

**BRAMHAM cum OGLETHORPE NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION (REGULATION 14):
STAKEHOLDER FEEDBACK ASSESSMENT**

Ref	Respondent	NP ref	Comment	Response of Steering Group	Proposed action
1	Historic England	4.5	Designated heritage assets: List all individual listed and scheduled buildings and assets individually and show on map.	Not considered necessary as all are already protected – Grade 2 listed and above.	Amend wording to recognition of all assets when considering any development.
2	Historic England	4.5 H1	Non- designated heritage assets: Set out criteria for identification of non designated local heritage assets and mark on a map.	Criteria already covered in H1. Map and additional location descriptions not considered necessary.	None
3	University of Leeds	3 Objective 7	Change wording to: “To support the continuing use of the University of Leeds Estate for agricultural / research / academic purposes and other developments which comply with Policy UoL1	Accept – and also apply to 4.6 ‘Policies Summarised’ box.	Amend wording as requested.
4	University of Leeds	4.3 HOU1	Policy H4 of the Core Strategy requires developments to take into account the nature of the development and character of the area, and as such, this should be built into Policy HOU1.	Noted – amendment not considered necessary.	None
5	University of Leeds	4.3 HOU1	We would question the soundness of the approach to prioritising different housing needs as there has not been a thorough assessment of need based on specific evidence. Change wording to: “Any housing development proposal of 10 or more dwellings should seek to provide a mix of dwelling types. Developments should seek to incorporate the following types of home, (which are listed in order of priority), while also taking into account the nature of the development and character of the area: a) Affordable starter homes; b) Homes for the elderly/retired; c) 1-2 bedroom homes, including flats; d) Family homes (3-4 bedroom)	Noted – amendment not considered necessary.	None

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6	University of Leeds	Section 4.5 Heritage	Section 4.5 and draft Policies H1 (Non-designated heritage assets) and H2 (Bramham Moor Battlefield – Local Heritage Area) need to refer to the National Planning Policy Framework (NPPF) in order to meet the basic conditions. The NPPF outlines that the assessment of any proposal relating to a designated or non-designated heritage asset is based on the significance of the assets, any harm caused and the benefits of the proposal. It is requested that Section 4 and draft Policies H1 and H2 are amended to refer to the process set out in the NPPF as currently there is no reference to the benefits of a proposal and how these are factored into the planning balance. The requested amendment will ensure that any harm caused by a proposal is weighed against any benefits delivered in accordance with the NPPF.	Noted – amendment not considered necessary.	None
7	University of Leeds	4.6 UoL1	Given that the University of Leeds has a significant land holding within the neighbourhood plan area, Section 4.6 and Policy UoL1 are welcomed and supported.	Noted	None
8	University of Leeds	throughout	We request that the draft plan is updated throughout to consistently refer to the ‘University of Leeds’ rather than Leeds University.	Accepted	Amend wording as requested
9	National Farmers’ Union	Not specific	‘any form of Neighbourhood Plan must adequately address the issues and opportunities of farming’ Diversification is in line with National Planning Policy Framework (NPPF) that provides that local authorities should support development that enables farmers to become more competitive and sustainable and diversify into new opportunities. A key message within the NPPF is the need for economic growth. “A positive planning system is essential, because without growth, a sustainable future cannot be achieved. Therefore, significant weight should be placed on the need to support economic growth	Noted – amendment not considered necessary.	None

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			through the planning system...the default answer to development proposals is yes.”		
10	National Farmers’ Union	Not specific	‘local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources’ (para 97); ‘have a positive strategy to promote energy from renewable and low carbon sources’ which ‘maximise renewable and low carbon energy sources’. Renewable energy represents an important opportunity for farms to reduce their energy bills and also to create revenue that can help support farming activity. We understand that this can be a contentious issue within communities and are aware that early consultation with those that are either impacted or likely to gain is crucial.	UoL1 provides opportunities on Headley. Propose small amendment to that policy to make it clear it is acceptable in association with the UoL operations there and therefore by implication not appropriate across wider rural landscape.	Amend UoL1: Final bullet: “The development of small-scale renewable energy schemes directly associated with and linked to the University’s research programmes on the estate.”
11	LCC	Page 5, Map 1	Remove “October 2016” from the title – LCC can provide	Accepted	Amend
12	LCC		Much of the text on page 1 is repeated on page 7, suggest that this is streamlined in the Submission Draft Plan and the bulk of the content is reflected in the Consultation Statement	Agreed	Remove Foreword P1 but could leave words on inside cover.
13	LCC	P10 Chart	Should be titled “Population Breakdown by Age”.	Accepted	Amend as stated
14	LCC	Images	images throughout the Plan would benefit from being captioned.	Accepted	Add captions to 11 images (not the thumbnails page)
15	LCC	Whole document	An audit of the formatting of the document is recommended, as there are many inconsistencies in	Accepted –	Amend any inconsistencies.

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			paragraph numbering, and use of different types of font which interrupt the flow of the document		
16	LCC	Page 12	The Vision statement starts off well “By 2033...” but then reads as a statement about Bramham in 2017 rather than what it will be like in the future. The statement should include phrases such as “will be” and “will have”. The Vision doesn’t mention housing or connectivity but these are stated objectives. The Vision and Objectives in a Plan should be joined up and complementary	Accepted	Add the following to the end of the vision: We will be a community conserving its heritage and providing a safe and invigorating environment through sympathetic development of housing and facilities.
17	LCC	Page 14, 4.1	bold writing at the top of the page (and subsequent: 4.2, 4.3, etc.): it is not necessary for the Submission Draft Plan to state what the “intention of setting out policies” of each section is, it would be beneficial for the introductory section / statement to set out how the policies in each section help to deliver the vision and objectives	Noted – no amendment necessary - link to vision & objectives is self evident.	None
18	LCC	4.1.2	should read “The community of Bramham enjoys... ” The rest of the sentence doesn’t make sense. Suggest “The community of Bramham enjoys the local offer of community facilities, including the village hall	Accepted	Amend to: The community of Bramham enjoys the many community facilities including ... etc
19	LCC	Page 16: 4.2.1	could say more about the benefits of improved access to the PROW network and how this would deliver on the stated objective of enabling all to enjoy a healthy lifestyle	Accepted	Add a sentence at the end: ‘This increased connectivity and

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					green infrastructure would encourage increased physical activity and resulting health benefits.'
20	LCC	Page 17:	The PROW map is referred to as Map 2, whilst on page 15 there is a reference to a different Map 2. Mapping would benefit from being rationalised to improve the legibility of the Plan as a whole. This occurs throughout. Maps should be clearly labelled and numbers / titles shouldn't be duplicated	Accepted –	Amend page 15 to read: 'The community facilities are shown on Map 18 – Bramham Neighbourhood Plan policies map2. Amend Map 17, 18, 19 (p58, p59,p60)to state policies maps a, b and c rather than 1, 2 and 3. – and check for any references to them throughout document
21	LCC	Page 18, 4.2.2:	the formatting would be improved by being consistent, for example 4.2.1 which introduces Policy LR1 is plain text, whereas 4.2.2 which introduces LR2 is in bold as a heading at the top of page 18	Accepted	1 st para under 4.2.2 should not be bold (check for other inconsistencies)
22	LCC	Page 20, 4.3.1	∴ should read: "Leeds City Council has proposed the allocation of 4 housing sites to be developed in the Plan period in the Submission Draft Site Allocations Plan. Each site is proposed to be allocated for the following:...	Accepted	Amend as stated
23	LCC	Page 22, 4.4.1	should read "The community greatly values	Accepted	Amend as stated

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24			Page 35, 4.5.2.: the third para has an incorrect reference, should refer to Policy H3	Accepted	Amend as stated
25	LCC		Page 37, first paragraph: suggest that this is reworded as “strict adherence to the principles of conservation areas has not been adhered to, nor enforced” doesn’t make sense	Accepted	Amend 2 nd sentence to ‘It should be noted that, since being designated a Conservation Area, the principles of Conservation Areas have not been complied with nor enforced.’
26	LCC		Page 42, 4.5.4.: should read “The community of Bramham greatly values	Accepted	Amend as stated
27	LCC		Page 61, it is unclear what these photographs are. Are they the non-designated heritage assets? If so, they should be correctly labelled and accurately referenced on the Policies Map 1 (i.e. non-designated heritage assets, rather than village assets). Reference should be provide in the heritage section	Noted	Give the page a title: ‘Various views and buildings of Bramham’ OR may lose this page after reformatting.
28	LCC		Whilst it is understood that Appendix 3 and Appendix 4 provide context for local residents showing how Policies flow from the community engagement and consultation undertaken, for the Submission Draft Plan it is recommended that these two Appendices form part of the Consultation Statement rather than the Plan itself.	Agreed	Remove appendices
29	LCC	Policy CF1:	An aspirational policy influenced by the results of community engagement, although the policy appears to simply list all of the facilities in Bramham. As written, if an	Accepted	Replace ‘measures to improve’ with ‘measures to protect

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			application came in to change the village shop and post or one of the pubs to a dwelling, then the policy doesn't provide any teeth to prevent the loss of these facilities. It would not be possible for the LPA to protect a medical centre as the responsibility for providing health care falls with the NHS. The title refers to "protect and enhance" but the policy refers to "improve" only, with no reference to protection		and/or improve'
30	LCC	Policy CF1	<p>The last sentence of the introductory/supporting text reads "If a development proposal would result in the loss of an existing facility, an alternative provision should be made elsewhere in the community, if a sufficient level of need is identified". This sentence would afford some protection to existing facilities and could form part of Policy CF1, similar approaches have been successful at examination in Holbeck and Clifford:</p> <p><i>"Where proposals for development would result in the loss of any of the following facilities or services, satisfactory alternative provision should be made elsewhere within Holbeck Neighbourhood Area if a sufficient level of need is identified" (Holbeck)</i></p> <p><i>"Proposals that will result in the loss of any of these facilities will be resisted unless it can be clearly demonstrated that its use is no longer financially viable or necessary, or that a replacement facility can be provided in a suitable location accessible to the community."</i></p>	Accepted	replace last sentence with <i>Proposals that will result in the loss of any of these facilities will be resisted unless it can be clearly demonstrated that its use is no longer financially viable or necessary, or that a replacement facility can be provided in a suitable location accessible to the community</i>

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			(Clifford)		
31	LCC	Policy LR1: Improving Public Rights of Way	The use of “must” is discouraged. As written, it would seem that only the residents of new developments should benefit from increased PROW provision. Suggest “New developments should take opportunities to improve and/or extend the existing byways, bridleways, footpaths and cycle paths, improving connectivity to the village or the open countryside. New provision should be appropriate and sensitive to local character. The loss of existing footpaths and cycleways will be resisted	Accept	Reword policy: <i>“New developments should take opportunities to improve and/or extend the existing byways, bridleways, footpaths and cycle paths, improving connectivity to the village or the open countryside. New provision should be appropriate and sensitive to local character. The loss of existing footpaths and cycleways will be resisted.”</i>
32	LCC	Policy LR1: Improving Public Rights of Way	The footpath map is clear and shows an excellent network of public footpaths. Care needed with terminology - the use of the terms ‘connectivity’ and ‘green infrastructure’ would be beneficial throughout this section. Good practice to see suggestions of new paths and links to existing paths	Accepted	Add on to 4.2 Heading: , increasing connectivity to the surrounding area and providing a green infrastructure’
33	LCC	Policy LR2: New sports and	It is not recommended that one policy refers to other policies in the Plan (Clause B) as the Neighbourhood Plan should be read as a whole. Generally, the policy should be	Accepted	Amend clause b to read ‘take into account

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		leisure facilities	more positively worded.		the nature of the development and character of the area' Amend last part of sentence to 'will be strongly supported, enabling all to enjoy a healthy lifestyle, :where such developmets:'
34	LCC	Policy LR2: New sports and leisure facilities	The policy doesn't mention any specific locations for the new facilities for the running track, boules area and additional children's play facilities	Accepted	Add locations: Running track (on playing field) Boules playing area (on playing field) Additional childrens play facilities (on small green spaces in the village)
35	LCC	Policy HOU1: Housing type and mix	This policy appears to be a replication of Core Strategy policies H4, H5 and H8. It is suggested that the policy is not necessary it does not add anything to the existing strategic policies	Leave in as Core Strategy not known to all.	<i>"Any housing development proposal of 10 or more dwellings should seek to provide a mix of dwelling types</i>

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36	LCC	Policy HOU1: Housing type and mix	Examiner may question why a figure of 10 is identified.	Over 10 = larger development.	<i>appropriate to the overall housing needs of the local community. Therefore, developments should seek to incorporate the</i>
37	LCC	Policy HOU1: Housing type and mix	The policy appears to be only based upon a limited survey of existing residents (is there other evidence for the policy?).	No amendment needed – survey was not limited – went to whole village with over 40% response.	<i>following types of dwelling, which are listed in order of priority~:</i> <i>a)Starter homes</i> <i>b)Homes suitable for the elderly.</i>
38	LCC	Policy HOU1: Housing type and mix	What is the definition of affordable starter homes and homes for the elderly/retired? If a developer wanted to propose say 15 dwellings, then only a proportion of those would need to be affordable under the Core Strategy policy	Remove ‘affordable’, re-word regarding elderly/retired.	<i>c) 1-2 bedroom homes, including flats.</i> <i>d)Family homes (3-4 bedroom).</i>
39	LCC	Policy HOU1: Housing type and mix	The information relating to residents opinions on the number of new dwellings required is unnecessary and does not relate to the policy.	Leave as is – provides background	
40	LCC	Policy NE1: Local Green	It is recommended that the opening sentence is changed to “The following sites are designated as Local Green Spaces, where development is ruled out other than in very	Accepted	Amend wording as requested.

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		Space	special circumstances, equivalent to national policy on Green Belt		
41	LCC	Policy NE1: Local Green Space	It is requested that the proposals to designate a number of adopted highway verges as local greenspace are removed	Retain - as Bramham has few such spaces.	None
42	LCC	Policy NE1: Local Green Space	The information in Appendix 1 supporting the policy is excellent. The site plans are particularly clear	Noted	None
43	LCC	Policy NE1: Local Green Space	There is a comprehensive narrative of how potential LGS were identified, assessed and some discounted, telling the story of the Plan preparation. It is noted that some sites have been discounted due to other protections and their ownership and this approach is to be commended	Noted	None
44	LCC	Policy NE2: Enhancement and protection of nature areas and biodiversity	It is assumed that the shaded text box on page 24 is a typo and not intended to be a policy	Accepted	Remove shading
45	LCC	Policy NE2: Enhancement and protection of nature areas and biodiversity	The terms reduce and damage are imprecise, suggest "harm" is used	Accepted	Amend wording as requested
46	LCC	Policy NE2: Enhancement	It would be better to identify local extensions to the Leeds Habitat Network across all the NP area and justify why any	Noted	None

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		and protection of nature areas and biodiversity	additional parts have been added to it at the local level		
47	LCC	Policy NE2: Enhancement and protection of nature areas and biodiversity	It is unclear what the justification is for including the “Wildlife Area behind the Senior Citizens Area	Leave in – an important nature area	None
48	LCC	Policy NE2: Enhancement and protection of nature areas and biodiversity	Reference to achieving enhancements adjacent to development sites – this may be difficult to achieve if expected as part of the development (i.e. S106 or CIL would be required).	Leave as is	None
49	LCC	Policy H1: Non designated local heritage assets	Suggest “non-designated heritage assets” is used to be consistent with national guidance	Leave – Historic England advise this is the best wording.	None
50	LCC	Policy H1: Non designated local	The list of non-designated heritage assets does not contain any buildings – is there a reason for this? This list could be expanded to offer greater protection for at risk heritage assets	Most in the Conservation Area which is extensive.	None

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		heritage assets			
51	LCC	Policy H1:Non designated local heritage assets	How have these been selected? What evidenced will be presented to the examiner? They must also be clearly identified on a plan	Evidence is in Grid in Evidence Base	Check the assessment framework is on the website and insert new final sentence in preamble to policy: <i>“A full assessment of all identified assets is included in the Evidence Base supporting the Plan, found on the website.”</i>
52	LCC	Policy H1:Non designated local heritage assets	The supporting text refers to the steering group having assessed the local area, can details of this assessment, process and subsequent recommendations for inclusion in the Plan be provided? Recommend that a similar approach to the Local Green Spaces Policy is taken		
53	LCC	Policy H2: Bramham Moor Battlefield – Local Heritage Area	There is an opportunity for a specific policy but as it stands this policy is fairly imprecise and lacking in evidence. Suggest further work is done on this	Disagree – an important local site	No change
54	LCC	Policy H2:	The policy could identify the area as locally important	Why?	

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		Bramham Moor Battlefield – Local Heritage Area	rather than designate		
55	LCC	Policy H3: Development within the Conservation Area	Some examiners are comfortable with a repetition of existing CA policy, others are not	Noted	None
56	LCC	Policy H3: Development within the Conservation Area	The introductory text to the policy needs to make reference to the statutory test and the need for a development proposal to preserve or enhance the character of the conservation area	What would this add?	None
57	LCC	Policy H3: Development within the Conservation Area	Three character areas are recognised, which is simple and effective. Character area 2, defined as 20 th century developments, describes cul-de-sacs, red pantiles, buildings set back from roads, etc. Whilst there is a precedent for this design typology in the village, are these features that should be perpetuated, and do they constitute good urban design? Should development try to reflect the more historic components of the built	Leave as is	

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			environment?		
58	LCC	Policy H3: Development within the Conservation Area	The pre-amble to this policy makes valid reference to too much on street car-parking and the conversion of garages into house extensions. This is not then developed into a policy which is clearly a missed opportunity	Accepted	Add a bullet point to H3: h) new development should provide off road parking facilities sufficient to the scale of the development i) Any development that reduces off road parking (eg conversion of garage to a dwelling) will not be supported
59	LCC	Policy H3: Development within the Conservation Area	A little more detail on the design of buildings in the historic core could be useful. Whilst the plan addresses materials, the way buildings interact with the street (offset distances and boundary treatments) is very important to contextual design	Leave as is	None
60	LCC	Policy H4: Development outside the Conservation Area	Identify the area on a plan	Not needed – it is anything in the parish but outside the conservation area shown on Map 9	None

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61	LCC	Policy H4: Developm ent outside the Conservati on Area	Further evidence could be provided and the policy could be more locally distinctive	Considered sufficient as is	None
62	LCC	Policy H4: Developm ent outside the Conservati on Area	Criterion b: development proposals don't always need to reflect local building design, form and style as this may stifle new innovative design that may in itself be acceptable. Also, not all development proposals need to provide green spaces, depending on the scale.	Leave as is	None
63	LCC	Policy H5: Key Views	This is similar to the Clifford policy and OK in principle. The use of photographs is helpful	Noted	None
64	LCC	UoL1 University of Leeds Estate	This is an aspirational policy. It is not clear what involvement the University of Leeds has had in the policy but this information will be important to help the examiner to consider the merits of the policy. This should be included in the Consultation Statement to be submitted alongside the Plan.	Noted	None
65	LCC	UoL1 University of Leeds Estate	The continued use and expansion of research activities..." – This might need tightening up a bit given that the policy applies to such a vast area of land. At the moment the policy wording could have unintended consequences. The	Agreed	Amend bullet 1: <i>"The continued use of existing facilities for research"</i>

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			majority of the site is in the Green Belt		<i>activities;”</i>