**Responses to the Neighbourhood Plan Consultation – Summer 2016**

***The Coal Authority – response on 12th July***

Nothing in the document which affects them so no comment

***Leeds Forward Planning - detailed response from Ian Mackay***

|  |  |
| --- | --- |
| The Chair  Bardsey cum Rigton Parish Council  Neighbourhood planning steering group | **City Development** |
| Forward Planning and Implementation |
| The Leonardo Building |
| 2 Rossington Street |
| LEEDS |
| LS2 8HD |
|  |
| Contact: Ian Mackay |
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| Email: [ian.mackay@leeds.gov.uk](mailto:ian.mackay@leeds.gov.uk) |
|  |
| Date: 28 July 2016 |
|  |

Dear Sir/Madam

**BARDSEY CUM RIGTON PRE-SUBMISSION NEIGHBOURHOOD PLAN – FORMAL COMMENTS**

Thank you for consulting the Council on the Pre-Submission Bardsey Neighbourhood Plan. There has been excellent collaboration throughout the preparation of the plan and the plan presented is both locally distinctive and high quality. The steering group are commended on preparing the plan and the significant time and effort made over a number of years.

The Council considers the plan is in general conformity with local strategic policies and has regard to national policies. There are, however, a number of areas where the plan could be improved. Some of these have already been discussed with the steering group at a recent meeting in July. The parish council are under no obligation to make the changes suggested. For ease of understanding, comments are grouped under the following headings:

**1. Timing/risks** – the risk of proceeding with a neighbourhood plan in the absence of an approved Site Allocations Plan

**2. Basic Conditions** – the neighbourhood plan will be assessed against the Basic Conditions at examination

**3. General comments**

**4. Planning policies** – detailed comments on each policy.

**1.​Timing/risks**

1.1​ There will be consultation in the ONE area in the autumn on proposed modifications to the SAP, subject to Executive Board agreement in September. At the moment, it looks likely that the Bardsey Neighbourhood Plan could be adopted in advance of the SAP. Given this, there is a small risk that elements of the neighbourhood plan could be superseded.

**2.​Basic Conditions**

2.1​ At examination, a neighbourhood plan will be judged on whether it complies with the Basic Conditions set out in paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990. The following are considered to be relevant to the Bardsey draft neighbourhood plan and comments are made on these in relation to the content of the draft Plan:

a) Having regard to national policies and advice contained in guidance issued by the Secretary of State

2.2 ​The draft Bardsey Neighbourhood Plan is considered to generally have regard to the provisions of the NPPF. It promotes sustainable development and by and large supports the strategic development needs and priorities set out in the Leeds Core Strategy. The development needs of the area have been assessed and the Plan contains policies and guidance to positively direct and shape future sustainable development to enhance and improve the area. Policies address a wide range of issues highlighted in the NPPF including housing mix, design quality, conservation of heritage assets, biodiversity, historic rural character, the protection of village facilities and green spaces.

2.3​​ The draft plan does not include policies on energy efficiency, on-site generation and community generation. These are important considerations in the NPPF and something the parish council may wish to consider.

b) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development

2.4​​ Overall, sustainable development is a core theme running throughout the document and this is clearly reflected through many of the policies and backed up (to some extent) by appendices. The plan is focussed on the protection and enhancement of the existing environmental, social and economic characteristics of the parish. It contains specific reference to protecting and improving open space provision, footways, footpaths and cycle ways. The plan does not, however, set out ‘projects’ or 'community actions' and perhaps this should be considered, in particular in relation to CIL priorities (but also in instances where it would be more appropriate for a proposed policy to be a ‘project’ or ‘community action’).

c) That making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority.

2.5​​ The policies contained in the draft Bardsey Neighbourhood Plan should be in general conformity with the strategic policies of the Local Plan. The Core Strategy was adopted in November 2014. There are also a number of RUDP policies that are ‘carried over’.

2.6 ​​Most policies in the Core Strategy that concern a wider area than just the parish might be considered strategic. Where appropriate, comments are made on the general conformity of the draft neighbourhood plan with adopted local strategic policies.

d) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

2.7 ​​Following consultation with the Environment Agency, Heritage England and Natural England it is considered that the neighbourhood plan will not have a significant positive or negative effect and so a Strategic Environmental Appraisal will not be required.

**3. General and other Comments**

* May wish to provide more information on who the key stakeholders are and how they have been involved
* Be careful not to place too much emphasis on questionnaire results
* There are a significant number of policies that could be more robust (see specific comments below)

**Biodiversity**

It would be useful to have a plan showing the nature conservation designations (Hetchell Woods SSSI, and Local Geology Sites) as per Core Strategy Policy G8, and also show the Updated 2014 Leeds Habitat Network as per Core Strategy Policy G9 on the same plan. The nature conservation designations and Updated 2014 Leeds Habitat Network can be sourced from West Yorkshire Ecology <http://www.ecology.wyjs.org.uk/>

It would be good to have an objective or action that affords a level of protection to all these biodiversity features as well as seeking to enhance them and their connectivity. The NPPF specifically refers to coherent ecological networks – may be the neighbourhood plan could go a stage beyond the Updated 2014 Leeds Habitat Network and seek to identify additional local biodiversity corridors to “improve” the network shown by the Updated 2014 Leeds Habitat Network.

The Objective should not only refer to protection and enhancement of the designated sites but also protection and enhancement of the land within the Updated 2014 Leeds Habitat Network as a minimum.

Magnesian Limestone is an important underlying geological rock type – both for scientific study and education. Some text could refer to this and use pictures of the Local Geology Sites as an example <http://www.wyorksgeologytrust.org/sitesleeds.html>

**Urban Design**

Page 25 policy BE1 (iii) should refer to ‘Building for Tomorrow Today’ (BFTT) Sustainable Design and Construction SPG. Appendix 4 – add BFTT

Page 28 Policy BE5 a map to illustrate the opportunities for new habitat corridors and green links would be useful. Reference to ‘improved drainage’ should be clear this refers to the added benefits of the new habitat corridors and green links (tree planting) to improve drainage.

Page 29 Policy H1 Are there any specific sites to propose? Design Team could help with site analysis and concept plans.

P35 Greenspace and new footpaths, There is an opportunity here to mention potential new green corridors and links to local greenspace. There is a list of Definitive Footpaths in the appendix but needs to also show proposed new footpaths that provide green links to local greenspace. A map to illustrate these opportunities would be useful.

**The use of “we”**

* There are a number of references to “we” in the plan and it is not clear who this refers to, although it seems to be the steering group. For example, Page 4 – “We worked with the parish council throughout, including presentations at their annual meetings.” The Submission plan should be written from the perspective of the plan becoming part of the Development Plan for Leeds.

**Repetition**

* There is some repetition of local planning policy. Some examiners see no harm in this whilst others recommend that any repetition is removed from the plan. In general terms, the plan should seek to be locally distinctive.

**Photographs, maps and plans**

* The photographs, maps and plans are high quality and the labelling of photographs is welcome.

**Proposals map**

* May wish to consider the addition of a proposals map.

**‘Future-proofing’**

* Suggest that a ‘future-proof’ check is carried out to consider how the plan will read in say 5 years time.

**“Will seek to”**

* Generally, it is better to use ‘should seek to’ or ‘should’

**Non-designated heritage assets**

* ‘Non designated heritage assets’ – suggest a policy is added to support Appendix 1 and assets are shown on a plan.There is a real opportunity for the plan to be much more locally distinctive with regard to local assets.

**4. Specific Comments on the Draft Planning Policies**

Policy LRE1 ‘Conserving historic rural character’

* Covers a lot and may be better to break up. For example, a separate policy on views.
* A bit vague. Replicates Core Strategy policies to some extent. Might not want to reflect the character of its immediate locality if existing is poor. Need to identified exact skyline locations.

Policy LRE2 ‘Enhancing the public rights of way network’

* Reference to “new development will protect intended routes…” needs a rethink.
* Perhaps cautious about new development protecting “the intended routes of new footpaths”. Not sure what this really means. Should it allow for the provision of routes through new development sites instead ?

Policy LRE3 ‘Biodiversity, conservation and enhancement’

* Positive worded condition. LCC have policies to protect habitats, etc.
* See general comments on ‘biodiversity’

BE1 ‘High quality building design’

* Reference to “respect the original design” includes design that may not be high quality. Don’t want to respect scale and character of existing buildings if they are poor quality.

BE2 ‘Improving streets and street scene’

* replace “will” with ‘should’
* exclude areas outside the parish
* unclear what is “unnecessary street signage”
* Need to clarify what “village gateways” are. Perhaps need to clarify what type of new development this policy is aimed at. It’s not buildings as this is covered by BE1.

BE3 ‘Managing car parking’

* Delete reference to “as a rule”.
* Perhaps the word “dedicated” should be removed or the sentence reworded.
* Don’t think we could insist on 2 parking spaces if the new housing development was a smaller unit for example (1 bed).
* Unclear what is meant by on-road parking bays (for new development sites – if they envisage any new housing sites) as it wouldn’t be existing streets

BE4 ‘Maintaining dark villages’

* Although ‘watered down’ from previous versions it is not entirely within remit of planning policy. However, part ii is OK.
* This would not usually require planning permission. It maybe something that could come from new housing development is they are built to adoptable standards. But any s38 Agreement (Highways Adoption) could seek to avoid street lighting (Park Lane Homes site off Woodacre Green in Bardsey).

BE5 ‘Integrating green infrastructure’

* This is largely aspirational
* A plan would be helpful
* Question meaning of “optimum multi functionality’.

H1 ‘New housing’

* This is fairly unclear, wordy and restrictive – previously discussed with steering group and welcome further discussion on revised policy.
* What is meant by “extraordinary event of a green belt exception site being proposed? Does this mean that if a green belt site for housing is proposed adjacent to the existing settlement boundary (which there are plenty of sites) then it would be appropriate ? Green Belt policy in the NPPF is very strong relating to development in the Green Belt.
* ii. All new development might not be able to achieve this.
* iii. Seems to impose a ban on all development in garden sites. Some garden sites, if developing sensitively, may be entirely appropriate.
* iv. I wonder what is meant by brownfield sites not being available.

H2 ‘Housing size and type’

* Repetition between i and ii – reference should be made to ‘most up to date assessments’ rather than “the housing needs survey”
* Policy H4 of the Core Strategy relates to housing mix. Second part is more aspirational.

H3 ‘Supporting sustainable development’

* Most of this can only be aspirational.

H4 ‘Scale of development’

* Policy should refer to ‘should seek to’ rather than “Support will be given”
* Might not want new housing development to reflect their surroundings, if surroundings are poor.

E1 ‘Small business development’

* Generally too wordy and restrictive.
* Home working would not ordinarily require planning permission, provided it is ancillary to the dwelling. Not sure if we can prevent changes of use from existing businesses unless they can prove it to be unviable. Not sure if they are really any business premises in Bardsey anyway.

Policy E2 ‘Farm diversification’

* Broadly OK but already covered by NPPF and other CS policies.

Policy E3 ‘Redundant Buildings’

* Shouldn’t this read “proposals for **the conversion of** redundant buildings” ?  Not sure why this policy is here and what it is seeking to achieve.

Policy CF1 ‘Retaining key community services and facilities’

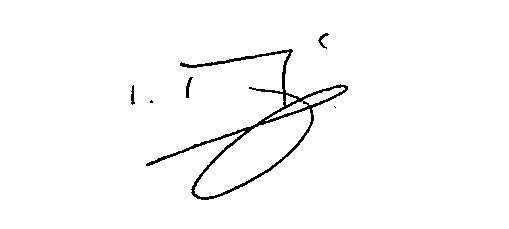
* Delete ii
* Aspirational. Not sure if this would prevent the redevelopment of say the village shop or the sports club if an application was submitted.

CF2 ‘Local Green Spaces’

* The policy should ***designate*** appropriate sites as Local Green Space.
* It is not entirely clear where the sites listed in Table 2 are therefore they should be plotted on a plan and detailed boundary plans should be produced for each site.
* More detailed assessments of each site should be included (may be in an appendix) which clearly justify the Local Green Space designation. Useful guidance on what can be identified as Local Green Space is contained in the Planning Practice Guidance Note <http://planningguidance.communities.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/> which is based on para 77 of the NPPF <http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/8-promoting-healthy-communities/#paragraph_77>. Local Green Space designation must be used for reasons set out in the NPPF and *not* to resist development. In particular a site must be “demonstrably special to a local community and hold a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.” The Open Space Society has produced some useful guidance notes which can be found at <http://www.oss.org.uk/what-we-do/protecting-open-space/> and <http://www.oss.org.uk/wp-content/uploads/2016/04/C20-Local-Green-Space-Designation.pdf>
* Green space can be designated in the Green Belt.However, Green Belt provides a high level of protection therefore it should be questioned whether a green space designation would be justified and appropriate, especially where there is no public access and no intention to develop the site.
* **Sites listed in Table 2 -** Without an annotated plan it is difficult to identify where these sites are and therefore to make specific comments. The designation of each site should be supported by an assessment. Some are identified as green space in the Site Allocations Plan e.g. Hetchell Woods, Hellpot Woods, Bardsey Primary School, and therefore are protected however they can still be designated Local Green Space in the neighbourhood plan.
* More detailed comments will be provided on each once the boundaries are clear.

We would encourage a meeting once the parish council has had a chance to consider all the representations made and to assist with any changes to the plan if needed.

Yours sincerely,



Ian Mackay

City Development

Leeds City Council

***West Yorkshire Archaeology Advisory Service – response from Ian Sanderson***

**From:** "Sanderson, Ian" <Ian.Sanderson@wyjs.org.uk>  
**To:** Ed Stentiford <edstentiford@yahoo.com>   
**Sent:** Thursday, 28 July 2016, 15:34  
**Subject:** RE: Bardsey cum Rigton Neighbourhood Plan

Dear Ed,

Further to your email below, asking for comments on the above by the West Yorkshire Archaeology Advisory Service.

Thank you for consulting WYAAS.

My main comment is that we hope you might consider strengthening and broadening references to the historic environment in your Neighbourhood Plan.

It is correctly identified as a national priority on p19 but the NP’s Objectives on p.21 do not mention the historic environment (although the built environment &

the natural environment are given separate objectives.). (The term “built environment” is rather limiting in its scope & is separate from the term “historic environment”

in the National Planning Policy Framework. )

For instance in your section 4.2.1 Historic Rural Character (p.23), by changing Objective 2 to read “maintain and improve the character of the historic environment” you would be including

historic hedgerows as well as buildings in the scope of the term.

We would welcome specific reference in the NP to preserve the settings and views of the castle site, the church & other listed buildings.

Policy LRE3: We would suggest some tweaks to the wording of Policy LRE3  to read “ Developments which protect or conserve, enhance and interpret  the Parish’s rich heritage …. will be supported”.

You might usefully add …”and Historic England and the West Yorkshire Archaeology Advisory Service for historic features” to the last sentence

Rationale: Protection is a more static term than conservation whilst conservation includes an element of managed improvement directly to the asset. Enhancement is something that might be

something not carried out directly to the heritage feature but still affecting it positively e.g knocking down an unsightly modern building in a conservation area may well enhance the CA.

interpretation might be something a developer might be prepared to do as part of planning gain to the community.

Bardsey is situated in an area of West Yorkshire where we possess many aerial photographs showing an extensively farmed landscape during the Late Iron Age and Romano-British periods (say c400BC – AD400). Should development

occur in or around Bardsey we would hope the NP would strengthen the case for appropriate archaeological investigation. We would also be particularly keen to ensure that any development

in close vicinity to the castle or church sites were archaeologically investigated and it would be very helpful if the NP shared this objective as it is the only way we are going to directly find out more about

key elements of Bardsey’s past.

Policy BE1: section ii – we would suggest adding “roof coverings” to the list of items, given roof tiles (particularly their colour) have a major and obvious visual impact.

I have attached a text that WYAAS wrote for Leeds City Council in 2008 on Bardsey’s Conservation Area that you are welcome to use to selectively strengthen section 2.1 in the NP, if you wish.

Minor suggested amendments:

p.12 Castle Hill motte and bailey castle (a Scheduled Ancient Monument, rather than grade II)

Further information on listed buildings and the historic environment (rather than environmental) record….

I’d also suggest adding the additional sentence:

“The West Yorkshire Archaeology Advisory Service (WYAAS) holds and actively maintains the West Yorkshire Historic Environment Record which

Is publicly accessible and available for consultation.”

I hope that is helpful. Please don’t hesitate to get back in touch if you would like to discuss anything further.

Yours sincerely,

Ian

***CPRE – Michael Church***

**From:** michael church <church\_mj@yahoo.com>  
**To:** "edstentiford@yahoo.com" <edstentiford@yahoo.com>   
**Sent:** Friday, 22 July 2016, 14:36  
**Subject:** Fw: Bardsey cum Rigton Neighbourhood Plan

Good Afternoon Mr Stentiford

Apologies for delay in replying due to holidays.

I am asking our Planning Officer to reply to you.

Best regards

Michael Church

 58 Alexandra Crescent  
Birkdale Road  
Dewsbury  
West Yorkshire  
WF13 4HL  
  
Tel: 01924 462811  
Mobile: 0777 607 7289

----- Forwarded Message -----  
**From:** CPRE National Office <info@cpre.org.uk>  
**To:** "'edstentiford@yahoo.com'" <edstentiford@yahoo.com>   
**Cc:** "'church\_mj@yahoo.com'" <church\_mj@yahoo.com>  
**Sent:** Tuesday, 12 July 2016, 11:43  
**Subject:** FW: Bardsey cum Rigton Neighbourhood Plan

Dear Mr Stentiford,

Thank you for your email, please accept my apology for the delay in getting back to you.  I have today forwarded your email to CPRE West Yorkshire as local issues are dealt with by them, they will get back to you as soon as they are able.  Please feel free to contact them directly their details are below.  In the meantime you may wish to visit our planning help website: [http://www.planninghelp.org.uk](http://www.planninghelp.org.uk/) /

 National office have a planning hotline that operates every Thursday 1.30 - 3.30, Tel. 020 7981 2868 - this line has been set up primarily for our members to speak to National Office's Planning team on specific planning queries or issues, however we are more than happy to deal with planning queries from non-members.  If you would like to take advantage of this privilege time please call on Thursday between 1.30-3.30 for help.

 Lastly you can also contact Planning Aid who give free advice to members of the public: <http://www.rtpi.org.uk/planning-aid/contact-us/>    Advice Line: 0330 123 9244 or General Enquiries: 020 3206 1880.

 Your local CPRE branch follows:

**West Yorkshire**

**Contact:** Michael Church, Trustee

58 Alexandra Crescent  
Birkdale Road  
Dewsbury  
West Yorkshire  
WF13 4HL

**Telephone:** 01924 462 811 or 07776 077289

**Residents**

***Simon Padgett***

**From:** Simon Padgett <simon.padgett@kwuk.com>  
**To:** edstentiford@yahoo.com   
**Cc:** info@bardseyvillage.org.uk  
**Sent:** Tuesday, 19 July 2016, 15:22  
**Subject:** "Neighbourhood Plan".-

Dear Mr Stentiford

I live at Overdale on Margaret Avenue in Bardsey and as a Bardsey resident I think that the bowling and tennis clubs are of significant value as village assets and feel it is very important that they remain in the village core providing recreational activities in a designated green space.

**Kind Regards**

**Simon Padgett**

**Operating Principal**

**Keller Williams Leeds Central (KWUK)**

***Andrew Dodsworth***

**From:** Andrew Dodsworth <dodsworthandrew@hotmail.com>  
**To:** "info@bardseyvillage.org.uk" <info@bardseyvillage.org.uk>; Ed Stentiford <edstentiford@yahoo.com>   
**Sent:** Tuesday, 28 June 2016, 22:28  
**Subject:** Neighbourhood Plan Feedback

Dear Ian, Ed,

I would like to feedback my comments on the neighbourhood plan.

In relation to the Bowling Club and Tennis Club under *Section 4.6 Page 34* in the plan covers *Community facilities* and discusses retention of community services and facilities and local green spaces, of which the bowling and tennis clubs both sit.

I value and believe the community also value the bowling and tennis clubs as village assets and would ask that the Parish Council consider applying for asset status for these facilities so they are protected from future development. As per objective 5 under section 3.3.

In my opinion it is important that the clubs remain in their existing locations in the village core in a designated and permanent green space for sport and social activities.

I believe the current location of the village bowls and tennis clubs and village hall help to preserve the character of our small village.

As you may imagine I do not want the Parish Council to consider any development on these sites.

Other Comments

I think the plan is well structured and easy to understand.

A few points which I don't understand are: Why are there differences in the village core descriptions for the village areas for conservation and for residential, should these not be the same as a village core is surely consistent i.e. the same area?

Would it add value to include a historic table of numbers of houses and residents for the last 50 years and forecasted for the next 20?

The reason I say this is that there have been significant changes in the 60's and 70's when several estates were built (some by my dad and grandad) and it would also highlight the village has expanded relatively recently.

You may or may not be aware that the email contact on the back of the Neighbourhood plan document is incorrect so this may limit the number of responses you receive. It maybe helpful to have the correct address on the website next to the two documents?

I have asked all our Bardsey resident bowling members to feedback their thoughts on the plan, though I gave them the wrong email which I'll correct.

Kind Regards

Andy Dodsworth

Note from EIS – there were several additional submissions about protecting the bowling green and tennis courts. Most of these were of similar/identical wording.

***Geoffrey and Pauline Tatman***

**Comments on Bardsey-cum-Rigton Neighbourhood Plan**

**Submitted by Geoffrey and Pauline Tatman.**

Firstly, we would wish to commend the NP Steering Committee (SC), for its very considerable input, over a 4.5 year period, culminating in this pre-submission draft.

Secondly, you will not be surprised to see that the majority of the following comments refer to the crucial issue of housing. The common thread to these comments can be attached to the words ‘development’ and ‘plan’. Indeed, in the Foreword to this document, the Chairman uses the word ‘development’ 5 times and the word ‘plan’ appears 8 times. There is also specific reference to the matter of housing development on 4 occasions in paras. 4, 5 and 6. It is also referred to as a key issue in para. 1.2 on page 7. Further support to the importance of this issue is given at para. 1.1 on page 5, specifically ‘principal objective.................use and development of land’ and ‘The NP...................should be in favour of appropriate development’.

The main thrust of our criticisms of this draft, is that there is a major dis-connection between these positive introductory sentiments and the actuality and deliverability of the housing policies, starting on page 29.

A ‘key consultation activity’ (page 7) of the NP was the Housing Needs Survey (May 2013). At that time, this was considered to be a very important element of the evidence base needed for this NP. Indeed, if memory serves us correctly, over £3000 was paid to Rosemary Kidd, the consultant. Her conclusions and the inferences drawn from them by the Steering Committee have led to the statement at para. 4.4.1.1. It is a matter of great regret that this NP’s housing policies do not actually provide for approximately this number of dwellings, in a site specific way. When David Gluck announced at his first appearance at a Steering Committee meeting, that he was not going to address the issue of sites, his view should have been questioned and countered at that time. Sites are a contentious issue, but that is no reason for not tackling it. One of the opinions expressed by parishioners during the preparation of this plan showed 76% in favour of site specific housing policies rather than generic ones. To ignore this majority view has been at the core of long-running discontent over this NP’s housing policies. Site specific policies would give certainty to vendors, developers and parishioners. Crucially, the final sentence of para. 4.4.1.1 recognises the obstacles and the dis-connect over this whole issue, (Green Belt, Housing Needs Survey, sites), but the following generic policies make no substantive efforts to address the problem. This is a failure in principle, of the whole of Section 4.4 of this plan.

We turn now to the individual policies :-

Policy H1.

i The call for sites within the existing built up areas and outside the Green Belt (GB), resulted in NO sites coming forward. There is absolutely no point in having a policy to which the answer is NIL. This whole document does not refer to the GB washed-over areas, which are already within the existing built up area of Bardsey. This is a serious omission and is seen by many, to be a missed opportunity. In our view, infill in these areas could provide, subject to all the desired quality parameters, approximately 20 dwellings, of the type required by the HNS. This possibility has never been explored by the Steering Committee. Earlier this year, in a consultation by central government, the opportunity was given to NP’s, to discuss GB in their plans, particularly where some small allocations were driven by ‘local need’, as is the case in Bardsey. As far as we are aware, the SC did not respond positively (or at all) to this opportunity.

iii This sub-policy is wrong, unfair and ignores completely, what has been taking place in Bardsey over the past decade, at least. During the development of this plan, we provided detail to the SC which showed that 60% of recent housing had been built in backland or gardens. These developments were clearly acceptable to Leeds City Council. We are not aware that LCC has changed its policies in this area. This NP should include a specific Infill policy. Indeed, LCC provided the SC with an example Infill policy during the preparation of this NP.

iv Development of ‘previously developed’, ‘brownfield’ or ‘greenfield’ land is an area already covered by LCC policies. There is no point in trying to replicate them in this NP. In any event, it is unreasonable to expect a developer to have comprehensive knowledge of the existence of brownfield sites in any particular area, or of their availability.

Policy H2.

ii We consider it is outside the remit of a NP to prescribe the number of bedrooms to be provided in new housing.

While the picture on page 30 is titled as ‘Typical’, we think it is misleading to illustrate a style of housing which is atypical of housing in Bardsey.

Policy H3.

We are not convinced that this policy is a requirement elsewhere in the LCC area. In our NIMBYistic society, most views obtained in such a scenario are likely to be negative. As such, they may be of limited usefulness.

ii These factors are already an integral part of a planning application covered by existing procedures. There is no need to replicate them here.

Finally :-

On page 38, Path No.1 – we walk this path regularly. Yes, there is a stile at both ends, but there are no field gates, en route.

We ask that you take these comments into consideration, in line with the penultimate paragraph of the Formal Consultation Phase letter.

Geoffrey & Pauline Tatman.

28th July 2016

***Jack Cairns***

COMMENTS ON BARDSEY NP PRE- SUBMISSION DRAFT

The overall presentation is very professional and of a high standard. The aspirations of the community are comprehensively explored and are clearly summarised in the vision and objectives statements. However, in my view, the draft fails to meet the present and future needs of the community in respect of housing provision and I would like to comment specifically on Policy H1 New Housing, items i and iii

*i) New housing development should be located within the existing built up area of Bardsey and outside the green belt. In the extraordinary event of a green belt exception site being proposed, it should only be considered if located adjacent to the existing built up area*

Comment :- It would be totally unrealistic to believe that a significant number of new houses will not be built in Bardsey within the time span of the NP. Given that there is no available ’non GB land’ within the parish boundary, it is therefore inevitable that ‘ green belt exception sites’ will be released and developed.

The wording, highlighted in red, is therefore misleading in stating “In the extraordinary event”

It is also surprisingly vague in stating “—if located adjacent to the existing built up area”. The NP should be more specific in indicating a preference for the location of GB exception sites. If it fails to do this, it will be vulnerable to exploitation by site developers

*iii) Sites which use back land and gardens which serve to reduce the open aspect of the parish will not be supported*

Comment:- Over 50 new houses have been built in Bardsey over the past 8 years in gardens and back land and all of these have “reduced the open aspect of the parish” to some extent. Such developments will continue in the future and should be supported, not banned. Item iii should therefore be replaced by a positive in-fill policy statement

I hope that the final version of Bardsey NP will address the concerns referred to above

Jack Cairns

29/07/16

***Responses at the drop in on 16th July***

Despite the very poor attendance there was one suggestion made which concerned adding a cherished view. This was from the ‘duck pond path’ looking across to Rowley Wood