

**ABERFORD & DISTRICT PARISH COUNCIL**

**ABERFORD NEIGHBOURHOOD DEVELOPMENT PLAN**

**CONSULTATION STATEMENT**

**JUNE 2018**

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## **1. Introduction**

This Consultation Statement has been prepared to meet the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Aberford Neighbourhood Development Plan.

The legal basis of the statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which requires 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;
- Summarise the main issues and concerns raised by the persons consulted;
- Describe how those issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan.

This statement:-

- Sets out the aims of the consultation process;
- Summarises the approach to consultation;
- Details the consultees;
- Sets out the consultation stages, the issues and concerns raised at each stage and the way in which they have been addressed.

## **2. Consultation Aims**

Throughout the Neighbourhood Plan consultation process, the aims have been:-

- To involve the community so that the plan was informed by, and took account of, the views of local people living, working and carrying out business in the Neighbourhood Area;
- To involve a wide range of statutory and non-statutory bodies in the development of the plan at key stages;
- To consult with landowners whose interests were affected by plan policies and proposals;
- To ensure that consultation took place at critical points in the process where decisions needed to be taken;
- To consult regularly and closely with officers of Leeds City Council to ensure that the plan was developing in line with legal requirements.

### **3. Background to Neighbourhood Plan Consultation**

The decision to produce a Neighbourhood Plan for Aberford was taken by Aberford and District Parish Council on 17<sup>th</sup> January 2012 in response to the Government's publication of the Localism Bill, on the grounds that it would enable the community to have more of a say in the future development of the local area, albeit within certain limits and parameters. It was felt that taking the step to produce a plan was a necessary move forward in order to protect and form the future shape of the village, allowing local residents to air their views throughout the process. This imperative was strengthened by Leeds City Council's work on a Local Plan and a search for housing sites, several of which were initially identified within the parish.

In July 2012 the steering group had a stall at the village gala to inform residents about the NDP and to answer questions raised.

The first formal step in the neighbourhood planning journey was to define the extent of the area the plan would cover ('The Neighbourhood Area'). An application to Leeds City Council (LCC) for the designation of the Neighbourhood Area was made on 25<sup>th</sup> May 2012. The Neighbourhood Area was approved by the council on 26<sup>th</sup> June 2013. This defined a reduced area of the parish, limited by the M1 to the south, on the grounds that this physical barrier represented a more sensible boundary for planning purposes. The inclusion of land in the parish to the south of the motorway would have encompassed the northern extremities of the expanding town of Garforth.

Initiated by the parish council, a Neighbourhood Plan Management Group was formed in the early months of 2012, following a public meeting attended by over thirty potential volunteers. It comprised residents and members of the parish council and met for the first time in March 2012. Terms of reference for the group, as updated in September 2015, are included as Appendix 1. Apart from periods of hiatus (see Section 5) the group has for the most part met on a regular monthly basis. Copies of the minutes are to be found as part of the plan's online evidence base.

From this point onwards, consultation with the community commenced and progressed through the following stages over the period 2013 to 2017:-

- Spring 2013 – initial explanatory newsletter and questionnaire delivered to all homes, together with village hall open-day;
- Spring 2015 – consultation with community, stakeholders and Leeds City Council on a 'Policy Intentions Document', including supporting village hall drop-in event;
- January/February 2017 – informal sites consultation with landowners and wider community, including community drop-in event;

- June-August 2017 – statutory Regulation 14 consultation on the Pre-Submission Neighbourhood Plan, including community drop-in event.

#### **4. Neighbourhood Plan Consultees**

Over the four years of the Neighbourhood Plan preparation process, a wide range of people and bodies have been consulted at the various preparation stages. These may be summarized as follows:-

- All residents in the Neighbourhood Area
- All businesses and landowners in the Neighbourhood Area
- All community and voluntary groups in the Neighbourhood Area
- Statutory consultees
- A range of non-statutory consultees, e.g. Sustrans, West Yorkshire Combined Authority, Garforth Neighbourhood Forum

A full list of statutory and non-statutory consultees can be found at Appendix 2.

## **5. Consultation Stages and Issues Raised**

### **Initial Questionnaire Consultation**

In January 2013, an initial 'issues' questionnaire, together with explanatory newsletter, was distributed to all households in the Neighbourhood Area, in order to gain an insight into the needs of the community and attitudes to housing development and location. The questions asked how often people used certain facilities, how important they were, how satisfied people were with some facilities, together with various questions regarding possible new housing development, ie:-

- the importance of different types of housing;
- what facilities would be needed to support new housing;
- how many more houses people would like to see;
- which areas within the plan area should be protected;
- how people felt about development;
- what their greatest concerns were should further development take place in the future.

A copy of the questionnaire is included at Appendix 3.

The Neighbourhood Plan Management Group also held an 'open day' in the village hall on 19<sup>th</sup> January 2013 to allow people to bring in their questionnaires or to discuss matters face-to-face with group members. All villagers, businesses and landowners were sent the questionnaire and invited to the open day. The local MP and ward councillors were also invited. Leaflets and questionnaires were delivered to every property within the plan area, posters (see Appendix 4) were placed on village noticeboards and the questionnaire was available on the parish council website. It was also advertised in the Village Newsletter and the Yorkshire Evening Post, with resultant post-event press coverage (see Appendix 5). A dedicated website and email address was set up to enable people to ask questions or feedback as well as using the questionnaire or open day.

Around one hundred people, including local ward councillors and our MP attended the 'open day'. 630 questionnaires were hand delivered to residents and responses were received back from 170, representing a 27% response rate.

The results from the questionnaire survey and supporting 'open day' are documented, respectively, at Appendices 6A and 6B. A 'results/issues grid' indicating the proposed plan response to the issues raised is included at Appendix 6C.

The survey information and analysis were used (along with issues identified in both the Aberford & District Masterplan of 2011 and the Village Design Statement of 2012/2013) as the basis of a 'Policy Intentions Document', setting out what the parish council was minded to include in a final 'draft plan', including a vision, aims, intended planning

policies and possible CIL (Community Infrastructure Levy) spending priorities.

The time lapse between the initial questionnaire consultation and the preparation of the 'Policy Intentions Document' was due to personnel changes within the management group, linked to a loss of urgency and impetus as the perceived threat of new housing development via the emerging Leeds Core Strategy receded. The securing of technical support from Planning Aid England served to reboot the process.

### **Policy Intentions Document Consultation**

In May 2015 a 'Policy Intentions Document' and accompanying questionnaire were produced for consultation purposes. These were issued to all households, businesses and landowners, together with the local authority. An online 'Survey Monkey' version of the questionnaire was also set up. A copy of the questionnaire is provided at Appendix 7.

A 'drop-in' style event was held in the village hall on 21<sup>st</sup> June 2015 (see poster at Appendix 8). This attracted some 25 attendees. Some 60 completed questionnaires (a roughly 10% response rate) were returned to the parish council, together with more detailed written representations. Reports detailing the results and implications of the consultation responses are included at Appendices 9A, 9B and 9C.

The responses and feedback received were used during the second half of 2016 to guide detailed evidence gathering and to develop a first full draft Pre-Submission Neighbourhood Plan.

A further time lapse between this consultation and the next stages of plan preparation and consultation were due to the loss of technical support and the inability to find a replacement source until the second half of 2016.

### **Informal Sites Consultation**

The emerging first full Pre-Submission draft plan now contained a number of policies and proposals (for Local Green Space, 'Non-Designated Heritage Assets', community facilities and community facility 'opportunity sites') relating to individual sites and buildings within the Neighbourhood Area. As such, it was considered necessary to carry out a targeted informal consultation with those with legal interests in these sites/buildings, as well as giving local people the opportunity to comment on these detailed proposals. The full draft was also submitted at this stage to Leeds City Council for informal comment and for the purposes of obtaining a screening opinion in respect of European Environmental and Habitat Assessment requirements.

The Informal Sites Consultation ran from January 23<sup>rd</sup> until February 19<sup>th</sup> 2017. Those with identified legal interests were consulted by e-mail, post or hand-delivered

correspondence (see Appendices 10A and 10B for, respectively, sample notification letter and feedback form). A widely-advertised 'drop-in' was held in the village hall on 5<sup>th</sup> February 2017 (see advertising poster at Appendix 11), as part of the consultation process, to allow both targeted consultees and the general public to find out more and to have their say. This was attended by 37 people.

The consultation attracted responses from 12 separate sources, together covering 36 of the 77 consultation sites and additionally putting forward further sites for consideration. A summary of the consultation results with recommended action is included at Appendix 12.

Responses from this consultation, combined with those from the earlier 'Policy Intentions Document' consultation, informed the finalisation of the Pre-Submission Draft Neighbourhood Plan for the statutory Regulation 14 consultation.

### **Statutory Regulation 14 Consultation on Pre-Submission Draft Plan**

On the 7<sup>th</sup> July 2017, the Pre-Submission draft of the Aberford Neighbourhood Development Plan was published for the statutory Regulation 14 public consultation. This consultation ran until 18<sup>th</sup> August 2017. The consultation was carried out in accordance with regulations and involved all those identified in the list at Appendix 2.

Documentation comprised the full draft plan, a plan summary and questionnaire (see Appendix 13). These were also available online, and on the Leeds City Council website, along with all previous documents from the NDP process. A copy of the full plan was made available in 10 locations around the village. As part of this consultation an 'open day' was held in the village hall on 23<sup>rd</sup> July 2017 where people were given the opportunity to drop in, look at the full plan and ask questions as well as fill out and/or drop off questionnaires. Fifteen people attended the drop-in.

There were 51 formal responses to the statutory consultation, 41 via the printed questionnaire, plus a further 10 written responses. Full details of all comments made, together with responses and agreed actions are provided in the 'results grid' at Appendix 14.

This stage of plan preparation and consultation is notable as being the point at which the potential development of a major new settlement at Parlington was formally introduced into the Neighbourhood Plan, following its introduction into the LCC Site Allocations Plan.

Both Leeds City Council and 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, but because they are consultees whose views were considered vital to the plan, the late responses were accepted.

All representations were carefully considered and agreed actions in response reflected in the final submission plan.

## **Summary of Main Issues Raised At Each Stage and How They Were Addressed**

### Initial Questionnaire Consultation

The community indicated particular support for the following:-

- Protection of services and facilities;
- Provision of new/more services and facilities;
- Provision of an acceptable level of housing;
- Meeting local housing needs;
- Protection of village character;
- Protection of Green Belt;
- Provision of more green spaces linked to new development;
- Protection of heritage assets.

With the exception of Green Belt protection, which is an excluded matter, and the explicit provision of more green space, the Submission Neighbourhood Plan addresses all of the above through the inclusion of policies CF1, CF2, H3, BH1, BH2, GE1, GE2 and GE3. It is considered that green space provision within the Neighbourhood Area is currently adequate and that in the event of any new development, Core Strategy policy would adequately cover any required new provision.

The plan does not explicitly provide for a target level of new housing in line with Aberford's position in the settlement hierarchy. It does however identify an opportunity for new housing on the Coal Staithes site, while also setting out key guiding development principles for housing on any subsequently allocated or identified housing sites (ie via the Local Plan) and 'tests' to determine the acceptability of housing on non-allocated sites.

### Policy Intentions Document Consultation

The main consultation comments were as follows:-

- More precise wording and definition of terms used in final policies;
- Housing - for younger people and objective assessment of housing need. Also scope for housing development at Coal Staithes (Aberford Motors);
- Environment – suggestions for sites to be protected; need to consider cycle paths and walkways;
- Heritage – sites to be protected suggested;
- Transport – workability of anti-congestion policy questioned;
- Transport/parking – suggestion that policy 'duplicates' existing Leeds City Council

policy; Coal Staithes and rear of village hall suggested as possible new car parking sites;

- Employment – not addressed in plan; specifically 2011 Masterplan ideas for a renewable energy centre and live/work units or offices and/or workshops on the Parlington Estate;
- Parlington Estate Leisure/Tourism – scope for NDP to ‘put flesh on the bones’ of still extant UDP policy (LT5B) regarding major tourism and leisure facilities.

The Submission Neighbourhood Plan positively addresses many of the above, with the following exceptions.

Regarding the objective consideration of housing needs, this was not considered necessary at this stage, given the village’s position in the settlement hierarchy and the availability of comparable existing evidence from neighbouring/nearby parishes, although a ‘community action’ regarding a possible future assessment is included in the plan.

Regarding employment, this had not been raised as a significant issue by the community in any Neighbourhood Plan consultation up to this stage. In addition, the Parlington Estate is in Green Belt, within which Neighbourhood Plans have no powers to allocate. More generally, there was no support for including development allocations within the plan.

Regarding leisure/tourism, the comments in the above paragraph regarding lack of community support, Green Belt and allocations all apply. As such, the scope to add to existing saved UDP policy without duplicating is negligible.

### Informal Sites Consultation

Comments were sought and received in respect of site-specific proposals for:-

- Local Natural Heritage Sites;
- Candidate Local Green Spaces;
- Non-Designated Heritage Assets;
- Community Facilities;
- Aberford Village Hall Site;
- Coal Staithes Site.

As a result of comments received, both in objection and support, together with suggestions regarding additional sites, action has been taken as follows:-

- Local Natural Heritage Sites – this site category has been deleted from the plan. Of the specific sites objected to, only ‘Hook Moor Green Boundary’ appears in the Submission Plan as the ‘Hook Moor Woodland’ Local Green Space.

- Candidate Local Green Spaces – of the 3 sites objected to, only ‘Aberford C of E Primary School Playing Fields’ appears in the Submission Plan. Of the 4 additional sites suggested, ‘Land Opposite North End Cottages’ now appears in the Submission Plan as ‘Land to the North of Markham Cottages’, following assessment.
- Non-Designated Heritage Assets – policy wording amended and evidence/assessments strengthened as a result of objections received. As a result, 4 assets deleted from policy list, despite there being no site-specific objections to their inclusion. Further assets added as a result of more comprehensive approach to assessments. Two further assets deleted from list as a result of site-specific objections.
- Community Facilities – all sites objected to retained on the policy list in the Submission Plan. The objections regarding Jessamine Cottage Surgery and Aberford Albion FC Clubhouse were overcome by revised policy wording, while the objection in respect of Aberford C of E Primary School was considered to be outweighed by the value of the facility to the community.
- Coal Staithes Site – policy in Submission Plan now refers to opportunity for housing use as part of mixed use with community facilities in line with objection.

#### Statutory Regulation 14 Consultation

The main consultation comments related to the following:-

- Minor amendments to vision, aims, supporting text and community actions to correct factual inaccuracy and imprecision of expression;
- Changes to policy wording to improve conformity with national and strategic local planning policy, and to improve clarity;
- Amendments to the mapping of plan proposals to improve accuracy and clarity;
- More robust justifications for Local Green Space and Non-Designated Heritage Asset proposals;
- The removal/addition of sites to policy lists for Local Green Space and Non-Designated Heritage Assets;
- The identification of an opportunity for housing as part of a mixed community use scheme at Coal Staithes (Policy CF4);
- The workability of proposed Policy DD2;
- The general thrust and detailed wording of Policy P1 covering the Parlington New Settlement;
- The timing of NDP submission relative to the progress of the Leeds Site Allocations Plan (SAP), with particular reference to Parlington.

The ‘results grid’ at Appendix 14 sets out individual comments in respect of these matters and the detailed responses to them.

The most significant change to the plan as a result of the above was the deletion of

Policy P1 and the Pre-Submission Plan's Parlington section, in respect of as yet unadopted SAP proposals for a new sustainable settlement at Parlington. This was due to uncertainty regarding the proposals and in respect of the timing of SAP hearings and final adoption relative to the NDP timetable and the parish council's eagerness to submit. As a direct consequence of this deletion, the Submission Plan now includes new and revised housing policies (H1 and H2), respectively addressing key guiding principles for any new housing development on allocated or identified housing sites and housing development on non-allocated housing sites.

As a response to comments, Policy DD2 was also deleted. As a result, in the Submission Plan, Policy DD1 now appears as Policy BH1 in an expanded Built Heritage section and the former Design and Development section no longer exists.

The opportunity for housing use now forms part of Policy CF4 in relation to the Coal Staithes site.

## **6. Conclusion – Reflection on Consultation Process and Outcomes**

### **The Process**

In general terms, it is the parish council's view that the overall consultation process, over a period of some four and a half years, has provided regular and ample opportunity for local community and wider stakeholder engagement, involving three non-statutory consultation stages (initial questionnaire survey, Policy Intentions Document and informal sites consultation), leading up to the final statutory Regulation 14 consultation. This has been supplemented throughout by the opportunity to attend regular and frequent Neighbourhood Plan Management Group meetings and full parish council meetings where the Neighbourhood Plan has been a constant agenda item.

What has been noticeable over the plan preparation period is a falling away of public interest and engagement, from a high of 170 questionnaire responses (27%) and 100 open-day attendees, at initial questionnaire survey stage in 2013, to 51 responses and 15 attendees at the 2017 Regulation 14 consultation stage. Intermediate consultation stages were also marked by comparably lower responses relative to the initial 2013 enthusiasm. While inevitable 'plan fatigue' is likely to account for a degree of this 'dropping-off', the receding 'threat' of new housing allocations was undoubtedly a key contributory factor up to and beyond the Policy Intentions Document stage. Thereafter, the community's intense pre-occupation with the late introduction of the major Parlington New Settlement proposal into LCC's Site Allocations Plan and the realisation that the Neighbourhood Plan was unable to support the campaign to resist the proposal, served to deflect public attention away from the plan towards what it perceived to be more pressing and relevant issues, i.e. the still ongoing campaign to try to prevent development at Parlington.

What could perhaps also have been done better over the preparation process was the specific targeting of older, younger and disabled interests within the community, in order to better establish their specific needs. That said, Survey Monkey statistics from the most recent Regulation 14 consultation do indicate the involvement of households with children in the completion of questionnaires. It is also fair to say that older and younger people's interests are clearly identified under 'community actions' in the 'Community Facilities and Services' section of the Neighbourhood Plan (i.e. Chapter 5 – Section 5.3).

### **The Outcomes**

As a result of the consultation process, the parish council is satisfied that Neighbourhood Plan policies:-

- reflect key majority concerns as expressed at initial issues stage;
- respond positively to objections and comments received at subsequent Policy Intentions Document, 'Informal Sites' and Regulation 14 consultation stages,

where considered to be appropriate and feasible.

Additionally, Neighbourhood Plan 'community actions' take on board many of the community's non-planning concerns, as expressed via consultations and through earlier Village Design Statement and Masterplan work, as filtered by the parish council in the light of up-to-date circumstances and knowledge.