

# Briefing

## Examination of the East Lindsey Core Strategy and the East Lindsey Settlement Proposals DPD: Inspectors' Matters, Issues and Questions – Stage 1 Core Strategy (May 2017)

June 2017

1. This Hearing Statement has been prepared on behalf of St Andrews Healthcare in respect of their land interests to the south of Tothby Lane, Alford ("the site").
2. The site is approximately 9.8 hectares in area and is located on the western edge of Alford. The centre of Alford is located 0.8km to the east of the site and it is bound by residential properties on its eastern and southern boundary; whilst a dismantled railway and Tothby Lane bound the site on its western and northern boundaries respectively.
3. The site is available and represents a suitable and achievable opportunity to deliver up to 200 dwellings over the plan period.
4. The site has previously been promoted through the Local Plan by Turley during the public consultation on the Core Strategy Pre-Submission Draft in January 2017 and the Draft Core Strategy in June 2016.

### **Matter 9 – Neighbourhood Planning (Policy SP6)**

#### **Question 1: Have any neighbourhood plans been made (adopted), are any in preparation and are any more proposed?**

5. It is understood that Alford Town Council has agreed to produce a Neighbourhood Development Plan and a Steering Group has been established to prepare work on the plan. It is evident that work has progressed on the evidence base, which to date consists of a Strategic Housing Land Availability Assessment and Sustainability Appraisal / Strategic Environmental Assessment.
6. According to the Alford Town Council website, a public consultation on the Alford Neighbourhood Plan Pre-Submission Draft will be consulted upon on Friday 7<sup>th</sup> July, although no date for the close of consultation has been established.
7. It is considered that the Alford Neighbourhood Plan is some way off from being 'made' given that it has yet to be subject to formal public consultation on the Pre-Submission Draft, and will then need to be submitted to the Council, who will review and check the Neighbourhood to ensure it is appropriate for consultation on its Submission Version.
8. The Alford Neighbourhood Plan will then be subject to independent examination, referendum and adoption procedures.

9. We seek clarification from the Council on the timetable for preparing the Alford Neighbourhood Plan following consultation on the Pre-Submission Draft.

**Question 2: Is any of the housing requirements in the plans or any other development requirement (eg employment, retail etc) intended to be delivered through neighbourhood plans? If so, do the plans provide appropriate strategic policies as required by the Framework, including those which set out the overall amount of development required?**

10. Strategic Policy 6 is silent on the level of housing requirement that is intended to be delivered through the Alford Neighbourhood Plan, which is inconsistent with paragraph 184 of the NPPF, as it is unclear how the ambition of the Alford Neighbourhood is aligned with the strategic housing needs and priorities of the District.
11. It is evident that the preparation of the Alford Neighbourhood Plan has stalled over the last five years since the designation of the Alford Neighbourhood Area in August 2012, and cannot be ascertained whether the Alford Neighbourhood Plan provides for deliverable housing sites to meet the amount of housing growth apportioned to Alford.
12. In line with paragraph 185 of the NPPF, the Alford Neighbourhood Plan should direct residential development to available, achievable and suitable sites such as land south of Tothby Lane, Alford.

**Question 3: In Alford, Table B in the CS indicates an allocation of 161. However, the Settlement Proposals DPD (page 8) states that site allocations and planning policies will be provided in the Neighbourhood Plan being prepared by the Town Council. Is the figure of 161 homes a housing target for Alford (ie to be delivered through the Neighbourhood Plan) and, if so, how was it justified? Is this intended as a strategic policy? Does this situation apply in any other Large Villages or settlements?**

13. We acknowledge the emphasis placed on Neighbourhood Plans by the Government to give communities the power to develop a vision for neighbourhood areas and to shape sustainable development. The Council is evidently embracing this by relying on Neighbourhood Plans to deliver a significant proportion of the Council's housing supply over the plan period at Alford. Whilst this is a reasonable strategy, there remains concern on how reliable the approach to delivering new homes will be, therefore we object to the principle of Neighbourhood Plans allocating housing sites for development in the context that it is not effective.
14. For example, it must be noted that it has taken Alford Town Council five years to produce a Pre-Submission Draft of the Neighbourhood Plan, which is due for consultation in July 2017. Following the adoption of the emerging Core Strategy, Alford Town Council may have to review the Neighbourhood Plan only five years after being 'made' (if the Neighbourhood Plan is adopted in 2018 and the Core Strategy is subject to early review), which places great resource and financial pressure on the Town Council to produce an up-to-date Neighbourhood Plan.
15. Our client supports the policy principle that the Council will 'step in' to fill delivery gaps and support sites that come forward if a Neighbourhood Plan fails to deliver and/or if there is an interim period between plans. This provides an added amount of certainty that the overall housing provision for the District and for that distributed to Alford will be met over the course of the plan period.

16. However, to reduce the risk of relying on Neighbourhood Plans being brought forward in a specified timeframe and to remove the need to add contingencies to the emerging Local Plan, it is more appropriate and realistic for housing sites to be allocated at Alford within the emerging Core Strategy or Settlement Proposals DPD. Another alternative would be for the emerging Core Strategy or Settlement Proposal DPD to indicate broad locations for development in or adjacent to Alford. This could be achieved through an illustration of the broad location on a diagram or through policy wording i.e. “*growth will be directed towards the west of Alford*”. This direction of growth is most appropriate given that there are minimal natural and historic constraints and most critically falls within Flood Zone 1 of the Environment Agency Flood Map for Planning.

**Question 4: Criteria 2 and 3 deal with scenarios where intended neighbourhood plans are not delivered. Is the approach justified?**

17. It is considered that Policy SP6 is both unjustified and inconsistent with national policy. In its current form, the Core Strategy contains insufficient explanatory text on what strategic policies of the emerging Core Strategy the Neighbourhood Plan will need to conform with and how the Neighbourhood Plan will align with the priorities not only in Alford, but the wider local area, as underlined at paragraph 184 of the NPPF.
18. It is integral to the performance of the emerging Core Strategy that as much guidance as possible is given to preparation of a Neighbourhood Plan (if the emerging Local Plan does not allocate strategic sites for development in Alford) to ensure that the social, economic and environmental objectives of the Council is met in a sustainable and well planned manner. By identifying broad locations for growth at Alford, the Council can begin to work with developers, statutory agencies and funding agencies through the plan-making process to identify and deliver the required infrastructure to supplement or enable housing growth in these broad locations. It is for the benefit of the Council and infrastructure providers to be able to identify during the plan-making process, what sites require which resource and funding.
19. Reference is also made to the preparation of memorandums of understanding between the Council and those Town or Parish Councils undertaking a Neighbourhood Plan to agree timetables for completion of neighbourhood plans. It is considered that any such memorandum of understanding should contain a review mechanism closely aligning policy principles 2 and 3 of SP6 to ensure that planned growth is delivered.

**Question 5: Is the CS sufficiently clear regarding the relationship between these plans and neighbourhood plans?**

20. No. Please see our response to question 4.

**Question 6: Is ADM16 necessary for soundness (reference to general conformity)?**

21. Yes. The modification is consistent with paragraph 184 of the NPPF which states that neighbourhood plans must be in *general* conformity with the strategic policies of the Local Plan.

**Contact**

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21 June 2017

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