

Horncastle Neighbourhood Plan Proposal Submission Consultation Responses

| Reference Number | Name and Organisation | Date | Comment | Reg 19 Request |
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| HNDP1 | Miss Rachel A. Bust on behalf of The Coal Authority | 20/03/15 | <p><i>Neighbourhood Development Plans</i></p> <p>As you will be aware The Coal Authority is a prescribed consultation body in Schedule 1 1(c) of the Neighbourhood Planning (General) Regulations 2012 in relation to Neighbourhood Development Plans (under Regulations 14 and 16).</p> <p>You will obviously understand that the interest of The Coal Authority lies within the defined UK coalfield, which covers a substantial part of England, but does not include your LPA area.</p> <p>We are mindful of the consultation requirements on designated Neighbourhood Forums or Town and Parish Councils who produce Neighbourhood Development Plans. There is also a further consultation requirement on LPAs. In the non-coalfield areas of England, our response to consultations received under Regulations 14 and 16 of the Neighbourhood Planning (General) Regulations 2012 is one of 'No Comment'.</p> <p>We would like to make the consultation process easier for all parties involved in Neighbourhood Planning. As such I attach a declaration of a deemed consultation response to be used by your LPA and any relevant Neighbourhood Forums or Town and Parish Councils who produce Neighbourhood Development Plans. I therefore confirm that there is no obligation for you or any relevant Neighbourhood Forums or Town and Parish Councils to consult us on any stages of the production of Neighbourhood Development Plans within your LPA area.</p> <p>The attached declaration of a deemed consultation response is to be used in demonstrating to both the LPA and the Independent Examiner that the Neighbourhood Development Plan has been consulted on as required by the 2012 Regulations.</p> <p>From 1 April 2015 we will no longer provide a bespoke response to consultations on Neighbourhood Development Plans in the non-coalfield parts of England.</p> <p><i>Neighbourhood Development Orders and Community Right to Build Orders</i></p> <p>As you will be aware The Coal Authority is a prescribed consultation body in Schedule 1 2(d) (b) of the Neighbourhood Planning (General) Regulations 2012 in relation to Neighbourhood Development Orders and Community Right to Build Orders made pursuant to Regulations 21 and 23 of the Regulations.</p> <p>As highlighted above the interest of The Coal Authority lies within the defined UK coalfield, which covers a substantial part of England, but does not include your LPA area.</p> <p>The Coal Authority is again very mindful of the consultation burden on designated Neighbourhood Forums or Town and Parish Councils who produce Neighbourhood Development Orders or Community Right to Build Orders. In the non-coalfield areas of England, our response to consultations received under Regulations 21 and 23 of the Neighbourhood Planning (General) Regulations 2012 is one of 'No Comment'.</p> <p>We would like to make the consultation process easier for all parties involved in Neighbourhood Planning. As such I attach a declaration of a deemed consultation response to be used by your LPA and any relevant Neighbourhood Forums or Town and Parish Councils who produce Neighbourhood Development Orders or Community Right to Build Orders.</p> <p>I therefore confirm that there is no obligation for you or any relevant Neighbourhood Forums or Town and Parish Councils to consult us on any stages of the production of Neighbourhood Development Orders or Community Right to Build Orders within your LPA area.</p> | |

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| | | | <p>The attached declaration of a deemed consultation response is to be used in demonstrating to both the LPA and the Independent Examiner that the Neighbourhood Development Order or Community Right to Build Order has been consulted on as required by the 2012 Regulations.</p> <p>From 1 April 2015 The Coal Authority will no longer provide a bespoke response to consultations on Neighbourhood Development Orders or Community Right to Build Orders in the non-coalfield parts of England.</p> <p>Should you require any further information, please do not hesitate to contact the Planning and Local Authority Liaison department via the contact details above.</p> |
| HNDP2 | Susan Davidson Marine Management Organisation | 21/05/15 | <p>Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments to submit in relation to this consultation.</p> <p>If you have any questions or need any further information please just let me know. More information on the role of the MMO can be found on our website www.gov.uk/mmo</p> |
| HNDP3 | Louise Quickfall, Departmental Clerk, Lindsey Marsh Drainage Board | 27/05/15 | <p>Thank you for consulting the Board on the above neighbourhood plan – This is outside of the Lindsey Marsh Drainage Board's area.</p> <p>We advise that you consult with the Witham Third District Internal Drainage Board at Lincoln.</p> |
| HNDP4 | Email sent by Sarah Phipps (on behalf of National Grid) Attachement by Julian Austin (Amec Foster Wheeler Consultant Town Planner, on behalf of National Grid) | 04/06/15 | <p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p>About National Grid</p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p><i>Gas Distribution – Low / Medium Pressure</i></p> <p>Whilst there is no record of National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes within proposed development sites. If further information is required in relation to the LP/MP network please contact plantprotection@nationalgrid.com</p> <p>Key resources / contacts</p> <p>National Grid has provided information in relation to electricity and transmission assets via the following internet link: http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p> <p>The first point of contact for all works within the vicinity of gas distribution assets is Plant Protection (plantprotection@nationalgrid.com).</p> <p>Information regarding the transmission and distribution network: www.energynetworks.org.uk</p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our</p> |

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| HNDP5 | Ross Anthony The Theatre Trust | 12/06/15 | <p>infrastructure. We would be grateful if you could add our details shown below to your consultation database:</p> <p>Julian Austin Consultant Town Planner n.grid@amectw.com Amec Foster Wheeler E&I UK Gables House Kenilworth Road Leamington Spa Warwickshire CV32 6JX</p> <p>Laura Kelly Town Planner, National Grid laura.kelly@nationalgrid.com National Grid House Warwick Technology Park Gallows Hill Warwick CV34 6DA</p> <p>I hope the above information is useful. If you require any further information please do not hesitate to contact me.</p> | Y |
| HNDP6 | J A Lawrence | 12/06/15 | <p>General Comments</p> <p>Unfortunately the Trust did not have an opportunity to contribute during the Regulation 14 consultation.</p> <p>As East Lindsey does not have an up to date local Plan that is consistent with the National Planning Policy Framework (NPPF), the Trust would strongly recommend the Horncastle Neighbourhood Plan include policies to protect and promote community and cultural facilities.</p> <p>The NPPF and Planning Practice Guidance notes that a range of issues could be considered through the plan-making including social and cultural well-being and the provision of a variety of community infrastructure and cultural facilities are vital for their contribution to the well-being of the local community. Essential community and cultural facilities include your theatre, pubs, library and the community centre. The importance of planning for culture and cultural facilities is emphasised in the National Planning Policy Framework by being included as a core planning principle (item 17). This is supported by guidance in item 70 of the NPPF which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.</p> <p>Recommendation: It is essential that a suitable policy is included in the neighbourhood plan that reflects item 17 or 70 of the NPPF. This will help protect buildings of cultural & community benefit which might otherwise be traded in for more commercially lucrative developments. This is particularly important with the recent listing of the Lion theatre as an asset of community value. We recommend a policy along the lines of:</p> <p>The loss or change of use of existing community and cultural facilities will be resisted unless replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site.</p> <p>The Policy should also contain criteria for encouraging the provision of new facilities to serve the growing population.</p> <p>For clarity, and so that guidelines are clear and consistent, we recommend that the accompanying text and the Glossary contains an explanation for the term 'community and cultural facilities'. We recommend this succinct all-inclusive description which would obviate the need to provide examples: community and cultural facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</p> | |
| HNDP6 | J A Lawrence | 12/06/15 | <p>I have the following comments to make in relation to the Neighbourhood Plan.</p> <p>My comments concern omissions from the Plan are best related to Community Needs. I strongly agree with the 1st comment under Community Needs in the Consultation document page 10 and the 2nd comment from resident A on page 17. As the Plan is for the next 15 years it should reflect the needs and desires of the residents in the area regardless of current planning regulations & guidelines as these may well change during this time. The lack of official target figures is no excuse for omitting any reference to the residents' preference s in size</p> | |

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| HNDP7 | Richard Barker | 15/06/15 | <p>and location of developments both residential and other.</p> <p>Although I largely agreed with the contents of the Plan when completing earlier consultation forms and filled in maps indicating my preferred areas for future developments on more than one occasion because of the omissions mentioned above I am unable to support the adoption of the Plan as it stands</p> <p>PREAMBLE.</p> <p>This final report from Richard Barker , RIBA, is a culmination of several reports and emails sent to both ELDC and the Horncastle Town Council and the HNDP Working Group following the last consultation process at the end of December 2014.</p> <p>My comments are specifically for the Inspector as representations to the ELDC, Town Council and HNDP Working Group have generally been ignored and the ELDC response is both flawed and detrimental to the well being of the historic Market Town of Horncastle. App 6</p> <p>Copies will be attached for completeness and clarity. APPENDICES 1,2,3,4,5 & 6</p> <p>THE FINAL CONSULTATION REPORT FOR THE ATTENTION OF THE INSPECTOR .</p> <p>For reasons not explained by the Working Group, the Town Council and in part ELDC, or evidenced by example and precedent this final draft HNDP is in my professional opinion both flawed, incomplete and contradicts the basic requirements of a Development Plan, as promoted by the Working Group's supporting documentation included as part of the formal submission. App 1 & 3</p> <p>As well as the web page introduction, App 3, which clearly refers to land use and development zoning the Basic Conditions Statement. App 1, in its introduction, refers to land use and development land use under clauses 1.1, 1.2 and 2.1, yet the final plan ignores these guidelines.</p> <p>Throughout the process, consultation by the HNDP Working Group has excluded public meetings and debate and relied on tick box surveys rather than full discussion. App 2 There has been an underlying desire, totally flawed in my opinion, to be the first Town to have the HNDP ratified. This is challenged as not in the best interests of the Towns future. The town have been let down.</p> <p>Not to include the supporting documents within the Plan Report and NOT supplying hard copies to the public displayed Plan in the Library is unacceptable. Reliance by individuals to trawl the website and appendices is partly acceptable but not for all the population of Horncastle.</p> <p>It would appear that this has been addressed by the availability of an A4 lever arch file containing all the relevant documents but these should have been in this format for the 2014 December consultation.</p> <p>Openness and transparency have been lacking from the Working Group as have answers to properly asked questions by myself and others.</p> <p>Unlike the Town Plan of 2007-9, which involved the public in all meetings of the Town Plan Working Group, all neighbourhood plan working group meetings were held in camera. This is unacceptable and has led to the flawed Plan being approved by Council and then submitted to ELDC.</p> <p>I would respectfully ask the Inspector to bear this in mind in making his deliberations.</p> <p>However, the greatest concern is the lack of zoning of land in and around Horncastle for not only housing use but industrial, commercial and amenity space. The Plan defines its policies in respect of Green Spaces but ignores the designation of land use which is after all the backbone of why such plans are written. This alone makes the Plan incomplete and flawed and it should be returned to ELDC and the Town Council to include a proper and in depth assessment of how Horncastle should grow and develop for the next 15 years and beyond. App 4 & 5</p> <p>This vital omission is compounded by ELDC Planning section saying that the designation and zoning of land cannot be undertaken until the Local Plan and housing numbers have been ratified. We will be a long time waiting as this was discussed back in 2010. App 4 & 6</p> |
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| HNDP8 | Stewart Attwood | 15/06/15 | <p>The failure and incompetence of ELDC should not prevent a reasoned and sensible approach by the HNDP to proffer housing numbers which meet the needs and resources of the Town and provide where the Town should expand for sustainable development.</p> <p>The failure of ELDC to perform in a timely and competent way has already resulted in two lost appeals and several developments being approved and new developments in the pipeline which could total 1500 to 2000 houses. The Town cannot cope in infrastructure terms, lack of employment opportunities and lack of school places and only one medical facility and the emergency services under severe pressure.</p> <p>Interestingly the retiring Planning Officer of ELDC, David Loveday, has publicly stated that the number of houses will not be related to Government edict but by market forces determining when developers invest millions of pounds to build out estates.</p> <p>Horncastle is not adverse to growth, providing is it well thought out, balanced across the economic spectrum of use and sustainable.</p> <p>The current plan covers other important aspects in a reasonable way but some of the policies need to be more clearly stated and achievable in implementation.</p> <p>There appears to be an inconsistency in approach with ELDC were Alford has included land use and suggested numbers based on what the Town can support in the future.</p> <p>Most Neighbourhood Development Plans clearly major on land allocation and zoning and I quote Uppingham, in Rutland, as an example.</p> <p>Finally I would draw the Inspectors attention to the concerns expressed by Horncastle District Councillors who have all said they have real concerns relating to the ability of roads and sewers and services generally to cope with large scale developments against a background of no jobs and lack of people to buy these hundreds of houses.</p> <p>In conclusion I personally have no issues with the Plan as written, except for its failure to designate zoning of land use and where development would be supported and where it should not.</p> <p>Common sense tells me that Horncastle needs to grow naturally against a background of improving economic wealth and sustainability which the present climate does NOT engender and is unlikely to for the foreseeable future.</p> <p>I would respectfully ask the inspector to return the plan and ask that zoning, land use and where development should be sited is included before the plan goes to a referendum. App 5</p> <p>APPENDIX AVAILABLE IN FOLDER</p> |
| HNDP8 | Stewart Attwood | 15/06/15 | <p>I wish to register my dissatisfaction with the HNDP as it stands at present. In my view it is inadequate and requires if not a rewrite some significant amendments.</p> <p>Some background may be useful.</p> <p>In June 2014 I was coopted on to Horncastle town Council and appointed to the Planning Committee. I did not stand for re-election this year for health reasons.</p> <p>When I first became aware of the HNDP I thought it a potentially valuable addition to the planning process particularly as it seemed to me to offer the Town and its representatives an opportunity to influence future expansion and growth. My three colleagues from the Council who sat on the HNDP committee although like me without professional qualifications in the field seemed to share my view. My initial view prevailed until I was able to read the first draft of the Plan. I very quickly realised that the HNDP as written was an insubstantial document which would have a limited impact on future development in the town. It seemed to me to contain much socio economic jargon and did not address the basic questions I had anticipated it would deal with such as which parts of the town would be allocated as suitable for residential ,business and recreational development and on what scale and of particular importance what arrangements should be in place to ensure the town's overall infrastructure would be sufficient to cope with future development. The HNDP is however laudable in respect of its 'green' content but I am afraid to say that the Urban structures 'Study' was and is in my view a computer generated exercise of very limited relevance .</p> <p>When I raised my concerns with my Council colleagues I was told that the HNDP had been shaped in the way it had been on the strong advice of the Consultant commissioned to write the Plan with support for the approach from ELDC and that there was nothing to be done</p> |

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| <p>HNDP9</p> | <p>Natalie Dear, Natalie Dear Planning / Stuart Robinson, Gin Property Ltd</p> | <p>17/06/15</p> | <p>about it. During the public consultation period at least two commentaries on the Plan written by professionally qualified residents of Horncastle were submitted to the HNDP committee. Much more eloquently and learnedly than I they suggested that the HNDP was failing in a number of important and vital areas to deal with future development of the Town. When I raised these commentaries at a full meeting of the Town Council and suggested that proper weight should be accorded to the views of professionally qualified residents of the Town my opinion was dismissed by Councillor Roark a member of the Council and one of its representatives on the HNDP committee and accused of having been 'sucked in by the troublemakers'. At the end of this unfortunate event I was approached by Councillor Williams who also sits on the HNDP committee and is now Chairperson of the same. She could not understand why I disagreed with the HNDP approach as I had 'been told twice that there was no alternative'. As a way forward she suggested that I should meet with the consultant who wrote the HNDP so that the approach could be explained to me. The inference being that both Councillors Roark and Williams or their colleague Councillor Aron who also sits on the HNDP committee were unable to do so. As I had reached this conclusion myself - I doubt whether any of them had fully read or understood the document - I accepted Councillor Williams suggestion. Unfortunately Councillor Williams subsequently informed me that the Consultant would only speak to me if I was prepared to pay a fee. I declined. End of background. Since the above the HNDP has as you know been accepted by the Town Council (I voted against acceptance and several others abstained which is unusual given that on most planning matters there is nearly always unanimity) I have also been unable to gather from the documents available whether any weight was given to the commentaries mentioned above . I have also read other Neighbourhood Development Plans and in many cases the approach taken is in stark contrast to that taken for the Horncastle Plan. In some examples the local authority lack a Local Plan and have also not formalised housing figures but this has not prevented the local Neighbourhood Development Plans dealing clearly with allocation of land and projecting housing numbers as well as addressing the vital matter of basic infrastructure. These are critical and valid areas that must be addressed by the HNDP and it is therefore extremely important that even at this late stage the HNDP is revisited and amended to focus and provide guidance on these crucial elements of development. I should be grateful if you could acknowledge receipt of this email and confirm that it will be made available to the Inspector in due course.</p> |
| | | | <p>I am instructed by my client Stuart Robinson, Gin Property Ltd, to write to you to make a representation in relation to the Submission Draft Horncastle Neighbourhood Development Plan which is currently out to consultation. As such, I wish to raise an objection to Policy 10 "Developing a Green Wheel Around Horncastle" insofar as it relates to area "N" identified as suggested new green spaces on Map 3: Green Wheel – Spaces. The southern part of this area lies within a site which was granted planning permission on 28th November 2014 at appeal for up to 300 dwellings at the land off Langton Hill, Horncastle (application reference S/086/01809/13). The northern part of site "N" represents a logical extension to this approved residential development, the appropriateness of which should be tested through the submission and determination of a planning application. Whilst it is acknowledged that area "N" is not proposed to be put forward as a Local Green Space designation, it is requested that it is not identified as a new green space on Map 3 as this would be at odds with the planning permission referred to above and would conflict with any future residential development in the northern area of the indicated site. An objection was raised on these grounds during the previous consultation period which took place in the latter part of 2014 and it is acknowledged that as a result of this objection a new paragraph 18.17 has been added to the document stating that the proposed green spaces on Map 3 are indicative and requiring developers to take these sites into consideration. Whilst this addition is welcomed in relation to the overall policy, it is still considered that including area "N" is inappropriate, particularly in light of the commentary in Appendix E which states that this should be for the creation of 2.5 hectares of accessible green space for informal recreation. The objection to area "N" is therefore maintained and this should be removed from the plan as it would not be deliverable within the defined area and would prejudice any future residential development in the northern part of the identified site. I would be happy to discuss this matter further if you consider that would be helpful.</p> |

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| | | | | <p>I would be grateful if you could notify me of the decision of East Lindsey District Council under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.</p> |
| HNDP10 | Emma Stuart, Highways England | 17/06/15 | <p>Highways England welcomes the opportunity to comment on the Neighbourhood Development Plan for the Horncastle Town Council area. It is the role of Highways England to maintain the safe and efficient operation of the strategic road network, whilst acting as a delivery partner to national economic growth. There is no strategic road network which routes through Horncastle and indeed the closest section of strategic road network is the A46 which is located over 20 miles away. With this said, Highways England does not consider that development coming forward in the Horncastle area would significantly impact upon the operation of the strategic road network.</p> <p>Within the Neighbourhood Plan document, reference is made to the "Highways Agency". This reference should now refer to Highways England as a result of the Highways Agency being converted into a government-owned company: "Highways England" on 1st April 2015.</p> <p>Highways England does not have any additional comments to provide and trusts that the above is useful.</p> | |
| HNDP11 | Pearl Wheatley Lincolnshire Historic Buildings Committee | 23/06/15 | <p>Housing. – We support the need for a good supply of affordable housing in any new development and designs to be compatible with those in the surrounding area. High rise buildings should not be allowed. Developments like the estate near the A158 in Wragby are alien to the small towns in East Lindsey.</p> <p>The plan notes the number of cul de sacs on housing estates and the lack of straight and through roads. Whilst some dead ends are good the present estates have too many making road users having to make circuitous routes before reaching a major way. New housing should have simpler plans and include pedestrian ways which give safe short cuts to shops and schools.</p> <p>Green Wheel ways -Horncastle has not made good use of its waterways. Footpaths alongside streams are a great asset. Any future development beside the rivers should take advantage of the opportunity to create green wheel routes.</p> <p>The map of such routes shows the lack of footpaths within and to the centre of the town. This shortage should be addressed and new developments have the facility made an essential part of the overall plan. The estate between the Spilsby and Mareham roads is a case in point. The plan suggests another bridge over the Thunker Beck. It needs to be a road as well as a pedestrian bridge to alleviate traffic using Foundry and Queen Streets.</p> <p>Appendix F lists non-designated heritage assets. This is a good list highlighting many buildings that should be protected to preserve the history of the town.</p> <p>There is a need to improve the town centre. Horncastle has some very special shop windows and a good range of shops of varying sizes. There is a potential for up grading the fabric without destroying the character.</p> | |
| HNDP12 | Louise Dale Assistant Safeguarding Officer (Statutory & Offshore) DIO Safeguarding (Ministry of Defence) | 24/06/15 | <p>Thank you for consulting the Ministry of Defence (MOD) in relation to the above consultation.</p> <p>The proposed designated area for the neighbourhood plan falls within the statutory 45.7m height consultation safeguarding zone for RAF Coningsby.</p> <p>Therefore, any development exceeding this height criterion needs to be reviewed by this office for review.</p> <p>I trust this adequately explains our position on this matter.</p> | |
| HNDP13 | Gail Dymoke, Horncastle Walker Are Welcome | 30/06/15 | <p>The Horncastle Walkers are Welcome group are grateful to have been included in the various consultations that have been presented to us during the progression of the HNDP. WAW are particularly interested in the Green Wheel Around Horncastle policy as this is relevant to our present and future achievements within Horncastle. The group has discussed the policy within our meetings and consider it to be excellent, not least because it will promote activity, health and wellbeing for many in the future.</p> <p>The HNDP, as a whole, is a very important document for the future of Horncastle and it's surrounding area, we therefore are fully supportive of HNDP and we look forward to it's implementation in due course.</p> | |

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| HNDP14 | Nick Baseley, IBA Planning (on behalf of W Crowder & Sons Ltd) | | <p>Thank you for consulting my client, W Crowder & Sons Ltd, on the above draft document.</p> <p>Mr Crowder is the seventh generation of the Crowder family emanating from Horncastle. The Crowders Garden Centre and Nurseries is a significant destination facility and local employer within the town. In short, my client positively supports the draft Horncastle Neighbourhood Development Plan and welcomes the many objectives contained therein.</p> <p>You will no doubt be aware that Mr Crowder presently has an outline application for mixed-use development under consideration by the Council on land to the east of Lincoln Road, Horncastle.</p> <p>Whilst the Neighbourhood Development Plan does not seek to allocate land for housing, we remain content that the proposal is closely aligned with all of the overarching objectives set out in the Plan as presently drafted, including the Green Wheel around Horncastle. In the above connection, having particular regard to Map 4, the proposed routes for the Green Wheel would not be affected by my client's current development proposals.</p> <p>Indeed, there may also be an opportunity to contribute further towards this initiative, given my client's intention to provide high quality landscaped pedestrian and cycle links between Lincoln Road and Elmhist Road as part of the overriding measures to ensure connectivity between the new development and the town centre.</p> <p>My client has consulted the Steering Group from the outset regarding his proposal and remains committed to working with the local community (and those involved with the Neighbourhood Development Plan) to plan for the future needs of Horncastle in a sustainable manner and in such a way that delivers much needed infrastructure improvements (education, healthcare, superfast broadband, local employment opportunities, affordable housing and housing to meet the needs of the ageing population) in tandem with the more conventional housing and associated development requirements.</p> <p>I trust the above comments of support for the work undertaken to the Plan so far will be appropriately conveyed and look forward to being consulted on all subsequent stages of the Draft through to final adoption.</p> |
| HNDP15 | Roslyn Deeming, Natural England | 30/06/15 | <p>Thank you for your consultation on the above document which was received by Natural England on 19 May 2015</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England considers that the Neighbourhood Plan provides a useful framework for achieving the sustainable development of Horncastle and that our interests in the natural environment are satisfactorily covered. We have no additional comments to make further to our response to the Draft Neighbourhood Plan (dated 08/01/15) and the Sustainability Review (dated 10/02/15).</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries relating to the specific advice in this letter only please contact Roslyn Deeming on 0300 060 1524. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.</p> <p>We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.</p> |
| HNDP16 | Rob Millbank, Environment Agency | 01/07/15 | <p>Thank you for consulting us on the Horncastle Neighbourhood Plan Submission Draft.</p> <p>Our comments/recommendations are included in the attached appendix. We support the draft policies at a strategic level, although we have proposed some additional supporting text and policy amendments that we wish to be included in the Plan. We have also identified areas where further work may help achieve the visions and objectives outlined in this document.</p> |

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| | | <p>We look forward to working with you and are happy to attend any meetings to ensure the best available information is being considered. Should you have any questions, or would like to discuss our comments, please contact me on the number below.</p> <p>Flood Risk comments</p> <p><u>Paragraph 23.4:</u> Please note that the Environment Agency Flood Maps are made from a combination of both historic flood events, and computer hydraulic models which are run for scenarios both with and without defences. The Flood Maps show the most conservative extent from a combination of these approaches.</p> <p><u>Paragraph 23.5:</u> We recommend that this section should also identify the property level protection scheme, which has been provided for residents affected by flooding from the River Waring, which complements the River Bain Washland scheme.</p> <p><u>Paragraph 23.6:</u> The requirements for SUDs is detailed in Paragraphs 103 of the National Planning Policy Framework (NPPF) and further reinforced within the Ministerial Statement of December 2014. It may be better to emphasise the flood risk benefits of SUDs here, rather than the biodiversity elements which are currently proposed, given that this is the flood risk section of the plan. This can include terminology such as source control, attenuating flows, mimicking Greenfield characteristics and looking to reduce flood risk overall.</p> <p><u>Paragraph 23.7:</u> Please note we currently have the 'Non-statutory technical standards for sustainable drainage systems' rather than 'National Sustainable Urban Drainage Systems Standards' which are currently referred to in the Plan.</p> <p><u>Paragraph 23.8:</u> We recommend that this section should refer to the requirement on new developments to reduce flood risk overall where possible, rather than simply 'not exacerbate' the flood risk.</p> <p><u>Paragraph 23.9:</u> Please note that this section should refer to the 'Environment Agency Flood Maps for Surface water' rather than 'surface water flood maps'. Furthermore, Lincolnshire County Council (LCC) has section 19 investigations where internal flooding from other sources of flood risk has occurred.</p> <p><u>Paragraph 23.12:</u> We recommend that this section should refer to 'major development' rather than '10 dwellings'. Furthermore, whilst we can only impose the 'No statutory technical standards' we do promote the adoption standards of adopting authorities including LCC and Anglian Water (AW).</p> <p>The drainage infrastructure must be maintained throughout the lifetime of the development to ensure that it performs as originally designed, taking into account the impacts of climate change.</p> <p><u>Paragraph 23.14:</u> We recommend that reference should be made to the 'sequential approach to site layout' – this ensures that more vulnerable uses within a development are located in the areas of the site that are at lower flood risk. Reference could also be made to the provision of space for water alongside watercourses and WFD aspects.</p> <p>Policy 15: Reducing Risk of Flooding We would like to take this opportunity to propose the following alterations to this policy, in order to provide clarity, and to ensure that is the most robust and effective that it can be.</p> <p><u>Point 1:</u> We recommend that 'flood sensitive areas' should also be informed by referring to historic flood locations. We also recommend the removal</p> |
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| | | <p>of the words 'compared to current use', and instead reference should be made to Greenfield rates.</p> <p><u>Point 2:</u> We strongly recommend that reference should be made to the Sequential Test here, or alternatively the words 'assuming the Sequential test has been passed' could be added. We also consider the wording in the subsections to be a little unclear here, so the following alternative wording may help provide clarity:</p> <ol style="list-style-type: none"> a. The development proposed <i>must not increase flood risk to third parties and seek to reduce flood risk overall</i>; b. The development proposed <i>must manage surface water on site using SUDs principles unless inappropriate</i>; c. <i>Surface water discharge from the site will be no greater than Greenfield runoff unless otherwise agreed with the relevant Drainage Authority.</i> <p><u>Point 3:</u> We would like to highlight that applicants will need permissions to culvert a watercourse under Section 23 of the Land Drainage Act. We suggest that a reference to this requirement should be added here.</p> <p><u>Point 4:</u> We suggest the following wording: <i>Development shown within an area of risk from all sources will not be permitted unless the development is 'safe' and will not have a negative impact on third parties.</i></p> <p><u>Point 5:</u> The promotion SUDs, and dual use of the infrastructure, should be considered together with the biodiversity and water quality aspects of the scheme.</p> <p><u>Point 7:</u> We consider that preference should be given to permeable surfacing for parking spaces and driveways where appropriate.</p> <p><u>Flood Risk Appendix:</u> We consider that the Plan should seek to promote Partnership Funding from development, to help support the business case for Capital schemes within the Town. You may wish to consider this as a policy, so sites within the town that are outside of floodplain can help fund projects to reduce flood risk.</p> <p><u>Water Quality comments</u></p> <p>Sewage flows from Horncastle are treated at Horncastle Sewage Treatment Works. Given the current nature of the WFD status of the Rivers Bain and Waring, increased effluent flows at Horncastle STW (AWS Water Recycling Centre) must be managed, with at least no deterioration strongly in mind, as these rivers are required to meet good ecological status under the Water Framework Directive.</p> <p>The installation of new Combined Sewer Overflows (CSO) in the sewage collection network is unsustainable, and should not be considered for new developments. Surface water separation in combined sewerage catchments is an option for reducing the frequency of CSO spills which should be considered when redeveloping sites.</p> <p>Furthermore, rainwater harvesting should also be considered to be used in non potable activities. If a development leads to an increase in wastewater of 10% or more upstream of a CSO, the impact of growth should be assessed using Urban Pollution Management techniques to design a mitigation solution.</p> <p><u>Water Resources comments</u></p> <p>For new developments in the area, in order to provide the sufficient requirement of potable water, developers should seek advice from Anglian Water Services (AWS) if licenses will be needed. It is assumed that water will be supplied using existing abstraction licence permissions. Further information is also available within Anglian Water's Water Resources Management Plan. The Environment Agency may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the</p> |
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| <p>HNDP17</p> | <p>Jessica Sweeney, Carter Jonas On behalf of LincpacLtd</p> | <p>02/07/15</p> | <p>environment.</p> <p>Any future development must not cause impacts on water features (i.e spring, wells, boreholes, ponds, and reservoir) in the area. Any proposed development should consider setting high standards regarding water use, and other indicators, to deliver sustainable development. As such, it is advised that any new and upgraded developments should consider applying water efficiency and water saving methods to minimise potential impacts on water resources within the area. The Code for Sustainable Homes is currently being superseded. Whilst new standards have not been finalised, we would recommend reviewing the document below: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291796/140313_Building_Regulations.pdf</p> <p>Projects and partnerships opportunities, which aim to improve the status of the above water bodies, would be welcomed by the Environment Agency. Our Customer and Engagement team can be contacted on 01522 785896 to discuss this matter further.</p> <p><u>Waste comments</u></p> <p>In respect to waste management it is accepted that Neighbourhood Plans do not generally address issues of waste management. The inclusion of waste management in a proportional approach, within a community neighbourhood plan, could provide a local steer towards maintaining a clean and sustainable environment.</p> <p><u>Map 8 and Policy 14</u></p> <p>We have historically promoted the land at Mareham Road, Horncastle (see attached plan) for a mixed-use redevelopment through the Local Plan process and via East Lindsey District Council's Strategic Housing Land Availability Assessment (SHLAA reference: HOR312). Whilst it is considered that the site could accommodate some employment generating uses in the future, this would need to be in combination with an enabling form of development (such as residential use) to make the proposed redevelopment viable. The prospect of speculative employment generating development coming forward is remote in the absence of some form of enabling development.</p> <p>Any employment generating use (be it light industry or otherwise) would most appropriately be located in the southern part of the site which takes access from Holmes Way. The northern part of the site would lend itself to residential development which would also enable improvements to the Mareham Road frontage to the site. Generally, residential development would be required as part of a mixed-use development in order to enable general improvements to the site and its boundaries.</p> <p>Given the above, we object to the inclusion of the land at Mareham Road within the 'Site for Industry' boundary shown on Map 8, as the site cannot meet the employment objectives proposed by Draft Policy 14.</p> <p>It may be that the part of the site with access from Holmes Way is promoted for employment generating uses following the implementation of enabling residential development on the northern part of the site which has frontage onto Mareham Road. Therefore, we would request that the site is removed from the 'Site for Industry' designation on Map 8 and that the northern boundary of this designation runs along Holmes Way. It appears incongruous that the former Lincpac factory to the west of the Mareham Road site is excluded from the 'Site for Industry' designation but that the undeveloped land is included within the designation.</p> <p>Paragraph 22.6 notes that it is not the intention of the Neighbourhood Plan to identify preferred sites; however Map 8 appears to contradict this and could impact the future redevelopment potential of important development sites in Horncastle, including the land at Mareham Road.</p> <p><u>Policy 10</u></p> <p>Whilst the principle of Policy 10 is supported (i.e. developing and enhancing a Green Wheel around Horncastle), it seems illogical to take the Green Wheel through an employment area for security and environmental reasons. The ability of the Mareham</p> | <p>Y</p> |
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Road site to contribute to the objectives of Policy 10 will be dependent on the site having an element of enabling development (as described above). For this reason, Map 8 has the potential to have a negative impact on the wider objectives of the Neighbourhood Plan.

Map 3


Map 3 shows the eastern perimeter of the land at Mareham Road highlighted in dark green for a 'suggested new green space'. Appendix U of the Neighbourhood Plan explains that this area (which is also denoted with an H) could be used as a picnic area/'pocket park' catering for local residents and visitors to the industrial estate. Although improvements to the appearance and 'greenness' of the site are supported, it should be recognised that the land at Mareham Road is privately owned land and that a designation for a public picnic area/'pocket park' could conflict with the future development proposals of the site. It would be more appropriate to use this initiative to provide a mature buffer to the boundary of the employment area.

Map 4

Improvements to the pavement area and the off-road routes shown in Map 4 are not objected to, however we would question how these improvements would be brought forward. This is particularly relevant in circumstances where Map 8 does account for any form of enabling development on the land at Mareham Road.

Additional Comment

We note that the plan does not envisage future residential development. We consider this is a missed opportunity. We reserve the right to review these representations in the event that other potential site allocations are advanced through this consultation exercise. It is important to ensure that the future development of Horncastle is planned in a balanced and holistic way.

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| <p>HNDP18</p> | <p>Clare Sterling, Lincolnshire Wildlife Trust</p> | <p>02/07/15</p> | <p>Mareham Road Site Location Plan</p>  <p>UNPAC Ltd Land at Mareham Road</p> <p>MAREHAM ROAD</p> <p>Path</p> <p>Drain</p> <p>Gas Cover</p> <p>Promap</p> | <p>Horncastle Neighbourhood Development Plan 2014-2029 / Page 21 / 8.0 Community Objectives</p> <p>Whilst we support the requirement within Community Objective 2 that future housing growth must minimise the impact on the natural environment, we would recommend that the objective could go further to require development to not only minimise impacts but provide enhancements to the natural environment.</p> | <p>Y</p> |
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| <p>HNDP19</p> | <p>Sue Turner, Resident</p> | <p>02/07/15</p> | <p><u>Horncastle Neighbourhood Development Plan 2014-2029 / Page 46 /Policy 9</u></p> <p>Policy 9: Green Infrastructure We generally support Policy 9 and are pleased that point 4 has been amended as per our previous suggestion to make specific reference to the inclusion of biodiversity benefits within green infrastructure.</p> <p><u>Horncastle Neighbourhood Development Plan 2014-2029 / Page 50 /Policy 10</u></p> <p>Policy 10: Developing a Green Wheel around Horncastle The Lincolnshire Wildlife Trust is generally supportive of the vision for developing a 'green wheel' around Horncastle as connectivity between green infrastructure assets is very important to allow wildlife to move freely within the landscape and avoid isolation within the built environment. We are pleased to note that an additional point e) has been added according to our previous comments, which includes a reference to biodiversity.</p> <p><u>Horncastle Neighbourhood Development Plan 2014-2029 / Page 54 /Figure 11</u></p> <p>Site La which is put forward as a proposed Local Green Space is already designated as Horncastle Canal Grassland Local Wildlife Site (LWS) for its botanical interest. Whilst we would strongly support the extra protection that the Local Green Space designation would give it in planning terms, we have concerns regarding the suggested potential use as put forward within Figure 11. Given that the site already has importance for nature conservation in its present state as a grassland habitat, it would be inappropriate and potentially damaging to use the site for tree planting. We would recommend appropriate management of the Local Wildlife Site to maintain and enhance the existing nature conservation interest of the site.</p> <p><u>Horncastle Neighbourhood Development Plan 2014-2029 / Page 54 /Figure 11</u></p> <p>It is not clear why only site La is included in Figure 11 and the other two sites (M and P) included in Policy 11 have been omitted. It is also not clear why the other sites included on the Map 3: Green Wheel – Spaces plan as 'suggested green spaces' are not mentioned within Policy 11 or its supporting text.</p> <p><u>Horncastle Neighbourhood Development Plan 2014-2029 / Page 55 /Policy 11</u></p> <p>We strongly support point 4, to prioritise the protection, restoration or enhancement of biodiversity within local green spaces and would recommend that public access arrangements are considered as a form of development and balanced against these priorities accordingly.</p> <p><u>Horncastle Neighbourhood Development Plan 2014-2029 / Page 70 /Policy 15</u></p> <p>Policy 15: Reducing the Risk of Flooding We are pleased to note that point 5 of this policy has been amended as suggested in our previous comments to recognise the biodiversity gains that can be achieved through flood attenuation and sustainable urban drainage solutions.</p> <p>Please find attached photos of the flooding that occurs at the rear of Mark Ave and how the field drainage runs down the field from both directions, through the fence and helps over fills the dyke. Quite a few of the photos were taken on 25/11/2012 and I will try and find the other dates if I can and they are required.</p> <p>If it rains heavily I go to the dyke and keep it clear as the rain falls. However, since my husband had a fatal accident at work, I do this on my own and am worried in case I slip while in the dyke and have an accident. Anglian Water do come periodically to clear the dyke of leaves and debris, however usually on a dry day, the leaves etc are often thrown up onto the bank and of course fall back in when it rains heavily. They have taken the debris away at my insistence over the phone. When they attend they come through my garden to get to the dyke and it is having a detrimental effect on the fence, I also have to access it this way.</p> |
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| HNDP20 | Darren Fabris, Mouche, On behalf of Lincolnshire County Council | 02/07/15 | <p>I am not totally against the development and understand the need to provide new homes in the community. However, I would like u to consider the following points.</p> <ul style="list-style-type: none"> • What effect will the new holding lake have on the dyke and who will be responsible to keeping the dyke clear of debris or will it all be piped from further up. • The drainage/sewer system - I understand that Anglian Water have already stated that the infrastructure can not cope with any more homes in the town. • Access onto Eimhurst Road - The road is not wide enough to cope with constant two way traffic and volume of traffic will have a huge impact on the properties and quality of peoples lives on that road. • The use of Prospect Street to access the town. This road is very narrow with parking all down one side, meaning people travelling out of town have to wait, usually from the entrance to the Fighting Cocks car park, before they can proceed down the road - more cars could cause the waiting queue to back up so blocking the road on that corner. At the moment if the dustbin lorry or a delivery van is working/delivering down there you can wait 5/6 minutes to get by - more traffic could cause big queues in both directions. • The access on to the main road off Accommodation Road - residents already wait for quite lengthy times to access the main road especially in the summer when people are travelling through to the coast and 8 - 8.30ish in the morning when people are travelling to work/school. This road is also on an incline so if there is more traffic using it there is a greater possibility of minor road traffic accidents from people rolling back. <p>IMAGES IN FOLDER</p> | Y |
| HNDP21 | Robert Doughty Consultancy obo Lindum Homes | 02/07/15 | <p><u>18.17 and ref to site I on Map 3 of Green Infrastructure study</u></p> <p>It is noted the plan propose a site location for an extended Horncastle Community Woodland by a further 1.25 ha, is a positive aspiration. However, the location of the proposal occupies a very important road frontage that could unlock a new development of a mixture of uses to include further employment land and new houses as part of a well-designed and balanced scheme to the rear of the allocation. It is possible that either a controlled junction or roundabout may be required in this location and further consideration would need to be made to a link through to other routes as congestion in the centre of Horncastle will no doubt be high on the Town Council's concerns.</p> <p>It is pleasing to note that The Horncastle Neighbourhood Development Plan will take a positive approach to development so long as it brings forward a balance of housing, employment, retail, community and leisure development to ensure Horncastle remains an attractive, vibrant place, providing all the amenities you would expect in a desirable town and that all development within the Plan period will maximise the environmental assets in and around Horncastle, improving access to the countryside and the open spaces for residents and visitors.</p> <p>It is recommended that the configuration of Site I is made flexible enough so as to allow for future development aspirations off Boston Road by the owner with an access into the site and in doing so gives rise for considerations of the provision for additional cemetery land within the allocation of green space as part of a new development allocation.</p> <p>We shall be pleased to discuss the wider opportunities in this location with you to realise mutual aspirations.</p> <p>Please see the attached letter sent in response to the earlier consultation carried out by the Horncastle Neighbourhood Planning Forum outlining our comments in respect of land to the east of Horncastle and the Neighbourhood Plan. We note the Plan is unchanged in relation to the comments we made.</p> <p>Page 1 of attached letter</p> | |



Robert Doughty
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Your ref: 577716 MB HC
Our ref: 16 December 2014

Chairman, Steering Group
Horncastle Neighbourhood Planning Forum
c/o Horncastle Town Council
Wharf Road
Horncastle
Lindisfarne
NSW 3114

Dear Sir

**LINDUM HOMES
LAND ADJACENT TO MAREHAM ROAD, HORNCASTLE**

We, on behalf of our clients, Lindum Homes, would like to commend the Neighbourhood Planning Forum on its draft Neighbourhood Plan for Horncastle. An active Neighbourhood Planning process, such as this one, which has successfully sought to engage a wide section of the community, is an effective way to get local people to think about the future of their area.

We support the plan's aim to manage change in such a way that seeks to ensure that Horncastle continues to be a thriving and attractive market town. We would like to see the plan set out clear, achievable, and realistic overall growth targets, or seek to allocate specific development sites it does accept that development of new homes and workplaces, allied with new investment in infrastructure, will be required to maintain the vitality of Horncastle over time. As such the plan sets out a valuable context for working with East Lindsey District Council both on the development of the Local Plan and in considering specific planning applications.

This approach is a sensible one at this time, as it does not commit the community to assessing in advance all the development options that could exist in and around the town, but does provide guidance for planning future investment in the town, whether this is in investment in utilities such as electricity and water supply, road improvements or changes to medical and education facilities in the area, in addition to new development proposals.

We consider that it would be helpful at this time to draw your attention to our client's land interest around the Thinker Drain, south of Spilsby Road. This is an opportunity for new development proposals that deliver some of the aspirations of the Neighbourhood Plan. The attached plan shows the site, which, as you will be aware, would be accessible from both Winceby Gardens and Banovallum Way to the north and Wesley Way to the west, where there is an extant planning permission for 23 affordable houses.

continued..



Robert Doughty Consultancy Ltd
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Page 2 of attached letter

Page 2 of 4

Our ref: 577 16 MB HC
16 December 2014

Chairman, Steering Group
Horncastle Neighbourhood Planning Forum

This site presents a number of opportunities to provide new development opportunities in the town of Horncastle. In the early stages of the process with Community Objective 9, we would at this very early stage, like to engage the Neighbourhood Planning Forum in discussion about the future development of Horncastle as a forerunner to a wider Public Consultation exercise. Through this engagement we would hope to ensure that any eventual development meets the specific housing needs of the local community (Community Objective 2) and addresses the specific concerns of the Urban Structures Study (Community Objective 8).

Although our clients have control of the whole area shown on the attached plan, they would like to seek planning permission for development between Banovellum Gardens and the Thunker Drain. In time they would expect to bring forward an application for further development to the South of Thunker Drain, in a way that would allow for a gradual growth of this part of Horncastle, linking the current proposal with the wider development of Horncastle and the approved affordable housing scheme on the southern part of the site.

We would welcome the opportunity to discuss this site with the Neighbourhood Planning Forum, but as an introduction to the development, we have outlined our views on the sites compliance with some of the key Community Objectives drawn from the draft Neighbourhood Plan listed as follows:

- Community Objective 1 – The character and Heritage of Horncastle is maintained and enhanced as the town grows.
- Community Objective 3 – New Housing development must integrate with the existing settlement pattern whilst sustaining and enhancing local facilities.
- Community Objective 6 – To ensure easy access to the countryside through green connections, protect and enhance local green space whilst supporting nature conservation.

The housing next to this site benefits from being accessible from both Spilsby Road and Mareham Road, and even within that development there are a number of choices to travel, and therefore distributes traffic, whether pedestrian or vehicular, across the area, reducing potential pinch points. As this site is accessible from three points this level of "permeability" and choice of route can be provided for in the design of the proposed scheme, allowing the new housing to reflect the existing character of the town in this part of Horncastle.

continued./

Our ref: 577.16 MB HC

16 December 2014

Chairman, Steering Group
Homcastle Neighbourhood Planning Forum

The draft Neighbourhood Plan is clear that the people of Homcastle value the views from the site and the importance of these views to the site. The plan sets out the key views from the site and some of these views are of particular relevance to this site, in that two key views look over it: View 5, from Spilsby Road, and View 7 - the view from Wesley Way. The focus of View 6, however, is the ridge line to the south of the site, and is viewed over the existing houses on Wincooby Gardens. The Lindum site itself does not currently feature in the view, as it lies on lower land beyond Wincooby Gardens and any development would be unlikely to impinge on the Key View from Spilsby Road (View 5), on the other hand, looks straight over this site, and the view from Wesley Way (View 7) is also framed by the existing road through the existing housing and views in many cases are framed by existing housing. A future phase of development would take account of these views and seek to maintain the longer distance views along an open corridor into the open country to the East, in the same way as the approved affordable housing. Further vantage points could also potentially be incorporated into the design of future development.

Furthermore, the Plan sets out a wider aspiration to improve the Green Infrastructure provision in this part of Homcastle, which is perceived to be lacking. Any development will improve the Green Infrastructure network by continuing the existing open corridor along the Thunker Drain, through the housing to the West, as part of the flood mitigation scheme for the proposal. This approved affordable housing scheme also promotes access to the Thunker Drain corridor from within the proposed development, which would provide greater direct public access to open spaces from within the development. The design of the affordable housing scheme can be designed to reflect the community aspirations regarding the Green Infrastructure network and link to the growing network of footpaths in the area.

The Neighbourhood Plan also includes a specific proposal to provide a bridge over the Thunker Drain in this area. Over time the development of the whole site would require a new road crossing of the Drain, which would provide a pedestrian crossing.

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Page 4 of attached letter

Page 4 of 4

Our ref: 577.16 MB HC
16 December 2014

Chairman, Steering Group
Horncastle Neighbourhood Planning Forum

The Lindum site offers the opportunity for an ongoing phased development to meet the town's growth needs over time in a sustainable location with good access to the existing services of the town. The relationship of the site to existing neighbouring development would ensure that the existing levels of accessibility to different parts of the town could be replicated within the new development. As the site is lower land between existing housing, this site would provide a relatively discrete area of new development that would have limited impact on the landscape setting of the town, including the town's historic core. We also offer the opportunity to expand the Green Infrastructure network and increase public access to the open spaces.

I would be grateful, therefore, if at this early stage, we could arrange a suitable time to meet the Neighbourhood Planning Forum to discuss the possibilities for this site in more detail, which will help bring forward a proposal that can meet the aspirations of the Neighbourhood Plan.

Should you have any queries in the meantime please do not hesitate to contact me.

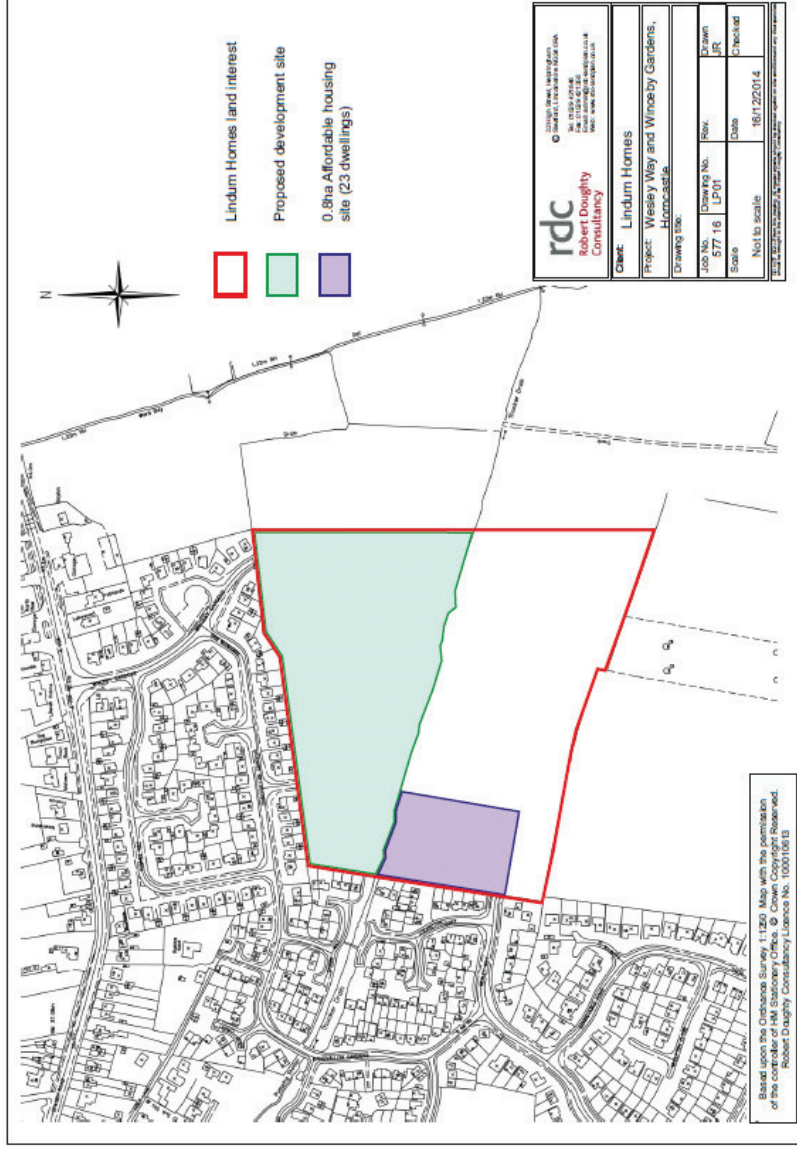
Yours faithfully



Michael J Baitwalte MRTPI

Enclosure: Site Plan

Page 5 of attached letter



ATTACHED LETTER ALSO AVAILABLE IN FOLDER

HNDP22

Stewart Patience,
Anglian Water

03/07/15

Para 4.6 (page 7)

Anglian Water notes that residents have expressed concerns about the impact of large scale development on existing drainage and sewerage systems which have become overloaded on occasions from heavy rain.

Consistent with the National Sustainable Drainage Systems (SuDS) Standards and Part H of the Building Regulations we are keen to see new developments managing surface water through the use of SuDS rather than connecting into the public system.

Policy 15 (page 70)

Anglian Water is generally supportive of Policy 15 in that it is intended to ensure that applicants have demonstrated that they have addressed the potential risk of surface water flooding within flood sensitive areas. However there is a need to consider the potential for surface water management outside of the areas identified by the Environment Agency as being at risk of surface water flooding. In addition Part H of the Building Regulations requires developers to consider the use of Sustainable Drainage Systems (SuDS) before making use of existing surface

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| | | | <p>water sewers.</p> <p>Therefore it is considered that Sustainable Drainage Systems (SuDs) should be incorporated into major developments within the Neighbourhood Plan area unless it can be demonstrated it is not feasible.</p> <p>It is therefore suggested that Policy 15 should be amended as follows:</p> <p>2. Development proposals including those located within the flood sensitive areas will be permitted where they can demonstrate:</p> <p>a) The development proposed will not have a detrimental impact on surface water run-off in the town</p> <p>b) Development proposals are consistent with the requirements of the surface water management hierarchy</p> <p>⇒ c) The development proposal should demonstrate its ability to manage surface water run-off which, unless evidenced, should be self-sufficient to the site.</p> <p>⇒ d) Development within flood sensitive areas will be designed to minimize predicted water discharge using the latest design solutions.</p> | |
| <p>HNDP23</p> | <p>Jan Allen, Historic Environment Team Lincolnshire County Council</p> | <p>03/07/15</p> | <p>Thank you for consulting the Historic Environment Team at Lincolnshire County Council on the Horncastle Neighbourhood Plan proposal.</p> <p>The town of Horncastle started life as a walled Roman town and much of its basic street pattern today still reflects its origins, many parts of the Roman wall are still standing and Roman remains lie beneath many parts of Horncastle both within and outside the walls. The Roman area was inhabited later in both Saxon and medieval periods which also left remains below the existing town. Historic England recognises the importance of the walls at Horncastle and we have been trying to work with their Heritage at Risk team and the various local owners to ensure a better consolidation of the walls which are currently deteriorating.</p> <p>We are pleased to see that Horncastle's unique heritage is referred to in Section 14 Historic Environment. Historic assets cover both above ground heritage and below ground heritage; historic buildings, archaeological remains and historic landscapes. We wonder if this part of the document would be strengthened by reference to archaeological assets as well as historic buildings. Horncastle has a wealth of both designated and undesignated archaeological assets and it would be good if these could be included in this section. These variety of assets are recorded in the Lincolnshire Historic Environment Record and it is a requirement that any submissions for planning consent have consulted this record (NPPF para 128).</p> <p>Perhaps this could also be reflected in the section on Development proposals; where some degree of harm to historic assets cannot be avoided (for example buildings to be erected on a site that contains archaeological remains), there are, depending on the significance of the asset, a number of avenues that can be taken to mitigate against the impact and enhance knowledge of the historic assets and this is provided for in the planning process by guidance at para 141 of the NPPF.</p> <p>I don't know if it's useful but I attach the recent draft Historic England advice note, whilst it has been put together to advise on site allocations in Local Plans it also contains some useful points for any assessment of the Historic Environment</p> <p>Please do not hesitate to contact me should you require further information or clarification.</p> | |
| <p>HNDP24</p> | <p>Roger Sargent, Roger Sargent Planning Ltd</p> | <p>03/07/15</p> | <p><u>Policy 1: Sustainable Development Principles</u></p> <p>In noting that the Horncastle Neighbourhood Development Plan (HNDP) will take a positive approach to development, the schedule set out in Section 2 (a) of this proposed policy would appear unduly restrictive and counter-productive to these aims.</p> <p>To achieve and facilitate a future sustainable growth objective, a broad range of residential homes will be required to meet both the future housing demands of a larger population as well as the existing local needs. As such this policy needs to be amended to address all the towns housing requirements, existing and future.</p> <p><u>Policy 2: Design Principles for New development</u></p> | <p>Y</p> |

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| | | <p>In a situation where the exiting development, adjacent to or in close proximity of a proposed new site, is of a poor quality, comprised of bland dwelling types and at an unsustainable density, then any future schemes in the locality should not be prejudiced by these historic characteristics, but considered on their individual merits.</p> <p>More appropriate design principles for a scheme on any for a future development site, would be to ensure that it has been designed to a much higher standard, incorporating more traditional local features and detailing, community benefits, infrastructure and greater integration/connectivity with the surrounding area.</p> <p>The recognition in Section 3 – “that there is scope for innovation in the larger greenfield sites” - away from the Conservation Area and other “local character areas”, is supported, particularly with respect to the area identified as “River Waring to Mareham Road”, where possible development sites on the land between the A158 Spilsby Road and Mareham Road have been identified on the Horncastle Neighbourhood Plan Information Map.</p> <p>To achieve the desired improvement to the current road network and movement in and around the town in this part of Horncastle, the creation of a perimeter link road, between Mareham Road and Spilsby Road is a logical solution, which will also assist in the provision of an important link to the “Green Wheel” as part of this future development plan.</p> <p>A comprehensive Master Plan for this area is currently being prepared for consultation with the Neighbourhood Development Plan Steering Group and East Lindsey District Council. This plan will show how future growth will be designed to deliver this essential road link as part of the phased development, with connections into existing developed areas and the town centre as well as showing where a green areas could be provided for public enjoyment in and along the “Green Wheel” route.</p> <p>Without an early commitment to future development on the land parcels identified as HOR313, HOR315 and HOR330 on the attached plan, the aspirations for this vital road link will not be realised as the scheme will need to form part of a comprehensive plan to remain viable and therefore deliverable.</p> <p>With regards to the Building for Life 12 Principles, whilst these do provide a useful guideline in the formulation of an appropriate design for a major development scheme, there are other material considerations which also need to be factored in, particularly the provision of costly infrastructure and affordable housing requirements. Rather than be used as a “rule to measure” the quality of any specific scheme, it should be applied as an aspirational target and not as the only “test” as to the appropriateness of a future development proposal.</p> <p><u>Policy 3: Car Parking on New Development</u></p> <p>In respect to Section 1, whilst it usually possible in the majority of residential schemes, to provide on-site parking for detached and semi-detached dwellings, where proposals include flats and terraced housing it may only be possible to provide appropriate parking in small groups adjacent to, rather than on the actual plot.</p> <p>This policy therefore needs to be reworded to take into account different types of housing provision.</p> <p>Provision of safe cycle storage as required in Section 2, is supported.</p> <p><u>Policy 4: Pre-Application Consultation</u></p> <p>With regards to development proposals of 10 or more dwellings on sites of 0.5 hectare or larger, or buildings of 1,000 sq.ms or larger a detailed Design and Access Statement should provide all the relevant information and therefore a separate Development Brief would not be required.</p> <p><u>Policy 5: Protecting the Historic Environment</u></p> <p>This policy is supported.</p> |
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Policy 6: Allocation of Affordable Housing

This policy is supported.

Policy 7: Provision of Affordable Housing

In supporting the "target" levels for the provision of affordable housing as set out in the proposed criteria 1, 2 and 3, the requirements suggested in criteria 4 and 5 could only be applied if certain other matters were deemed acceptable.

Would it be possible to effectively manage and maintain these properties if they were scattered around a large housing development and if the affordable housing units catered for a completely different form of accommodation to the market housing would the form and type of these properties "fit" in the street scene.

Policy 8: A Mix of Housing Types

Whilst this policy is supported in principle, other factors such as viability, housing market trends, and contributions to community benefits need to also be taken into consideration.

Policy 9: Green Infrastructure

In supporting all the aspirations contained in this seven point policy, their application to future development proposals needs to be applied in a realistic, balanced and effective manner to ensure schemes remain viable and will be able to come forward.

Policy 10: Developing a Green Wheel around Horncastle

In supporting all the criteria proposed in Section 1 and 2 of this policy, the local community will need to embrace the fact that significant growth will be required to achieve the scale of improvements to connectivity between existing roads, footpaths, and cycle ways in and around the town, particularly in the south east quadrant of the town.

Policy 11: Designating Local Green Space

This policy is supported.

Policy 12: Visual Connections with the Countryside

Whilst generally in support of the proposed criteria (a) and (b) in Section 1 to this policy, criteria (c) is considered to be an unreasonable constraint as it would be very difficult to achieve on most development sites, particularly where the land slopes upwards away from the town.

Policy 13: Strengthening The Retail Core

This policy is supported.

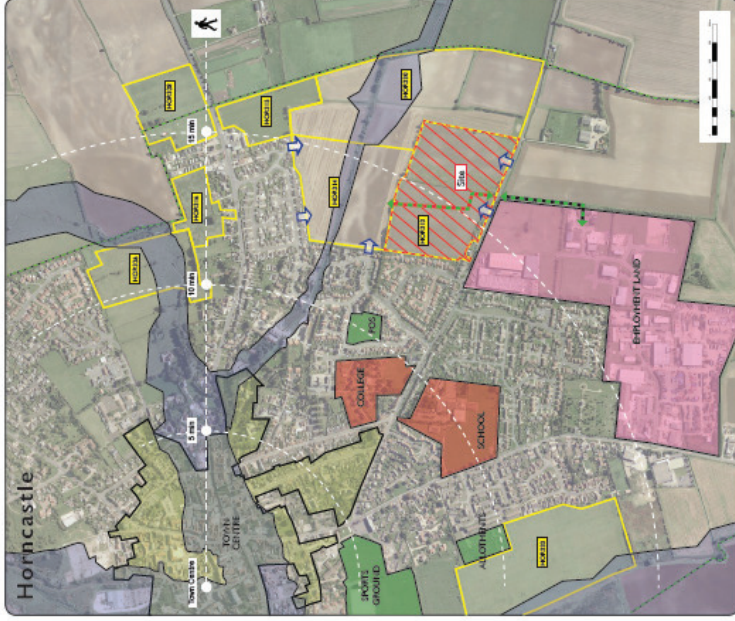
Policy 14: Supporting Local Business Growth

This policy is supported.

Policy 15: Reducing the Risk of Flooding

This policy is supported.

Plan



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| | Proposed site |
| | Possible development site & nr. <small>(within 500m of proposed site)</small> |
| | Parish boundary |
| | Road along zone |
| | Access points |
| | Distance from boat moorings <small>(within 500m of proposed site)</small> |
| | School / college |
| | Public open space <small>(including watercourse)</small> |
| | Conservation area |
| | Employment land |
| | Existing cyclepath |
| | Extension to cyclepath |

Introduction

Gladman Developments Ltd (Gladman) specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for planning to deliver the homes, jobs and thriving local communities that the country needs. Every effort should be made to delivering the housing and economic needs of an area, whilst responding positively to the wider opportunities for growth.

These representations are made in response to the Horncastle Neighbourhood Plan (HNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Gladman have been actively involved throughout the preparation process of the HNP and would like to thank the Council for the opportunity to comment on the submission version of the plan. However, we are disappointed to see that Gladman's previous recommendations made to the pre-submission version of the HNP have been ignored by the Steering Group. A copy of these representations can be found in appendix 1 of these representations.

John Fleming,
Gladman

HNDP25

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| | | <p>If the HNP is to be successful then it is important that these matters are addressed prior to the Plan being examined. If these matters are not addressed then the Plan runs the real risk of failing to meet the Neighbourhood Plan Basic Conditions and subsequently will not be able to proceed to Referendum.</p> <p>National Planning Policy and Guidance.</p> <p>Gladman feel it is necessary to reiterate the requirements of the National Planning Policy Framework (the Framework) and how it sets out the Government's planning policies and how these are expected to be applied.</p> <p>The Framework sets out the requirements for the preparation of neighbourhood plans and the role they must play in meeting the development needs of the local area. The policies set out in the Framework have now been supplemented by the Neighbourhood Planning chapter contained in Planning Practice Guidance (PPG).</p> <p>Paragraph 16 of the Framework specifically sets out the positive role that Neighbourhood Plans should play in meeting the development needs of the local area. It states that:</p> <p>"The application of the Presumption (In Favour of Sustainable Development, set out in paragraph 14 of Framework) will have implications for how communities engage in neighbourhood planning. Critically it will mean that neighbourhoods should:</p> <ul style="list-style-type: none"> □□ <u>Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;</u> □□ <u>Plan positively to support local development, shaping and directing development in their area that is outside of the strategic elements of the Local Plan"</u> <p>Further guidance is set out in paragraph 184 of the Framework which states the importance of the relationship between Neighbourhood Plans and the strategic policies in the wider area set out in a Council's Local Plan, paragraph 184 states;</p> <p><u>"The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date plan is in place as quickly as possible. Neighbourhood Plans should reflect these policies and neighbourhoods should plan positively to support them."</u></p> <p>Before a Neighbourhood Plan can proceed to referendum it must be tested against each set of Neighbourhood Plan Basic Conditions, set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended by section 38A of the Planning and Compulsory Purchase Act 2004). This is also underpinned in PPG at paragraph 065 of the Neighbourhood Planning Chapter. The basic conditions are as follows;</p> <ul style="list-style-type: none"> (a) <u>Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</u> (b) <u>Having special regard to the desirability of preserving any listed building or any features of special architectural or historic interest that it possesses, it is appropriate to make the order.</u> (c) <u>Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order.</u> (d) <u>The making of the order contributes to the achievement of sustainable development.</u> (e) <u>The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</u> |
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| | | <p><i>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations, and</i></p> <p><i>(g) Prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.</i></p> <p>It is clear from the above requirements as set out by both the Framework and PPG that Neighbourhood Plans must conform to both national planning guidance and the up-to-date strategic policy requirements set out in the relevant authorities adopted Local Plans. Neighbourhood Plans must take a positive approach to facilitate new development and should not be used as a constraint to restrict growth going forward in the plans strategy.</p> <p>If a Neighbourhood Plan is not developed in accordance with the Neighbourhood Plan Basic Conditions then there is real risk that it will fail when it reaches Independent Examination.</p> <p><u>Relationship with Local Plans</u></p> <p>To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, Neighbourhood Plans should be prepared to conform to up-to-date strategic policy requirements set out in Local Plans. Where an up-to-date Local Plan has been adopted and is in place for the wider authority area, it is the strategic policy requirements set out in this document that a Neighbourhood Plan should seek to support and meet in full. When a Local Plan is emerging or is yet to be found sound at Examination, there will be no strategic policies over what scale of development a community must accommodate or the direction of policies the Neighbourhood Plan will need to take.</p> <p>The East Lindsey Local Plan (ELLP) was adopted in 1995, the policies and text contained in this plan were later updated in 1999 via a formal amendment. A number of these policies were later saved following the Secretary of States 'Saving Direction' in September 2007. The policies contained in the ELLP covered the period up to 2001. The ELLP is therefore significantly out of date and time expired against the requirements of the Framework.</p> <p>The Council has commenced work on its new Local Plan which will replace the ELLP, the progression of this document has been significantly delayed. Discussions with the Council have confirmed that the Council's latest LDS is out of date and at the time of writing are unable to provide details of the emerging Local Plan's progression. The Council have commissioned a new SHMA to incorporate the 2012 Household Projections. This assessment of housing need may point to a significantly higher level of housing need than what was previously identified by the 2012 SHMA. The HNP will need to ensure it can demonstrate a significant level of flexibility and adaptability in order to meet Horncastle's and the wider areas housing needs.</p> <p>Given the current status of the emerging Local Plan and the uncertainty over the final policies it will set for the District, we question the ability of the HNP to be progressed at this time, informed by the policies of a development plan which is out of date and time expired. There is currently no certainty over what level of development Horncastle will be required to accommodate or the direction of the policies in the Neighbourhood Plan will need to take.</p> <p>Although the Neighbourhood Plan PPG indicates that Neighbourhood Plans can be advanced before an up-to-date Local Plan is in place, Gladman strongly question the ability to progress a Neighbourhood Plan on this basis. If a Neighbourhood Plan is progressed prior to an up-to-date Local Plan being prepared, or the strategic policies and development requirements set out in the Local Plan change in the interim, then work will likely be abortive.</p> <p>If the HNP is progressed it will effectively pre-empt the strategic policies for the wider area. Gladman recommend that it would be appropriate to delay progression of the HNP until the emerging Local Plan has been submitted to the Secretary of State for Examination and successfully tested by an Inspector.</p> <p>Horncastle Neighbourhood Plan</p> <p>Whilst the HNP provides a seemingly positive vision, the suite of development management policies contained within the HNP may affect the ability of future sustainable growth being delivered contrary to the requirements of national planning policy and guidance.</p> |
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| | | <p>The HNP has been developed through a series of development management policies some of which merely repeat national planning policy and/or are more appropriately dealt with by the local planning authority, in such circumstances we believe it is appropriate to delete these policies.</p> <p>As the Town Council will be aware, Gladman have secured planning consent at land at Langton Hill for residential development of up to 300 dwellings. We are concerned that the HNP does not have any regard to the development framework submitted as part of the application, Gladman recommend that the HNP recognises the proposed development framework as submitted in the outline application. The site should also be illustrated on a policies map to help represent the proposed development and other policies contained in the Plan.</p> <p>Furthermore, the plan period cannot be considered to be drawn up over an appropriate timescale as from adoption the plan will be able to demonstrate at best a 13-14 year plan period from the date the plan is formally 'made'. We therefore recommend that the plan period be amended to reflect the minimum 15 year time period required by the Framework.</p> <p>Gladman's specific comments on the HNP is as follows:</p> <p><u>Policy 1: Sustainable Development</u></p> <p>This policy states that the HNP will take a positive approach to bring forward a balance of housing, employment, retail, community and leisure development. Planning permission will be granted where it can demonstrate its ability to meet the criteria attached to this policy. This policy should also be read in conjunction with all development management policies contained in the plan.</p> <p>No robust assessment has been undertaken to assess Horncastle's objectively assessed local housing needs and the Districts OAN has yet to be identified. Policy S1 needs to ensure it adopts a more flexible and adaptable approach consistent with the requirements of the Framework. If development is sustainable it should go ahead without delay, in accordance with the presumption in favour of sustainable development.</p> <p><u>Policy 2: Design Principles for New Development</u></p> <p>This policy seeks the provision of a number of design proposals. This policy states that all development should have regard to principles detailed in the Horncastle Urban Structures Study.</p> <p>Gladman submit that the approach taken by policy S2 is too prescriptive and may act to constrain the ability of future sustainable growth opportunities being delivered viably. We question why the Steering Group have continued its impractical strategy despite our comments made to the pre-submission version of the HNP. The Horncastle Urban Structures Study adds further prescriptive detail of how it expects development to be delivered. It is noted that the Urban Structures Studies requires new development to reflect the historic aspects of Horncastle, Gladman reiterate the response made to the pre-submission version of the HNP. Design policies should avoid any unnecessary prescription or detail and should not attempt to impose architectural styles or particular tastes that would stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles.</p> <p>In its current form Policy 2 is contrary to paragraphs 59, 60 and 173 of the Framework is therefore inconsistent with basic conditions (a), (d) and (e).</p> <p>Policy 7: Provision of Affordable Housing & Policy 8: A mix of housing types Whilst Gladman support the Steering Group's positive intention to provide affordable housing/housing mix, we feel that this matter should only be dealt with by the local planning authority based on robust and up-to-date evidence. The Council has commissioned new evidence to take account of the 2012 Household Projections. This assessment will identify the level of affordable housing the Council will be required to deliver across the district.</p> <p>If this policy progressed it may pre-empt the strategic priorities for the wider area and is therefore inconsistent with basic conditions (a), (d) and (e). We recommend the deletion of Policies 7 and 8.</p> |
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Policy 9: Green Infrastructure

Gladman submit that this policy as proposed is unduly restrictive. Future development proposals can often be successfully integrated into existing natural assets through the use of high quality design. However, in some instances the loss of some assets may be required i.e. for access. It should be remembered that new development will often compensate for losses caused by development and in some instances the removal of biodiversity features as part of a wider scheme may result in greater improvements to green infrastructure overall.

Policy 10: Developing a Green Wheel around Horncastle

This policy states applications for major housing and employment schemes will be supported where they contribute to the criteria attached to this policy.

This policy suggests a number of new green space provisions, we note that a proportion of Gladmans' site at land at Langton Hill has been identified as part of this provision. The Consultation Statement states that this designation is indicative, this provision should therefore be better reflected in the policy wording.

Gladman have outline planning consent on this land for the development of up to 300 dwellings. In this regard we find it inappropriate for the Steering Group to propose this land as open space. Whilst this is subject to future reserved matter applications, Gladman believe it is more appropriate that this suggested green space be deleted and the HNP recognise the approved development (and Framework Plan) with regards to open space provision contained in the development proposal (Application ref: S/086/1809/13. A copy of the Framework Development Plan can be found at appendix 2.

Policy 12: Visual connections with the countryside

This policy states that development will be supported on the edge of Horncastle providing that it maintains the visual openness and connections with and to the surrounding countryside whilst maximising opportunities to enhance the existing views to the countryside and does not particularly or wholly obscure the skyline. This policy further states that development that has a significantly effect on the landscape will not be permitted.

This policy identifies Gladman's site at Langton hill under 'view corridor 1'. We note the supporting text of this policy states, 'development should seek to ensure this view is maintained by avoiding interrupting the near ridge line and should instead nestle into the hillside.'

The HNP will need to ensure that Policy 12 incorporates a significant degree of flexibility and takes into account the existing planning permission at Langton Hill. We feel that Policy 12 places undue and unsubstantiated policy requirements that may affect the deliverability and viability of the development proposal.

Gladman recommend that it would be more appropriate if Policy 12 was deleted and replaced with the following wording:

'Development adjacent to existing settlements will be permitted provide that the adverse impacts do not significantly and demonstrably outweigh the benefits of development.'

This alternation makes certain that future sustainable growth opportunities are not restricted by this policy whilst still ensuring that no harm to the District's landscape is caused.

Policy 15: Reducing the Risk of Flooding

Gladman consider that the application of national standards is better suited to deliver the Steering Group's objectives and implementation of this policy. Sufficient weight is already afforded by national planning policy and this policy would merely repeat these requirements. We therefore recommend the deletion of Policy 15.

Sustainability Appraisal

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| | | <p>The Town Council has produced a Sustainability Appraisal (SA). The adequacy of an SA/SEA goes to the core compliance of basic condition (f) which requires strict adherence to the requirements of the Strategic Environmental Assessment Directive and implementing UK regulations.</p> <p>Legislation form the Environmental Assessment of Plans and Programs Regulations 2004 makes clear at paragraph 12 (2) 'The report shall identify, describe and evaluate the likely significant effects on the environment of – (a) Implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (our emphasis).'</p> <p>Whilst the SA assesses each policy against the set of criteria identified, it does not assess any reasonable alternatives. Given the unclear status of the emerging Local Plan the SA should be tested against a set of alternative development management policies in line with national policy and guidance. The development management policies should be properly tested for their effects on development viability and supported by a robust and adequate assessment testing their cumulative impacts on development viability.</p> <p>Conclusions</p> <p>Gladman have highlighted a number of concerns with the HNP in its current form. In a number of instances the development management policies proposed by the submission version of the HNP may effectively act to restrict the ability of future sustainable development. If the HNP is progressed before the emerging Local Plan has been submitted for Examination and successfully tested by an Inspector, it will act to pre-empt the strategic priorities for the wider area and therefore cannot be consistent with the Neighbourhood Plan Basic Conditions.</p> <p>If the HNP is progressed in its current form it may be found contrary to the Neighbourhood Plan Basic Conditions and will be unable to proceed to referendum, representing a waste of both Town Council's and the local planning authorities time and resources.</p> <p>Gladman believe there is a fundamental need to review the development management policies contained in the HNP to ensure that the Plan is compliant with the National Planning Policy Framework, Planning Practice Guidance and the Neighbourhood Plan Basic Conditions.</p> <p>It is crucial that the HNP takes account of existing development proposals within the surrounding area. Progressing with a Neighbourhood Plan for Horncastle, in advance of the adoption of the emerging Local Plan may give rise to fundamental legal issues. We therefore suggest it is appropriate to postpone the progression of the Neighbourhood Plan until there is greater certainty over the strategic priorities for the wider area.</p> <p>As proposed the Horncastle Neighbourhood Plan contravenes the following basic conditions:</p> <p>(a) Having Regard to national policies and advice contained in guidance issued by the Secretary of State,</p> <ul style="list-style-type: none"> - Gladman contend that the strategy as proposed by the Horncastle Neighbourhood Plans suite of development management policies may act to arbitrarily constrain the delivery of future sustainable growth. This is in direct conflict with the National Planning Policy Framework. - The Horncastle Neighbourhood Plan fails to have sufficient regard to the advice and guidance contained in the PPG; Neighbourhood Plans, Strategic Environmental Assessment. <p>(d) The making of the order contributes to the achievement of sustainable development</p> <ul style="list-style-type: none"> - A number of development management policies may act to prevent sustainable growth due to unsubstantiated policy requirements and may act to prevent the delivery of sustainable development, contrary to the national growth agenda. <p>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area (or any part of that area)</p> <ul style="list-style-type: none"> - The Council are in the early stages of preparing its emerging Local Plan. Therefore the Horncastle Neighbourhood Plan cannot be considered to be in conformity with the strategic policies for the wider area when it is based on a development plan that is significantly out-of-date and time expired against the requirements of the Framework. The Horncastle Neighbourhood Plan has no up-to-date strategic |
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context upon which it can be based or tested. Bringing forward the Neighbourhood Plan when the preparation of its parent document is still in its infancy pre-empt the strategic outcome of the emerging Local Plan.

(f) The making of the order does not breach, and is otherwise compatible with EU obligations

- The requirement to undertake an SA/SEA goes to the core compliance of basic condition (f). The SA as submitted is ineffective and does not test all reasonable alternatives and the plans cumulative effects on development viability.

Appendix 1 – Horncastle Pre submission reps
Page 1



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Horncastle Neighbourhood Development Plan
C/O Horncastle Town Council
Horncastle Library
Wharf Road
Horncastle
LNS 3HL

RE: Draft Horncastle Neighbourhood Development Plan

(Representations submitted via email to info@horncastle.towncouncil.co.uk)

Introduction

Gladman developments (Gladman) specialise in the promotion of strategic land for residential development with associated community infrastructure. Based on our experience we understand the requirement for the planning system to deliver the homes, jobs and thriving local places that communities across the country need. Every effort should be made to meet the housing and business needs of Horncastle whilst responding positively to the wider opportunities for growth.

Gladman understand that the HNDF Steering Group is currently seeking comments, this letter provides Gladman's representations on the Draft Horncastle Neighbourhood Development Plan (HNDF).

Gladman would like to take this opportunity to highlight a number of concerns regarding the HNDF, these should be addressed prior to advancing to the next stages in the neighbourhood plan process. Gladman question the ability of the HNDF to be advanced ahead of the emerging East Lindsey Local Plan and provide a critique of the development management policies which have been prepared. Gladman consider that it may be more appropriate to postpone further work on the HNDF until such time that the East Lindsey Local Plan has reached a more advanced stage and has been tested at examination. If the HNDF is to be successful and proceed to referendum it is important that these issues are addressed now.

National Guidance – Role of Neighbourhood Plans

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. The Framework sets out the requirements for the preparation of neighbourhood plans and the role they must play in meeting the development needs of the local area. The policies set out in the Framework has now been supplemented by the Neighbourhood Planning chapter contained in Planning Practice Guidance (PPG).

Page 2

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| | <p>Paragraph 14 of the Framework specifically sets out the possible role that Neighbourhood Plans should play in meeting the development needs of the local area. It states that:</p> <p><i>"The application of the Presumption (in Favour of Sustainable Development, set out in paragraph 14 of Framework) will have implications for how communities engage in neighbourhood planning. Critically it will mean that neighbourhoods should:</i></p> <ul style="list-style-type: none"> <i>• Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;</i> <i>• Plan positively to support local development, shaping and directing development in their area that is outside of the strategic elements of the Local Plan;</i> <p>Further guidance is set out in paragraph 14A of the Framework which states the importance of the relationship between Neighbourhood Plans and the strategic policies in the wider area set out in a Council's Local Plan, paragraph 14A states:</p> <p><i>"The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date plan is in place as quickly as possible. Neighbourhood Plans should reflect these policies and neighbourhoods should plan positively to support them."</i></p> <p>Before a Neighbourhood Plan can proceed to referendum it must be tested against each set of Neighbourhood Plan Basic Conditions set out in paragraph 14(1) of Schedule 6B of the Planning and Compulsory Purchase Act 2004 (the 2004 Act) and the Planning and Compulsory Purchase Act 2004. This is undertaken in PPG at paragraph 665 of the Neighbourhood Planning Chapter. The basic conditions are as follows:</p> <ol style="list-style-type: none"> (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order; (b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order; (c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order; (d) The making of the order contributes to the achievement of sustainable development; (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area); (f) The making of the order does not breach, and is otherwise compatible with, EU obligations; (g) Prescribed conditions are met, in relation to the order and prescribed matters have been complied with in connection with the proposal for the order. <p>It is clear from the above requirements set out by both the Framework and PPG that Neighbourhood Plans must conform to both national planning guidance and the up-to-date strategic policy requirements set out in the relevant authorities adopted Local Plans. Neighbourhood Plans</p> | |
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must take a positive approach to facilitate new development and should not be used as a constraint to restrict growth going forward in the plans strategy.

The HNDF in its current form only assesses the plans policies against the saved Local Plan policies which are now considered out of date and are therefore contrary to the requirements set out in paragraph 14 of the Framework. The emerging East Lindsey Local Plan has been subject to significant delay, Gaden therefore question the ability of the HNDF to be progressed at this time. It cannot be certain that the HNDF will adhere to the up-to-date strategic policies and development requirements of the authority when the Council's Local Plan is yet to be published and tested at examination.

Although the Neighbourhood Plan section of PPS indicates that Neighbourhood Plans can be advanced before an up-to-date Local Plan, Gaden strongly submit that it would be more appropriate for the Parish Council to postpone any further work until the emerging East Lindsey Local Plan is advanced further and tested at examination. If the Neighbourhood Plan is advanced in its current form and the strategic policies and development requirements for the village change, then the work on the HNDF is likely to be abortive.

Combining with the HNDF prior to the Local Plan being adopted will result in policies which do not align and accord with the strategic guidance for the district. This fundamentally goes against the requirements set out in the Framework as to how Neighbourhood Plans should be established. Gaden recommend that the Steering Group should refrain from advancing further until the Council's strategic position is more apparent.

Development Management Policies

The HNDF does not allocate sites for residential development, instead the HNDF relies on a suite of development management policies to guide development over the plan period.

The development management policies contained in the HNDF seek to establish a series of design criteria and the importance of local distinctiveness, seeking future applications to identify how they have addressed any of the issues and guidance identified in the Historic Urban Structures study. Gaden recognise the contribution that high quality design can have in providing sustainable development. However, design policies should not be overly prescriptive nor should they place a constraint on sustainable development coming forward. Design policies should avoid unnecessary prescription or detail and should instead concentrate on guiding the overall scale and level of development in accordance with paragraph 29 of the Framework.

The HNDF should not seek to place policy burdens which may affect the viability and deliverability of schemes coming forward, this in accordance with paragraph 173 of the Framework which states, 'the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed sustainably is threatened, or that compliance requires a willing landowner and willing developer to enable the development to be deliverable.'

In its current form the HNDF has developed a series of design policies that may subject future residential proposals to an extensive list of design requirements. Policies that restrict the ability to deliver sustainable development are impractical and are contrary to the aims of the Framework which seeks to boost significantly the supply of housing. Such an exhaustive list of design criteria may affect the potential for future residential development to come forward, resulting in a negative effect on the wider aspirations for housing growth across the district.

Gladman recommend that the design policies should not be as subjective as they are currently set out and a review of the design policies contained in the HNQP should be undertaken before any further progression of the plan. Gladman recommend that a more appropriate strategy would be to refer to recently approved planning applications that promote high quality design. This approach will promote more sustainable patterns of development that are in keeping with the local surroundings without placing unnecessary policy burdens that may impact the delivery of residential development.

Conclusion

Gladman recognise the role of Neighbourhood Plans as a tool for local people to shape the development of their community. However, it is clear from national guidance that there must be consistent with national policy and the up-to-date strategic requirements of the wider local authority area. If the Neighbourhood Plan does not meet the Neighbourhood Plan Basic Conditions then there is a real risk that the HNQP will fail to be found sound at examination.

Gladman have highlighted a number of concerns with the HNQP in its current form and therefore question the ability of the HNQP to meet all of the Basic Conditions as required by paragraph 8(2) of Schedule 4a of the Town and Country Planning Act 1990 (as amended by section 38A of the Planning and Compulsory Purchase Act 2004). The HNQP in its current form will fail to meet basic conditions (a), (d), (e) and (f).

East Lindsey District Council are in the process of preparing a new Local Plan. It is unclear how the HNQP can support the strategic planning policies and development requirements for the area when it is based on the requirements of saved Local Plan policies. If the HNQP progressed ahead of the emerging Local Plan and alternative strategic policies and growth targets for the village are proposed, work on the HNQP will be abortive, and the document will need to be reviewed. If the HNQP progresses ahead of the emerging Local Plan it will fail to meet basic conditions (a) and (e).

The HNQP also seeks to establish a series of design measures across the suite of development management policies. Gladman recognise that high quality design is essential for development however, the way in which it is proposed in the HNQP will limit the viability potential and therefore affect the delivery of future development proposals. Gladman recommend that the Steering Group reconsider its approach to design policies and should instead refer to recently approved schemes. Until the design policies have been reviewed the HNQP will fail to meet basic condition (d).

Gladman suggest that the most sensible option at this stage is to post some further work until the strategic policy framework for the wider area has reached a more advanced stage.

I hope you have found these representations constructive.

Yours faithfully

John Fleming

Gladman Developments

Appendix 2 – Framework Development Plan



APPENDICES IN FOLDER

David Lawrence, 10/06/15 - received 15/06/15

I reject the proposed plan as flawed and therefore inadequate to serve the needs of Homcastle.

While the Green Infrastructure Study is acceptable the Urban Structure Study amongst other things fails to justify the proposal for long streets. There is no comparative study outlining the pros and cons of different layout---cul-de-sacs versus linear layouts. Roads in the town that are proffered as models are rat runs and lack security or tranquility that might be expected for residential areas.

The fundamental failing of the plan is however the subject that has not been covered. It was my expectation (and indeed that of residents in general) that the plan would make recommendations on housing numbers and land allocation/zoning. In the case of zoning, then not only

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| | | <p>residential but also industrial and commercial land should have been covered.</p> <p>Land allocation/zoning was the subject of early activity but it was subsequently dropped. There is no explanation in the draft Plan. More recently it has transpired that this relates to the failings of the ELDC.</p> <p>It is unacceptable that housing numbers and land allocation/zoning should be omitted because the ELDC has failed the town in providing a Local Plan. The Steering Group and the Town Council are ill-advised in accepting the counselling of consultants and/or the ELDC to prepare a document that fails to deal with these extremely important matters. Over the last 12 months there have been applications for housing developments totalling in order of 1000- 1200 units and the ELDC Land Allocation Plan 2014 for Horncastle suggests there are sites for a total of 2000 units. The draft Plan could not protect the town over the past year but equally it will offer no protection in the future if it is approved in its present form. Two planning appeals have allowed 429 housing units and future appeals will equally swept aside if they rely upon the proposed document.</p> <p>My belief is that that Horncastle should be able to set out its preferences in the plan in respect of land use. It is also within the technical abilities of Horncastle to give guidelines on the numbers of houses needed.</p> <p>For the purposes of clarity and to ensure that the subject of land allocation/zoning is balanced within this letter, I here reiterate part of paragraph 3) above that '...in the case of zoning, then not only residential but also industrial and commercial land should have been covered'.</p> <p>I enclose an analysis I prepared in response to the Public Consultation taking place at the end of 2014. This was submitted to the Steering Committee and there is brief reference to parts of it in the draft plan now under scrutiny. It was also made available to a number of the Town Councilors. While my analysis covers the two consultancies and the draft plan in detail the main area of concern was housing numbers and land allocation/zoning. The final section of the analysis entitled 'Is there any more' makes it clear that if housing numbers and land allocation/zoning are not covered then the plan is incomplete.</p> <p>I am sad to say that neither the Steering Committee, nor the Town Councilors, nor the ELDC Planning Department have provided explanation that satisfactorily covers the omissions. I am also sad to say that it seems more important to some councillors that Horncastle is to have a plan earlier than other towns in the area. A more enlightened approach and one better serving the people of Horncastle is to revisit the plan and complete the same. It is better to have a robust and effective plan later on than a mediocre one now.</p> <p>Neighbourhood Development Plan December 2014 Dr David Lawrence</p> <p>Comment on Green Wheel</p> <p>Where is the bridge on the river picture on the front page? It does not seem to be Horncastle. It may be beyond Tattershall.</p> <p>Vision</p> <p>Agreed. Must cover housing employment, retail community, leisure. Vision cannot overlook infra structure---drainage highways etc.</p> <p>Page 2 GI Assets</p> <p>Who will manage and fund assets? This must be itemized.</p> <p>Page 3</p> <p>Existing GI provision.</p> <p>If in parallel to housing development then some can be funded with the larger developments. But this will leave gaps. Who will fund these? The Town Plan considers this.</p> <p>The text ignores existing paths through the town and their relationship to current and future movement. This is covered in the Town Plan. It further ignores country roads around the town that provide walking and particularly cycling routes. The writer has 6-10 routes for cycling</p> |
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| | | <p>linking Woodhall Hemingby and others. These in some cases lead to the Water Rail.</p> <p>Page 4</p> <p>Where is the Millennium Wood? Is Community Woodland part of the Woodland Trust?</p> <p>Page 5.</p> <p>Map unreadable.</p> <p>Shortage of space on east side noted to be provided by development. So far the only suggestion of this is Mareham Road and the space is purely for the residents. In any effect parks/spaces in new eastern developments it will not server the town since it is cut off by existing estates and access through them will be limited through residential areas.</p> <p>Page 6</p> <p>No ELDC provision in this area. The Land Availability Map shows various sites which would be suitable subject to acquisition.</p> <p>Page 8</p> <p>Green Wheel Concept</p> <p>The concept is excellent. It cannot wait on developers. Some sites---even Langton Hill---could take 20 years to come to fruition. It should start now and is a grand version of the discussion on the Town Plan.</p> <p>Page 9</p> <p>Wheel does not show all the existing pedestrian/cyclist routes.</p> <p>Route 9 would need a wide strip of land to make it worthwhile. At the moment it would be along a series of dilapidated fences. It would need grass and planting and be at least 15m wide.</p> <p>Page 10</p> <p>More could be done on the old Workhouse site. Already part is use for an unofficial car park.</p> <p>(Car parking should also be considered as part of the Wheel. The Bannovallum Park has virtually no parking and is sadly underused. The least that should be done now is to open the path across the Bells Yard site now.)</p> <p>Page 12</p> <p>Linkages</p> <p>It is sad that other places in the country have had attention. Why has Horncastle and I suspect East Lindsey been overlooked?</p> <p>All principles supported. In particular it must be established now who is responsible for upkeep. This is a simple matter but responsible bodies prefer not to think about it since it costs money. Snipe Dales is a good example of good management. The playing area behind the Scout Hut; the Skate Board park, (and Prospect Street park) did not have a good reputation at the time of surveys for the Town Plan. They are 'round the back and out of sight and can be convenient forgotten'. Users should not have to report problems. The authority responsible should know.</p> <p>Page 15</p> <p>Maintenance. Funding. Management. This must be in large print and considered now. It is a significant element of the Town Plan. The local</p> |
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authorities must make precise commitments to this scheme and not say it is good but then ignore it. Acceptance is required now.

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Well considered Delivery Action Plan but it will not work unless the ELDC gets the overall plan for Horncastle established. The Land Availability Plan 2014 while tentative is fast going out of date. Lands between Mareham Road and Spillsby Road are currently under consideration for development and two sites if approved will completely upset these proposals in terms of alignment and visual amenity.

Overall we have an example of different authorities and agencies operating in silos. Horncastle needs this wheel but who will mastermind the process. This must be established now or the scheme will simply fade away.

Urban Structure Plan

2.4 Scope and limitations

Building for Life 12. Experience shows that developers quote all of these and 'say' they comply. By repeating the statement they think that their view of the situation will be accepted. In practice the level of achievement falls far below their statement.

3.2

Best connected streets are noted to be the older streets. These are also the rat-runs. They give visual character but lack of traffic management means that they have little feeling of security or tranquility. Foundary Street and Queen Street are theoretically controlled but in fact are questionable as a pedestrian route for children and are certainly not resident only.

3.3

There are various statements made in this section that are flawed

New development should provide streets which do not disrupt movement.

Line lengths need to increase.

Integration analysis suggests no 'housing pods'. Ask a resident of Foundry Street, Queen Street or Albert Street what they think of this!

Bells Yard is seen as poor but the connection by the mill is still not provided.

3.4

The Green Wheel will add a good leisure network. Will it add anything to circulation? It must be developed further internally and not simply rely on peripheral routes.

3.5

Care must be taken not to let development dictate or stifle the potential of the wheel. This is agreed but it is already happening because the authorities do not have integrated thought patterns. Policy on layout of the infrastructure should precede any extensive development such as is now the risk for Horncastle now with anything up to 2000 housing units in the pipeline. The Land Availability Map should not be a tentative document half thought through but one of authority.

3.6

It is questionable that development should reflect linear configurations unless it is established how traffic is controlled at an acceptable non-threatening level but as speed and density. It is a fact that Stanhope Road in 5 years has become a rat run and density of traffic increases to make it a less pleasant road but Highways seem to ignore this. How can the authorities administer development on an adhoc basis?

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| | | <p>3.7</p> <p>Has the Qube report been approved? I am not sure that the History & Heritage Society was ever asked to comment.</p> <p>Fig 4.2.9 Sector 1 Green Wheel</p> <p>This seems to be getting pedestrian links muddled with vehicle links. The Wheel is not the Ring Road!</p> <p>Fig 4.2.11. Long Streets and West Street as a model. This is very specific for a huge area. Is it really necessary to specify plot sizes?</p> <p>Fig 4.3.11. Routes along the rivers. For what? Cars? Pedestrians?</p> <p>4.4</p> <p>There is no convoluted orbital between Mareham Road and Spilsby Road. The planners and the Highways might like to see that but it is simply a rat run which destroys the quiet enjoyment of the area.</p> <p>Fig 4.4.2</p> <p>Queen Street and Foundry Street are not through routes and should not be so designated simply because a piece of planning software suggests this. Mind over machine might be a good maxim in this exercise!</p> <p>There is no through route across the Work house grounds.</p> <p>Fig 4.4.9</p> <p>Is this really Queen Street? Looks like Foundry Street. They are quite different.</p> <p>Comment is made that parking is a problem in this layout. It is the failure of this layout. The planners have allowed a terrace of 4 in a garden between FSt and QSt and approved only 2 parking spaces. At the same time 2 spaces are lost along what was 6 spaces along the wall without openings. This will have a chain reaction as far as Albert Street. The provision of semi detached will not produce a QSt environment. The straight street will produce another rat run.</p> <p>Fig 4.4.11</p> <p>Less cul-de-sacs and more straighter streets will produce rat runs. This concept is not thought through. What other planning schemes are there? What is happening in other countries? More research is necessary. New Urbanism has been tried for the Mareham Road application now under inquiry but due to pressure from the planners to provide a through route for buses this was destroyed. It was not perfect before but is a failure now. Through routes without full consideration for the implications is not the way to go. Have the estate agents in town been asked if they like to sell houses on busy rat runs to the more affluent client?</p> <p>Fig 4.5.11</p> <p>Agree with consistent and strong boundary treatments with high levels of greening. The History and Heritage Society has called for this in all recent major applications on the edge of town but little notice has been taken. In the case of Louth Road Development the provision of a more dense screen to the north would have greatly reduced the number of housing units. For the Wesley Road development there is simply no space for screening and it should be rejected but I expect it will eventually be approved.</p> <p>Fig 4.6.11.</p> <p>This area should perhaps have received more consideration. There are several sites shown on the Land Availability Map and therefore it is likely to be developed to a far greater extent than other zones. Not only is there the extensive site on Langton Hill which has just been</p> |
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| | | <p>approved by the Planning Inspector but there are those between the canal and the Woodhall Road one of which has just been sold. Langton Hill Road should not be a model for all these sites. Indeed if the developers of the Gladmans site follow Gladmans plans it will not follow the Neighbourhood Development Plan.</p> <p>Overall</p> <p>This report proposes a specific style of development hinging around Foundry Street and Queen Street. While cul de sacs have disadvantages so to linear development. This report promotes linear design without outlining any alternatives. The discussion must go further than this. I also hold to question the simplistic suggestion that extensive swathes of Horncastle can be offered as a starting point for design and selection of material. This has merits in some areas but generally it is as superficial as the broad current demands of the planners that generally everything should be built of brick with pantile roofs.</p> <p>No consideration has been given to universal problems of uPVC windows and solar panels. How are these to be integrated? They are a fact of life and sadly even exist across the Conservation Area.</p> <p>I have questioned the validity of the Qube report. It recommends I believe the Foundry Street should become part of the Conservation Area. I agree with this. What is the status of the Conservation Area under the Neighbourhood Development Plan?</p> <p>Horncastle Neighbourhood Development Plan 2014-2029</p> <p>2.3</p> <p>Comment is made that the Plan does not seek to challenge proposed housing targets. This is a great concern. For the duration of the Plan process I have been under the impression that it will give local view on housing needs. The influx of predatory planning applications has capitalized on the fact that ELDC has no figures. Applications seek to prove we need housing but ignore employment, infrastructure, and adequacy of schooling and medical services. It was thought that the Plan would put into perspective what the ELDC has failed to do and the applicants do not want to do.</p> <p>There is further concern that the Plan is prepared in relation to saved element of the 1999 plan. What happens when the ELDC eventually prepares a new plan? How much of the ND Plan will remain valid?</p> <p>4.6</p> <p>A good summary of problems. In addition must be added that the ELDC has failed to set housing quotas and the town is now a target along with the rest of the district. This is an over arching reason of the concerns of the population of Horncastle.</p> <p>Reference to Section 106 funding. This seems out of context. More importantly it seems that this has not been applied in the past. How will it be applied in the future? Who will take direct and active responsibility?</p> <p>4.7</p> <p>The list of Community Projects is relatively short in comparison with the extensive lists in the Town Plan. It is sad that the Town Councillors have forgotten them already. Is this an indicator of the councils ability to process the Development Plan when it is validated?</p> <p>6.3</p> <p>Does the Urban Structures Study really evidence difficulty of movement? As written it does not show that the people in 'pods' feel the same way as the investigators.</p> <p>6.4</p> |
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| | | <p>I do not read the Plan so far as stimulating the economy. Are there objectives to support this?</p> <p>6.5 Neither the Town Council nor the Chamber of Commerce have shown any collective interest in tourism. Without a dynamic working group this will never happen. The National Trust in the US have guidelines for this sort of thing. Are there any in the UK which are up to date?</p> <p>7.2 d) This does not go far enough. How will this be done? Will the TC or the ELDC be involved? The ELDC actively promotes tourism on the coast. What has it done to attract commerce or industry to Horncastle or any other town?</p> <p>Community Objectives</p> <p>Does this mean that the Vision is the overview of the more detailed Objectives? This section need a more detailed explanation. The objectives lack definition. They further omit to consider some of the precursors to success which are infrastructural. A hilltop site does not have drainage problems but where does the rainwater go? Where are the objectives to cover deficiencies that now exist and must be remedied in order to allow any development at all? Councillors have said that there should be no more development until the infrastructure is 'mended'. Do they now forget this basic need when the opportunity for futuristic planning is the order of the day? The risk is that unless effectively defined the futuristic and laudable planning proposals will only be day dreaming since no one can administer the outcome.</p> <p>ONE Not entirely clear. Retain character and heritage of the old town. Ensure that the new areas are attributes not negative elements.</p> <p>TWO This states growth for local needs. This fails as soon as reference is made to Lincoln as not far away and so Horncastle attractive to workers there. It fails when ELDC say that Horncastle will need to absorb growth that will be restricted in the coastal flood plain and that Horncastle will need to absorb the development needed for small villages. This all needs explaining. If the coastal area is restricted then it will not need housing in Horncastle. All small village can absorb some well designed development.</p> <p>THREE Yes housing must integrate and enhance existing facilities.</p> <p>How? Green Wheel is half the solution. Where is parking? When will current provision be rationalized? Where is reference to public transport?</p> <p>FOUR More attractive shopping centre, evening economy, tourist industry. How. Where will the shops be? Who will develop tourism. These are nothing to do with housing at the end of spoke or radial.</p> <p>FIVE What does form and function mean? Reference to materials is restrictive. Architecture should come first. Materials will ensure the mediocrity of the recent developments into new. The Structures Study should be a hint of where to not a dictate. For instance Lincoln Road vernacular should not dictate adjoining development.</p> <p>SIX</p> |
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| | | <p>Who will administer the green spaces and connections? How will they be established since only a few will relate to specific developments. Where are the guidelines on open spaces in developments? The spaces in Wesley Way and Greystones developments under consideration are a joke.</p> <p>SEVEN</p> <p>Community funding from developments. How will this work. ELDC only seem to respond to requests for miniscule sums for medical and schools. On several occasions in the last 5-7 years there has been a suggestion for a bridge near Tesco. It has been ignored by ELDC and the applicants have not offered it.</p> <p>EIGHT</p> <p>Developments must show how they have used the Urban Structure Study. This assumes the Study is accepted in its entirety. I consider that it is flawed in several respects. It certainly does not seem to consider traffic density. If any part of this study is accepted then it must be an appendix to the legislation. Who will administer this? Highways invariably seem adamant that the roads can cope.</p> <p>The coloured charts are not a guide to design but an indicator that things can be changed. In effect every time a development is put forward the software must be administered to prove the situation. In most cases flow of traffic is outside the individual development and so the developer can rightly say that it is 'not me Gov!'</p> <p>NINE</p> <p>Community consulted. What does this mean? A public meeting? Will this include consultation with Chamber of Commerce, the various agencies supporting the community Age Concern, doctors, transport, professional architects engineers surveyors, churches. At the moment apart from the TC only the History & Heritage Society are involved and the latter has to ask for details if outside the Conservation Area. What will be the process?</p> <p>TEN</p> <p>Flourishing new businesses. What does this mean? Is this anything to do with planning as now exists? This is a business matter. Does it mean that the TC or the ELDC will promote such influx by offering benefits? Will empty property be promoted by tax relief? Will residents be allowed to set up factories or workshops in their garages? As of now the answers are no to each question and in some cases should remain not. The concept is important but needs a framework which has to be actively administered.</p> <p>ELEVEN</p> <p>Economic vitality supported. This seems a rather short list and not very coherent.</p> <p>How will a developer show that a design supports home working? For instance would it be appropriate to show that internal walls are not load bearing so can be pulled out to provide workshop spaces?</p> <p>Broadband? Good. Who will ensure this will happen? This is somewhat like bringing in gas or electricity. There must be a provider in the first place. Is this do-able because the ELDC or the LCC already have this in hand? Will the developer need to fund a Stirling 0.5 million to bring in a line form Lincoln or Boston?</p> <p>Support retail and commercial activity in town? Good. How? Predatory developers say that this happens anyway. More houses equals more people and so increased use of the town centre. Does this mean something more? It needs explanation.</p> <p>9.0 Development Management Policies</p> <p>9.1</p> |
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| | | <p>This refers only to planners at ELDC. What about TC and ELDC planning committee?</p> <p>POLICY ONE</p> <p>Sustainable development.</p> <p>Should not 1) be HNPD requires.....?</p> <p>How will it be 'shown' that development 'supports' etc etc? No recent application has shown there is a need or that it is met. What are the statistical parameters that must be provided?</p> <p>What are the principles and advice in the HNPD?</p> <p>(There are refs 4 & 5 at the foot of this page. I have not noticed other references. Have I missed them or are the not entered?</p> <p>11.5</p> <p>The Urban Structures Study is challenged. It contains some useful observations but denigrates cul- de-sacs out of hand. This is wrong. It offers no perspective in terms of size and frequency or their value in terms of security from wrong doers, for children, for quiet enjoyment. The only criteria for linear design is convenience of flow. There is some argument for this and there are strong and overriding reasons why this should be controlled. Queen Street and Foundry Street are offered as good examples. That may have been the case 50 years ago but the era of the motor car has changed the situation. QSt and FSt are in fact examples of a failure of the proposed design. The concept need more careful consideration before it is adopted. There are other designs and these must be considered too. Developers must not be told they will have layouts approved if linear. Sadly they are primarily interested in the financial income and will do anything that gets an approval without considering the correctness of the situation. This ruling prevents the architects and engineers supporting developers from using their skills.</p> <p>11.7</p> <p>If the Study or any other document is to be an integral part of the HNPD it must be attached. It is no good having to look at a separate website or to go to the Horncastle Library. It must be an Appendix.</p> <p>11.8</p> <p>This means that several small sites in a particular area are not required to comply. This hardly seems a way of ensuring continuity.</p> <p>11.9</p> <p>Building for Life 12 should be in full in an Appendix. Developers should not rely on the abridged version.</p> <p>11.10</p> <p>An independent BL12 Assessment. Who is to do this? The text only highlights the problem.</p> <p>POLICY TWO</p> <p>1) There is merit in the concept of this Policy but it cannot rely upon the Urban Structural Study unless the study is publicly adopted. There is no reference in this document that this is the case.</p> <p>2) This should not restrict design requirements to only large developments.</p> |
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| | | <p>The requirements of the Urban Structure Plan as set out are questionable. These would dictate development design in the following manner</p> <ul style="list-style-type: none"> • Crowders land as per West Street in terraces with parking on the road. Where are the trees or potential garden city approach. • Louth Road as per Linden Street. Good but the Louth Road site recently approved and much supported by the TC is bereft of trees and a decent screen to the north would have reduced the number of units. • Mareham Road as per Queen Street but for some reason incorporating trees. • Churchill Avenue should have not 'buffering' but high levels greening but this site much supported by the TC has only on outlet to Boston Road. This is a good development but would not fit the limitations of the Study. <p>Generally these guidelines could do more damage than good especially if administered by individuals not realizing the limitations but bent on following the book. Who will administer the guidelines? There is suggestion that the Community will have a say but in effect the planners will be in control.</p> <p>3) Who will administer BL 12? The suggestion is a good building related professional? Who will pay the fees?</p> <p>4) Most large developers have access to consultants. These are the people who conclusively prove that criteria is met now. To this end a professional not related to the developer must be employed by the TC or ELDC and administered by them but with the fees met by the developer. Suitably qualified would mean RIBA or RICS or similar.</p> <p>12.0 Car parking</p> <p>What does this mean? Is this one book or three?</p> <p>Since these documents are not made available then the public cannot comment.</p> <p>Generally the basic requirements must be spelled out. Mareham Road development changed several times and never managed to meet the quoted LCC standards. Do the LCC standards apply? Mareham Road and Greystones will be very poor.</p> <p>POLICY 3</p> <p>c) is questioned. This assumes that all Conservation Area projects will be approved without real consideration of parking.</p> <p>It is considered that the question of improvement of parking and its rationalization should be included in the NDP on the grounds that developments of significance have impact on parking in and around the town. Car parks will have heavier use. Parking on streets will come under more pressure. Should there be resident parking where the situation is worsened by developments in older parts of the town.</p> <p>13.0 Consultation</p> <p>Does this replace the Core Strategy? If not then this section cannot be written without the Core Strategy being in place so it is known what the conditions are.</p> <p>POLICY FOUR</p> <p>Why is Appendix D mentioned but not Appendix C?</p> <p>Appendix C makes no reference to a number of important factors. There will be others.</p> <p>Is the foul water drainage system adequate?</p> <p>Is the rain water drainage system adequate?</p> <p>Whether an outline or full planning application is proposed?. We know that developers can say anything they like on an outline proposal.</p> |
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| | | <p>Whether there is work in the town for the residents. This means consideration of views of employers and any realistic local, district, or national initiatives to bring in employment. (Building wind generators in Hull will not do nor will the fact that building a few houses generates short-term employment.)</p> <p>What does the bus company have to say about a service to the area?</p> <p>Does the developer own land where suggestions of paths are made?</p> <p>Who is to maintain all the new facilities and services?</p> <p>Appendix D</p> <p>While not wishing to stunt the growth of developers is seems that a minimum of methods of consultation and time scales should be listed.</p> <p>14.0 Historic Environment</p> <p>14.6 Heron & 6 Bridge Street</p> <p>Inclusion of these buildings as targets for redevelopment are not supported. There are numerous other buildings that might be considered in the same way. Heron is not likely to alter their building since it is sound. And what should the alteration be....mock Tudor. Mock Georgian. Has consideration been given to a modern design? Facadism is a weakness of the English that should be treated with care. Number 6? Is this not empty and need of a tenant? Who will fund change? There was the Conservation Area Project about 15 years ago with ELDC funding organized by the Conservation Officer. He no longer has funds. If the clause must be kept then keep out specific buildings. That should be considered if there is funds and with owners applying and sharing cost and on priority.</p> <p>POLICY FIVE</p> <p>1) Are all items in Appendix G non-listed? I suspect it could be longer.</p> <p>Generally there should be a clause separately covering the Conservation Area.</p> <p>Consideration should also be given as to how the Qube report is covered. Has the Conservation Officer be consulted? Has he made recommendations to expand the report to cover Foundry Street? This last comment is made based upon the fact that the only copy made available to the History and Heritage Society includes this road.</p> <p>3) This clause should not include specific buildings.</p> <p>Has consideration been given to protection of deteriorating listed buildings? Can developers contribute to a fund? The conservation Area is key to the quality of this town and there should be a framework in place to cover deterioration. I would add that the Enforcement group which is part of the Planning Office is singularly bad at pressing for repair or even removal of unauthorized changes in the town. The NDP could be used to deal with this weakness.</p> <p>15.0 Affordable Housing</p> <p>Should the allocation priority arrangement not be after creation? That is to say that these clauses are reversed.</p> <p>POLICY SIX</p> <p>It is not appropriate to put in only part of the Appendix E. Explain what it is and either put the full Appendix text in the text or say to look at the text. Effectively a statement should be made that the community wants to see it provided.</p> |
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| | | <p>One matter that needs coverage is the question of sale at a profit. How is this prevented. I once purchased a house at market price of Sterling 64 000 which was purchased by the tenant from the local authority a few years ago for Sterling 10 000.</p> <p>16.0 Provision of Affordable Housing.</p> <p>POLICY SEVEN</p> <ol style="list-style-type: none"> 1) Is data not always available? If so then simply say the statement is required and state the percentage it is based upon. 2) This is not clear. Does 'contribution' mean a cash contribution for works elsewhere or construction of a number of houses on site? 3) Is this necessary? Surely it is to be expected that any developer will still consider and contribute to the Green Wheel. <p>17.0 Provision of Mix of Housing</p> <p>The explanatory clauses attempt to explain the demographic problem. They should state the limitations that are envisaged.</p> <p>Overall the proposals turn upside down what has happened in the past. While the writer of these notes searched for a location within walking distance of the town centre (and found Albert Street at 8 minutes walk for a fit 70+ year old) most 'retirees' to the town pick Roman Way or some other side street out of the centre.</p> <p>It is not clear how the demographic support for a development will be written. Will all edge of town development be for a range of age groups or only for family housing?</p> <p>It is not clear how the projected demographic are to be read in terms of the increase in need for 65+ and even 85+. Where are the care homes? Where are the increased medical support sites? Where is the improved public transport? Overall this needs review.</p> <p>POLICY EIGHT</p> <ol style="list-style-type: none"> 1) How can developers provide a mix at a particular point in the Plan period? They will simply say 'this is what we offer and it is not possible for anyone to challenge our mix'. 2) If the SHMAA 2012 is a judgement/decision/compilation of the ELDC then is it acceptable? Why is Horncastle to take up any numbers of residents dictated by the ELDC? It is not acceptable that people not housed in the coastal area are forced to come to this town. Retirees will want to go to the coast or make their choice of another coastal region. To this end any figures provided by the ELDC are speculative. This is not a firm foundation for long term development. 3) Five minutes will mean living closer than 400m from the town unless the aged person is really fit. And for me it is along a so-called linier route out of cul-de-sack Albert Street. <p>Overall this Policy needs a great deal of work. The intention is good but the arrival at a solution is very complex and what is written here is not the answer. The Gladmans of this world will play havoc with it. For a start it is necessary to consider what Horncastle actually needs and not what we must take because ELDC demands that we absorb those from Sheffield or Leeds who wish to relocate. Another aspect is the fact that the ELDC appears to have decided that Horncastle is to be a town to come to die. Is that why there is no attempt to generate commerce and industry? If that is so then why bother with discussions of a balanced range of housing. Let us simply go for a giant infirmary. Younger residents if there are any can work there and the ELDC can raise income by taxing the infirmary in respect of the number of beds and pop-up arm chairs. The fact is that the Plan is planning for what the ELDC says is inevitable and not for that which can be reasonably aspired to or achieved. This clause is a rear-guard action and an easy option for the ELDC and not a futuristic plan for the people of Horncastle.</p> <p>18.0 Green Infrastructure---OPEN SPACES</p> <p>The topography is accepted as an important attribute to the character of the town and its formulation.</p> <p>Figure 8 indicates primary routes arising from topography. It has no reason to discuss secondary routes which are not the product of topography QSt and Stanhope are over promoted in this paper. They have become rat-runs and should have no part in the consideration of</p> |
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| | | <p>the future developments. QSt is a restricted street but this is ignored by the public...and by the NDP which is inappropriate.</p> <p>18.2 What does this say? Change should be controlled I think. It has been ignored in the Gladman Langton Hill decision.</p> <p>18.4. Green Infrastructure is commendable. Was it ever advertised in Horncastle by the ELDC? I do not recollect seeing a reference to it in planning applications.</p> <p>18.6. it is difficult to provide green space in an area already developed unless co-ordinated effort is made by authorities. Where is that intentioned published by ELDC? How does it intend to finance improvement in such areas? Where is the plan of potential green areas? Should they not be in the SHLAA 2014 map?</p> <p>18.7. A commendable aspiration.</p> <p>18.8. The plans indicate statutory areas and as far as can be seen 'no' non-statutory areas. What is the point of this within the terms of the NDP?</p> <p>18.9. More recreation areas are needed, if they can be attached to developments that is good. What if there is no development in an area that is deficient. How is the deficiency to be made good? This can only be achieved by the local authorities.</p> <p>18.10. There are many footpaths in Horncastle. They often link cul de sacs to other routes. The authorities must provide. How will they do this? How will they do it without undue light pollution of the sort that ensues where tall lamp posts are used that light not only the route but private land. No provision for screening is obvious on any lighting in Horncastle to avoid nuisance.</p> <p>POLICY NINE Green Infrastructure</p> <ol style="list-style-type: none"> 1) This clause appears to need rewording. Is it not a fact that much of the land referred to in the Green Wheel document is not in public hands. It cannot be protected until it is acquired. 2) Surely this needs rewording. The developers must a) protect existing amenities, and b) provide and transfer new ones to public ownership or give indefinite rights of access. 3) How will the 'contribution' be made? Against specific sites the local authority wishes to acquire? How will this be achieved? 4) 5) What authority does the Green Infrastructure Plan have? 6) Alternative replacement provision is good in principle but the developer is bound to prove that there is no loss? Who will prove that there is and who will administer new acquisitions. <p>Overall it has to be asked who will administer the open spaces that come into place as a result of this Policy. The spaces are commendable but will the TC and the ELDC take on maintenance and general upkeep? The developer cannot be expected to do this. If neither the councils nor the developers want the cost and responsibility then it will need to be passed to new residents. Who will that work/</p> <p>Green Infrastructure PATHS</p> <p>18.12. Accepted that there are walkers and cyclists and facilities need improving. This in part is because many of the cul de sacs are linked to other routes. There could be more but the Urban Structure Study has a skewed approach.</p> <p>18.13. Not read the survey. Too many 'bits and pieces' spread around.</p> <p>18.14 & 15. Agreed that there needs to be best provision for movement. What is questioned is why it is necessary to quote that there will be a 30% group of residents over 65 by 2021. The % is irrelevant now or then. More importantly is that fact that ELDC appears to be diverting retirees from the coastal strip to Horncastle. ELDC is inflating the figures. Provide for the aged now but strive against unbalanced numbers simply because of ELDC design.</p> <p>18.16. It is not stated if the Green Wheel comes out of public proposals or is the initiative of a consultant. The concept is supported but it is</p> |
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| | | <p>essential that the administration and funding is clearly delineated not only for acquisition but for ongoing maintenance and management. It is no good saying that the authorities will work together. There is no obligation to do so unless it is enshrined in a clear document of responsibilities. And what happens at the end of the NDP live? Who does what then?</p> <p>18.17. Clause 18.16 Involves a range of authorities whereas 18.17 vests the responsibilities in the Town Council. Where is that documented? Do not the developers come into this too? For instance the scheme can only work in the case of Mareham Road to Spilsby Road if the developers cede land.</p> <p>18.18. The concept is good but it is primarily for leisure since most of the paths are peripheral. It will not be fully successful until routes within the centre are established. How can these be funded? Who will be responsible? TC has not shown any real interest since the publication of the Town Plan which covered this matter.</p> <p>18.19. Agreed that access to the town must be optimized without the use of the car. At the same time the car parking must be rationalized and optimized.</p> <p>POLICY TEN</p> <p>Supported in principle but this does not go far enough. The Green Wheel must be an inspiration not simply all that is sought.</p> <p>1) Developers must not only show how they contribute to the Green Wheel as outlined but how they might improve it especially in interior of the wheel.</p> <p>2) Bus routes must also be included to enhance what now exists.</p> <p>3) Car parks must be rationalized and optimized.</p> <p>4) Management and maintenance and running costs must be established.</p> <p>5) Where appropriate the local authorities must take on innovations that are not within the developers capabilities.</p> <p>19.0. Designated Local Green Spaces</p> <p>19.1. The text refers to 2 sites but then lists 3 in Fig 11 which adds the Wong. Designation of M, La make sense. Are these really the only sites to be considered?</p> <p>The question of P the Wong is unclear. If the site is ceded to the TC by ELDC then surely it is protected and does not need this designation. If it is not ceded then how can the ELDC be forced to agree to this? Similarly what guarantee is there that the ELDC will act on Lb?</p> <p>POLICY ELEVEN</p> <p>Good in principle.</p> <p>Site P cannot be included since it is an ELDC site for which the Justification appears to state that it must first be released. Omit. This appears to be a strategy to wrest the site from the ELDC when all other attempts have failed. Why antagonize the ELDC and encourage them to obstruct the passing of the NDP?</p> <p>Who will manage and maintain these sites? Some is now farmland. Will the owner sell the land and then vest the upkeep into the TC or other authority?</p> <p>20.0 Visual Connections.</p> <p>Who selected the views? Was this by popular vote? It should not rely on a consultant.</p> <p>20.1 is confusing in that it seems to suggest that the views are from the town. In fact they are over the town.</p> | |
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| | | <p>The Town Plan said that the sky line should not be developed. Already the Langton Hill decision has ignored this and set a precedence that will be used by developers.</p> <p>There is likely to be more compromise. The SHLAA map 2014 shows many sites and some are clearly the planners favourites.</p> <p>View 1 is lost.</p> <p>View 2 is irrelevant unless multistory blocks are intended.</p> <p>View 3 is irrelevant unless the sports fields are developed.</p> <p>View 4 is straight up the road!! Is there any thought to divert the road?</p> <p>View 5 overlooks possible development on the SHLAA map.</p> <p>View 6 overlooks a site which is due for Inquiry.</p> <p>View 7 is lost since if the Inquiry for Mareham Road allows development then Wesley Way site will follow. Even though there has been an attempt to keep sight lines for existing property the SHLAA map indicates much more development will follow.</p> <p>There is too the reverse side of this. When looking down into the town from the Wolds we do not have a very good record of ensuring that development is screened from the distance.</p> <ul style="list-style-type: none"> • Views from several directions of the Boston Road Industrial Area are a disaster. • Wesley Way and adjacent road are not screened except by unsightly dilapidated fences. • Any development must be screened from the Wolds. <p>This is a very weak Policy as written and should be deleted unless it can be presented more effectively and particularly cover views into town and the effect of peripheral development from afar.</p> <p>POLICY TWELVE</p> <p>Omit. Unworkable. The Langton Hill ruling destroys the concept. How to cover views back in towards new development?</p> <p>22.0 Supporting Local Business Growth</p> <p>22.1. The Map 8 is not clear. The key has no colour coding when read on the computer.</p> <p>22.4 is a problem. Firstly mention of parking and the lorry park is found in the Town Plan but nothing has been done about it. Secondly this justification cannot make statements about what the TC will do. This is only the preliminary to the introduction to the text covering the NDP clauses.</p> <p>22.5. On what authority does this document state that there will be significant development of employment land? What is employment land? Industrial? Commercial? Academic? Medical? Who will stimulate growth bearing in mind that has been little or none in the last 5-10 years? What high standards are referred to?</p> <p>Where are comments upon the lack of employment growth in the town? Where are proposals to attract businesses to provide work for the increasing population? Recent planning approvals for housing total 460 housing units. (Langton 300, Churchill Av, 80, Louth Road 80). This could result in some 2000 new residents. Worst scenario situation means that this is 1000 needing employment. Even at 500 how willing they be employed? Home working will not exceed 20% therefore 400 will be looking for work.</p> <p>Next month it is likely that Mareham Road will be approved and allow up to 150 units and therefore in the order of 600 residents. This is likely</p> |
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to mean a minimum of 150 jobs to be found.

In the event that all the sites on the SHLAA map 2014 were to be developed in the next 10 years there would be some 2000 units and 8000 residents of which 4000 could need jobs. Where is the development plan for this? What is the TC and the ELDC going to do about this.

POLICY FOURTEEN

This is inadequate.

It appears to have been written by ELDC and for their convenience. The NOP is suppose to set out the towns aspirations and needs and therefore it must consider what employment growth is to be sought and achieved and where it will be situated. This even effects roads, drains, power needs, water needs and so on.

Is there an ELDC policy on employment? If the coastal tourist industry is the ELDCs only route then it is misguided. If industry is to be expanded on the Humber then why is Horncastle expected to provide housing when if really ought to be a new town in the north---say at Manby with new access routes.

The reference to Broadband is commendable but is an over emphasis of one aspect of a complex situation. A fast road in and out of Horncastle to other industrial areas would be needed.

Clause 3 is perhaps the key to intention. The ELDC does not positively look for the employers to make possible the expansion of the Boston industrial site. It rather vetos expansion unless it contributes to the Green Wheel!! This clause may be commendable in promoting green work sites but it much more clearly demonstrates a lack of understanding of development priorities....or is it just badly written? Where is the prospectus for modern, clean, green, well managed sites to encourage and support entrepreneurs and investors?

Two final comments

1. Home working with computers has been a reality for 20 years. It is common for professionals to undertake part of their work at home rather than waste time traveling to the office when it is not necessary. Is that happening here where there are no large professional centres in reasonable range?
2. For others to turn to home working by computer it assumes a high standard of education. Where is the training that makes this possible? This means a wide range of skills and yet the Horncastle College is under threat. If young people have to go away to train they are less likely to return.

23.0. Flooding

The description of flooding relies upon 2 floods in 2007. This is rainwater from upstream inundating the town by flooding the two rivers.

Summer rains in 2012 brought extreme attention to a second threat. Overhead rain which cannot run away because drains are inadequate or poorly maintained. Drains two areas of the town were burst underground and even now the road surface over one breakage has not been repaired. Has the drain been repaired? At that time the rivers were empty but the roads on either side in the town centre were under water.

In simple terms we have river and aerial water to worry about.

POLICY FIFTEEN

Clause 1 is acceptable but does not make sufficient allowance for the fact that rainwater discharges in one area might well cause problems in another. It is not acceptable to continue to look at one site in isolation to the whole community.

Clause 2 is generally in place already in theory but it is not effectively administered. If an outline planning application is made it can be

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| | | <p>expected that rainwater drainage will be given only cursory attention on the grounds that it will be considered further at a later date. In the case of Mareham Road there have been 3 submissions on drainage each different to the previous. This is on the Thinkers Drain and will contribute to flooding in the Conservation Area if not drained safely.</p> <p>Clause 2 c) How will water control be administered? Why is it so important in flood areas? Rainwater at 25mm per hour will probably be far in excess of 80 litres per person per day. Will there be control valves on water supplies? Will there be attenuation tanks? Is this not a somewhat fantastical scheme? Do not introduce a process which may not make any difference to flooding. In fact this raises the question of conservation of resources. This should be a Policy in its own right. Where is the policy on alternative energy, water conservation, orientation of housing, window design, designed heat gain, designed heat prevention. Do not get different processes muddled up.</p> <p>Clause 3 is a formula for disaster. A water course should never be closed down.</p> <p>Clause 5. What does this mean? Public Realm?</p> <p>Clause 6. What is the justification for a park on Thinkers Drain. Explain this. Water coming down the drain from the open fields has an acceptable route now. The problem is that if the ELDC continue to go out of its way to develop the area then more and more water will be channeled down the drain. Where is the engineering justification? What happens where the drain is already developed? What about the bottle neck with the Warring adjacent to Stanhope Road? This does not seem to have been thought through by the authorities bent on the Mareham/Spilsby Road development of farmland regardless.</p> <p>Clause 7. This is incomplete. It is assumed it is said that hard surfaces must be porous. This is only workable if the ground below is porous and not waterlogged. This again is more complicated than seems to be understood. It goes to road surfaces and foot paths and anywhere where drainage is needed. The in term at the moment is SUDS. In fact these are only really large or linear soakaways. These were proposed for Mareham Road but abandoned when it was found that the ground was not constantly absorbent. Not withstanding this the 3rd scheme relied on them to drain to an attenuation tank. At Langton Hill at the outset it was said that they would not work so water is dumped into a pond. Neither of these schemes is proven other than by the consultants for the developer. Mention is made for the need for a professional check of the Live 12 ratings. What is really needed is a serious need for an independent check of drainage schemes. That way the planners might not be so ready to recommend schemes that are questionable.</p> <p>No mention is made of the fact that the Bain is to have an attenuation pond. I will believe it when I see it but what ever the case it is very important and must be covered. In early designs there was supposed to be one for the Warring but this was dropped because of cost. This does not mean that it is not important. In fact both of these change the flood zones and it is not correct to go ahead without this being investigated.</p> <p>Thinkers Drain will be the centre of the Mareham Road Inquiry. It will be interesting to see if approval for development is given. It will give an indication as to how interested the ELDC is about flooding and runoff of water. It is considered it is more interested in ticking boxes and pleasing the Central Government. The NDP is intended to ensure that the people of Horncastle are protected.</p> <p>Map of Risk of Flooding from Surface Water. The map is questioned. Surely it shows fluvial flooding. Surface water would be the problems in town and where roads and drains cannot cope.</p> <p>Overall Policy 15 Flooding does not cover the full spectrum. It needs extensive redrafting.</p> <p>24.0 Implementation</p> <p>24.1. The inference is that the TC will have an influence. How is this guaranteed since the subject is not enshrined in the NDP. Surely the TC will have no more influence than now and even where the TC is against a development proposal the ELDC can ignore the council.</p> <p>24.2. The projects listed in this plan include the Green Wheel and some projects the public would like to see. Reference is made to those in the Town Plan. No reference is made to investigating and improving drainage or other utilities that are inadequate. It is essential that medical,</p> |
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| | | <p>schooling are included to make it clear that it is falling behind and must be expanded. The ELDC must raise essential funds not only for expansion but for the current deficiencies.</p> <p>24.3. This is the first comment on a Community Infrastructure Levy. Why is it not enshrined in a Policy? Is the TC capable of managing projects from this? Where is the expertise? Do we not need a Town Manager with the necessary time and skills.?</p> <p>24.4.</p> <p>24.5. The TC did not actively seek to carry out the recommendations of the Town Plan. If that situation is changed then it should have a covering Policy. If asked I am sure that the public would like to see this. My aspiration is a proactive TC and perhaps a Town Manager.</p> <p>24.6. The TC has not monitored the progress of the Town Plan. The impression is that it has never thought to relate the Town Plan to any business of the town. If it is to do this then it must be part of a Policy.</p> <p>APPENDICES</p> <p>Town Plan. It is not clear how these recommendations are to be used in the NDP. They are written in a more prescriptive manner and clearly show how authorities are to deal with them. Do they have a specific place in the NDP or are they only illustrative? It is considered that this needs to be clearly stated.</p> <p>Appendix G</p> <p>This is very short. It could be longer. A reason why they are important must be given. Appendix H If a document is important it should be included in the NDP as an appendix. It is not reasonable to cite a website without good explanation of structure and content.</p> <p>Appendix K-R. Without these the consultation document is not complete and therefore has fails.</p> <p>Appendix S</p> <p>This is so short it is hardly worth listing as an appendix. It should be in the main text. Is this all that can be mustered? The Town Plan should be referred to on this to make it credible. It is founded upon public input.</p> <p>The old water mill needs a lot of thought. Has anyone been in the premises? It might be good for conversion to apartments. As a stripped out and derelict shell does it really have enough character to permit conversion to a public building which would presumably be publicly owned, and run?</p> <p>IS THERE ANY MORE??</p> <p>The NDP is seen to be superficial.</p> <p>Housing is a central element but there is little in the way of guidelines on housing numbers, location of housing, density. The ELDC may be the authority charged with planning of populations but the people of Horncastle must have a view and express it.</p> |
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