**PART A**

|  |  |
| --- | --- |
|  | **Your Details** |
| **Full Name** | George Davies |
| **Address** | 160B High St, Riseley, Bedford |
| **Postcode** | MK441DR |
| **Telephone** | 07768197549 |
| **Email** | georgedavies160@gmail.com |
| **Organisation (if applicable)** |  |
| **Position (if applicable)** | Resident and Landowner |
|  |  |

**Dear Planning Policy Team**

**Re Riseley Neighbourhood Plan Regulation 16 Consultation**

It is difficult to respond to this Regulation 16 Consultation for Riseley because so much of what has gone before it has been done so poorly.

All the literature on Neighbourhood Planning emphasises the need for consultation and engagement and there has been minimal consultation and engagement in Riseley. It has been a top down process.

As a landowner, as well as a resident, (I have lived in Riseley for 53 years) in the 5 years of the Neighbourhood Plan I have had only 15 minutes of face to face interaction with the Riseley Neighbourhood Plan Steering Group (RNPSG) despite endless requests on my part.

The fact that the RNPSG had to abandon the allocation of potential development sites is tragic for the village and testament to the total lack of engagement and proper consultation. The implosion of the site allocation process has hollowed out the plan and crippled its worth. The reasons for this collapse should be looked into by the Examiner.

There have been 50 RNPSG meetings and to date only 2 sets of minutes have been published despite many requests to have them published.

The Terms of Reference of the Riseley Neighbourhood Plan Steering Group (RNPSG) have not been published.

No agendas for RNPSG meetings have been published.

No RNPSG Accounts have been published.

Errors in the AECOM Site Suitability Assessments have not been corrected. Please see Appendix 3

Publishing bland monthly reports is not consultation.

No details of what was gleaned from the Regulation 15 Consultation have been published

No dedicated Riseley Neighbourhood Plan website has been published.

The public consultation questionnaire should have been published ahead of the consultation not on the day of the public exhibition and asking people to respond to the questionnaire as the left the Village Hall Exhibition in October 21 is not engagement or proper consultation.

Describing land incorrectly as equivalent to Green Belt in the October 21 Exhibition in Riseley Village Hall was a serious error which should have been corrected and wasn’t. Please see Appendix 1

It should be noted there is not a single sq inch of Green Belt Land in Bedford Borough.

The very short time for the September 21 Public Consultation just 6 days, with no workshops or engagement steps, no route to address errors- it was a rubber stamp exercise.

Thoughout the entire Neighbourhood Planning process the RNPSG have beed confused by and in turn have confused the residents over the differences between Green Space, Local Green Space and Village Open Space, Village View, open spaces, green vistas.-this compromises the validity of the Plan.

The October 21 Public Consultation Questionnaire was not fit for purpose.

The golden rule of questionnaire design is only ask one question at a time. This rule is broken frequently. The responses you get to a multipart question are meaningless. This is why respondents used so much free text outside of the defined comments boxes.

Here is one example:

*Objective GS1 Retain Open Spaces, Views and Local Green Spaces as identified on the Bedford Borough Council Policies Map insert 28 Riseley 2020 and protect them from development. Agree Disagree*

How does a respondent answer if they agree with no development on Local Green Spaces but disagree with no development on Open Spaces? How do respondents know what they are Agreeing or Disagreeing to, when the Policies Map is not included in the questionnaire? A respondent may not want development on the Local Green Spaces, Ross Meadow and the Playing Field but does want to see the village given the choice to accept appropriate development on Open Spaces, when the reasons for designation are not compromised or a material benefit outweighs the need to keep the land undeveloped. The questionnaire generated meaningless answers.

Another example:

*Objective NE1 "The natural environment, including landscape features, biodiversity, green spaces and views and public rights of way will be protected and enhanced." Agree Disagree*

This is a four component question. Green spaces and views are conflated. Landscapes, biodiversity and public rights of way are lumped together. How on earth can you make sense of an agree or disagree response?

The flawed statistical analysis in the site suitability assessments undermined the credibility of the RNPSG

Why would you attempt to reconcile two different sets of opinions, one based on the views of people who live in Riseley and have nothing but good intentions for the village and the views of a planning consultancy, AECOM, who have never spent a full 24 hours in Riseley and who have no long term commitment to Riseley and its future. The way to reconcile the different views is not to run a complex statistical analysis but to go back to the people of Riseley, in a proper public consultation and ask them what they think, what would they prefer.

I find it surprising and inappropriate that statistical analysis has found its way into the Riseley Neighbourhood Planning process and I disagree with the conclusions drawn from the analysis. It would be helpful to know how many other Neighbourhood Plans have used Spearman's rank correlation.

There may be a statistical correlation between the Riseley Neighbourhood Planning Group rankings and the AECOM rankings, of site suitability. However, the Spearman's rank correlation of 0.71, 0.73 or 0.67 depending on which data set is used, does not mean that the interpretation is correct for all sites . Some sites, in statistical terms are "outliers". They don't fit the pattern and they should be evaluated differently. The statistical analysis appears objective but is actually very subjective.

No details of what was gleaned from the Regulation 15 Consultation have been published

No dedicated Riseley Neighbourhood Plan website has been published.

The front cover of the draft plan, dated October 2022, is marked as 2022 to 2040. The submission plan, the subject of this consultation, dated March 2023, is marked on the front cover 2022 to 2030. It this a typo? If not when and why was the decision taken to reduce the life of the plan by 10 years?

**PART B – please include a separate form for each comment.**

**To which part of the Neighbourhood Plan or any of the submitted evidence base documents (e.g. site assessment) does your representation relate? Please state the paragraph number which relates to your representation or Policy reference if relating to the Neighbourhood Development Plan.**

|  |  |  |  |
| --- | --- | --- | --- |
| Para 5.2A, B and C |  | Policy Reference: |  |

**Do you support, oppose, or wish to comment on this paragraph? (Please select one answer)**

Support

Support with modifications

Oppose

Have comments

## Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)

**Paragraph 5.2 A** is poorly drafted. It mentions green vistas, open spaces, views . Are these defined anywhere?

**Paragraph 5.2B** We get a reference to green spaces – are they different to green vistas, open spaces, views in 5.2A?

“The village remains inconspicuous from the surrounding countryside or when entering via road” This is an irrelevant concept and may contribute to speeding traffic as motorists may not realise they have entered Riseley. -delete please

**Paragraph 5.2C**

Please add “into old age” to the end of the headline.

**Policy H1 Housing Mix page 30**

This policy should be the same as the proposed Bedford Borough Policy DN1(s) in the developing Local Plan 2044 It should apply to sites of 10 or more dwellings and require 30% to be affordable homes.-redfaft.

**Policies CF2 and CF3 oppose**

Policy CF2 Open Spaces and Recreation

These are two separate issues and should not be lumped together.

Paragraph 13.8 page 33

Village Open spaces- Location and Attributes

Area G Field off High Street, Bottom End- the attributes description should be the same as the description on BBC Policy AD40 not one made up by the Neighbourhood Plan group to include heritage assets-Delete and substitute as follows

*Area G -The gap provides visual relief in an otherwise built up area punctuating the street scene; The open space assists the transition between village and countryside providing a soft edge to the village which is pleasing visually.*

*Existing designated open spaces as shown on the Policies Map will be protected from development .* This wording should be identical to Bedford Borough Council Policy AD40 and it is not. Please note that in CF3 Local Green Spaces, a higher designation than AD40, development is only resisted but Open Spaces, which probably means Village Open Spaces, are protected from development. Confusing and unhelpful drafting. Redaft please.

**Please set out what change(s) you consider necessary to make the Plan able to proceed to the next stage of examination and eventually referendum, related to the objection you have raised. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet if necessary).**

The Plan needs to be paused a fresh Steering Group formed and a proper engagement and consultation process followed to allocate sites for development in Riseley. The word Riseley does not appear all in the developing Bedford Borough Council 2040 Local Plan! The current Plan for submission does not help Riseley.

**PART C**

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

## If an oral examination is necessary would you like to participate? (please select one answer)

*No, I do not wish to participate at an oral examination* ........................................................

*Yes, I wish to participate at an oral examination* ..................................................................

## Please note the Examiner will determine whether an oral examination is necessary.

**If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)**

The entire Neighbourhood Planning process in Riseley has been dominated by exclusion and top down imposition. . Engagement and effective consultation have been minimal. This is the last chance to rectify the situation and seek ways to build a Neighbourhood Plan that will help Riseley develop and prosper.

**If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.**

*Please notify me* ................................................................................................................

**Appendix 1**

**Serious error in the information displayed at the Riseley Neighbourhood Plan Public Consultation**

Sonia Gallaher, Senior Planner, Planning Policy, Bedford Borough Council has confirmed that there was a serious error in the information displayed at the Riseley Neighbourhood Plan Public Consultation last September regarding Green Belt Land. This incorrect information was very misleading and may well have caused visitors to the public consultation to have completed the questionnaire believing that sites 512 and 459, which both have in part AD40 designation, were Green Belt, when they are not. This undermines the validity of the public consultation with regard to sites 512 and 459

A close-up of a sign

Description automatically generated with low confidence

Misleading information re Green Belt Land on display board at the public consultation September 2021.

Dear Mark

Further to my email to Alison dated 21 January 2022, you can that the email below from Sonia Gallaher, Senior Planner, Planning Policy, Bedford Borough Council dated 26 January 2022, confirms that there was a serious error in the information you displayed at the Riseley Neighbourhood Plan Public Consultation last September regarding Green Belt Land. This incorrect information was very misleading and may well have caused visitors to the public consultation to have competed the questionnaire believing that sites 512 and 459, which both have in part AD40 designation, were Green Belt, when they are not. This undermines the validity of the public consultation with regard to sites 512 and 459.

Sonia Gallaher goes on to confirm that there is no blanket ban on potentially allocating a site in a Neighbourhood Plan designated Policy AD40 Village Open Space, which is what the Riseley Neighbourhood Plan Group have done. In the AECOM “summary of justification for the red overall rating” for Site 512, it is stated “therefore, it is unlikely the site could be developed without compromising the (policy AD40) designation.” “Unlikely” is not “can’t”. AECOM have confirmed that it is not up them to make the final decision , it is up to Riseley Parish Council who have already formally supported the development of Site 512, and please note the Parish Council used the word "support" not "no objection" see www.riseleyvillage.co.uk/minutes-september-2019, as did 70 residents of Riseley, in the recent planning applications and Sonia confirms that it is possible to allocate Site 512, subject to consultation with Bedford Borough Council, to see if a layout/design can be developed that does not compromise the two reasons the site was designated as a Village Open Space.

It does appear that Site 512 has been assessed on the basis of a misunderstanding of Bedford Borough Council's policies and should be ranked higher and added to the sites with the potential to be allocated in the Riseley Neighbourhood Plan.

Sue and I look forward to hearing from you.

Regards

George

From: Sonia Gallaher <sonia.gallaher@bedford.gov.uk>

Date: 26/01/2022 15:09:43

Subject: RE: [External] Policy AD40 and Neighbourhood Plans

To: George Davies <georgedavies160@gmail.com>

Bedford BC - OFFICIAL-Unsecure

Dear George,

I can confirm that the information in the photo that you supplied about Village Open Spaces and green belt is incorrect. Village open spaces and view designations do not have equivalent protection to green belt. This is only for designated Local Green Spaces.

Allocations and Designations Local Plan Policy AD40 allows development on a site designated as a Village Open Space where it can be shown that the reasons for the designation (which differ from site to site) are not compromised, or where there are other material considerations that outweigh the need to retain the open space or view undeveloped. In some circumstances that may mean that development can be justified but in others it may be that development would not be appropriate. The background paper that was produced for the Allocations and Designations Local Plan 2013 outlining these reasons for the designations and the methodology is on our website here. In terms of plan making, it is for the plan maker to weigh up the evidence and justify the selection of sites.

I trust this is of help. I would suggest that you contact the Riseley Parish Council Clerk if you have any further queries about the Riseley Neighbourhood Plan production.

Many thanks

Sonia Gallaher, Senior Planner, Planning Policy, Bedford Borough Council

**Appendix 2**

**Public Consultation Questionnaire-not fit for purpose**

The golden rule of questionnaire design is only ask one question at a time. This rule was broken frequently in the Riseley Neighbourhood Plan Consultation Questionnaire. The responses you get to a multipart question are meaningless. This is why respondents have used so much free text outside of the defined comments boxes and, in part, why the analysis is taking so long.

**Best practice for creating items (questions) Imperial College London  
*Avoid 'agree-disagree' responses*** *Agree-disagree response options may introduce acquiescence bias, which is the tendency to agree with an item regardless of its content (Wright, 1975).*

*Asking respondents to rate their level of agreement to different statements can be cognitively demanding, which increases respondent error and reduces respondent effort (Fowler, 2009).*

*Instead, use verbally labelled response options that reinforce the underlying topic (e.g., the responses for “How happy are you?” would be not at all happy, slightly happy, somewhat happy, quite happy, extremely happy).*

***Empirical evidence demonstrates that agree-disagree response options diminish item quality and are among the “worst ways to present items****”(Saris, Revilla, Krosnick, Schaeffer, & Shaeffer, 2010) and (Gehlbach & Artino Jr., 2018, p. 361).*

***Use at least five response options per scale*** *Use at least five response options per scale to capture a wider range of perceptions. Research indicates that the “sweet spot” of the number of response anchors is about five (Weng, 2004; Nielsen, Makransky, Vang, & Danmeyer, 2017).*

*A five-item scale that assesses a representative cross-section of a respondents experience should improve measurement (Gehlbach & Artino Jr., 2018).****Ask about one idea at a time*** *Ask about one idea at a time rather than using double-barrelled items, which ask about two or more ideas in the same question (e.g., instead of asking, “How happy and engaged are you?” ask two questions, one about happiness and one about engagement). If you use double-barrelled items, you risk respondents responding to only one part of that item (Dillman, Smyth, & Christian, 2014)*[*https://www.imperial.ac.uk/education-research/evaluation/tools-and-resources-for-evaluation/questionnaires/best-practice-in-questionnaire-design/*](https://www.imperial.ac.uk/education-research/evaluation/tools-and-resources-for-evaluation/questionnaires/best-practice-in-questionnaire-design/)

**Survey Monkey The go-to guide for crafting better questions**

***Don’t use double-barrelled questions*** *Although it might be tempting to combine two questions into one, resist the urge or risk the reliability of your survey data. Take, for example, the following market research question: “Do you like our brand new ice lolly flavour and would you buy it more frequently than the original flavour?”*

Since *there are two questions embedded within, it’s difficult to gauge what respondents feel about each of the statements.*[*https://www.surveymonkey.co.uk/mp/online-questionnaires/*](https://www.surveymonkey.co.uk/mp/online-questionnaires/) *Stay away from asking double-barreled questions.  
Double-barreled questions are when you ask for feedback on two separate things within a single question.  
  
Here’s an example:  
  
“How would you rate the quality of our product and support?”  
  
How would the respondent answer this question? Would they address the quality of the product? The quality of support? Maybe they’d skip the question or (worse) leave your survey altogether.  
  
You can fix a double-barreled question by either choosing one thing to ask or by breaking the question up into 2 separate ones.*[*https://www.surveymonkey.co.uk/mp/survey-guidelines/*](https://www.surveymonkey.co.uk/mp/survey-guidelines/)

The golden rule of questionnaire design is only ask one question at a time. This rule was broken frequently in the Riseley Neighbourhood Plan Consultation Questionnaire. The responses you get to a multipart question are meaningless. This is why respondents have used so much free text outside of the defined comments boxes and, in part, why the analysis is taking so long.

Please see the following examples of poor design from the Riseley Public Consultation Questionnaire:

*Objective GS1 Retain Open Spaces, Views and Local Green Spaces as identified on the Bedford Borough Council Policies Map insert 28 Riseley 2020 and protect them from development.*

*Agree Disagree*

How does a respondent answer if they agree with no development on Local Green Spaces of which Riseley has two, but disagree with no development on Open Spaces? How do respondents know what they are Agreeing or Disagreeing to, when the Policies Map is not included in the questionnaire? A respondent may not want development on the Local Green Spaces, Ross Meadow and the Playing Field but does want to see the village given the choice to accept appropriate development on Open Spaces, when the reasons for designation are not compromised or a material benefit outweighs the need to keep the land undeveloped.

*Objective D4 Development is preferred on sites with previous development.*

*Agree Disagree.*

There may be other sites which have not been previously developed but have a greater benefit to Riseley - how do respondents answer with only Agree or Disagree as the response?

*Objective D5 "Design of housing should be in keeping with the surrounding properties and the village".*

*Agree Disagree*

What does this mean? It depends what is meant by " in keeping". As written, it means that only medieval dwellings can be built within sight of Philip Strickland's house! How do you interpret the replies to this question?

*Objective NE1 "The natural environment, including landscape features, biodiversity, green spaces and views and public rights of way will be protected and enhanced."*  
*Agree Disagree*

This is a four component question and there may be sites where development would give a greater benefit to the village. Unanswerable in its current form.

*Objective NE3 "Retain existing trees"*  
*Agree Disagree*

Does this mean never cut down another tree in Riseley? Not an absolute, can't answer agree or disagree, there may well be exceptions.

*Objective NE5 " Previously developed sites are preferred for development to minimise the risk of flooding"*  
*Agree Disagree*

This has two issues in one item and is impossible to answer with agree or disagree. Do 40 dwellings on the Maggie B site represent a bigger or lesser flood risk than 7 bungalows on The Paddock Site 512?

*Objective NE6 "Retain the open aspect and views of the brook and the wildlife habitats"*  
*Agree Disagree*

Again two concepts in one question, one about the views of the brook and one about wildlife habitats. Impossible to answer with agree or disagree.

*Objective NE7 "Protect and enhance biodiversity within the Parish"*  
*Agree Disagree*

What does this mean in practice? Unanswerable in its current form.

*Objective BE2 " The historic character and heritage assets should be preserved and enhanced"*  
*Agree Disagree*

Two things in one broad brush question and neither adequately defined. Unanswerable question

*Objective BE3 " High quality design will be secured in all new developments reflecting the distinctive character of Riseley"*  
*Agree Disagree*

Amazingly subjective. What is the distinctive character of Riseley and who decides it? How can anyone answer this question without knowing what it means.

*Objective BE4 "Rooflines (heights) of new developments should be compatible with surrounding dwellings".*  
*Agree Disagree*

What does "compatible" mean? Does it mean one can not build a house if surrounded by bungalows or bungalows adjacent to houses?

The questionnaire asked for responses differently in the on-line version and in the hard copy version.

In the on-line version, respondents were asked to mark "Agree" or "Disagree" as the response. In the hard copy version, respondents were asked "Do you agree?" then mark "Yes" or "No" as the response. The on-line version should have been identical to the hard copy version. Using a different response format can introduce ambiguity into the meaning of the responses.

**Free text outside the comments box.**

Because of the poor quality of the design of the questionnaire respondents put free text outside of the defined comments boxes, please see example below. The RNPSG decision, as stated in their minutes dated November 21, not to include comments written outside the defined comments boxes in the questionnaires is unacceptable.

**Appendix 3**

**AECOM Site suitability Assessment for Site 512, The Paddock, has factual errors**

**Question 5**

***Is the land classified as the best and most versatile agricultural land (Grades 1,2, or 3a)? Yes-Grade 3 (no specification between 3a and 3b)***

Site 512 is listed as Grade 3 land. This is incorrect. You can’t just dream up the Agricultural Land Classification, you must use the best possible data source. Site 512 is identified on the 1969 MAFF agricultural Land classification map as "**Land predominantly in urban**use" and on the Defra 2004 Predictive Best and Most Valuable Land Assesement map, Site 512 is classified as " **Urban/Industrial**" . In the absence of an Agricultural Land Classification survey of the site this is the best data available and should have been used  by AECOM and the RNPSG. It is not acceptable to just make it up. Should be green.

Source [Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk)](https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land)

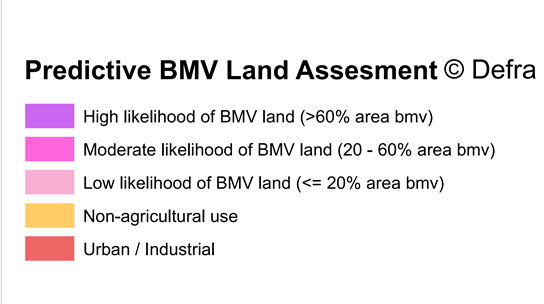
**Likelihood of Best and Most Versatile (BMV) Agricultural Land -  map Eastern Region (ALC020)**

[**http://publications.naturalengland.org.uk/category/5208993007403008**](http://publications.naturalengland.org.uk/category/5208993007403008)

**Published 2017/10/04**

A picture containing map, text, atlas, diagram

Description automatically generated



A map of the world

Description automatically generated with low confidence

A map of a city

Description automatically generated with low confidence

A picture containing text, stationary, paper product, map

Description automatically generated

An aerial view of a town

Description automatically generated with low confidence

**Aerial view of Riseley June 2019**

**Easy to see where the arable cropping ends**

**PF  School playing field**

**GA Garden (Gell)**

**G -grass, never cultivated for arable crops**

**512 The Paddock- rough grass never cultivated for crops**

**Question 6**

***Does the site contain local wildlife-rich habitats?***

A preliminary ecological survey including GCN eDNA and a reptile survey found nothing of note. The full PES is attached. The ecologist commented that because of its proximity to houses on three sides, the site is clearly patrolled by domestic cats who suppress any wildlife. Should be green

A link to the Preliminary Ecological Appraisal report is below

|  |  |
| --- | --- |
| Preliminary Ecological Appraisal 2 at High Street, Riseley-Eco-Check Ltd- 01052019.pdf | [Preliminary Ecological Appraisal 2 at High Street, Riseley-Eco-Check Ltd- 01052019.pdf](https://www.thepaddockriseley.co.uk/resources/Preliminary%20Ecological%20Appraisal%202%20at%20High%20Street%2C%20Riseley-Eco-Check%20Ltd-%2001052019.pdf) Size : 3837.806 Kb Type : pdf |
|  |  |

**Question 15**

***Are there any significant trees within or adjacent to the site?***

There are no significant trees within or adjacent to the site – should be green.

**Question 18**

***Would development of the site cause loss of social, amenity or communal value*?**

In reality there is no loss of social, amenity or communal value by developing the site as proposed.  The next question 19 re loss of visual amenity is correctly answered No.  The answer to question 18 should be no - green

**Question 19**

***Is the site low, medium or high in terms of landscape?***

The answer should be low and therefore should be green.

**Issues with the Riseley Site Assessments**

Please find attached in the pdf below a detailed list of errors / inaccuracies with the AECOM report and theAnalysis of the Site Suitability Assessments conducted by Riseley and AECOM report, that I consider to be factual and/or verifiable and needed correcting.

My document in the attached pdf is long, detailed and evidence based, unlike the AECOM report.

It would have been much better to have been able to have meaningful dialogue with the Parish Council / RNPSG rather than enter into email ping pong.

I refer you to Duncan's email, as Chair of the Riseley Parish Council, to me, dated 19

November 2021 where he stated "*I will recommend a consultation takes place with*

*landowners and developers, on a one to one basis, to explain the rating system for their site and the rationale in the decision process*." **This never happened.**

Extract of email from me to Riseley Parish Council, dated 13 December 2021

*“The RNPSG is working hard in isolation, but as a landowner I am keen to help them get their information right. This must be the case for other landowners and the village - please can we start the meaningful dialogue.”*

I made this request in the Riseley Parish Council Open Forum on December 17 2021

*"In the interest of fairness and accuracy I request that meaningful dialogue takes place between the RNPG and village stakeholders including landowners before any output from the public consultation is published."*

**At the Parish Council Meeting on 20 January, Mark Chamberlain confirmed that the RNPSG have no intention of talking to landowners,**

As you can see in the emails in the pdf below I raised many issues regarding the AECOM report, with Mark and Riseley Parish Council back in August 2021 before the September public

Public Consultation.

