

Alford Neighbourhood Plan Examination

Answers to Examiner's Questions

Questions for Alford Town Council to Answer:

1. Were the St Andrew's Healthcare sites referred to in the Reg 16 representations considered in site assessments following the Reg 14 consultation when similar representations were raised.

Following the Regulation 14 Consultation, as indeed with all previous consultations, the Alford Neighbourhood Plan Steering Group reviewed the assessments of all potential housing sites. No evidence was presented that changed the relevant assessments of sites AL309 and AL312.

St Andrew's Healthcare, via their agent Turley Associates, responded to the Regulation 14 Consultation on one matter only, namely the proposed Local Green Space Designation for land to the west of Park Lane, Alford. The Neighbourhood Plan Steering Group's response to all the points they made is set out in the Plan's Consultation Statement. No mention was made by St Andrew's Healthcare about the possibility of the land in question being used for housing development. This site, AL309, was assessed by East Lindsey District Council in the SHLAA, which was part of the evidence base for the Local Plan, and was discounted as a potential site due to poor access and flood risk issues. In addition, development adjacent to the Manor House in Alford, a Grade II listed building, which is the major tourist attraction in the town, and near to a Conservation Area, was felt wholly inappropriate. The site scored negatively on the Sustainability Appraisal and low according to the Housing Site Assessment.

St Andrew's Healthcare made no comments in connection with housing site AL312 as part of their response to the Regulation 14 Consultation. They did, however, send a general letter to Alford Town Council with regard to a proposed development of housing site AL312, land to the south of Tothby Lane, ahead of their Regulation 14 response. In that letter they make it clear that they would be making a separate response to the Regulation 14 Consultation. The letter of information simply set out the supposed virtues of their forthcoming planning application for this site. The Steering Group considered carefully this representation as part of the site assessment, but concluded that no information contained in the letter produced evidence to warrant changing the previous assessments of this site (being "-6" on the Sustainability Appraisal & amongst the lowest as measured by the Housing Assessment methodology).

In conclusion, the Steering Group considered in its site assessments all representations made by St Andrew Healthcare, both as part of Regulation 14 Consultation as well as previous correspondence.

2. Is there specific evidence to support the claim that the Bull Fair Field is ancient grassland and of ecological importance and was the assessment of it confirmed by a professional ecologist?

In the production of the Alford Neighbourhood Plan, and in particular its Character Assessment, much detailed research was conducted, and in this connection the Lincolnshire Wildlife Trust (through local community member, Trust Trustee and Deputy Chairman, Dr David Sheppard*) and the Greater Lincolnshire Nature Partnership were consulted. As

indicated in the Steering Group's response to the Regulation 14 Consultation representation by St Andrew's Healthcare, regarding the proposed Local Green Space designation for the Bull Fair Field, the specific evidence to support the ecological importance of the site was obtained from the Greater Lincolnshire Nature Partnership (GLNP). The link below will take you to the website of the GLNP, which clearly shows that this body is the chief source of ecological data in the county of Lincolnshire, and as such, presents independent and authoritative information on these matters.

<https://glnp.org.uk/partnership/lerc/>

The "Lincolnshire Environmental Records Centre Data Search Report 2015" (attached) is based on GLNP's comprehensive database of recorded sightings of protected species. The database shows that sightings of Brown Long-eared Bats have been made both in and near the Bull Fair field, whilst there have been sightings of the European Water Vole & the European Otter in the adjacent Wold Grift Drain and a waterway feeding directly into this. Please refer to the attached database, "*Species Search database showing Bull Fair related sightings from GLNP master database*", which shows those records relating to the Bull Fair Field and the nearby area. These recorded sightings support those made in the field by local residents, which with regard to the bats, are made on a regular basis.

In addition David Sheppard made the following statement in his document "*Profile of Alford Environment*" (attached), which was a response to the Steering Group's request for information:

"Several species, protected by a variety of designations, have been found in recent years within the parish of Alford or nearby."

That report, using information from the GLNP database, states that protected species other than bats, voles and otters, such as skylarks and brown hares, have also been recorded in the parish of Alford. This supports the sightings by local residents of these animals in the Bull Fair field. Whilst unrecorded, local sightings do not amount to confirmed independent evidence, they should carry some weight, as their frequency are a good indication of the rich wildlife to be found within this field. In addition, other protected species, namely Kingfishers, Little Egrets, common toads, and the West European Hedgehog, have all been spotted in the Bull Fair Field, along the adjacent Wold Grift Drain and in the near vicinity of the area.

It is also worth pointing to the comments received by the Environmental Agency (Consultation Statement, comment 6 and comment 7 Environmental Agency, pages 20 and 21) regarding the identification of "*the Woldgrift Drain as a Lincolnshire Chalk Stream. Chalk streams are very special habitats, which support some of our most threatened plants and animals (...) The Woldgrift Drain, due to a number of pressures, does not support the numbers of plants and animals that would be expected in a chalk stream (...) Any opportunities to improve or restore habitat within Alford as part of future developments would be beneficial. Measures to improve in-channel diversity would help provide improved habitat for fish, invertebrates and other ecology, and create diversity of flow within the channel.*" The Environment Agency goes on to say that the designation of the Bull Fair Field as a Local Green Space appears to present opportunities for enhancement of the area. The "*identification that the Bull Fair Field would be an ideal location for an additional park appears to have particular potential and it may be that working in partnership with the*

Lincolnshire Wolds Countryside Service, subject to funding, that significant benefits could be achieved to the Drain and the surrounding green space.”

When compiling the “Alford Character Assessment” for the Neighbourhood Plan the phrase “ancient grasslands” was originally included. However, before its completion the phrase was altered to read “an old grass field”. This was because it was thought there was no specific evidence to support the original description. In contrast this more general description is a matter of common knowledge, not requiring specific evidence. The fact that the phrase “ancient grasslands” remains in the Appendices to the Plan is an error, for which we apologise. It should also have been replaced with the description “an old grass field”.

** Dr David Sheppard was appointed a Trustee of the Lincolnshire Wildlife Trust in 1993. He is convenor of the Nature Reserve Development Team, an active member of his local Area Group and Watch leader. David is a nationally recognised invertebrate expert, formerly with Natural England and its predecessor organisations.*

3. What, other than the aspiration to encourage development closer to the town centre, led to the identification of the Eastern Quarter in Policy Diagram 3? Were constraints on this area taken into account?

The identification of the Eastern Quarter was motivated by the desire to redress the physical imbalance to the town caused by concentration of development westward and southward. The previous East Lindsey Local Plan (ELLP) 1995 (still in force when the Alford Neighbourhood Plan was being produced) recognises this issue and makes a “deliberate attempt to redress” this dynamic through site allocations (Chapter 17, paragraph 17.5). Unfortunately, the ELLP was not particularly successful in this sense, and the town continued to grow southward rather than eastward. As a result of that, the Market Place has been progressively “pushed” to the edge of the main body of the town, losing its centrality with potential effects on its vitality and viability. It is believed that development in the Eastern Quarter will help to put the Market Place once again at the physical centre of the town, which may in turn promote use of the retail shops and community facilities offered by the town centre, and thus fuel its regeneration.

Community consultation demonstrated public support for the idea of addressing the geographical imbalance by supporting development to the north and east. The Housing Site Assessment Methodology, which includes a “geographical balance across the town” criteria, was consulted at the early stage of preparation of the plan and supported by the community.

As explained in paragraph 5.3.11 of the Justification Text of Policy 3, the Diagram should not be interpreted as an allocation or a zoning tool, but as a visualisation of the spatial concept represented by the Eastern Quarter. The identification of this diagrammatic quarter is based on the eastern side of the main body of the settlement, taking the Market Place as a reference point to define the east side. Ultimately, the Local Planning Authority will need to decide on a case-by-case basis whether or not a development proposal is located in the Eastern Quarter and hence helps to redress the geographical imbalance, using the Diagram as an indicative location.

Constraints in this area have been taken into account as part of the site allocation: sites proposed in the Eastern Quarter have been assessed against the Sustainability Appraisal of Housing as well as the Housing Site Assessment Methodology. These methodologies included criteria to assess planning constraints such as impact on Conservation Area and

heritage assets, environmental and landscape impact, flood risk, access and traffic, access to service and facilities, etc. Although no site has been allocated in the area, the assessment demonstrated the area is not unsuitable for development due to any major constraint. Windfall development proposals in the Eastern Quarter will still be required to meet all the Policy requirements contained in the Neighbourhood Plan as well as the Local Plan.

4. What evidence is there to support the assertion in the Basic Conditions Statement that there would be no impacts on human rights and equalities? Was an impact assessment carried out?

As part of the submission of the Neighbourhood Plan, the Screening Opinion produced by East Lindsey District Council (see Alford Neighbourhood Plan Basic Condition Statement – Appendix A – Screening Opinion) required a full SEA.

The Steering Group complied with this request through the preparation of a Sustainability Appraisal. Sustainability Appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment. Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues.

However, Sustainability Appraisal does not simply consider the effects of the proposed Neighbourhood Plan on the environment, but analyses ways by which the plan can contribute to improvements in social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have on these two strands of sustainability.

A Sustainability Appraisal Scoping Report was produced for the Neighbourhood Plan in December 2015, and provided an overview of the local community, analysing among other factors the situation of different equality groups in Alford (based on age, gender, ethnicity, sexual orientation, religion or beliefs, disability, etc.).

The Scoping Report concluded that the population of Alford as a whole is older than the national average, about the same as the county average and younger than the district average. It is also mentioned that Alford lies towards the most deprived end of the IMD ranking. Finally, the schools in Alford reported a higher than average number of pupils with special educational needs and/or disabilities.

The Report highlighted that the residents in Alford rate their health very similarly to residents across the district, and slightly poorer than residents across the county and nationally. The Report did not highlight any minority group in terms of nationality, ethnicity, people who do not speak English as a first language, religion or belief.

In producing the Sustainability Appraisal, with regards to the social impact, particular attention has been given to the issues of the ageing population, the rights of disabled people, and the level of deprivation in the Town. Looking at the SA Objectives used to evaluate Objectives and Policies of the Neighbourhood Plan, it is worth noting the following:

- "SA Objective 9: Support inclusive, safe and vibrant communities" considered the need of the above mentioned equality groups to promote a more diverse and cohesive community.

- “SA Objectives 10: Ensure that local housing needs are met” assessed policies against their capacity to meet the identified needs of all sectors and equality groups in the community, and
- “SA Objective 12 Encourage and provide the facilities and infrastructure for healthy lifestyles” ensured Objectives and Policies of the Plan contributed to the reduction of health inequalities.

The Sustainability Appraisal was submitted to ELDC for initial review in October 2017 and was consulted on as part of the Regulation 14 Consultation in January 2018.

Regarding the level of consultation throughout the whole plan-making process, great care has been given to ensure that the views of the whole community were embraced to avoid any unintentional negative impacts on particular groups.

The main issues for planning are the right to family life and in preventing discrimination. The Plan makes positive contributions in this sense, seeking to provide housing to meet local needs and promoting affordable housing.

The population profile has revealed that there are not significant numbers of people who do not speak English as a first language and it has not been necessary to produce consultation material in other languages.

The Neighbourhood Plan has been prepared with extensive input from the community and stakeholders as set out in the accompanying Consultation Statement. There have been numerous consultation and engagement opportunities from the very first stages of the process; all these events and opportunities have been widely publicised in advance, trying to connect with different community groups and to reach all residents. Both the publicity solutions and engagement methods were tailored to engage with each identified group, taking account of specific characteristics of the target groups, (e.g. demographic, locations, etc.).

The draft Neighbourhood Plan was consulted on as part of Regulation 14 Consultation in January 2018; responses have been recorded and any changes as a result described in the Consultation Statement.

In conclusion, whilst an Equality Impact Assessment Report has not been specifically prepared, it is believed that the SA incorporated the elements of such an assessment and appraised the potential impact on human rights and equalities; moreover, the level of consultation and the whole engagement strategy were designed to ensure equitable and fair opportunities for the entire community of Alford.