location adjacent to the grade I listed church. Development would therefore need to comply with both ELDC Policy SP11 on Heritage Assets, as well as the emerging policy of the Neighbourhood Plan(H10: Heritage and Design). Therefore, a number of policy mechanisms are in place to ensure that development would not have a negative impact on heritage assets.</p> <p>It is therefore suggested that a greater score should be allocated to this site under this section within the Housing Site Assessment.</p> <p>Our comments are similar in relation to the Visual & Environmental Impact of the site which is also scored as 0 <i>“Would have an unacceptably detrimental impact on the views of the town on approaches and/or from within the town, and/or on the surrounding environment.”</i></p> <p>The Character Appraisal of Alford which accompanies the Neighbourhood Plan identifies key views around the town, including those of St Wilfrid’s. The site is located in very close proximity to the church itself and short term views would be possible of if development takes place. However, longer terms views are considered unlikely to be affected because the site is screened by existing trees and buildings, in particular along St Wilfrid’s Close.</p> <p>As noted in relation to the impact on heritage assets, development of the site would be in accordance with the Historic Environment policies of the Local Plan, and could ensure a high quality, sympathetic scheme which reinforces the character of the area, and respects views wherever possible. The use of appropriate building materials, boundary treatments and planting could be a way to minimise visual impacts.</p> <p>We therefore suggest that a greater score should be allocated to this site under this section within the</p>

			Housing Site Assessment.
Lincoln Diocesan Trust and Board of Finance	Savills UK Ltd (Rural Consultancy Services)	Policy Map 10 Conservation Area, page 76	<p>It is proposed that site AL055 should be included within the Conservation Area boundary for Alford. The site is in close proximity to St Wilfrid's and therefore has a degree of protection because of its relationship with the church. In addition, the site is well screened by trees which at the present time affords a degree of visual separation.</p> <p>This is confirmed by the work included within the Alford Character Assessment which shows that AL055 falls into a separate Character Area (East Street and Bilsby Road) to St Wilfrid's Church, which is located within the Station Road and West Street Character Area.</p> <p>It is not therefore considered necessary to include the site within the amended Conservation Area boundary.</p>
NFU		-	<p>The NFU has 4,800 farmer members out of the 6,000 farmers in the East Midlands region who are commercial farmers. About 90 per cent of land within this part of Lincolnshire is farmed. The viability and success of farmers near Alford is crucial to the local economy and the environment. Farmers need local plan policies which enable:-</p> <ul style="list-style-type: none"> - New farm buildings needed by the business. This could be for regulatory reasons (e.g. new slurry stores) or because new or more crops and livestock are being farmed (grain stores, barns, livestock housing etc). - Farm and rural diversification. Some farmers will be in a good position to diversify into equine businesses, on farm leisure and tourism and in other sectors which will help boost the local economy and support the farm business. - On farm renewable energy. Farms can be ideal places for wind turbines, pv, solar, anaerobic digestion, biomass and biofuels plant provided they do not cause nuisance to others. The UK must meet a target of 15% renewables by 2020. Currently we are not meeting this target but on farm renewables can help us to meet it. - Conversion of vernacular buildings on farms into new business use or residential use. This enables parts of older buildings to be preserved whilst helping the economy and the farm business. <p>Fast broadband and mobile connectivity. Rural businesses depend on these but so often these are not provided and planning can be an obstacle to their provision rather than the enabler that it should be.</p> <p>The NFU will be looking to see that the neighbourhood plan has policies which positively encourage the above and do not deter them because of, for example, restrictive landscape designations and sustainable transport policies which imply that all development needs to be by a bus stop. There can also be issues</p>

			<p>about new buildings being sited too close to noisy or smelly farm buildings which cause nuisance to new householders and lead to abatement notices being served on longstanding businesses. We would urge the local planning authority to be especially careful before granting permission to residential development near to bad neighbour uses.</p>
Equality and Human Rights Commission			<p>Thank you for your letter dated 15 August 2018.</p> <p>The Commission does not have the resources to respond to all consultations, but will respond to consultations where it considers they raise issues of strategic importance.</p> <p>Local, parish and town councils and other public authorities, as well as organisations exercising public functions, have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics. The PSED is an on-going legal requirement and must be complied with as part of the planning process. The Commission is the regulator for the PSED and the Planning Inspectorate is also subject to it. In essence, you must consider the potential for planning proposals to have an impact on equality for different groups of people. To assist, you will find our technical guidance here.</p> <p>Yours sincerely, Tom White</p>
Highways England			<p>We welcome the opportunity to comment on the Submission version of the Alford Neighbourhood Plan which covers the period 2018 to 2031. The document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Alford Neighbourhood Plan, our principal interest is safeguarding the A46 which routes some 35 miles to the west of the Plan area.</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Alford is required to be in conformity with the adopted East Lindsey Local Plan and this is acknowledged within the document. The</p>

			<p>Neighbourhood Plan identifies a total of 205 dwellings to be delivered over the Plan period. As such the housing requirement for Alford as set out in the East Lindsey Local Plan for 161 dwellings has already been met and exceeded through existing commitments.</p> <p>Due to the small-scale of development growth being proposed and the distance of the Neighbourhood Plan from the SRN, it is considered that there will be no impacts upon the operation of the A46. We have no further comments to provide and trusts the above is useful in the progression of the Alford Neighbourhood Plan.</p>
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