

ASPECT OF PLAN COMMENTED UPON	REPRESENTOR	REPRESENTATION MADE	RECOMMENDED RESPONSE
Aberford's Vision Statement	AECOM on behalf of M&G	Page 13, paragraph 6 (Page 14, paragraph 5 of the pre-submission Plan): The text has been changed to 'Aberford and its surrounding rural hinterland will be very much the same'. This is at odds with appendix 14 of the Consultation Statement (which identifies as an action 'amend by replacing 'will' with 'could'...'). However, we would further observe that the word "will" appears in the following paragraph and the two paragraphs should be consistent. The vision statement needs to be considered in the context of the comments below regarding page 15.	The decision to retain 'will' rather than replace with 'could' was taken following the decision to omit the Parlington New Settlement section (formerly section 6) from the plan. The results grid entry at appendix 14 of the Consultation Statement should have been adjusted accordingly. In the context of a plan for which the major development of Parlington is no longer a context, it was considered reasonable to set out a vision for an Aberford which will be very much the same. This is in no way at odds with the use of 'will' in the following paragraph, as this relates to the village's incremental growth which it is considered highly likely over a period of some 10 years. Incremental growth will leave the village very much the same.
5.1 Green Environment - Introduction	AECOM on behalf of M&G	Page 15, paragraph 1 (page 16, paragraph 1 of the pre-submission Plan): A limited change has been made by deleting 'preserve' (in accordance with appendix 14 of the Consultation Statement). However, it is noted that the words 'will remain intact' have been added which is not cited in the Consultation Report. It is questionable whether the use of the word 'intact' is accurate given	The introduction is a summary of the relevant parts of the vision statement and aims which relate to 'Green Environment' not a verbatim reproduction. The insertion of 'will remain intact'

		<p>the allocation of Parlington (MX2-39 and BL1-42 in the Leeds Site Allocations Plan). If the change referred to immediately above (regarding page 13) is made, there would then need to be a consequential change to this paragraph to read “could”, which may address the issue. We would question whether this introduction reflects the vision statement as there does appear to be some conflating of the various aspects of the vision statement. For example, the vision statement refers to the village as being at the heart of the parkland estate landscape; whereas the introduction suggests the parkland landscapes are at the heart of the rural hinterland.</p>	<p>constitutes a small change, not made as a result of Regulation 14 consultation comments, which makes no material difference to the plan. The word ‘intact’ relates to the essence of countryside character and the parkland landscapes which it is maintained will remain intact. Parlington is not an allocated site in the adopted development plan and so does not form a strategic context to this plan. The representation seems to place undue emphasis on semantics within a part of the plan which is of no material significance, i.e. not vision, aim, planning policy or policy justification/evidence.</p>
5.1 Green Environment – Special Landscape Areas policy preamble	Historic England	<p>Special Landscape Areas, para 2:- -The second sentence erroneously refers to the “Celtic/Roman period” – Action: amend to “Iron age/Roman period”; -Aberford Dike is not referred to – Action: include reference to Aberford Dike.</p>	<p>Suggested amendments acceptable.</p>
5.1 Green Environment – Policy GE1	Historic England	<p>1) The policy states that “...development would be acceptable, provided it would not seriously harm the character and appearance of the landscape.” This implies that development which causes “less than serious harm” would be acceptable. Action – remove “serious” from the text. 2) Additionally, the policy does not refer to the ‘significance’ of the landscape. Action – amend 2nd paragraph: “...should have regard to the <i>landscape’s significance</i>, character and special features...”</p>	<p>1) Removal of ‘serious’ would result in the policy no longer being in general conformity with adopted development plan policy UDP N37 – a strategic element of the Local Plan. Policy would as a result exceed the protection afforded by this higher level policy and fail to meet the basic conditions.</p>

			2) Suggested amendment acceptable.
5.1 Green Environment – Community Action	Sustrans	<p>We would endorse working with the Parish Council and others on (page 20):</p> <p>Cycle Routes</p> <ul style="list-style-type: none"> • Improvements to National Cycle Route 66 and wider network improvements. <p>This is a key section of NCN linking Aberford with Garforth and Leeds, and potentially Tadcaster and York in the other direction. The existing NCN67 route alongside the A1(M) goes north to Bramham, Boston Spa and Wetherby. Making it easier to cycle to/from Barwick in Elmet / Scholes and Sherburn in Elmet would also be beneficial.</p>	No response - not a planning element of the plan so not subject to examination.
5.2 Built Heritage	Historic England	This section's title is misleading as the text and policies refer to Listed Buildings, scheduled Monuments, Conservation Areas and Non-Designated Heritage Assets. Action – re-title section 'Heritage Assets'.	Suggested amendment acceptable.
5.2 Built Heritage – Built Heritage Assets policy preamble	Historic England	<p>1) There are 38 grade II listed buildings within the NP boundary. Actions:-</p> <p>2)-include a full schedule of listed buildings within an appendix;</p> <p>3)-include separate sub-section on Scheduled Monuments & Archaeology, including paragraph 3 (<i>NB assume paragraph 4 is actually meant</i>)</p>	<p>1) Paragraph 2, P22 already references these, i.e. 3 grade II*, 33 grade II and 2 registered historic parks.</p> <p>2) A full schedule is already included in the plan's evidence base and referred to from paragraph 2. As the plan has no policies relating to listed buildings, this is considered to be sufficient.</p> <p>3) As the plan has no policies relating to scheduled monuments or archaeology (aside from those specific archaeological sites identified in Policy BH2 as non-designated heritage assets), it is</p>

			considered unnecessary to expand on existing paragraph 4.
5.2 Built Heritage – Policy BH2	Historic England	Several of the “Non-designated heritage assets” are now listed, including: ix. Barwick Lodge x. The Dark Arch xiii. Home Farm xiv. The Ice House xv. The Light Arch xxi. The Stallion Pens xxiv. Wakefield Lodge Action – check and amend list, removing designated heritage assets (which should be included in the Listed Buildings Schedule).	Suggested amendments to policy acceptable, together with concomitant amendments to the Neighbourhood Plan Map, Appendix 4 and the listed buildings evidence base document.
5.2 Built Heritage – Policy BH2	AECOM on behalf of M&G	Page 23: it is recommended that the following be removed from the list (and the map) as they are now afforded Grade II listing by Historic England (and, the case of the former Deer Park, Grade II Registered Park and Garden): ix. Barwick (Thrupenny Bit) Lodge; x. Dark Arch; xi. Deer Park; xiii. Home Farm (in part); xiv. Icehouse; xv. Light Arch; xxi. Stallion Pens; and xxiv. Wakefield Lodge. The deletion of the above is likely to result in consequential updates being required of other sections of the Plan (such as the appendices).	Suggested amendments to policy acceptable, together with concomitant amendments to the Neighbourhood Plan Map, Appendix 4 and the listed buildings evidence base document, with the exception of xi. Deer Park, Parlington (aka Parlington Park). Its location within the registered Park and Garden does not preclude its separate identification as a non-designated heritage asset on the basis of its heritage assessment as set out in appendix 4 of the plan. This is consistent with the listing of other assets located within the Registered Park and Garden.
5.4 Housing – New Housing Development-key	AECOM on behalf of M&G	Page 31, final sentence prior to policy H1: this refers to the integration of any such development into the existing linear form of the village being particularly important to the community.	Suggested amendment acceptable.

Guiding Principles policy preamble		Previously this text immediately preceded what is now policy H2, relating to development on nonallocated sites. This statement is not applicable to MX2-39 and BL1-42. We have noted that the bullet point requiring consistency with the linear form has been deleted from the now policy H2 and if this sentence is still required we would suggest that the words “where appropriate” be added after “village”.	
5.4 Housing – Policy H1	AECOM on behalf of M&G	<p>Page 31, Policy H1: We have concerns over some of the requirements within this policy as follows:</p> <p>It is noted that this in part reflects the Site Requirements of Policy MX2-39 and BL1-42 (Parlington) of the Leeds Site Allocations Plan. The use of the words ‘agreed’ and ‘agreement’ within the Neighbourhood Plan might be misinterpreted as requiring agreement within the Parish Council or the Neighbourhood Development Plan Management Group, which we assume is not the intention. Policy MX2-39 of the Site Allocations is clear that the Local Planning Authority agrees to the documents identified in the limb of this policy as part of the planning application process. Of course, M&G will ensure that the Parish Council will have the opportunity to comment on the emerging planning application and Leeds City Council (as Local Planning Authority) will consult stakeholders as part of the planning application. Consequently, it is recommended that the wording be amended to better reflect the requirements of Policy MX2-39 and BL1-42 to avoid any misunderstanding that such documents ultimately need to be agreed with the Parish Council or Neighbourhood Plan Group. The Council is aware that M&G have been preparing a Masterplan Report in support of MX239 and BL1-42. The Draft Masterplan Report is attached at Appendix 3 to this response. The Draft Masterplan is indicative and remains an evolving piece of work; it demonstrates one way in which a sustainable new Garden Village community could be developed but it does not seek to prescribe</p>	<p>As this plan, once ‘made’ will form part of the Local Plan for the area, all policies, including H1, have been drafted as Local Plan style policies to be implemented by Leeds City Council in the same way as all other Local Plan policies. As such, the use of ‘agreed’ and ‘agreement’ relates to the relationship between the local planning authority, applicant and any other statutory agencies as required and not to the parish council or its neighbourhood plan management group.</p> <p>That said, a re-wording of ‘limb i.’ along the following lines would be considered acceptable:-</p> <p>i. For major developments a Local Planning Authority approved strategic approach, based on the preparation of the following documents:-</p>

		<p>this in detail. The development of a Draft Masterplan represents the catalyst for a wider process of community and stakeholder engagement that will broaden the vision and refine the key development principles that will be undertaken before and during the Planning Application process.</p> <p>It is recommended that the sentence between limbs i. and ii. is reworded as it appears to be missing some words.</p> <p>Limbs ii. iii. and v. are absolute in that they do not allow any development which would result in adverse impacts. This is considered to be unreasonable and is recommended that the limbs take account of opportunities to offset such adverse impacts, for example, by adding the words ‘unless such impacts are appropriately mitigated or outweighed by any benefits from the proposal’ at the end of each limb.</p>	<p>It should be noted that Policy H1 does not relate specifically to any future development at Parlinton, but rather to any future housing development within the neighbourhood area.</p> <p>No words are missing. It is considered that the sentence clearly indicates that the documents at limb i. a. b. and c. should address the key guiding principles set out in the remainder of the policy. The wording could conceivably be made clearer by substituting ‘the above’ for ‘these’ in the sentence.</p> <p>All limbs of the policy, including limbs ii. iii. and v., are written within the context of the first sentence of the policy, i.e. that development should be undertaken in accordance with them. The use of the word ‘should’ as opposed to ‘will’ makes the limbs less than absolute and allows for the flexibility sought by the suggested amendments.</p>
--	--	--	---

		<p>Limb vi.is not considered to be reasonable as it does not appear to be based on any evidence. Highways improvements, as relating to Parlington, will be informed by the very detailed transport model recently prepared by Leeds City Council and by the ‘comprehensive transport study’ identified by limb i. Further, the timing of such highway improvements will be identified by the ‘infrastructure delivery plan’ identified in limb i. Consequently, it is recommended that limb vi.be deleted.</p> <p>Limb xi.is linked ‘existing parking problems in the immediate vicinity of the site’. However, the location or extent of such problems is not identified by the Plan, so the necessity for including this limb is unclear. Further, parking requirements will be informed by the documents identified by limb i. Consequently, it is recommended that limb xi.be deleted.</p>	<p>The limb addresses the general local concern that the village and existing road network could be adversely impacted by construction and new resident traffic if any identified necessary highway improvements are not implemented before any housing construction works commence. All limbs of the policy, including limb vi., are written within the context of the first sentence of the policy, i.e. that development should be undertaken in accordance with them. The use of the word ‘should’ as opposed to ‘will’ makes the limb less than absolute. Limb i. of the policy only applies to major developments requiring the documents specified. Limbs ii. To xi. Apply to all new housing development.</p> <p>As stated, limb xi. would only apply where there are existing local parking problems in the vicinity of a development site. This to be assessed if and when any development comes forward. Limb i. will only apply to major developments – as such parking requirements will not be informed by limb i. documents in other cases.</p>
--	--	--	---

			NB Policy may benefit from greater clarity in the definition of 'major development' in limb i.. Policy could instead refer to 'largescale major development' i.e. 200+ houses/4ha+ as identified in Government guidance, as a level appropriate for requiring the identified documents.
Appendices General	AECOM on behalf of M&G	No comment other than to highlight that the appendices are not available on the Parish Council's website and that changes will be required as a result of the comments made above.	NP appendices are part of the submission NP, are available on the PC website and have been since the submission date. Accepted that appendices will need to change as a result of any amendments recommended by the examiner and agreed by the local planning authority/PC.
The Neighbourhood Plan Map	AECOM on behalf of M&G	No comment other than to highlight that changes will be required as a result of the comments made above.	Accepted that neighbourhood plan map will need to change as a result of any amendments recommended by the examiner and agreed by the local planning authority/PC.
Other	Historic England	We note that the draft Neighbourhood Plan has been significantly amended following the Pre-submission consultation stage:- 1) omitting Sections 5.4 'Design & Development' and 2) 5.6 'The Parlington New Sustainable Settlement' entirely. We assume this is on the basis that the proposed allocation of the Parlington Site will fail, following Examination in Public.	1) Former section 5.4 incorporated into expanded 5.2 'Built Heritage' – as explained in Consultation Statement P14. 2) The reason for the omission of former section 5.6 is explained in the Consultation Statement P13/14.

Other	AECOM on behalf of M&G	It is noted that Section 5.6 'The Parlington New Sustainable Settlement' (pages 33 to 37) have been deleted. A new section and policy (H1) is inserted relating to 'New Housing Development – Key Guiding Principles' on page 31.	No response
General	Highways England	No plan-specific representations made	No response
General	Natural England	No plan-specific representations made	No response
General	Selby District Council	No plan-specific representations made	No response
General	The Coal Authority	No plan-specific representations made	No response
Consultation Statement	AECOM on behalf of M&G	<p>It is noted that the Statement is dated June 2018, whereas the Neighbourhood Plan is dated March 2018. There might be reasons for the difference in dates but the reader might interpret that the Neighbourhood Plan has not captured all the material within the Consultation Statement.</p> <p>Page 10 – the last paragraph states that '...M&G Investments, the owners of the Parlington Estate (as represented by AECOM), failed to submit their representations within the formal six week consultation period...'. The deadline for making comments was 17:00 on the 18th August 2017 and our comments were emailed to the Parish Clerk at 14:38 that same day (with a paper copy following in the post). That said, the matter is academic as the last paragraph goes on to state that '...because they are consultees whose views were considered vital to the plan, the late responses were accepted'.</p>	<p>The NP was finalised and sent to design/layout in March 2018. The Consultation Statement was prepared in June 2018 while the NP was at design/layout stage. The NP takes account of all stages of consultation as reflected in policy preambles. The Consultation Statement details those consultations – it does not inform the preparation of the plan. The suggestion is entirely refuted.</p> <p>Apologies for this inaccuracy. As stated, however, it is academic.</p>

<p>Consultation Statement Appendices</p>	<p>AECOM on behalf of M&G</p>	<p>No comment other than to highlight that Appendix 14 does not appear to have captured all comments.</p>	<p>As far as the PC is concerned, the results grid which forms appendix 14 does capture all comments specifically made on the pre-submission plan. Comments have been reproduced verbatim wherever they related to any aspect of pre-submission plan content and responded to in the grid as deemed appropriate.</p>
--	-----------------------------------	---	--