

ALFORD NEIGHBOURHOOD DEVELOPMENT PLAN 2018 - 2031

Consultation Statement

PREPARED BY ALFORD
TOWN COUNCIL



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1. What is the Consultation Statement?

- 1.1. This Consultation Statement document has been prepared to support the submission of the Alford Neighbourhood Development Plan (the Plan), prepared for the town of Alford, for the period 2018 – 2031.
- 1.2. This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012. Section 15(2) of Part 5 of the Regulations which sets out that a Consultation Statement should contain:
 - **Details of the persons and bodies who were consulted about the proposed neighbourhood development plan;**
 - **Explain how they were consulted;**
 - **A summary of the main issues and concerns raised by the persons consulted;**
 - **A description of how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan.**
- 1.3. The Pre Submission Draft Alford Neighbourhood Development Plan was made available for consultation in accordance with Regulation 14 of the Neighbourhood Plan Regulations from 15th January to the 25th February 2018. This document provides a description of the amendments made to the document based on the comments received.
- 1.4. The following section of this document, the 'Consultation Summary' sets out chronologically the consultation events that have led to the production of the Draft Alford Neighbourhood Development Plan. This consultation formed the basis of the Neighbourhood Policies contained within the Plan.

2. Consultation Summary

What is the Summary of Consultation?

- 2.1. The Alford Neighbourhood Plan (the Plan) has been produced by the Parish Councils of the parishes involved, led by a Steering Group comprised of residents from across the whole Plan area and town councillors. The Plan has also been produced exclusively using the views and opinions expressed by all the stakeholders in the area, such as; local residents, local business owners and local landowners. The aim of the Plan is to positively plan for the future development of the area to create a sustainable place for people to live, work and visit.
- 2.2. This Section sets out the chronological order of events that have led to the production of the Alford Neighbourhood Development Plan in terms of consultation with local residents and other leading stakeholders and statutory consultees. This consultation has in particular led to the production of the Development Management Policies contained within the Plan that aim to control and promote the sustainable development and growth of the area. In this Statement, the Steering Group has taken a broader approach in setting out the consultation for both the land-use and non-land-use policies and projects contained in the Plan.
- 2.3. Provided in this document is an overview and description of the numerous consultation events and periods involved in the production of the final Neighbourhood Plan. In some instances, more detailed reports have been produced by the Steering Group or other professional bodies, where this is the case, this report is referred to in the overview of that event and it is included in the Appendices of this document.

Aims of Consultation

2.4. To ensure that the local community truly can feel a sense of ownership of the Neighbourhood Plan, and feel they are truly being empowered to control the development and growth of the Plan area, the consultation undertaken in production of the Plan itself must be thorough and the process is clear and transparent. To ensure the consultation undertaken in production of the Plan can achieve such, the Steering Group developed several aims that the consultation process would work towards achieving. The aims of the consultation process of the Plan were:

- **Front load:** The Steering Group decided early in the process that as much consultation with local residents would be undertaken before any contents of the plan were discussed and decided. This would ensure that the contents of the Plan have been wholly influenced and decided upon based on consultation undertaken with the local community.
 - **Reach all aspects of community:** Another key aim of the consultation process was to ensure that all different sections of the community were allowed the opportunity to participate in the Plan process. This involves ensuring that local residents of all ages and both genders engage in the process guaranteeing that the final Plan is truly representative of the local community and their aspirations for the Plan area.
 - **Ensure 'hard to hear' groups participate:** In addition to ensuring all sections of the community are involved in the process, special effort must be made to include those sections of the community described as 'hard to hear' groups, such as: young people, young adults and over 65's. This can be achieved by utilising consultation techniques and events specifically aimed at including these groups.
 - **Ensure transparency:** The Steering Group are keen to ensure that the NDP process is viewed as open and transparent. This involves not only making all documents and consultation results used to produce the contents
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of the final Plan publically available, but also ensuring that local residents are kept up to date with the progression of the plan and also how they can engage and participate at different stages of the process.

General Overview

2.5. The Neighbourhood Planning Steering Group considered different engagement technics and sort advice from consultation specialists to ensure any consultation was undertaken correctly and that all sectors of the community were given the opportunity to have their say on the contents and policies within the plan. The methods used are listed below:

- Questionnaires to local groups
- Attendance at community events
- Press releases
- Website
- Social media
- Town Council newsletters

2.6. The bulk of the work was done by the steering Group, assisted by about a dozen other local people, who helped with framing questionnaires and distributing material to all households.

Date	Activity	Involved Stakeholders	How it has been publicised
April 2012 (February 2018)	Application for the designation of a Neighbourhood Plan Area	All residents East Lindsey District Council	Press release in the local press and in the Alford Town Council Newsletter. ELDC website
July 2012	Information Event	Approximately 100 people attended over the two days	Via leaflets to every household in the town, posters around the town, through a press release and the Alford Town Council Newsletter
April 2013	Consultation Event	All residents. Approximately 90 people attended Alford Group of Doctors Queen Elizabeth's Grammar School	Via leaflets to every household in the town and in shops and other locations around the town centre, through a press release and the Alford Town Council Newsletter
July 2015	Vision and Objective Consultation Event	All residents. Approximately 150 people attended	Via leaflets to every household in the town and in shops and other locations around the town centre, through a press release and the Alford Town Council Newsletter.
July 2017	Draft Plan Consultation Event	All resident. A total of 98 residents attended	Via leaflets to every household in the town and in shops and other locations around the town centre, and in the Alford Town Council Newsletter. In addition all landowners of potential housing sites considered for allocation and ELDC were consulted via letter or email

Figure 1. Activity Log

Application for the designation of the Neighbourhood Plan Area (all related materials available in Appendix A: Neighbourhood Plan Area Designation)

Overview

The decision to produce a Neighbourhood Plan for the area was first explored by Alford Town Council in 2012. With regards to Part 2 of the Neighbourhood Planning Regulations 2012 Alford Town Council submitted an application for designation of the Neighbourhood Area covering the parish of Alford for the purpose of creating a Neighbourhood Plan with Alford Town Council to act as the qualified body to do so. This application was received by East Lindsey District Council (ELDC) on the 12 April 2012 and a statutory 4-week consultation period was enacted and advertised.

As outlined in the Regulations the Local Authority have a duty to publicise the Area Application and the 4-week consultation period in a manner that will bring them to the attention of people who live, work or carry out business in the area. The full Application and information on how to comment was made available on the Council's website and information on the application and how people could make representations was placed in the local press, and in the Alford Town Council Newsletter.

The application for the designation of the Neighbourhood Area is available to view in **Appendix A** of this document.

Conclusions

During the 4-week consultation period, no objections were received to the Neighbourhood Area as outlined in the initial application. Therefore, on the 31st August 2012 East Lindsey District Council contacted Alford Town Council to confirm that they may proceed with the preparation of a Neighbourhood Plan for the parish of Alford. (See **Appendix A**). Unfortunately neither ELDC nor Alford Town Council can find any records that confirm the advertisement of the designation area application in 2012. Consequently ELDC re-advertised the Designation Area application for the 4 week period 28th

February to the 28th March 2018 on the Council’s website and in the local press. Once again, no objections were received to the Neighbourhood Area as outlined in the initial application.

Information Events 14th and 15th of July 2012 (all related materials available in Appendix B: Information Event July 2012)

Overview

A drop-in event was held on Saturday 14th July (10.00 am – 2.00 pm) and Sunday 15th July (1.00 – 3.30 pm) 2012 at the Corn Exchange in Alford. The event was advertised via leaflets to every household in the town, posters around the town, through a press release and the Alford Town Council Newsletter.

Why the event was organized

The event was organised to provide an introduction to the Neighbourhood Plan – the following was the wording on the flyer sent out to advertise the Consultation:

“When it is completed our Neighbourhood Plan will show how we as a town want Alford to develop in the future.

In particular:

- The location, style, density and type of future housing development.
- The location and size of additional industrial land.
- How we want to improve retailing in the town centre and the type of retail outlets needed to service the town’s housing clusters.
- What buildings and areas of the town should be protected.
- Where green spaces, footpaths, sports and leisure facilities and play areas should be.

- Potential sites for allotments, wildlife areas and cemeteries.

Attendees were invited to make comments on any of the above and submit ideas etc. via a comment form.

Attendance

This event was well attended (approximately 100 people over the two days), although no formal record was kept of exactly how many. 30 comment sheets were received from attendees.

Results

A large variety of comments and ideas were submitted by the Alford public, some of which were suitable for consideration in the Plan. These helped form the foundation for the initial stages of plan writing.

Conclusions

As a starting point to the process, the event went well and appeared to engage the public. It was decided to follow up this event with a further Consultation in the near future. This would put some more “meat on the bones” of possible proposals to be carried in the Plan.

Please see **Appendix B** for documentation and records relating to this first consultation.

Consultation Events 26th April, 27th April, 28th April 2013 (all related materials available in Appendix B: Consultation Event April 2013)

Overview

A drop-in event was held on Friday 26th April 2013 (10 am – 2 pm), Saturday 27th April 2013 (10 am – 2.00 pm) and Sunday 28th April 2013 (1.00 – 3.30 pm) at the Corn Exchange in Alford. The event was advertised via leaflets to every

household in the town and in shops and other locations around the town centre, through a press release and the Alford Town Council Newsletter.

Why the event was organized

This event was intended as a follow up to the initial consultation, to give more detail on what possible proposals might feature in the Plan for the following areas: Housing, Industrial land, Shops, Heritage, Leisure and anything else to do with the development of the town, allowing the public to give their feedback.

Attendance

An attendance register was taken recording attendance at 89 people over the three days, many of whom submitted written comments.

Result

A large variety of comments and ideas were submitted by the Alford public. Many of these were relevant to the future direction of the plan and were taken on board.

Conclusions

This event was generally well supported and the Steering Group felt there was a good level of engagement. Again relevant ideas and proposals were incorporated into the plan writing. It was resolved to present the public at the next consultation with much more specific content from the draft plan for them to comment on.

Please see **Appendix B** for documentation and records relating to this second consultation.

Vision and Objectives Consultation Events 10th July and 11th July 2015 (all related materials available in Appendix B: Vision and Objectives Consultation Event July 2015)

Overview

A drop-in event was held on Friday 10th July 2015 (10.00 am – 3,00 pm) and Saturday 11th July 2015 (10.00 am – 1.00 pm) at the Corn Exchange in Alford. The event was advertised via leaflets to every household in the town and in shops and other locations around the town centre, and in the Alford Town Council Newsletter.

Why the event was organized

This event presented to the public the proposed Vision and Objectives of the Neighbourhood Plan along with the housing sites assessment methodology and the consequent priority list for development.

Attendance

Around 150 people attended the event across the two days, with 123 feedback forms being submitted, although not every part of the form was completed in each case.

Results

There was overwhelming support for the plan's Vision & Objectives, and no negative comments about the housing site methodology. Other comments were recorded.

Conclusions

The Steering Group concluded that the main content of the plan, and especially the policies, needed to be written with the Visions & Objectives as its basis, and that the housing site assessment methodology should form the primary tool for the allocation of housing sites. It was also concluded that the next consultation should be opened up to other stakeholders, as well as the public, and should consider the specifics of housing site allocations, as well as the policies, the main plan

document and relevant supporting evidence.

Please see **Appendix B** for documentation and records relating to this third consultation.

Draft Plan Consultation Event, 7th July 2017 (all related materials available in Appendix B: Draft Plan Consultation Event, July 2017)

Overview

A drop-in event was held on Friday 7th July 2017 (10.00 am – 7.00 pm) at the Corn Exchange in Alford. The Consultation was then held open for 2 weeks from this start date, with all relevant documents and the means to complete a feedback form available online and at the Alford Town Council office, The event was advertised via leaflets to every household in the town and in shops and other locations around the town centre, and in the Alford Town Council Newsletter. In addition all landowners of potential housing sites considered for allocation and ELDC were consulted via letter or email. Other landowners were made aware of the Consultation.

Why the event was organized

Whilst the focus of the consultation was the Plan Policies and Housing Allocation, the entire draft Plan was available for scrutiny, as well as various evidence and underpinning methodology documents. The public were presented with a selection of potential housing sites that scored highest on the two methodologies employed by the Steering Group to assess the suitability of possible sites across the town. They were asked whether they would support each one of these sites or not. Various sites were discounted because they were assessed as unsuitable, but the public were presented with these and asked to comment if they felt they should not be discounted for any reason.

Attendance

98 Alford residents attended the Consultation event at the Corn Exchange, Alford on 7 July 2017, and in total across the two week consultation period 52 feedback forms were received, both hard copies and those submitted online, together with three letters.

Results

All comments and feedback were taken into account and the draft Neighbourhood Plan revised accordingly. Most changes were minor with the plan policies clearly endorsed by the public. However, the most significant outcome of the Consultation was the revision of the housing allocation site list in accordance with the wishes of the people of Alford. Whilst the methodology adopted by the Steering Group in selecting potential housing sites for consideration was principally endorsed by the choices of the public, voting slightly altered the priority order of allocated sites. The results were made available online and their existence advertised via leaflet to all households in the town. All respondents were replied to, and those housing site owners under consideration for allocation were informed of the outcome of the consultation directly.

Conclusions

With the views of residents and other stakeholders taken into account the Steering Group now had a definitive preference list of housing sites for allocation, and the clear endorsement of policies and methodologies to enable them to proceed to Regulation 14.

Please see **Appendix B** for documentation and records relating to this fourth consultation.

Other forms of Consultation

In addition to the formal events and consultation periods detailed above, consultation with other agencies throughout the process has taken place as indicated below. In all cases feedback and advice received as a result has been incorporated into the writing of the plan where relevant and necessary.

ELDC – on-going liaison and consultation has been maintained with the Local Authority throughout the process, and for

all formal consultations. In particular the initial Scoping Report and Sustainability Appraisal of the plan were shared with ELDC and given general approval in early 2016. Around the same time the Steering Group worked together with officers at ELDC on the Sustainability Appraisal of housing sites, agreeing the methodology and scoring system. The full appraisal was given approval by ELDC when the task was completed. Likewise the Steering Group shared the proposed housing site assessment methodology with ELDC officers and this was also given general approval as an approach in early 2016.

Statutory bodies like Historic England and the Environment Agency were consulted with regard to the initial Scoping Report and Sustainability Appraisal of the plan Dec 2015/Jan 2016, and this was also shared with the Alford Civic Trust at the same time.

Landowners of potential brownfield housing sites in the town, and those of potential employment land were written to in June 2015, in order to ascertain the availability of their sites.

The Steering Group wrote to the *Flood, Water and Major Developments Team at Lincolnshire County Council* in February 2016 with regard to flood risk considerations for the plan.

As part of a Groundwork Locality Grant application, the Steering Group took up technical support for the plan in the second half of 2017 with Aecom. An advisory report was subsequently received and recommendations acted on where necessary and relevant, resulting in some adjustments to the plan prior to Regulation 14.

The 2008 Alford Town Appraisal was a comprehensive survey conducted in the town of Alford. Its findings were considered in the writing of the plan.

3. Regulation 14 Pre-submission Consultation

- 3.1. Consultation with the community and Statutory Consultees on the Draft Alford Neighbourhood Development Plan began on 15th January 2018 and ended 25th February 2018.
- 3.2. The Consultation exercise included a survey, available both online and in paper format (available in Appendix C: Regulation 14 Consultation) asking Consultees to state whether they supported or did not support the Vision and Objectives of the Draft Plan, each of the policies, the Alford Character Appraisal, the Housing Assessment Methodology, the Reasoning for Scoring on Housing Assessment Report, the Reasoning for Scoring on Sustainability Appraisal of Housing Sites Report, the Housing Site Pro-forma Document, and the Sustainability Appraisal.
- 3.3. Statutory Consultees were emailed or written to, in order to inform them of the Regulation 14 Consultation (a complete list of Statutory Consultees is available in Appendix C: Regulation 14 Consultation). The communication also provided a link where all Plan documents could be downloaded or viewed. This included the main Plan and all the other evidence based documents (i.e. the Alford Character Appraisal, the Housing Assessment Methodology, the Reasoning for Scoring on Housing Assessment Report, the Reasoning for Scoring on Sustainability Appraisal of Housing Sites Report, the Housing Site Pro-forma Document, the Sustainability Appraisal). The letter sent provided contact details to respond to the survey in writing or to receive additional information, plus a link to the Survey Monkey online Consultation form, and informed Consultees that hard copies

of the Draft Plan and evidence based document where available at the Alford Focal Point/Library in Alford. The email also informed Consultees of the drop-in consultation event held at the Corn Exchange, Alford, on Friday 19th January 2018 between 10.00 am and 7.00 pm.

- 3.4. Landowners that replied to the initial the Call for Sites run by the Steering Group, as well as landowners of proposed Local Green Spaces, were emailed or notified by regular mail. To add clarity, the emails and letters to landowners that replied to the initial the Call for Sites explained the reasoning why land allocations had been included in the Neighbourhood Plan. The letter to landowners of sites proposed as Local Green Spaces specified what a Local Green Space is and directly quoted the NPPF (available in Appendix C: Regulation 14 Consultation).
- 3.5. A list of business active in the Parish were informed of the Consultation via email, post or by hand-delivered notices..
- 3.6. All houses in the Parish were informed of the information contained in paragraph 3.3 via leaflets. Regulation 14 Consultation was publicised on the Town Council website and its Facebook page as well.
- 3.7. The following tables present all the comments received from statutory and non-statutory consultees. Each comment is assigned a code that is referenced in the tables "Response to Comment and Changes to the Plan".
- 3.8. The results of the Consultation Form available online and at the Regulation 14 Consultation Event are available in Appendix C: Regulation 14 Consultation, as the following table only contains comments to the Plan. To summarise the result, for all items on the Consultation Form the majority of the respondents supported them.
- 3.9. ELDC, as a Statutory Consultee, was informed of the Regulation 14 Consultation, but decided not to provide any formal comment as part of the Consultation. Prior to the starting of Regulation 14 Consultation, a Pre-submission Draft Version of the Plan was sent to ELDC for informal review, and a number of amendments were suggested: the version of the Plan who presented as part of Regulation 14 Consultation addressed the majority of these suggested

amendments.

Statutory Consultees Comments

Comment Number	NP Section or Evidence Base document	Comment
Anglian Water		
1	Policy 1	<p>Site ANP9: Hunts Depot – there is an existing groundwater extraction site (Alford Water supply works) in Anglian Water’s ownership located adjacent to the above site. It is essential that the re- development of this site for housing does not adversely affect the continued operation of this site to supply potable water to Anglian Water’s customers.</p> <p>We would therefore recommend that the policy should refer to this site being in close proximity to Alford Water supply works and the need to ensure that it does not prejudice the continued operation of this site. Proposals should also not include soakaways on this site given the potential risk of pollution to the existing water source. It is our intention to provide further information on this issue to assist the Parish Council in the development of the Neighbourhood Plan next week.</p>
2	Policy 1	<p>Site AL316: Farlesthorne Road opposite Cemetery – there is an existing sewage pumping station in Anglian water’s ownership located close to the boundary of this housing allocation site.</p> <p>Habitable buildings should be located a minimum of 15 metres from the boundary of Pumping Stations in accordance with the current version of Sewers for Adoption.</p> <p>It is therefore proposed that Policy 1 should include the following text under ‘Development consideration and requirements’ for the above site: ‘Consider the proximity of the foul pumping station in the design and layout of the scheme, and allow for a distance of 15 metres from the boundary of the pumping</p>

		station to the buildings to reduce the risk of nuisance/loss of amenity associated with the operation of the pumping station.'
3	Policy 2	The requirement for adequate infrastructure to be provided to serve the development should apply to both the housing allocation sites and housing which come forward elsewhere in the Parish.
4	Policy 4	We would ask that the policy is strengthened to make it clear that SuDS are the preferred method of surface water disposal consistent with the requirements of the National Planning Practice Guidance. Surface water discharge to public sewerage network should be considered as last resort having demonstrated that alternatives methods of surface water disposal are not technically feasible.
5	Housing Assessment Methodology	There are a number of issues relating to Anglian Water's existing infrastructure not included in this document - please see comments relating to Policy 1.
Environment Agency		
1	General	We support the plan which we have found to be in conformity with national planning policies and guidance and the strategic policies of the emerging East Lindsey District Council (ELDC) Core Strategy. The plan also seeks to improve the neighbourhood and achieve sustainable development.
2	Policy 1	We are pleased to see that all allocated residential sites in the Plan are located outside flood zone 2 and 3, which reflects the approach advocated in paragraph 102 of the National Planning Policy Framework (NPPF) to steer development to areas with a lower probability of flooding. We are also pleased to see that surface water from the development will not be allowed to discharge into the foul system, thus avoiding any further burden on combined surface water and sewerage systems, which currently require regular maintenance and can be a potential source of flooding.
3	Policy 3	We welcome Policy 3 which states that windfall sites will be supported, provided that there is adequate infrastructure including sewerage and drainage and that surface water will not be allowed to discharge into the foul system

4	Policy 4	<p>We support Policy 4 which will ensure that development within flood zones 2 and 3 will have to meet the requirements of the sequential and exception tests, where appropriate, as advocated in paragraph 100 of the National Planning Policy Framework (NPPF).</p> <p>We acknowledge that within Policy 4 residential development is supported in flood zone 2, within or at the edge of the Town Centre boundary for brownfield development, which aligns with the National Planning Policy Framework's (NPPF) Core Planning Principles as well as the Strategic Policies SP10 and SP16 of the ELDC Core Strategy.</p>
5	Core Objectives, Policy 7 and Policy 9	<p>We welcome core objective E (c) to protect and enhance access to green infrastructure and biodiversity and that this is integrated into your policy requirements, for example seeking to ensure that flood attenuation features positively enhance biodiversity and the public realm as well as those requirements in Policies 7 and 9, which specifically relate to these issues.</p>
6	Policy 7	<p>We note that the plan identifies the Woldgrift Drain as a source of flood risk to the town. The Woldgrift Drain is a Lincolnshire Chalk Stream. Chalk streams are very special habitats, which support some of our most threatened plants and animals. They have been designated as a priority habitat within the UK Biodiversity Action Plan (BAP). Lincolnshire's chalk streams have the potential to be a prime examples of this unique habitat, teeming with fish, invertebrates and other wildlife. However, due to a number of different factors such as changes in water demand and supply; water management and land management practices over the last fifty years, there has been a decline in water quality and in the number and diversity of species within the rivers.</p> <p>The Woldgrift Drain, due to a number of pressures, does not support the numbers of plants and animals that would be expected in a chalk stream. The channel has been modified for land drainage purposes and therefore there is a lack of habitat and in-channel diversity to support chalk stream species. Water quality also impacts in the species supported. This is also evident in the Water Framework Directive (WFD) classification. The Woldgrift Drain is classified as moderate ecological potential and fails to meet WFD targets for invertebrates, macrophytes, phosphate and morphology.</p> <p>Any opportunities to improve or restore habitat within Alford as part of future developments would be beneficial. Measures to improve in-channel diversity would help provide improved habitat for fish, invertebrates and other ecology, and create diversity of flow within the channel. This would be subject to appropriate consents.</p> <p>Improvements to the habitat within the channel or bankside will also improve the visual amenity of the</p>

		Drain. Improvements upstream or through Alford could also provide dual benefits of reducing flood risk through the town.
7	Policy 6, Policy 7 and Policy 8	Employment allocation EMP1 and the Bull Fair Field (Local Green Space ID1) both appear to present opportunities for enhancement. Your identification that the Bull Fair Field would be an ideal location for an additional park appears to have particular potential and it may be that working in partnership with the Lincolnshire Wolds Countryside Service, subject to funding, that significant benefits could be achieved to the Drain and the surrounding green space.
Historic England		
1	Policy 5 and Policy 10	The conservation area is currently assessed as being "at risk" in the Historic England Conservation Areas Survey, which is compiled each year from assessment provided by local planning authorities. The reason for this risk is in part the level of vacant shops in the town centre. The centre benefitted from heritage funding a number of years ago, and a number of the shops had shops fronts restored at that time, so overall its appearance apart from this is consistent with its significance as a fine historic market town. The north Market Place is however characterised by a broad expanse of tarmac and quite narrow pavements. The broadening of these pavements as part of a re-planning of these space might attract other uses such as cafes into the square, which are notable by their absence. 106 agreements on development that will see increased use of the town centre could be used to fund such work if viability allows.
2	General	The historic buildings conservation officer at East Lindsey is the best placed person to assist you in the development of your Neighbourhood Plan. We would also recommend that you speak to the staff at Lincolnshire archaeological advisory service who look after the Historic Environment Record and give advice on archaeological matters.

1	Policy 1	<p>There is a comprehensive scoring matrix and sustainability appraisal for new housing developments within the Plan which mainly identifies several brown sites for housing redevelopment/infill. Many of these sites are located within already built up areas much of which is terraced family accommodation with lack of amenity. Sustainability appraisal is used in relation to themes of social, economic and environment, but not health or wellbeing!</p> <p>Sustainability Appraisal Objectives below;</p> <p>7. Improve accessibility to key services, facilities, amenities and green infrastructure including the promotion of sustainable modes of access.</p> <p>9. Support inclusive, safe and vibrant communities</p> <p>12. Encourage and provide the facilities and infrastructure for healthy lifestyles</p> <p>Should these sites be assessed by their comprehensive scoring matrix in relation to the objectives above and wider health and wellbeing criteria, not just in relation to housing?</p>
2	Policy 5	<p>We welcome efforts to retain and enhance a vibrant and active town centre. The Public Health England publication on Healthy High Streets might be of the use.</p> <p>The Plan states that Class A5 hot food takeaways are supported. From a Public Health perspective a restriction on hot food takeaways to avoid an over-concentration would be helpful; particularly with secondary schools being in close proximity.</p>
3	Policy 7	<p>We welcome the effort to protect spaces of value to the community but are not familiar with the specific sites. Two are referred to as orchards – do these provide the opportunity for residents to pick free fruit? Public Health would be particularly keen to see opportunities for community growing spaces. Such orchards and growing spaces could be 'managed' through volunteer community groups. Policy 8 – Allotments is welcomed in a similar vein.</p>

4	Policy 9 and Policy 10	Green and recreation space is limited. Two secondary school facilities in Alford with substantial green spaces are not available to the community. Could the Plan seek to address this?
5	Policy 11	<p>Could more be made here of specific design criteria for new developments and homes themselves such as for example:</p> <ul style="list-style-type: none"> • Following healthy-weight environment guidance published by the Town and Country Planning Association (TCPA); • Requiring Building for Life 12 standards; and • Homes intended for older people being built to be dementia-friendly.
6	Transport	Despite transport being an objective little further reference to the subject was seen – there is no specific Planning policy. Heavy traffic issues across the town including quite a number of large coaches, double decker buses, mini-buses, etc., transporting children to and from school could lead to road safety issues and possible air quality issues. Is there an opportunity to aim to address this through local Plan policy?
7	Health and Wellbeing	<p>The proposed community action on health and wellbeing is quite narrow.</p> <p>7.4.1. Alford Town Council, in collaboration with relevant public bodies and stakeholders, should seek measures to improve disability access within the town.</p> <p>7.4.2. Alford Town Council, in collaboration with relevant public bodies and stakeholders, should seek measures to improve the opportunities for physical, recreational and leisure activities for Alford's residents.</p> <p>Could there be more aspiration, through the desire to create a culture of community to ensure there are activities to help Alford's residents maintain healthy lifestyles:</p> <p>E.g. Community-led health walks and or park runs; eat well sessions, digital inclusion sessions, luncheon clubs and other social activities, etc</p>

8	General	Overall in our opinion the Plan is good but too light on scoping, planning and sustainability in relation to health and wellbeing, although it could be argued that increased housing should be the top priority as good housing is key to good health and wellbeing - if it is affordable!
Natural England		
1	General	Natural England does not have any specific comments on this draft neighbourhood plan.
National Farmers Union NFU		
1	General	<p>Farmers need local plan policies which enable:-</p> <ul style="list-style-type: none"> • New farm buildings needed by the business. This could be for regulatory reasons (e.g. new slurry stores) or because new or more crops and livestock are being farmed (grain stores, barns, livestock housing etc). • Farm and rural diversification. Some farmers will be in a good position to diversify into equine businesses, on farm leisure and tourism and in other sectors which will help boost the local economy and support the farm business. • On farm renewable energy. Farms can be ideal places for wind turbines, pv, solar, anaerobic digestion, biomass and biofuels plant provided they do not cause nuisance to others. The UK must meet a target of 15% renewables by 2020. Currently we are not meeting this target but on farm renewables can help us to meet it. • Conversion of vernacular buildings on farms into new business use or residential use. This enables parts of older buildings to be preserved whilst helping the economy and the farm business.

2	General	<p>The NFU will be looking to see that the neighbourhood plan has policies which positively encourage the above and do not deter them because of, for example, restrictive landscape designations and sustainable transport policies which imply that all development needs to be by a bus stop. There can also be issues about new buildings being sited too close to noisy or smelly farm buildings which cause nuisance to new householders and lead to abatement notices being served on longstanding businesses. We would urge the local planning authority to be especially careful before granting permission to residential development near to bad neighbour uses..</p>
<p>Senior Conservation & Design Office, Planning and the Built Environment, East Lindsey District Council,</p>		
1	General	<p>I've had a quick skim and am impressed by both the acknowledgement that it is the towns' heritage that is its selling point and arguably its life-blood and encouraged that it is valued by so many. The corresponding text and references to heritage back this up.</p>

Figure 2. Statutory Consultees Comments

Non-statutory Consultees Comments

Comment Number	NP Section or Evidence Base document	Comment
Lindum Homes		
1	General	Phase 1, 9 dwellings towards the southern end of the site, has been formally implemented as confirmed by East Lindsey District Council. Phase 2, 20 units towards to the rear of the site, is to be implemented this year. It is noted, however, that the site the subject of the Phase 2 permission is not shown within the 'Main Body of the Settlement' as defined by Policy Map 3. This scheme is to be implemented in the coming year, and as such Policy Map 3 should be amended to reflect this approved scheme.
2	Policy 1	There is requirement for an additional 161 dwellings up to 2031, reduced to a need for 66 dwellings taking into account approved permissions. As stated above, the 29 units already approved (and partially implemented) are committed schemes and should form part of numbers in this regard.
3	Policy 1	In more general terms, Lindum support the residential allocation of Hunts Garage (Site ANP9). It should be borne in mind however that, if Hunts do decide to relocate, there are a variety of factors to be considered, not least the potential for significant land contamination. It may be, therefore, that other supplementary uses need to be considered to enable a viable scheme to come forward. As such, Lindum would recommend a mixed use allocation on this site ensuring various uses can be considered if required. This also ensures that Hunts have the best opportunity in attracting a viable offer for their site, should of course they decide they would like to relocate..

4	Policy 5	The protection of the town centre is clearly a high priority for the neighbourhood plan, and in general terms is welcome. It is recommended, however, that the 300m edge of centre measurement is taken from the town centre boundary, and not Market Place specifically as currently stated within the Policy. It is felt that this is unduly restrictive, and could potentially be detrimental to economic viability of the Town.
Resident 1		
1	Vision and Objective	Brownfield sites and eyesores in the town should be developed firstly.
2	Policy 3: Residential Development	There has been too much development recently with the housing not being filled by local people
3	Policy 7: Local Green Space	Green space isn't very evenly distributed across the town. It is very much in one area.
4	Policy 9: Sport and Leisure Facilities	Lack of sports & leisure for all ages. Youths need something to do to stop them hanging around the streets.
5	Policy 1: Site Allocations	I strongly disagree to the proposal to develop AL316 Farlesthorne Road, currently the traffic is very heavy especially around school drop off and collection times. It struggles with the amount of HGV's and tractors that pass through the small street especially where on-street parking is an issue. I do not think Alford needs more housing considering the numbers being built on Willoughby Road, there is no employment opportunities, shortage of doctors and school places with Alford having very little to offer. Alford is going downhill rapidly and with more people it would be a greater drain on the town and its facilities.
Resident 2		

1	Policy 1: Site Allocations	I feel that Alford doesn't need any additional development considering recent and future plans on the Willoughby Road. I don't agree with the proposal on Farlesthorpe Road as it already suffers from high traffic volume.
Resident 3		
1	Policy 3: Residential Development	It needs to be contained within the town boundaries.
2	Policy 7: Local Green Space	The allocations are vital to reflect the rural and historical location.
3	Policy 8: Green Infrastructure and Connectivity	Vitally important that new housing should be able to access the town on foot.
4	Reasoning for Scoring on Housing Assessment Report	It's as good as it could be given the wide range of variables.
Resident 4		
1	Policy 1: Site Allocations	No support to Policy 1 Site Allocation but support ANP15
2	Policy 1: Site Allocations	Definitely no building on AL316. This is a greenfield site on a country road. School traffic is very heavy. It would be dangerous to access on to Farlesthorpe Road. The wrong area for development. If part of the

		building is for social housing why should we have to put up with, as we are doing now, all the people turned away from our neighbouring towns and the Midlands.
3	Policy 6: Employment	No support to Policy 6: Employment but support EMP3
Resident 5		
1	Policy 1: Site Allocations	Object to AL316 - the road is not suitable and it's too near the school.
Resident 6		
1	Policy 6: Employment	Not enough land allocated off industrial estate
Resident 7		
1	Vision Objectives &	We need to have some control over the future development if possible.
2	Policy 1: Site Allocations	They are OK but identifying more central locations is more sensible.
3	Policy 4: Flood Risk	Houses should be built in zone 2 with preventative measures to mitigate any harm.
4	Policy 6: Employment	More land needs to be identified for commercial use. Industrial Estate is full.

5	Policy 7: Local Green Space	I'm all for green space but these need to be created on the unused brownfield land until development is granted.
6	General Comments	Please consider a by-pass. The road through Alford drains the life out of it. Look at Burgh Le Marsh
Resident 8		
1	Policy 1: Site Allocations	Object to AL316 - greenfield site, productive farmland. Houses opposite this field all have septic tanks because they are too low for mains drainage. In 1979 no more houses were supposed to be built on Farlesthorpe Road because of this. Since then an agricultural bungalow & 3 large houses with septic tanks have already been built. AL316 is a field where rare barn owls hunt and also a route for badgers, deer & foxes. Buzzards also fly over. The road is very narrow and congested outside the cemetery and the primary school with parking from beyond the cemetery down into Rawsley Close and as far as the Children's Centre. Lorries from the largest chicken farm in the area pass all day from 5.30 am and the narrow road already suffers from huge tractors, farm machinery and tracked vehicles. This is part of the 3 mile walk round the town through Bilsby Back Lane and Bilsby Road which many townspeople use regularly to keep fit.
2	Policy 3: Residential Development	ID sewerage & drainage does not apply to AL316. Policy 3 does not address the imbalance of the town (developing eastwards). The town centre old brewery site/ Straven Knitware as a brownfield site be built on first
3	Policy 4: Flood Risk	Flood Risk zone 2 has had no problems with flooding and is nearer town centre for suitable housing.
4	Policy 5: Town Centre Vitality & Viability	With so many new houses we will need a larger supermarket and more doctors & school places.
Resident 9		

1	Policy 6: Employment	Inadequate vision to meet residential targets.
Resident 10		
1	Policy 1: Site Allocations	Object to AL316. Too much traffic already in Farlesthorne Road with Fairburns. Policy 1 - Site AL316 - Very large agricultural machinery and ever increasing school traffic use the road. The road itself is in a very poor state. The site would need a pumped sewer installing to reach the sewage works. It is an area with considerable wildlife presence i.e. barn owls, buzzards, deer, foxes & badgers have been seen.
2	Policy 3: Residential Development	There appears to be no means of addressing the east/west town imbalance. More development is needed in the east. Why is the brewery/Straven site not included? A classic brownfield site close to the Town Centre that should be developed
Resident 11		
1	Policy 3: Residential Development	More sheltered-type housing needed - perhaps integrated housing for younger people (of Europe).
2	Policy 6: Employment	We need more jobs here!
Resident 14		
1	General Comment	Having waded through many pages of officialise, I believe that Alford Town Council is doing its' level best to face the oncoming government gale coming our way. There does seem to be a substantial comprehension gap between the directors of such ideas in Whitehall and ourselves, living in a small, well established community here in Alford. This gap seems to permit total ignorance of the fact that our services are creaking under the current load, e.g. our water services and sewage services were not designed for a population which has nearly doubled in size. I am told that we have two and a bit doctors to serve this population now, when I arrived in Alford over thirty years ago, there were five doctors here. What effect will a further 100 plus houses have on an already stretched medical service? Will those

		insisting on these changes provide funding, or perhaps more doctors to alleviate the situation? I just feel saddened when I see our town, through no fault of its' own being treated in this shabby manner, by people who appear to live in a parallel universe, where numbers and balance sheets are the only directive
Resident 15		
1	Policy 1: Site Allocations	Only some, not AL316, road not suitable.
2	Policy 3: Residential Development	Agree with individual dwellings not large developments.
3	General Comment	I can't understand why the government can't take into consideration the further expansion of the Willoughby Road estate. The infrastructure needs setting in place before any further big builds take place. It can take up to 3 weeks to see your doctor, dentists are hard to get, schools and hospitals are full and some closing. No work for all these new residents, let alone the people already living here. Where is the common sense? Must be in a tin in the cupboard!
Resident 16		
1	Policy 1: Site Allocations	Only some, not AL316, road not suitable. As for plot AL316 the road is sub-standard, there is a cemetery adjacent, it's used by heavy agricultural equipment and large lorries and would pose a threat to children's safety using the two schools at "Spendluffe" and the Sure Start Centre, not to mention the congestion it would cause.
2	Policy 3: Residential Development	Agree with individual dwellings, not large scale.
3	General Comment	There is no consideration for the lack of infrastructure i.e. doctors, dentists, schools, jobs, hospitals, care for the elderly, just to mention a few. We have already planning permission for a number of large estates. Why more large ones when there is no work for the "would be" population which would only exacerbate all the already over-worked social services.

Resident 17		
1	Policy 1: Site Allocations	AL036 not suitable now Safelincs have moved in.
2	Policy 4: Flood Risk	Gardens rather than block paving.
3	Policy 6: Employment	Not heavy industry.
4	Policy 7: Local Green Space	Create green space behind the White Horse with allotments and sculptures.
5	Policy 9: Sport and Leisure Facilities	Qegs charge too much for use of facilities. The tennis club had to leave.
6	General Comment	Free car parking is vital for the economic survival of the market. This should be the case throughout the town making visitors welcome. Can we encourage more use of Alford's natural spring water and explore and test for possible healing properties?
Resident 18		
1	Policy 3: Residential Development	This seems to be the only place to put this comment: On 5.2.2 the term Windfall Policy is introduced but not defined. On 5.3.1 Windfall development up to 50%.. "makes provisions for the promotion of such sites..." Further on in the document there are many mentions of Windfall, ie: windfall proposal. Have I missed something and is the terminology explained somewhere? I know what it means but for example my wife and several other people don't seem to know what it means.
Resident 19		
1	Policy 1: Site Allocations	To bring prosperity to the town it needs more people from outside the County to come into the town, build more houses, from my experience most volunteers in Alford are all people that have come into Alford and

		not the people that were born here, in my opinion the people that are born in Alford, want it to stay as it is, the Town is going downhill, too many charity shops , too many shops opening and closing, more people from outside coming into Alford are more prepared to spend money
2	Policy 2: Local Connection Criteria	Alford needs new blood to come into the Town as well as helping local young people with housing,
3	General Comments	Alford will never prosper whilst there are lots of untidy land scarring the Town, owners should be made to tidy the land or compulsory purchase it to build on or turn into a park or land for the community instead of being an eye sore, in Hanby Lane, we have such a piece of Land and it has made Hanby Lane one of the worst looking roads in the whole of the Town, and certainly doesn't look like the picturesque photos I have seen, its a blot on the landscape.
4	General Comment	Better public transport facilities.
Resident 20		
1	General	When I went to the town hall last year to look at the options for the neighbourhood plan I spoke with some of people involved in the preparation of the plan. I pointed out that the land owned by myself and John Coles would be available for development. I was told that the council would consider this as the land is between the land off Spendluffe Avenue and Bilsby Road ie behind the old and new vicarages and the houses to the south side of Bilsby Road. It's boundary to the south is the land off Spendluffe Avenue and it would be a logical to include it with that land. I have heard no more and note that this proposal has not been included in the plan. Has it been considered and found inappropriate or has the matter simply been overlooked?

Waterloo Housing Group		
1	Policy Chantry Close LGS	7 The land in question is owned and maintained by New Linx Housing Trust. We have no objections to it's inclusion in the Neighbourhood Plan as 'Green Space'.
Landowner of Orchard Chapel Street- east and Orchard Chapel Street 1 (Landowner OCS LGS 1)		
1	Policy Orchard Chapel Street- east and Orchard Chapel Street- west LGS	7 I am only one of seven owners of this land and it is part of six acres of which this is a small section. (...). Speaking personally I would like the land to be put to good use, and I would have thought that with the need for affordable housing being so high this would have taken priority over reserving good building land for a green space which only benefits the view from houses that overlook it?
Landowner of Orchard Chapel Street- east and Orchard Chapel Street 2 (Landowner OCS LGS 2)		
1	Policy Orchard Chapel Street- east and Orchard	7 I would like you to know that my preference for the future of the land would be for it to be used as a green space for the benefit of the people of Alford.

	Chapel Street-west LGS	
Landowner of Orchard Chapel Street- east and Orchard Chapel Street 3 (Landowner OCS LGS 3)		
1	Policy Orchard Chapel Street-east and Orchard Chapel Street-west LGS 7	<p>There are currently 7 individuals with a beneficial interest in this land, however the legal title to the property is in my hands as Trustee.</p> <p>We have a number of concerns, which I am happy to raise.</p> <p>The area designated 'Orchard' Park Road, we do not recognise as Orchard, as far as we are concerned this area of land forms part of the whole field that has previously been let for summer grazing, should we require to do this in the future we will need to re-instate the boundary fencing, so there should be no presumed right of access to this area.</p>
2	Policy Orchard Chapel Street-east and Orchard Chapel Street-west LGS 7	<p>The area designated 'Orchard' Chapel Road, has previously been a fruitful Orchard, cultivated by my family who were residents of the town, however in recent years this area has become overgrown and this is with some personal regret, as I consider that this land could be put to better use, however presently this land cannot be considered an Orchard, as it is overgrown and wild.</p>
3	Policy Orchard Chapel Street-east and Orchard 7	<p>In any case both areas of 'Orchard' that you propose to designate 'Green space' are totally enclosed by land that we otherwise own and there is no formal public right of access. We consider the designation a threat to our title.</p>

	Chapel Street-west LGS	
4	Policy 7 Orchard Chapel Street-east and Orchard Chapel Street-west LGS	The amenity presently enjoyed by the neighbours should be adequately protected by existing planning constraints, should there be any proposed development in the future, there is no requirement for enhanced protection. This precedent has already set.
5	Policy 7 Orchard Chapel Street-east and Orchard Chapel Street-west LGS	You have not provided an adequate rationale for the inclusion of this land, as designated green space. We note that Bull Fair Field which is also part of your proposal, is unsuitable for future development in any case as this land is on a flood plane and the other areas being considered appear to be under council, county council ownership and club ownership. No individual owner is otherwise affected by your plans as we are
6	Policy 7 Orchard Chapel Street-east and Orchard Chapel Street-west LGS	<p>We have no immediate plans develop any the land that is owned by our family trust on this site and specifically the 2 areas identified, as Orchard and we understand the constraints of the location; however we are of the opinion that this land could be put to better use. Specifically the area designated 'Orchard Chapel Road' has the potential to provide a high quality residential development, the location enjoys a prime position, has access and is very close to the town centre and is not on the flood plan.</p> <p>You have identified the need to provide affordable housing in the area, surely with this need being so high it would take precedent over your proposal to provide additional green space in this area which appears to benefit only the few overlooking properties, rather than the community as a whole.</p>

Turley Associates (on behalf of Landowner of Bull Fair Field LGS)

1	Policy 7	St Andrew's Healthcare notes that land west of Park Lane has been designated as Local Green Space within Policy 7 under the site name 'Bull Fair Field'. The NP justifies the proposed designation on the basis that the site has been identified in the Council's Local Green Space Assessment and is in accordance with the definition in the NPPF at paragraph 76.
2	Policy 7	Firstly, it is relevant that the land is not subject to any such designation in the emerging East Lindsey Local Plan and that there is therefore no overriding policy context for this.
3	Policy 7	St Andrew's Healthcare acknowledges that the first principle of paragraph 77 of the NPPF is satisfied given that the site lies within close proximity to Alford town centre and adjacent residential properties to the east and west.
4	Policy 7	It appears that the conclusions of the Local Green Space Assessment have not been produced by a chartered author / body and is instead 'public opinion'. This is considered to be highly inappropriate and applies an onerous prioritisation, in the absence of a robust and credible evidence base. Indeed, the NPPF provides no endorsement to public opinion alone determining the designation of land.
5	Policy 7	Whilst it is acknowledged at paragraph 76 of the NPPF that local communities through neighbourhood plans should be able to identify for special protection green areas of particular importance to them, it is imperative that such identification is supported by a robust evidence base. Therefore, to put forward sites in light of criterion (b), the NP should be informed by the following evidence base, which is currently insufficient or absent:

		<ol style="list-style-type: none"> 1. a landscape character assessment to demonstrate the landscape value (i.e. its beauty / tranquillity); 2. a heritage impact assessment to demonstrate its historic significance; 3. an outdoor sports and play facilities quality assessment to determine the potential recreation value; and 4. a preliminary ecological appraisal to identify the baseline ecological conditions. <p>St Andrew's Healthcare consider, as landowners, that the site has no historic significance, is not of any particular beauty in relation to the surrounding open spaces and countryside, nor does it have any particular richness in wildlife or recreational value.</p>
6	Policy 7	Policy 7 and its explanatory text is silent on how much Local Green Space is required for designation within or adjacent to Alford, whether this be a requirement determined by East Lindsey District Council or Alford Town Council.
7	Policy 7	A review of the Local Green Space Assessment identifies that a total of approximately 6.1 hectares of land within or adjoining Alford has been designated as Local Green Space. It is concerning that approximately 3.6 hectares of the total designation is identified at land west of Park Lane, which represents 59% of the total area designated for Local Green Space. Such an extensive and disproportionate designation of Local Green Space at the site is unjust and offers an unsustainable skew towards the northern extent of Alford when a significant amount of the town's population live to the west and south. In comparison to the other Local Green Spaces, land west of Park Lane is 2.2 hectares larger than 'Tothby Lakes' and is 45 times larger than Chantry Close.

8	Policy 7	<p>The extensiveness of the designation is recognised in the NP at Appendix A, (...). St Andrew's Healthcare strongly objects to the above statement and seek clarification from the Neighbourhood Plan Group on how the grassland has been qualified as 'ancient'. In addition, the assessment of the 'feel' of the site is inappropriate, onerous and is inconsistent with the NPPF, which provides no guidance that 'feel' should determine the designation of land. The comparison to other "<i>typical town centre park</i>" is also inaccurate given that every town within the District and/or across the country vary in scale, form and character and the definition of 'typical' is very subjective.</p> <p>In light of the above, St Andrew's Healthcare considers that the site represents an extensive tract of land and its designation is unjust and does not accord with the third criterion as set out at paragraph 77 of the NPPF.</p>
9	Policy 7	<p>The Neighbourhood Plan Group should acknowledge that the site is already subject to existing and emerging policy which affords protection to the site from development. The 'East Lindsey Schedule of Proposed Main Modifications to the Local Plan – Core Strategy', which was subject to consultation until 16 February 2018 sets out such protection at MM4 [Page 30 – SP3 – Clause 5]. The proposed main modification sets out strict criteria for proposed development outside the settlement boundary (...)</p> <p>In light of the extant protectionist policy criteria, there is no justification for imposing a further layer of spatial restriction on the site.</p>
10	Policy 7	<p>East Lindsey District Council is currently preparing the Local Plan which does not seek to allocate any Local Green Space at Alford and delegates the power of designation to the Alford Neighbourhood Plan.</p>
11	Policy 7	<p>In line with paragraph 77 of the NPPF, St Andrew's Healthcare considers that the Local Green Space designation will not be appropriate for land west of Park Lane. This is because it cannot be robustly demonstrated that the land is either special to the local community or holds a particular local significance or indeed that both of these requirements are satisfied, as is required. In addition, the designation is not</p>

		based on sound evidence which considers whether or not the site is local in character and it is also relevant that the site, given its size, represents an extensive tract of land.
Landowner 1		
1	Policy 1	<p>The above land is situated in an ideal residential development location that will greatly enhance Alford as a market town for generations to come.</p> <p>The site is located on Farlesthorne Road, which is a small road leading out of Alford to the villages of Bilsby, Farlesthorne and beyond.</p> <p>My original thinking for this land was for a tasteful, relatively low density mixed development of 2 & 3 bedroom bungalows and houses all with gardens. This plan I felt was very much in keeping with the town and sensitive to the area.</p> <p>In this day and age any residential development will require some vehicular access. I believe this site to be excellent in that it is situated slightly out of the town centre on a quieter road. Indeed by car the site is only 850m from Alford Market Place.</p> <p>As importantly is the excellent pedestrian and bicycle access links to the town centre and it's facilities to which this site greatly benefits. On foot or by bicycle, the site comfortably links the town being under 200m away from Alford's Primary and Secondary Schools, 650m away from the Medical Centre, 690m away from the Library and 710m away from Alford Market Place and local shops all of which can be accessed on small roads such as Hanby Lane Caroline Street etc.</p>

		<p>If possible, my family and I wish this land to be developed in a sympathetic sensitive way ensuring it is in keeping and appropriate for the area. I genuinely believe that with careful design this land could produce a much sought after mixed development of quality housing meeting the needs of local residents for years to come.</p>
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Figure 3. Non-statutory Consultees Comments

Statutory Consultees – Response to Comment and Changes to the Plan

Comment Number	Comment Source	NP Steering Group Response	Change to the draft plan
1	Anglian Water	The Steering Group agrees with the comments regarding the site and agrees to modify Policy 1 table and the Site Pro-forma to mention the proximity to the groundwater extraction site and the requirement in terms of soakaways, as well as the requirement to ensure the continued operation of the site.	<p>Policy 1: Site Allocation Table, ANP9 amended as follow.</p> <p>“There is an existing groundwater extraction site (Alford Water supply works) in Anglian Water’s ownership located adjacent to the above site. Development should ensure that it does not prejudice the continued operation of this site. Proposals should also not include soakaways on this site given the potential risk of pollution to the existing water source.”</p> <p>Housing Site Pro-forma Document, amended to read the wording above for Site ANP9.</p>
2	Anglian Water	Due to lack of community support for the site and negative feedback from statutory and non-statutory consultees regarding its appropriateness, the Steering Group decided to remove the site from Policy 1 (see more comments below)	AL 316 has been removed from Policy 1: Site Allocation, from Policy Map1 and from the Housing Site Pro-forma Document.

3	Anglian Water	The Steering Group agrees with Anglian Water that the requirement for adequate infrastructure should apply to both allocated sites and windfall sites. Policy 1 has been amended to reflect these conclusions.	Section 1.b. of Policy 1 amended as follow: “b) the proposal addresses development requirements set out for each site, as detailed in the Site Pro-forma Document and summarised in the Table below, addresses the principles of Policy 10, the Alford Character Assessment, the Alford Conservation Area Appraisal (where applicable), and in general delivers all adequate infrastructure to serve the development (including safe and convenient walking and cycling routes, road access, sewerage and drainage, and education, health and social provision).”
4	Anglian Water	The Steering Group agrees to strengthen the reference to SuDS as the preferred method of surface disposal where feasible. The Steering Group understand feasibility as a wider concept than simply technical feasibility, as the economic viability should be considered as part of this assessment as well. Policy 4 has been amended to reflect these conclusions.	Section 3 of Policy 4: Flood Risk has been amended as follow: “3) Development will need to demonstrate it will not have a detrimental impact on surface water flow routes or ordinary watercourses, and will not increase the risk of flooding from surface water or other sources. The implementation of Sustainable Urban Drainage Systems and other appropriate design features would be the preferred method of surface water disposal and will be required as part of the development where feasible. Surface water discharge into the public sewerage network should

			be considered as a last resort having demonstrated that alternatives methods of surface water disposal are not feasible.”
5	Anglian Water	The Housing Assessment Methodology it is not the only assessment methodology employed to select sites for allocation, as a Sustainability Appraisal of Housing Sites (based on ELDC methodology) has been employed as well. The Sustainability Appraisal Objective 3 considers issues related to the protection of “natural resources from avoidable losses and pollution and minimise the impacts of unavoidable losses”, thus including to some extent Anglian Water services and infrastructure.	No change required
1	Environment Agency	Support noted	No change required
2	Environment Agency	Support noted	No change required
3	Environment Agency	Support noted	No change required

4	Environment Agency	Support noted	No change required
5	Environment Agency	Support noted	No change required
6	Environment Agency	<p>The Steering Group considers the Woldgrift Drain a key habitat site for Alford, supporting a number of mature trees and native plants, as well as birds such as the Kingfishers and Little Egret. The Steering Group agrees with the Environmental Agency that the area is experiencing a number of pressures and that more should be done to improve and restore this key habitat. The level of protection granted by a Local Green Space designation represents a step in this direction, ensuring future development does not further exacerbate this problem and increase pressure on this threatened habitat. The Steering Group welcomes the suggestions to improve biodiversity in the habitat, visual amenity of the area and reduce flood risk through intervention upstream. These recommendations have been inserted in the Community Action Section.</p>	<p>The following section has been added to the Community Action Section:</p> <p>“7.7. Woldgrift Drain:</p> <p>7.7.1. Alford Town Council will seek collaboration with East Lindsey District Council, the Environment Agency and Lincolnshire Wildlife Trust to implement any feasible and appropriate intervention to improve or restore the ecology and habitat of the Wold Grift Drain to ensure it supports the diversity and number of plants and animals that would be expected in a chalk stream. In</p>

			<p>particular, measures to improve in-channel diversity would help provide an improved habitat for fish, invertebrates and other ecology, and create diversity of species within the channel.</p> <p>7.7.2. Improvements to the habitat within the channel or bankside should also deliver improvement to the visual amenity of the Drain.</p> <p>7.7.3. Improvements to the habitat upstream or through Alford should also be aimed at reducing flood risk through the town.”</p>
7	Environment Agency	The Steering Group agrees that both areas present opportunities for enhancement from an environmental point of view. Provision for employment-creating development in Site EMP1 sets out requirements in terms of protection from “off-site pollution of air and water, intrusive levels of noise or odour outside the site, or ground pollution”. The opportunity to create an additional park, where possible, working in partnership with the restoration of	<p>The following paragraphs have been added to the Community Action Section:</p> <p>“7.4.3. Alford Town Council will seek collaboration with relevant public bodies and private agencies, such as the Environmental Agency, the Lincolnshire Wolds Countryside Service and private</p>

		<p>the Wold Grift Drain is welcomed by the Steering Group. These recommendations have been inserted in the Community Action Section.</p>	<p>landowners, to promote the creation of public rights of way connectivity links along the Wold Grift Drain, adjacent to Bull Fair Field, from West Street to the public rights of way to the north of Alford Manor House, beyond the Bull Fair Field.”</p> <p>“7.4.4. Alford Town Council will seek collaboration with relevant public bodies and private agencies, such as the Environmental Agency, the Lincolnshire Wolds Countryside Service and private landowners, to promote the creation of an additional public park area within the town. “</p>
1	Historic England	<p>The Steering Group agrees with the Historic England comment regarding the risk vacant shops pose to the conservation and regeneration of the Conservation Area. Policy 5 is meant to reverse this trend and, together with Policy 10, promote the presence of retail and commercial activities in the Town Centre and the appropriate development and redevelopment of historic buildings. The suggestions for the regeneration of the south Market Place are welcomed. These recommendations have been inserted in the Community Action Section.</p>	<p>Paragraph 7.1.5 of Community Action Section has been amended as follow:</p> <p>“7.1.5. Where possible Alford Town Council, in collaboration with relevant public bodies and stakeholders, should seek measures to revitalise the Market Place and its immediate area (i.e. the town centre), in order to create a more viable, central hub for the town. This may entail re-fashioning this area to foster greater and more varied use by the community and visitors, for example through the</p>

			broadening of the pavements in south Market Place in recent times. Section 106 agreements on development that will result in increased use of the town centre could be used to fund such work if viability allows.”
2	Historic England	The Steering Group have consulted East Lindsey Conservation Officer. The suggestion to consult with the archaeological advisory service is welcomed.	No change required
1	LCC, Public Health	The Steering Group believes that the Sustainability Appraisal has been used in a comprehensive way giving adequate consideration to health and wellbeing, as demonstrated by the Sustainability Appraisal Objectives 7, 9, and 12. The sites have been assessed based on their comprehensive impact on health and wellbeing assuming they are developed as housing sites, using the above criteria to assess impact in the wider context.	No change required
2	LCC, Public Health	Policy 5 aims to promote a diverse and vibrant economy. To ensure a successful and achievable regeneration of the Town Centre, the Steering Group believes that greater flexibility of use needs to be encouraged, with a different mix of both retail and service businesses (including hot food takeaways). At this stage, the Steering Group does not consider it necessary to limit the number of A5 hot food, as there is no over-concentration of hot food takeaways at the present nor evidence that it is a risk for the medium term future. However, Alford Town Council will monitor the development of the area regularly, and amend the plan promptly in case over-concentration starts to occur.	No change required
3	LCC, Public Health	The Orchard – Chapel Street east and the Orchard – Chapel Street west LGS have been removed from Policy 7 (see comment below). The Allotment Policy was present in a previous version of the Plan, but removed before finalising the	No change required

			Consultation 14 Regulation Version of the Plan due to unsuitability of the proposed site. The Steering Group is not sure which version of the Neighbourhood Plan LCC Public Health consulted.	
4	LCC, Health	Public	The Neighbourhood Plan cannot present policies regarding the management and accessibility of private facilities, unless this is in connection with a planning development proposal. The Community Action 7.4.2. proposes that the Town Council will be proactive in engaging public and private stakeholders (including the schools) to create more opportunities for sport and leisure activities	No change required
5	LCC, Health	Public	Policy 1, Policy 3, Policy 7 and Policy 8 aim to ensure houses are in close proximity to green infrastructure and services to promote walking and cycling and sport activities. The Steering Group does not consider it necessary to make explicit reference to the guidance of the TCPA. The Steering Group believes that the Strategic Policy SP5 of the ELDC Core Strategy sufficiently tackles the issue of homes intended for the older population, and that there is no need for duplication. A previous version of the Plan contained reference to Building for Life 12 standards, but it has been removed following recommendation from ELDC to avoid duplication.	No change required
6	LCC, Health	Public	Neighbourhood Plans can only deal with land use planning issues. Transport issues, such as road safety, public transport and traffic are not in the remit of Neighbourhood Plan policies	No change required

7	LCC, Public Health	Community Action in term of health and wellbeing are considered adequate and achievable. The solutions proposed by the Public Health Department are welcomed and could be pursued under the remit of proposed community action	No change required
8	LCC, Public Health	The Steering Group believes the Plan is adequately ambitious and uses most of the potentiality offered by the Neighbourhood Plan tool in term of promotion of health and wellbeing, conscious that Neighbourhood Policy can only deal with land use management and planning-related matters.	No change required
1	Natural England	The Natural England comment has been noted.	No change required
1	NFU	The policies contained in the Neighbourhood Plan do not prevent development of new farms, and the Plan relies on the Strategic Policies contained in the ELDC Core Strategy to manage development of new farm buildings and the conversion of agricultural buildings into residential development. To avoid duplication the Steering Group decided not to develop its own policies as the ELDC policies were considered adequate. Policy 11 promotes the installation of renewable energy-generating technologies in building, where the design does not harm the character of the area.	Policy 5.c.ii. amended to read “ii) for the sale of items or services produced on or adjacent to the same premises; or”

		Policy 5.c.ii. has been amended to include services and thus cater for farm leisure and tourism activities in locations outside the Town Centre.	
2	NFU	The Steering Group believes that the Neighbourhood Plan Policies, together with the provision of the ELDC Core Strategy, positively encourage the development envisaged by the NFU. Moreover, Policy 1 and Policy 3 ensure residential development will not occur in close proximity to farms, to avoid conflict with their continued operation.	No change required
1	Senior Conservation & Design Office	Support Noted	No Change required

Figure 4. Statutory Consultees – Response to Comment and Changes to the Plan

Non-statutory Consultees – Response to Comment and Changes to the Plan

Comment Number	Comment Source	NP Steering Group Response	Change to the draft plan
1	Lindum Homes	The Main Body of the Settlement is based on existing building footprint and implemented planning permission. The Main Body of the Settlement will be amended and updated in future review of the Neighbourhood Plan, and will include phase 2 of the development if developed at that stage.	No Change required
2	Lindum Homes	The 29 houses that will be delivered by the site are indeed considered as existing commitments in the calculation.	No Change required
3	Lindum Homes	Support for the allocation noted. The Steering Group agrees that in the planning application phase, consideration will need to be given to potential land contamination and proximity to the groundwater extraction site. Considering the appropriateness of the site and the need for additional houses in the town, the Steering Group does not believe that mixed use should be supported on the site, which should be allocated as a residential site.	No Change required
4	Lindum Homes	The Steering Group believes that the 300m buffer set from the Market Place incorporates all locations adjacent and at the edge of the Town Centre boundary, and that a 300m buffer around the boundaries itself would include too large of an area and potentially decentralise business activities, contradicting the vision of Town Centre revitalisation. The number of locations included in the current definition is considered large enough to promote economic development of the town centre and of Alford as a whole.	No Change required

1	Resident 1	Being a Brownfield site was a key criterion in the allocation methodology .	No Change required
2	Resident 1	Policy 2 establishes local connection criteria to ensure local people have preferential access to social housing. Regarding commercial housing, it is not possible for the Neighbourhood Plan to give priority to people with a strong connection with Alford.	No Change required
3	Resident 1	In a town as old as Alford, developed over centuries, green spaces simply could not be found proportionately across the settlement. Policy 7 aims to protect the most locally valuable Local Green Spaces, irrespective of their location, but based solely on the statutory criteria listed in the NPPF. Policy 8 aims to set out the requirement for the creation of more open spaces through development all over the town, including areas in the south and the west	No Change required
4	Resident 1	Policy 4 supports the creation of new sporting and leisure facilities. The Community Action Section contains projects and aspirations to increase sport and recreational activities in Alford.	No Change required
5	Resident 1	As part of the Regulation 14 Consultation, the Steering Group received a relevant number of comments opposing the allocation of site AL316. This comments resonate with the concerns raised by Anglian Water and the Highway Officer regarding allocation. Considering the lack of community support, site AL316 has been removed from the allocation of Policy 1 .	AL 316 has been removed from Policy 1: Site Allocation, from Policy Map1 and from the Housing Site Pro-forma Document.
1	Resident 2	Based on the calculation made by ELDC, it is likely that Alford will grow in the future and will need additional development: the Steering Group decided to allocate sites that scored positively	AL 316 has been removed from Policy 1: Site Allocation, from Policy

		<p>according to the methodology to steer future development in the most sustainable and positive way, ensuring sites that are supported by local residents will be prioritised in the future.</p> <p>As part of the Regulation 14 Consultation, the Steering Group received a relevant number of comments opposing the allocation of site AL316. These comments resonate with the concerns raised by Anglian Water and the Highway Officer regarding allocation.</p> <p>Considering the lack of community support, site AL316 has been removed from the allocation of Policy 1.</p>	Map1 and from the Housing Site Pro-forma Document.
1	Resident 3	The Windfall Policy in the Neighbourhood Plan complies with Strategic Policy SP3 of the ELDC Core Strategy, which allows windfall development adjacent to the town boundaries	No Change required
2	Resident 3	Support Noted	No Change required
3	Resident 3	Support Noted	No Change required
4	Resident 3	Support Noted	No Change required
1	Resident 4	Based on the calculation made by ELDC, it is likely that Alford will grow in the future and will need additional development: the Steering Group decided to allocate sites that scored positively according to the methodology to steer future development in the most sustainable and positive way, ensuring sites that are supported by local residents will be prioritised in the future.	No Change required
2	Resident 4	As part of the Regulation 14 Consultation, the Steering Group received a relevant number of comments opposing the allocation of site AL316. This comments resonate with the concerns raised by Anglian Water and the Highway Officer regarding allocation.	AL 316 has been removed from Policy 1: Site Allocation, from Policy

		Considering the lack of community support, site AL316 has been removed from the allocation of Policy 1.	Map1 and from the Housing Site Pro-forma Document.
3	Resident 4	According to Strategic Policy SP13, through the Neighbourhood Plan Alford is asked to allocate 1 hectare of land for industrial/commercial development. Unfortunately, availability for employment sites in the Town is extremely limited, due to a combination of shortage of suitable sites and landlords' intention not to develop land for employment- generating uses. Policy 6 Employment aims to deliver enough employment-generating land in the lifetime of the plan.	No Change required
1	Resident 5	As part of the Regulation 14 Consultation, the Steering Group received a relevant number of comments opposing the allocation of site AL316. These comments resonate with the concerns raised by Anglian Water and the Highway Officer regarding allocation. Considering the lack of community support, site AL316 has been removed from the allocation of Policy 1.	AL 316 has been removed from Policy 1: Site Allocation, from Policy Map1 and from the Housing Site Pro-forma Document.
1	Resident 6	According to Strategic Policy SP13 through the Neighbourhood Plan Alford is asked to allocate 1 hectare of land for industrial/commercial development. Unfortunately, availability for employment sites in the Town is extremely limited, through a combination of shortage of suitable sites and landlords' intention not to develop land for employment uses. Policy 6 Employment aims	No Change required

		to deliver enough employment-generation land in the lifespan of the plan.	
1	Resident 7	The Neighbourhood Plan permits control over future development as the policies contained in the document become material considerations when determining planning applications	No Change required
2	Resident 7	Proximity to the town centre was a key criterion in the allocation methodology	No Change required
3	Resident 7	Policy 4 complies with Policy SP16 of the ELDC Core Strategy which sets out the requirements to allow development within the Zone.	No Change required
4	Resident 7	According to Strategic Policy SP13 through the Neighbourhood Plan Alford is asked to allocate 1 hectare of land for industrial/commercial development. Unfortunately, availability for employment sites in the Town is extremely limited, through a combination of shortage of suitable sites and landlords' intention not to develop land for employment uses. Policy 6 Employment aims to deliver enough employment-generation land in the lifespan of the plan.	No Change required
5	Resident 7	Local Green Spaces are allocated for the whole lifespan of the Plan, and cannot be developed unless in very special circumstances. The designation is not appropriate for brownfield sites with an aspiration to be developed in the future.	No Change required
6	Resident 7	Neighbourhood Plans can only include policies related to land use planning issues. Transport and the construction of new roads is not such an issue.	No Change required

1	Resident 8	<p>As part of the Regulation 14 Consultation, the Steering Group received a relevant number of comments opposing the allocation of site AL316. This comments resonate with the concerns raised by Anglian Water and the Highway Officer regarding allocation.</p> <p>Considering the lack of community support, site AL316 has been removed from the allocation of Policy 1.</p>	AL 316 has been removed from Policy 1: Site Allocation, from Policy Map1 and from the Housing Site Pro-forma Document.
2	Resident 8	<p>Section 4.b. of Policy 3 specifically addresses the imbalance of the town.</p> <p>A planning application on the Straven Knitware site would comply with and therefore be supported by Policy 3 of the Neighbourhood Plan.</p>	No Change required
3	Resident 8	<p>Policy 4 complies with Policy SP16 of the ELDC Core Strategy which sets out the requirements to allow development within the Zone.</p>	No Change required
4	Resident 8	<p>Health and education facilities will be delivered and developers' contributions will be required, according to the guidelines of the ELDC Core Strategy. The inclusion of policies related to large supermarkets was discussed, but a community consensus on the issue has not been reached, and hence the issue has not been included in the Neighbourhood Plan. An application for a large supermarket would be considered on its own merit and according to the Policies contained in the ELDC Core Strategy and the Neighbourhood Plan.</p>	No Change required
1	Resident 9	<p>Based on the calculation made by ELDC, it is likely that Alford will grow in the future and will need additional development: the Steering Group decided to allocate sites that scored positively according to the methodology to steer future development in the most sustainable and positive way, ensuring sites that are supported by local residents will be prioritised in the future.</p>	No Change required

1	Resident 10	<p>As part of the Regulation 14 Consultation, the Steering Group received a relevant number of comments opposing the allocation of site AL316. This comments resonate with the concerns raised by Anglian Water and the Highway Officer regarding allocation.</p> <p>Considering the lack of community support, site AL316 has been removed from the allocation of Policy 1.</p>	AL 316 has been removed from Policy 1: Site Allocation, from Policy Map1 and from the Housing Site Pro-forma Document.
2	Resident 10	<p>Section 4.b. of Policy 3 specifically addresses the imbalance of the town.</p> <p>A planning application on the Straven Knitware site would comply with and therefore be supported by Policy 3 of the Neighbourhood Plan.</p>	No Change required
1	Resident 11	<p>Policy 1 Site Allocation ensures that a number of affordable houses will be delivered as part of the development of allocated sites.</p>	No Change required
2	Resident 11	<p>According to Strategic Policy SP13 through the Neighbourhood Plan Alford is asked to allocate 1 hectare of land for industrial/commercial development. Unfortunately, availability for employment sites in the Town is extremely limited, through a combination of shortage of suitable sites and landlords' intention not to develop land for employment- generating uses. Policy 6 Employment aims to deliver enough employment- generating land in the lifespan of the plan.</p> <p>Policy 5 Town Centre aims to regenerate the Town Centre creating more employment opportunities in the Town.</p>	No Change required
1	Resident 14	Support Noted	No Change required

1	Resident 15	<p>As part of the Regulation 14 Consultation, the Steering Group received a relevant number of comments opposing the allocation of site AL316. This comments resonate with the concerns raised by Anglian Water and the Highway Officer regarding allocation.</p> <p>Considering the lack of community support, site AL316 has been removed from the allocation of Policy 1.</p>	AL 316 has been removed from Policy 1: Site Allocation, from Policy Map1 and from the Housing Site Pro-forma Document.
2	Resident 15	Policy 3 contains provisions to ensure that applications for large development go through a strict process of check and control and consultation with the residents.	No Change required
3	Resident 15	The requirements in terms of infrastructures and contributions to health and education facilities for development which secured planning permission are the responsibilities of the Local Planning Authority and cannot be influenced by the Neighbourhood Plan.	No Change required
1	Resident 16	<p>As part of the Regulation 14 Consultation, the Steering Group received a relevant number of comments opposing the allocation of site AL316. This comments resonate with the concerns raised by Anglian Water and the Highway Officer regarding allocation.</p> <p>Considering the lack of community support, site AL316 has been removed from the allocation of Policy 1.</p>	AL 316 has been removed from Policy 1: Site Allocation, from Policy Map1 and from the Housing Site Pro-forma Document.
2	Resident 16	Policy 3 contains provisions to ensure that applications for large development go through a strict process of check and control and consultation with the residents.	No Change required
3	Resident 16	<p>Based on the calculation made by ELDC, it is likely that Alford will grow in the future and will need additional development: the Steering Group decided to allocate sites that scored positively according to the methodology to steer future development in the most sustainable and positive way, ensuring sites that are supported by local residents will be prioritised in the future.</p> <p>The requirements in term of infrastructures and contributions to health and education facilities for development which secured</p>	No Change required

		planning permission are the responsibilities of the Local Planning Authority and cannot be influenced by the Neighbourhood Plan.	
1	Resident 17	<p>As part of the Regulation 14 Consultation, the Steering Group received a relevant number of comments opposing the allocation of site AL316. This comments resonate with the concerns raised by Anglian Water and the Highway Officer regarding allocation.</p> <p>Considering the lack of community support, site AL316 has been removed from the allocation of Policy 1.</p>	AL 316 has been removed from Policy 1: Site Allocation, from Policy Map1 and from the Housing Site Pro-forma Document.
2	Resident 17	Policy 3 requires the introduction of SUD solutions, that often prioritise permeable surfaces such as gardens over impermeable ones (e.g. block paving).	No Change required
3	Resident 17	Policy 6 Employment sets out requirement to ensure employment-generating development is of a use/class other than heavy industries and industrial activities that could be harmful for the health and wellbeing of residents.	No Change required
4	Resident 17	The Neighbourhood Plan explored the opportunities to acquire land for allotments, but the site indicated by the consultee was not put forward. The only site identified was later deemed unsuitable due to soil contamination.	No Change required
5	Resident 17	The renting price of sporting facilities is not a land use planning issue and thus cannot be dealt with a Neighbourhood Plan Policy.	No Change required
6	Resident 17	Policy 5 Town Centre aims to regenerate the Town Centre. Free car parking and testing of the spring water are not land use planning issues and thus cannot be dealt with a Neighbourhood Plan Policy.	No Change required
1	Resident 18	The Steering Group agrees with the comment. A definition of windfall development, based on the definition contained in the NPPF, has been added to the justification text of Policy 3	<p>Paragraph 5.3.1. has been added to the Justification Text of Policy 3 and now reads</p> <p>5.3.1. Windfall sites are defined in the NPPF as "sites which have not</p>

			been specifically identified as available in the Plan process. They normally comprise previously-developed sites that have unexpectedly become available”.
1	Resident 19	Based on the calculation made by ELDC, it is likely that Alford will grow in the future and will need additional development: the Steering Group decided to allocate sites that scored positively according to the methodology to steer future development in the most sustainable and positive way, ensuring sites that are supported by local residents will be prioritised in the future.	No Change required
2	Resident 19	Policy 2 does not prevent people from elsewhere in the region or in the country moving to Alford and being assigned affordable accommodation: it simply gives priority to people with a strong connection with the town.	No Change required
3	Resident 19	Compulsory purchase of land is a prerogative of the Local Planning Authority and only used in very special circumstances. The Neighbourhood Plan promotes redevelopment of derelict brownfield sites both through Policy 1 and Policy 3.	No Change required
4	Resident 19	Public transport management is not a land use planning issue and thus cannot be dealt with a Neighbourhood Plan Policy.	No Change required
1	Resident 20	The Call for Sites for the Neighbourhood Plan closed on 31/05/17, following extensive consultation and advertisement with local residents and landowners (see Section 1). Sites submitted after this date have not been assessed as part of the Site Allocation process. If necessary, future reviews of the Neighbourhood Plan may allocate additional sites, meaning that a new Call for Sites will be undertaken. The allocation is not the only way new housing will be built in Alford, but rather a way to ensure a minimum number of	No Change required

		houses will be built in the future; windfall development that meets the requirement of Policy 3 will be supported. If the site meets the criteria of Policy 3 we suggest the landowner submits a planning application in the future explaining how the site meets the criteria set out in the policies in the Neighbourhood Plan and in the ELDC Core Strategy.	
2	Waterloo Housing Group	Support noted	No Change required
1	Landowner OCS LGS 2	Support noted	No Change required
1	Landowner OCS LGS 1	There is no specific requirement for affordable housing for the Alford Neighbourhood Plan. Regarding the allocated sites, the Neighbourhood Plan sets out requirements based on the provision of the ELDC Core Strategy . Neither of the Orchard Sites have been proposed for allocation as part of the Call for Sites.	No Change required
1	Landowner OCS LGS 3	Both sites have been designated as orchards based on the information retrieved from the Magic Website, which qualifies the land as a Traditional Orchard according to the Priority Habitat Inventory.	No Change required
2	Landowner OCS LGS 3	The Steering Group agrees that the site currently has no value in term of fruit or food production and it is currently not used as an Orchard.	No Change required

3	Landowner OCS LGS 3	<p>Local Green Space Designation does not result in a change of ownership, nor in public access to the land. The Steering Group acknowledges that the lack of formal public access to the site undermines the recreational value of the proposed designation.</p> <p>The Steering Group have reviewed the Local Green Space Assessment for this site, and have reached the following conclusion:</p> <ul style="list-style-type: none"> • In terms of beauty, it has been acknowledged that due to its location, views of the site can only be enjoyed from the end of Chapel Street, a residential cul-de-sac mostly used by local residents. Views of the site would hence be enjoyed predominantly by residents of in that locality, with little benefit for the rest of the community • Little remains from the time the areas were used as orchards, and the historic value of this activity cannot be easily assessed. • The sites have no public access, meaning that there is little recreational value, and no PROW runs through or adjacent to the sites. • The fact that the sites are on the outskirts of the Main Body of the Settlement in a residential cul-de-sac, and the fact that the sites have not a PROW within or adjacent to it, make it difficult for them to be enjoyed by local residents of Alford due to their tranquillity. • The sites are overgrown with plants, and it is highly probable that they represent a nesting site for birds and shelter for small mammals. <p>Based on this revised assessment, the Steering Group does not consider the wildlife component alone relevant enough to meet the requirements of the NPPF in term of LGS. For this reason, the Steering Group agrees to remove the proposed LGS Orchard Chapel Street-east and Orchard Chapel Street-west from policy 7</p>	Orchard Chapel Street- east and Orchard Chapel Street-west have been removed from the list of designated Local Green Space from Section 1 of Policy 7, from Policy Map 7, and from Section 8.3 of Appendix 8
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4	Landowner OCS LGS 3	<p>The Steering Group disagrees with the statement that existing amenities are adequately protected by existing planning constraint and that there is no need for enhanced protection. On the contrary, Alford experiences a scarcity of local green space as pointed out in the ELDC's Green Infrastructure Audit. This is partly due to the lack of statutory planning protection for open and green spaces</p>	No Change required
5	Landowner OCS LGS 3	<p>Local Green Space Designation does not result in a change of ownership, nor in public access to the land. The Steering Group acknowledges that the lack of formal public access to the site undermines the recreational value of the proposed designation.</p> <p>The Steering Group have reviewed the Local Green Space Assessment for this site, and have reached the following conclusion:</p> <ul style="list-style-type: none"> • In term of beauty, it has been acknowledged that due to its location, views of the site can only be enjoyed by the end of Chapel Road, a residential cul-de-sac mostly used by local residents. View of the site would hence be enjoyed for the most part by residents of Chapel Road, with little benefit for the rest of the community • Little remains of the time the areas were used as orchards, and the historic value of this activity cannot be easily assessed. • The sites have no public access, meaning that there is little recreational value, and no PROW run through or adjacent to the sites. • The fact that the sites is on the outskirts of the Main Body of the Settlement in a residential cul-de-sac, and the fact that the sites have not PROW within or adjacent to it male it difficult for them to be enjoyed by local residents of Alford due to their tranquillity • The sites are overgrown with plants, and it is highly probable that they represent a nesting site for birds and shelter for small mammals. 	Orchard Chapel Street- east and Orchard Chapel Street-west have been removed from the list of designated Local Green Space from Section 1 of Policy 7, from Policy Map 7, and from Section 8.3 of Appendix 8

		Based on this revised assessment, the Steering Group does not consider the wildlife component alone relevant enough to meet requirements of the NPPF in term of LGS. For this reason, the Steering Group agrees on removing proposed LGS Orchard Chapel Street- east and Orchard Chapel Street-west from policy 7	
6	Landowner OCS LGS 3	There is no specific requirement for affordable housing for the Alford Neighbourhood Plan. Regarding the allocated sites, the Neighbourhood Plan sets out requirements based on the provision of the ELDC Core Strategy. Neither of the Orchard Sites have been proposed for allocation as part of the Call for Sites.	No Change required
1	Turley Associates	The Land has been identified by the Neighbourhood Plan Steering Group, not "the District Council", through the Alford Character Appraisal. The Alford Character Appraisal is a document that has been submitted to the residents for comment and amendments on several occasions, not least as part of Regulation 14 Consultation, where it received support from the vast majority of respondents.	No Change required

2	Turley Associates	<p>The land is indeed not directly designated under the Policies of the ELDC Core Strategy. However, the Steering Group does not acknowledge the relevance of this comment. It is customary for Local Plans to set out general requirements in terms of protection of local green space, and leave to Neighbourhood Plans the power to identify specific small scale sites in the local context, using in particular LGS Designations. In ELDC's case, this is done through Strategic Policy 25 i) & ii) of the Core Strategy. There is also no requirement for a site to be formally designated to qualify for LGS Designation. The "East Lindsey Green Infrastructure Study" (2013) states that Alford is seriously deficient in access to green infrastructure, for both biodiversity and accessibility green space, when compared to Natural England's Accessible Natural Greenspace Standards</p>	No Change required
3	Turley Associates	Support Noted	No Change required
4	Turley Associates	<p>Although the NPPF establishes that planning should be based on adequate, up-to-date and relevant evidence, there is no requirement for assessments and evidence collection to be performed by a chartered body/authority, as long as the methodology is adequate and the assessment based on proportionate evidence. This is particularly true for Neighbourhood Plans, which are produced by local communities.</p> <p>Local knowledge and public opinion are pivotal evidence in the Neighbourhood Plan process. Neighbourhood Plans give "communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need", and Local Green Space aims to assess intangible, qualitative elements such as "special to the local community" and</p>	No Change required

		<p>"local in character": public opinion and community consultation are deemed adequate instruments to assess these elements.</p> <p>In conclusion, the Steering Group believes that the assessment is indeed based on robust and credible evidence, and that in this instance involvement of a chartered body was neither required nor proportionate, and recognises the value of public opinion in the LGS Assessment process.</p>	
5	Turley Associates	<p>The Steering Group agrees that the assessment should be supported by a robust evidence base. However, it is unclear from whence the consultee derived the list of very specific documents: such a detailed requirement is not set out in the NPPF nor in any other guidance available to the Steering Group.</p> <p>The assessment of the Steering Group is informed by different, yet robust and proportionate, evidence and assessment, listed in the next comments. Again, the Steering Group recognises the value of public opinion in the LGS Assessment process. As explained below, it concludes that the site has a strong local character for its beauty, historic value, recreational and wildlife value.</p>	No Change required
5.1	Turley Associates	<p>This area is a site of undeniable landscape value, in that it provides a beautiful, green, tranquil space close to the town centre. It provides a corridor of green space, connecting this very small market town to its rural setting, with views from the main street (West Street) through to the countryside. It provides the perfect rural, 'estate' setting for the immediately adjacent Manor House, being the main jewel and tourist attraction of the town, which is and has been used for commercial and community events over many decades.</p> <p>These conclusions are backed by consultation with the Alford & District Civic Trust, which has offered its views celebrating the heritage and history of the proposed Bull Fair Field as a Local Green Space. The Alford & District Civic Trust has a significant authority from its professional standing as an accredited museum with substantive recognition as a local centre of excellence for curating</p>	No Change required

		<p>exhibitions and archiving artefacts from Alford's heritage. In particular, the Trust highlighted that:</p> <ul style="list-style-type: none"> As the only open land abutting directly the grounds of the Manor House, there are unspoilt views from the House. <p>Many visitors and local people enjoy town and countryside walks around the numerous footpaths circling the town with the House and the Bull Fair field as a particular focal point.</p>	
5.2	Turley Associates	<p>This area was used by the community for the Lincoln Red Cattle Show and Sales, which were well known across the country at that time, and it was also part of Alford Manor House Estate.</p> <p>The Alford & District Civic Trust highlighted that:</p> <ul style="list-style-type: none"> Certainly in living memory, and probably from time immemorial, this land has been in permanent pasture. The proximity of this last remaining piece of land in agricultural use in the town centre constitutes an important historical link to the town's feudal roots. A gate in the rear boundary of the Manor House provided access to and from the field on which the town's renowned Bull Fairs was held. The Bull Fairs were established by the initiative of a local solicitor towards the end of the 19th century and flourished for almost 100 years, before in 1986 they were transferred to the Lincolnshire Showground. As such, the Bull Fair field emphasises the rural characteristics and connections of the town with its mediaeval past and its retention as green space is essential to the heritage the Trust aims to preserve for the town and the public. 	No Change required
5.3	Turley	<p>With the co-operation of the tenant farmer, the field has been used several times to site a music and entertainment marquee and</p>	No Change required

	Associates	performers' parking during the 3-day August Bank Holiday Craft Market and Fair in the Manor House, with its grounds used for the core events.	
5.4	Turley Associates	<p>When the Alford Character Appraisal was carried out, ecological, landscape, heritage and other information was known to the appraisers, from their and others local knowledge. Moreover, Greater Lincolnshire Nature Partnership has provided 185 recorded wildlife sightings for the period 1970 to 2016, which are referenced within, adjacent or near the Bull Fair Field.</p> <p>In carrying out the Alford Character Appraisal, the appraisers were aware of the substantive knowledge relating to the field, which was part of the consideration for designating it as a Local Green Space. These considerations included the wide range of fauna locally observed within this local ecology. Little egrets (only approx. 600 breeding pairs in the UK), buzzards, barn owls, tawny owls, green and greater spotted woodpecker, deer, rabbits, brown hares, weasels and stoats, foxes, hedgehogs, field voles and field mice are amongst the wildlife seen in and around the field and, along its margins abutting the Wold Grift Drain, also supporting a locally significant population of kingfisher and little grebe, many of which have not been formally recorded with GLNP.</p> <p>Additionally, the Environment Agency in its Regulation 14 response has made very positive comments about the proposal for this field because of the great potential to link up with the action of the Lincolnshire Wolds Countryside Services in their Wolds Chalk Stream Initiative (part of the UK Biodiversity Action Plan) as the Wold Grift Drain, which borders the site to the west, is included in the initiative. The Environment Agency have indicated that much work needs carrying out on the Wold Grift in order to achieve the aims of the Chalk Stream Initiative.</p>	No Change required

6	Turley Associates	<p>There is no statutory requirement in terms of the designation of a Local Green Space: sites are proposed for designation based on local value.</p> <p>However, the "East Lindsey Green Infrastructure Study" (2013) states that Alford is seriously deficient in access to green infrastructure, for both biodiversity and accessibility green space, when compared to Natural England's Accessible Natural Greenspace Standards", which is a less than optimal situation. The Plan aims to redress this trend using Policy 7 in combination with Policy 8.</p>	No Change required
7	Turley Associates	<p>The size of one Local Green Space in comparison with the other is not a statutory criterion that should influence designation, and the Steering Group is not aware of any official document or guidance stating the contrary.</p> <p>Regarding the comment on imbalance, in a town as old as Alford, developed over centuries, green spaces simply could not be found proportionately across the settlement. Policy 7 aims to protect the most locally valuable Local Green Spaces, irrespective of their location, but based solely on the statutory criteria listed in the NPPF. Policy 8 aims to set out the requirement for the creation of more open spaces through development all over the town, including areas in the south and the west.</p>	No Change required
8	Turley Associates	<p>The term ancient is used in relation to the history of the site, please refer to the comments of the Alford & District Civic Trust in comment "5.2 Turley Associates".</p> <p>The Steering Group recognise that the site is considerably bigger in size in comparison to the other proposed designations: however, the NPPF does not set a maximum requirement in terms of size, precisely to leave the necessary flexibility based on the urban context. The NPPF mentions that the site should be "local in character and is not an extensive tract of land", effectively making</p>	No Change required

		<p>extensiveness not an absolute concept but linked to the context of “local in character”. The Steering Group assessment used this conclusion as a starting point, mentioning that the size of the proposed site is “local in character” for this part of the town, and that its size is not out of character if compared with the size of parks one would reasonably expect to encounter in the centre of a town like Alford. The term “feel” and “typical” need to be interpreted in this sense.</p> <p>In light of this, the Steering Group consider the size appropriate and local in character, hence not unduly extensive.</p>	
9	Turley Associates	<p>The Steering Group does not agree that the level of protection granted by the Policies mentioned in the comment is sufficient to protect a site of this value. The Steering Group believes it has extensively demonstrated the value of the site according to the NPPF criteria, which automatically means that the site is so special to the local community as to require the level of protection granted by the LGS designation</p>	No Change required
10	Turley Associates	<p>The land is indeed not directly designated under the Policies of the ELDC Core Strategy. However, the Steering Group does not acknowledge the relevance of this comment. It is customary for Local Plans to set general requirements in term of protection of local green space, and leave to Neighbourhood Plans the power to identify specific small scale sites in the local context, using in particular LGS Designations. In ELDC’s case, this is done through Strategic Policy 25 i) & ii) of the Core Strategy. There is also no requirement for a site to be formally designated to qualify for LGS Designation. The “East Lindsey Green Infrastructure Study” (2013) states that Alford is seriously deficient in access to green infrastructure, for both biodiversity and accessibility green space, when compared to Natural England’s Accessible Natural Greenspace Standards</p>	No Change required

11	Turley Associates	As demonstrated in the comments above, the Steering Group believes that Bull Fair Field site meets all the criteria set out in the NPPF, that the evidence collected in the Alford Character Assessment supporting the claim that it holds particular local significance are sound and verified by extensive community consultation on the document. The Steering Group also believes that the site is not extensive in size according to the NPPF definition.	No Change required
1	Landowner 1	As part of the Regulation 14 Consultation and previous consultations, the Steering Group received a significant number of comments opposing the allocation of site AL316. This comments resonate with the concerns raised by Anglian Water and the Highway Officer regarding allocation. Considering the lack of community support, site AL316 has been removed from the allocation of Policy 1. The Steering Group highlights that allocation is not the only way new housing will be built in Alford, but rather a way to ensure a minimum number of houses will be built in the future; the windfall development that meet the requirement of Policy 3 will be supported. If the site meets the criteria of Policy 3 the landowner should submit a planning application in the future explaining how the site meets the criteria set out in the policies in the Neighbourhood Plan and in the ELDC Core Strategy	AL 316 have been removed from the allocation in Policy 1: Site Allocation, from Policy Map1 and from the Housing Site Pro-forma Document,

Figure 5. Non-statutory Consultees – Response to Comment and Changes to the Plan

4. Appendixes

- Appendix A: Neighbourhood Plan Area Designation (see separate document)
- Appendix B: Pre-submission Consultation Materials (see separate document)
- Appendix C: Regulation 14 Consultation (see separate document)