

INDEPENDENT EXAMINATION OF ADDINGHAM NEIGHBOURHOOD PLAN

EXAMINER: Andrew Freeman BSc (Hons) DipTP DipEM FRTPI

Jane Markham
Clerk to Addingham Parish Council

Iain Cunningham
City of Bradford Metropolitan District Council

Examination Ref: 01/AF/ANP

Via email

23 May 2019

Dear Ms Markham and Mr Cunningham

ADDINGHAM NEIGHBOURHOOD PLAN EXAMINATION

Following the submission of the Addingham Neighbourhood Plan (the draft Plan) for examination, I would like to clarify several initial procedural matters. I also have a number of preliminary questions for Addingham Parish Council and the City of Bradford Metropolitan District Council. These are attached in the Annex to this letter.

1. Examination Documentation

I can confirm that I am satisfied that I have received a complete submission of the draft Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement and the Regulation 16 representations, to enable me to undertake the examination.

Subject to my detailed assessment of the draft Plan, I have not identified any very significant and obvious flaws that might lead me to advise that the examination should not proceed.

2. Site Visit

I intend to undertake a site visit to the Neighbourhood Plan Area during the week commencing 27 May 2019. This will assist in my assessment of the draft Plan, including the issues identified in the representations.

The site visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the Neighbourhood Area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

3. Written Representations

At this stage, I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. However, I will reserve the option to convene a hearing should a matter(s) come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

4. Further Clarification

I have a number of initial questions seeking further clarification, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response within **two weeks** of receipt of this letter. It is possible that I may have further questions, following my site visit.

5. Examination Timetable

As you will be aware, the intention is to examine the Neighbourhood Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within 4-6 weeks of submission of the draft Plan. However, as I have raised a number of questions I must provide the opportunity to reply. Consequently, the examination timetable will be extended but please be assured that I will aim to mitigate any delay as far as is practicable. The IPe team will seek to keep you updated on the anticipated delivery date of the draft Report.

If you have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter and any subsequent response, are placed on the City of Bradford Metropolitan District Council and the Parish Council websites.

Thank you in advance for your assistance.

Your sincerely

Andrew Freeman

Examiner

ANNEX

From my initial reading of the submission draft Addingham Neighbourhood Plan and the supporting evidence, I have a number of questions for the Parish Council and one for the City of Bradford Metropolitan District Council. I have requested the submission of a response within **two weeks** of receipt of this letter.

Questions for the Parish Council

1. Policy ANDP1 a): To gain the support of the policy, any housing development would have to be on previously developed land. Is that the intention?
2. Policy ANDP1 b) and paragraph 7.4: To assist developers, the meaning of protected open space will need to be clear. Is this the same as “protected recreation”?
3. Policy ANDP1 c) – “valued views”: Are these the same as the views and vistas shown on Policies Map 1?
4. Policy ANDP1 e): Is this part of the policy intended to cover all designated heritage assets (not just listed building and the Conservation Area)? To aid interpretation (and under Policy ANDP2), should the complete Conservation Area boundary be shown on Policies Map 1?
5. Would it be appropriate to include a policy acknowledging the need for new development beyond the settlement boundary?
6. Policy ANDP2: The first paragraph of the policy (and criterion k and elsewhere) would require new development to conserve and enhance. This goes beyond the statutory test (Planning (Listed Buildings and Conservation Areas) Act 1990) to conserve or enhance. Is this reasonable?
7. Policy ANDP2 b): Should the use of appropriate materials be subject to viability?
8. Policy ANDP2 c): Would it be reasonable to add that highway safety should not be compromised?
9. Policy ANDP2 f): Clarity will be needed over what is meant by “valued areas of open space” (see above).
10. Policy ANDP2 h): Are there instances where a modern shopfront would be justified?
11. Policy ANDP3: Developers should be able to rapidly identify local non-designated heritage assets. Are these all listed in Appendix 1?
12. Policy ANDP4 h): Will all applicants know what is meant by “Secure (sic) by Design features”? Should a reference be added?
13. Paragraph 7.18: Is it clear what is meant by “good practice documents”?
14. Policy ANDP5 d): Is there clarity over the extent of the views?
15. Policy ANDP5 f): Is it clear what is meant by “the area’s historic water management systems”?

16. Policy ANDP6: Is it clear what is meant by “additional infrastructure provision”? Is the term to be limited to the matters identified in paragraph 7.31?

17. Policy ANDP10 would be supportive of any amount of additional parking. Is this reasonable? Should there be some limit (eg, not exceeding the parking standards of Bradford Council)?

18. Policy ANDP10: Should there be reference to the need of cyclists?

19. Policy ANDP11 and Appendix 2: Some of the proposed Local Green Spaces (LGS) are already protected by Green Belt or Conservation Area designation. What additional local benefits would be gained by LGS designation?

20. Policy ANDP11 – Old First School: Should the boundary be amended to take in the whole of the former First School site?

21. Paragraph 7.56 – summary of analysis: Appendix 2 does not provide sufficient evidence (for example, type of particular local significance). Further detail is needed.

22. Policy ANDP14 b): Should there be reference to the Sequential Approach?

23. In the light of the representations, please comment on the adequacy of consultation at the Regulation 14 and 16 stages; also, the decision to omit housing site allocations.

24. In the light of representations, has appropriate prominence been given to the following matters: All heritage assets; Green Belt; Flood Risk; European Habitats Regulations; Bolton Abbey; and the Yorkshire Dales National Park and Nidderdale Area of Outstanding Natural Beauty?

Question for the City of Bradford Metropolitan District Council

26. Does the City of Bradford Metropolitan District Council have any comments on the submission version of the Plan?