

Addingham Neighbourhood Development Plan

Respondent ID	001	Name & Organisation	North Yorkshire County Council	Date Received	11/16/2018
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	-	Nature of Comment	Observation
Comment					
No comments to make					
Comment Reference	ANDP001/1				

Respondent ID	002	Name & Organisation	Wood Environment & Infrastructure Solutions UK Limited (for National Grid)	Date Received	12/5/2018
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	-	Nature of Comment	Observation
Comment					
National Grid has identified the following high-pressure gas transmission pipeline as falling within the Neighbourhood area boundary:					
<ul style="list-style-type: none"> • FM29 - Pannal to Nether Kellett 					
From the consultation information provided, the above gas transmission pipeline does not interact with any of the proposed development sites.					
Gas Distribution – Low/Medium Pressure					
Whilst there are no implications for National Grid Gas Distribution’s Intermediate/High Pressure apparatus, there may however be Low Pressure(LP)/Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network, please contact plantprotection@cadentgas.com					
Electricity distribution					
Information regarding the distribution network can be found at: www.energynetworks.org.uk					
Comment Reference	ANDP002/1				

Respondent ID	003	Name & Organisation	Historic England	Date Received	12/10/2018
Document	Draft Neighbourhood Development Plan; Strategic Environmental Assessment	Section, Policy or Paragraph	-	Nature of Comment	Observation
Comment					
We write in response to your consultation regarding the Submission Draft of the Addingham Neighbourhood Development Plan 2018-2030. We have previously provided advice and comments to Addingham Parish Council in our letter dated 24 August 2018.					

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With regards to the SEA, we previously gave advice to the Parishes Planning Consultants, in our letter of 24 August 2018, that we concurred “with the conclusion of the Addingham Neighbourhood Plan SEA and HRA Screening Report v.2 July 2018, set out on pg. 17, para. 5.5, that the preparation of a SEA is not required”.

Having carefully considered the Submission Draft of the Addingham Neighbourhood Development Plan 2018-2030, we do not consider it necessary to provide any further comments.

Comment Reference ANDP003/1

Respondent ID	004	Name & Organisation	West Yorkshire Archaeology Advisory Service		Date Received	12/19/2018
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP2		Nature of Comment	Support
Comment						
WYAAS supports the proposed wording of the proposal policy ANDP2 New Development in and affecting the setting of Addingham Conservation Area and believes that this policy is both in accordance with the NPPF and would help conserve the character of Addingham's conservation area.						
Comment Reference	ANDP004/1					

Respondent ID	004	Name & Organisation	West Yorkshire Archaeology Advisory Service		Date Received	12/19/2018
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP3		Nature of Comment	Support
Comment						
WYAAS supports the proposed wording of the proposed policy ANDP3 New development Affecting Non-Designated Heritage Assets and believes this policy is both in accordance with the NPPF and would help conserve Addingham's significant non-designated heritage assets.						
Comment Reference	ANPD004/2					

Respondent ID	005	Name & Organisation	Local Resident		Date Received	12/19/2018
Document	Consultation Statement	Section, Policy or Paragraph	Consultation Process		Nature of Comment	Object
Comment						
<ol style="list-style-type: none"> 1. The section 14 and section 16 consultation process is inadequate. There is a lack of publicity and information and no consultation process. The limited publicity material is misleading. 2. The housing site allocations were unilaterally omitted from the plan by the Parish Council without notice and without consulting the village residents on this significant action. <p>Attached reports provide details on the matters.</p>						
Comment Reference	ANDP005/1					

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Respondent ID	005	Name & Organisation	Local Resident		Date Received	
Document	Consultation Statement		Section, Policy or Paragraph	Page 4	Nature of Comment	Object
Comment						
<p>P4 states that the Parish Council 'has engaged local residents in the Neighbourhood Planning process throughout'. This is not correct. The public were consulted and informed up to an including the public event/exhibition on 9/10 March 2018 and the related feedback but there has been a lack of consultation and very little information - particularly regarding subsequent Housing Allocations deletion and the Section 14 Consultation.</p> <p>The Parish Council have therefore failed to comply with requirements:</p> <p>"..a qualifying body must - a) publicise in a manner that is likely to bring it to the attention of people who live, work and carry out business in the area".</p> <p>The Parish Council have failed to take into account and respect the concerns and wishes of the community in its unilateral and unannounced decision to omit Housing Allocations. There was also a failue to engage with the Forum group and the Forum was not allowed to comply with the set down purposes and principles (see attached document for details).</p> <p>"Detailed feedback received from Bradford MDC Planning department, raising objections over inclusion of housing site policies in the Draft Plan".</p> <p>The feedback comments (appendix 5) do not object to Housing Allocations as an objective - they request further work and information on the selected sites (which could have been provided relatively quickly) and only objected to the inclusion of windfall individual house sites - 54 in number. This figure was based on an analysis of a number of previous years when 4 dwellings per year had been constructed. This figure could simply have have been altered to include only those constructed since 2013 (20) and accept that future windfalls could not be foreseen.</p>						
Comment Reference	ANDP005/2					

Respondent ID	005	Name & Organisation	Local Resident		Date Received	
Document	Consultation Statement		Section, Policy or Paragraph	Page 17 - Item 22	Nature of Comment	Object
Comment						
<p>P17 item 22 - "...the decision not to proceed with housing allocations was taken in a transparent and open manner, two Parish Council meetings were held on 4 and 20 June...".</p> <p>Residents would only have been aware of thses meetings from notices on the council noticeboard. The public were not informed of their significance in any way. Printing of the leaflet was only approved at the meeting of 20 June, therefore could not have advised of these 2 meetings (minute 110/18). It is also noted that with the minutes that Cllr Naylor briefed members outside the meeting - there are no records of this briefing. Hardly " a transparent and open manner".</p>						
Comment Reference	ANDP005/3					

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Respondent ID	005	Name & Organisation	Local Resident		Date Received	
Document	Consultation Statement		Section, Policy or Paragraph	Page 19 - Item 24	Nature of Comment	Object
Comment						
P 19 item 24 states the requirements for consultation. There was a lack of information and publicity - the leaflet does not inform on any of the listed requirements, in particular no consultation period dates are given.						
Comment Reference		ANDP005/4				

Respondent ID	005	Name & Organisation	Local Resident		Date Received	
Document	Consultation Statement		Section, Policy or Paragraph	Page 19 - Item 27	Nature of Comment	Object
Comment						
P19 item 27 indicated where copies of the plan could be inspected. None of these locations (except the the Co-Op) are available in the evenings or weekends and none are suitable to study documents and notes. Moreover, none of the documents are complete - there is only the Plan document without any addenda sections, in particular the comments section.						
Comment Reference		ANDP005/5				

Respondent ID	005	Name & Organisation	Local Resident		Date Received	
Document	Consultation Statement		Section, Policy or Paragraph	Page 32	Nature of Comment	Object
Comment						
P32 - Objections to removal of Housing Allocations. There is a statement that there are 24 identical responses - not correct. There are 24 different responses, all making a variety of objections to the deletion. The Parish Council response is that the objections are based on a misunderstanding on the part of a few village residents. It is correct that only a few village residents are aware and have any knowledge of the Parish Council actions and decision in acting against the wishes and interests of the community. Should the required openness and consultation have taken place there would have been many more comments.						
Comment Reference		ANDP005/6				

Respondent ID	005	Name & Organisation	Local Resident		Date Received	
Document	Consultation Statement		Section, Policy or Paragraph	Page 33 - Item 2	Nature of Comment	Object
Comment						
P33 item 2 - The Parish response statement claims that "it will be extremely unlikely that a draft Plan containing housing allocations could progress through a system in the face of objections from the planning authority...". There is no evidence to support this statement.						
Comment Reference		ANDP005/7				

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Respondent ID	005	Name & Organisation	Local Resident		Date Received	
Document	Consultation Statement		Section, Policy or Paragraph	Page 33 - Item 3	Nature of Comment	Object
Comment						
P33 item 3 - The Parish Council continues to maintain that it is intended to reinstate the Housing Allocations at future stage. This is despite written confirmation from the Director of Place that this will not be possible. No answers can be obtained from the Parish Council to queries on how and when the re-introduction process could occur. No work has been carried out on this matter since May 2018.						
Comment Reference		ANDP005/8				

Respondent ID	005	Name & Organisation	Local Resident		Date Received	
Document	Consultation Statement		Section, Policy or Paragraph	Page 33 - Item 5	Nature of Comment	Object
Comment						
P33 item 5 - The Parish Council admit that "In the event that any development does take place in the village...before a Neighbourhood Plan could include a housing site policy the PC wishes to take advantage of the increased CIL funding...". This links to the original reason given by Cllr. Tennant, in his proposal to Council on 16 May 2018, that Housing Allocations be omitted - the reason for urgency stated at the meeting was that if not agreed the Council "stood to lose £1m. in funding". The Parish Council have consistently refused to minute this fundamental statement. (I have made a formal complaint to this regard see council minutes for the November meeting). A calculation of the potential Parish Council CIL income relating to the number dwellings proposed in formal developer enquiries to the planning department (approx 300) equates very closely to the quoted £1m figure and illustrates that finance is a major factor in the decision rather than the wishes of the villagers.						
Comment Reference		ANDP005/9				

Respondent ID	005	Name & Organisation	Local Resident		Date Received	
Document	Consultation Statement		Section, Policy or Paragraph	Page 36 - Item 6	Nature of Comment	Object
Comment						
P36 item 6 States that a "...a significant number of residents opposed the policy in respect of one of the 3 sites..". The word opposed is not correct - there were a number of concerns and questions relating to the "The Old School Site" - these related to the extent of any development and how site access could be resolved. These were matters which have been addressed in the development of the Plan.						
Comment Reference		ANDP005/10				

Respondent ID	005	Name & Organisation	Local Resident		Date Received	
Document	Consultation Statement		Section, Policy or Paragraph	Page 39 - Item 1	Nature of Comment	Object
Comment						

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P39 Item 19. There is no mention of surveyors working on fields adjacent to the cricket ground. The Parish Council Clerk has also stated that developers are looking at potential development on this land. I made a complaint to the Bradford Monitoring Officer that the owner of the land - a parish councillor - remained in the meeting on 16 May and voted in favour of the intention to omit housing allocations. A copy of the response dated 2 July 2018 is attached. Matters appear to have progressed.

Comment Reference	ANDP005/11
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Respondent ID	005	Name & Organisation	Local Resident	Date Received	
Document	Consultation Statement	Section, Policy or Paragraph	-	Nature of Comment	Object
Comment					
<p>Addingham Neighbourhood Forum - The Forum was set up by the Parish Council as a working group to carry out the detailed work of drafting the Neighbourhood Plan. The group comprised 8 members of the local community with a variety of expertise - some with a professional background in planning and related subjects.</p> <p>Terms of reference were provided; of particular relevance are:</p> <p>"1. Purpose. The Forum will engage with the local community to ensure that the Plan is truly representative of local views. The Forum will maximise support taken in the Neighbourhood Plan by ensuring high levels of community engagement through the Plan making process"</p> <p>"Principles...encourage widespread participation and giving equal consideration to opinions and ideas from all members of the community".</p> <p>Members of the group proceeded with the preparation of the draft plan and agreed principles and objectives - including housing allocations. Formal meetings were held to review progress, chaired by a Parish Councillor. The consultant was present at some of these meetings but direct contact between the working group and the consultant was not permitted - all had to be via the Parish Clerk. Public attendance at Forum meetings was also not allowed.</p> <p>Display material was prepared and a widely advertised public event was held on 9 and 10 March 2018. Some 300 village residents attended. The overwhelming concerns related to potential housing developments and support the principle of including Housing Allocations as one of the primary elements of the Plan. The event was run by volunteers with little involvement of councillors - few even visited the event.</p> <p>Forum members continued with the development and editing of the Draft Plan in the expectation of this being taken to Section 14 public consultation. The Parish Council however, at its meeting of 16 May 2018 agreed that the Housing Allocations section should be omitted. Forum members were neither consulted or advised on this action. The Council decision was confirmed at an extraordinary Parish Council meeting on 4 June 2018.</p> <p>Bradford MDC formal comments on the Draft Plan were issued to the Parish Council on 7 June 2018 (yet not circulated to the Forum members until 25 June). At the Parish Council meeting on 20 June it was agreed to circulate a leaflet - this had already been prepared and printed - again without consulting or advising the Forum (Copy attached). This states Housing Allocations have been omitted from the Plan because of compliance with Bradford requirements - "...could take months, possibly years" and also that Site Allocations will be reintroduced at some future date.</p>					

A Forum meeting was held on 29th June and members expressed strong objections to the actions of the Parish Council. The Forum members had by now had the opportunity to study the Bradford feedback comments and considered that, in particular, the requirements with regard to additional work required on the Housing Allocations was not onerous and could be dealt with in a short period of time. The Parish Council decision to omit Housing Allocations could leave the village in a vulnerable position with regard to developer proposals. They objected to the statement in the leaflet that work "could take years" and questioned the practicality of the statement that Housing Allocations could be reintroduced at a later stage.

All 8 non-Council members met on 30th May and produced a joint list of concerns and queries for the Parish Council and consultant. At the Forum meeting on 29 June the chairman (Cllr. Tennant) refused to address these matters. Forum minutes of meeting failed to record any for the foregoing - despite subsequent objections to their accuracy. Several forum members resigned because of the Parish Council actions and I was debarred from future meetings because I made a formal complaint regarding the inaccurate and incomplete records.

The modified plan was put out for Section 14 Consultation for a period ending on the 24 August 2018. The leaflet issued in late June gives no information regarding the consultation or the relevant dates. Members (and former members) of the Forum discuss the lack of public information and involvement and offered to organise a public exhibition/display event - this offer was declined by the clerk on 24 July.

The Forum Group had a meeting with John Grogan MP to express their concerns regarding the actions of the Parish Council and Forum member doubts as to the potential for the reintroduction of Housing Allocations. He undertook to contact Bradford MDC and subsequent correspondence from Steve Hartley, the Director of Place, confirms that if allocations not included in the plan then Bradford MDC will carry out the exercise themselves.

In the Autumn village newsletter (copy attached) the Parish Council continue to repeat the statement that if Housing Allocations are included "The process could be delayed, possibly for a couple of years" without any evidence or justification for this statement. They also state that they will continue with the preparation of Site Allocations information - although since May 2018 no actions have been taken in this regard.

The Parish Council decided at the meeting on 21 November - again without notification or formal proposal - to disband the Forum retaining only the 3 Parish Council members. The ex-forum members continue to question the actions of the Parish Council and seek clarification on the intentions for re-introduction of Housing Allocations. The NP has had a lack of support by the PC for the work of the Forum. The public have not been properly informed., consulted or involved. Furthermore misled regarding the reintroduction of Housing Allocations.

Attached newsletters and copy of complaint to PC.

Comment Reference	ANDP005/12
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Respondent ID	006	Name & Organisation	Coal Authority	Date Received	12/20/2018
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	-	Nature of Comment	Observation
Comment					

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As you will be aware the Neighbourhood Plan area lies within the current defined coalfield.

According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity including mine entries and likely unrecorded coal workings at shallow depth.

It is noted that the Neighbourhood Plan does not propose to allocate any sites for future development and on this basis we have no specific comments to make in respect of the Neighbourhood Plan.

Comment Reference ANDP006/1

Respondent ID	007	Name & Organisation	Natural England (Yorkshire & Northern Lincolnshire Team)		Date Received	12/21/2018
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	-		Nature of Comment	Observation
Comment						
<p>Thank you for consulting Natural England on the updated Addingham Neighbourhood Plan.</p> <p>Natural England notes the changes made to the plan and assessments and has no further concerns. We welcome the updated references to Bradford Core Strategy Policy CS8 in paragraphs 4.20 regarding biodiversity and 7.4</p> <p>Thank you for consulting Natural England on the Addingham Neighbourhood Plan. Natural England's Yorkshire and northern Lincolnshire Team are not in a position to review the latest draft of the neighbourhood plan at present or to assess the potential impacts on statutory nature conservation sites or protected landscapes. If you consider there are significant risks to statutory nature conservation sites or protected landscapes then please re-consult us detailing the areas on which you would like us to provide detailed advice.</p> <p>concerning Policy ANDP1 New Housing Development within Addingham Village which addresses the comments made in our letter dated 15 May 2018 (our ref 243093). We also broadly welcome chapter 4 of the plan which identifies key issues pertaining to our strategic environmental interests and objective 3 to conserve and enhance the area's natural environment. However we have no detailed comments to make.</p>						
Comment Reference	007/1					

Respondent ID	008	Name & Organisation	Local Resident		Date Received	1/4/2019
Document	Consultation Statement	Section, Policy or Paragraph	Whole Document		Nature of Comment	Object
Comment						
<p>COMMENTS ON THE CONSULTATION STATEMENT :-</p> <p>The above statement also refers to articles (plural) in the local press and suggests these were to inform residents of the two meetings. I am not aware of any such articles that specifically refer to these dates..</p>						

Note: quotations taken from parish council reports/minutes and other documents are shown in italics.

Page 17 - *“To ensure that the changes to the Preferred Option draft and the decision not to proceed with housing site allocations were taken in a transparent and open manner, two Parish Council meetings were organised on 4 and 20 June respectively. Residents were notified of these meetings and their significance by using a leaflet, posters and articles in the local press.”*

This suggests that members of the parish were being invited to attend to discuss the issue of the removal of Housing Allocations as a consultation. However, the PC’s Policy on the Conduct of Meetings states:

- 2. Anyone wishing to raise items during the public session must provide notice to the Clerk before the meeting starts and, if detailed issues are involved, questions/ concerns must be put in writing.....*
- 8. The public session will be expected to take no more than 15 minutes.*
- 9. Members of the public should expect to speak for no more than 2 minutes each.*

This level of restriction on involvement and discussion cannot be considered a ‘consultation’.

No leaflet was produced notifying residents of the dates of these two meetings. The leaflet that was circulated to residents (shown on page 64 of the document) was only approved at the meeting on the 20th June – minute 110/18 refers:

Resolved: *That the Clerk be authorised to issue a press release and organise the distribution of flyers and display of posters around the village to publicise the preparation of a new draft of the Neighbourhood Plan and then to publish it for the purpose of Regulation 14 formal consultation, as determined in Resolution 104/18, and that funding of up to £300 be authorised for printing and distribution costs, as necessary.*

The leaflet shown on page 64 is titled *“Keeping People Informed – of decision to remove housing sites”*.

There is no reference to it being to publicise any form of consultation.

It should be noted that the minutes of the council meeting on 4th June do not record the presence of any residents (Appendix 7 refers) and the minutes of 20th June record only 6 residents as being present (Appendix 8 refers). This demonstrates the ineffectiveness of the publicity.

The decision not to proceed with housing site allocations is not transparent. The parish council minute 90/18 (16th May 2018) states:

“That the draft Neighbourhood Development Plan be adopted for the purpose of publicising it, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area, as required by Regulation 14 of the Neighbourhood Planning (General) Regulations 2012, in the form of the draft submitted to the meeting, or as later revised following receipt of comments made by the planning authority, and in particular as revised to exclude the policies for housing site

*allocations, **if considered necessary**, and that the Clerk be authorised to process any such amendments accordingly.” (My bold emphasis).*

There is no subsequent council resolution minuted to confirm the deletion of housing site allocations, only a general resolution (Minute 104/18 of the meeting June 4th 2018, see Appendix 7):

“That the Clerk be authorised to work with planning consultants, Kirkwells, to produce an amended and simplified version of the Addingham Neighbourhood Development Plan for the purpose of submitting it for formal (Regulation 14) consultation, and with a view to completing the Plan for referendum in May 2019”.

Note that no proposer or seconder is minuted for either Resolution 90/18 or 104/18.

The only negative CBMDC comments on the housing allocations that are published in the Consultation Statement (Appendix 5, 4th page – pages are not numbered) are “possible future objections”:

“Policy ANDP1 Housing Allocations. Whilst the sites are likely to be suitable for Housing allocations at some level, the Plan and evidence, in its current form does not adequately justify these yields.”

And:

“With regard to the housing allocation policy and its approach, there is a danger that if left following its current ideology, the Council would have to object at Regulation 16. This centres on the aim to use future below threshold windfall development to lower the Core Strategy housing apportionment for Addingham by 54, which is completely unacceptable and does not accord with the Core Strategy. Paragraphs 7.7 and 7.8 should be reworded or deleted.”

On the basis of these comments the parish council state in the Consultation Statement:

“Housing allocation policy to be deleted”.

There is some evidence that discussions took place outside the parish council on the matter but these are neither minuted nor were the meetings open to the public:

“110/18 Addingham Neighbourhood Plan

Members had been briefed outside the meeting by Cllr Naylor. Detailed comments from BMDC had now been received and, following the decision of the Council taken at the meeting held on 4 June (Resolution 104/18), a redraft of the Plan was being prepared by consultants. Consideration was given to publicising recent developments as widely as possible”. (Appendix 8 refers)

The parish council have stated in writing that:

“If we were to continue work on a version of the Plan containing site allocations, even if we could deal with the specific issues and objections raised by planning officers, the

process could be delayed for an indeterminate period, possibly for a couple of years”.

The only evidence that has been released by the parish council that CBMDC planners have objected to the site allocations is that mentioned above. Any other objections by planners must therefore have been made informally and off the record since no records have been released.

Resident members of the Forum with professional planning experience considered these listed potential objections could be overcome. The parish council over-ruled them and deleted the housing allocations without further consultation.

Page 42 - “In addition, there have been 2 meetings held in public at which the reasons for revising the previous Preferred Options draft, as stated in Section 1 1-5 above, were explained and advice was received from the Parish Council’s planning consultants.”

Once again this suggests there were two open consultation meetings when they were in fact normal parish council meetings at which the restrictions on resident involvement outlined above apply. These meetings are notified to residents through the normal notices of parish council meetings posted on village notice boards and on the parish council website. No other publicity specific to these meetings was produced.

Page 43 - The parish council continues to advise residents that they will be able to reinstate the housing allocations at a later date:

“3. Specific comments relating to the housing site allocations may be reflected in later modifications of the Plan when it is possible to bring forward a policy for housing site allocations again”.

In recent correspondence with a local MP, the Strategic Director Place at CBMDC wrote “It is not possible to do that”.

Requests to the parish council for information on their proposed method of re-instating the housing site allocations have brought no response.

Page 45 – “None of the members of the Forum were working for the Council as “professionals” all were volunteers. The Council was provided with professional advice by planning consultants, Kirkwells”

This statement is highly misleading. The Forum included a professional architect (FRIBA) and a town planner, both with a high level of planning experience, one of whom is also working with a community in a West Yorkshire town on producing their neighbourhood plan. To dismiss their knowledge and expertise in such a cavalier manner demonstrates a fundamental lack of understanding of the complexity of the issues by the parish council.

Page 32 – “Residents grouped comments from 24 individual (identical) responses”

The responses are not identical. The subject matter (deletion of the Housing Allocations) may be the same but the content and the arguments are far from identical. This demonstrates a use of language to obfuscate the reality.

Page 65 - From the terms of reference for the Forum:

“All decisions made by the Parish Council shall be fully evidenced and supported through consultation with the local community.

- *Regularly report back to the Parish Council with recommendations for any decisions which need to be taken; and*
- *Agree, subject to ratification by the Parish Council, a final submission version of the Addingham Neighbourhood Development Plan. cross-section of volunteers from the community (stet)”*

The decision to remove the housing allocation is not fully evidenced, discussions took place outside the parish council meetings that are not recorded (see above) and the local community were not properly consulted over the decision to remove the housing allocations. The Forum members did not agree the final submission version of the Plan. There is no documented record of this agreement before the Plan was modified by the arbitrary removal of the housing site allocations.

Page 10 – *“13 July 2018: Formal consultation on draft Addingham Neighbourhood Development Plan for 6-week period to 24 August 2018”*

There are reports of meetings with a number of local groups:

- Addingham Primary School on 21st September 2018
- Addingham Churches Together on 27th September 2018
- Addingham Environment Group on 30th September 2018
- Addingham Totally Locally on 9th October 2018

All of these dates are outside the time frame for the formal consultation period and cannot therefore be included in the Consultation Statement.

Regulation 16 consultation:

The CBMDC website: <https://bradford.moderngov.co.uk/mgConsultationDisplay.aspx?ID=166> did not include the Consultation Statement until after December 14th when they were notified that it was missing from their site by a resident. This date is one month from the start of the consultation period. Subsequently CBMDC extended the consultation time frame by a week from 9th January to 16th January 2019, although as of 3rd January 2019 the Addingham Parish Council website was still quoting the old date. No publicity has been seen regarding this time extension from either the Parish Council or CBMDC. This comment form still contains the old date.

Comment Reference	ANDP008/1
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Respondent ID	009	Name & Organisation	SDS Land Ltd (for a client)		Date Received	1/4/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Objective 1/Policy	ANDP1/Paragraph 7.1	Nature of Comment	Object
Comment						
Landowner: Mr Walbank;						

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1. The housing allocations in the Plan do not comply with the Core Strategy and need for 200 dwellings
2. The Settlement Boundary should be slightly extended (as show in Plan 1 attached) to allow for housing growth and would form part of the Green Belt review for the District.
3. The existing policy within the built up area should remain and be numbered 7.1
4. A new section 7.2 should read '7.2 The Settlement Boundary shall be extended on the A65 frontage to allow for housing growth with access from mount Pleasant/Stockinger Lane. The extension is shown on **Plan 1**. This are should then be subject to Green Belt review witha recommendation that the land be deleted from the Green Belt and made available for housing. These fields have no impact on the village, the environment or views from Main Street.

Comment Reference ANDP009/1

Respondent ID	010	Name & Organisation	Lower Wharfedale Ramblers	Date Received	1/8/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Whole Document	Nature of Comment	Support
Comment					
<p>Lower Wharfedale Ramblers weekly walks and members visit Addingham many times each year as it is such a key confluence of many routes. We are keen to support and work with others on the maintenance and enhancement of Public Rights of Way and their signage and interpretation, on-site or on-line.</p> <p>So we support the statement in 7.51 page 56, especially the sentence: 'Improvements to public rights of way, and off-road cycle routes to Ilkley and Bolton Abbey, to encourage walking and cycling, will be encouraged wherever possible'.</p> <p>It would be good if the plan could also mention another type of user of some of the routes: horse-riders (using bridleways) and include a willingness tackle the issues of shared use and to make some paths more accessible for prams, wheelchairs and mobility scooters.</p> <p>On the Addingham Neighbourhood Development Plan map on p.68 green dotted lines are keyed as 'Green Infrastructure' which seem to denote mostly Public Rights of Way. What does it actually stand for in total? Could another map give more detail of different path status please.</p> <p>Ramblers also support Objectives 3 and 2, on the Natural Environment and Built Heritage and see the rights of way as providing wider access to the enjoyment of these.</p>					
Comment Reference ANDP010/1					

Respondent ID	011	Name & Organisation	Barton Willmore (for Chartford Homes)	Date Received	1/9/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP1	Nature of Comment	Observation
Comment					

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It is noted that this policy seeks to support future housing growth providing it is located within the settlement boundary of Addingham, is small in scale and represents infill development. The policy also protects areas of land which are to be designated as Local Green Space and which are currently utilised for recreational and community facilities.

Whilst our client understands the intention of this policy to guide future development within Addingham, they have concerns that the policy does not acknowledge that there may be a requirement for future expansion outside of the settlement boundary in order to ensure that the housing requirement, as defined within the Bradford Core Strategy is adequately met.

It is considered that there are a number of constraints within the village that will limit the opportunities for new housing and it would therefore be sensible to include a policy which acknowledges that some new development may be required outside of the settlement boundary. This would also enable the Parish Council to provide further guidance as to how such developments are delivered.

Whilst it is acknowledged that the Parish Council can not alter Green Belt boundaries through the Neighbourhood Plan, we are aware of other Parish Council's outlining their support for certain sites to be allocated through their respective local planning authorities Site Allocations Plan. For example, the Wilsden Neighbourhood Plan follows this approach.

Comment Reference	ANDP011/1
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Respondent ID	011	Name & Organisation	Barton Willmore (for Chartford Homes)	Date Received	1/9/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP2	Nature of Comment	Object

Comment

The policy seeks to ensure that new development in the area, which may impact upon the Conservation Area is designed in a manner that remains sensitive to the heritage assets. It is noted that the policy states "*new development in and affecting the setting of Addingham Conservation Area should be designed sensitively to ensure the special characteristics of the area are conserved and enhanced*" (our emphasis).

It should be noted that the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out a test of neutrality in terms of new development within Conservation Areas and is clear that new development should preserve or enhance the character of the area. As such, we would advise that the final sentence of the policy is not sound and does not align with Government policy as currently drafted and should be revised to align with the Act.

This is also embedded with the NPPF, which states at paragraph 200 that "*proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably*".

Part b) of the policy states "*use of appropriate materials such as traditional local stone for elevations; stone slates and Welsh Blue slates for roofing materials; timber for windows, doors and shop fronts; and cast iron for railings and gates. Stone walls or hedgerows should be used for boundary treatments*".

We would recommend that such a request is subject to viability, as the use of such materials can be prohibitive. In addition, we do not consider it reasonable to request the

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use of such materials where sites are located outside of the Conservation Area, as this should be made clear within the policy.						
Comment Reference	ANDP011/2					
Respondent ID	011	Name & Organisation	Barton Willmore (for Chartford Homes)		Date Received	1/9/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP4		Nature of Comment	Observation
Comment						
Our Client is generally positive regarding the contents of Policy ANDP4 and consider it represents a fair and logical policy that will ensure that new development is of good quality. They would however request that part b) is revised so it aligns with our comments regarding Policy ANDP2 i.e. that there is a requirement for development within the Conservation Area to retain <u>or</u> enhance the special characteristics, not to retain <u>and</u> enhance as currently drafted.						
Comment Reference	ANDP011/3					
Respondent ID	011	Name & Organisation	Barton Willmore (for Chartford Homes)		Date Received	1/9/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP5		Nature of Comment	Observation
Comment						
Following our representations to the Pre-Submission draft of the Neighbourhood Plan in August 2018, it is noted that the Parish Council have made alterations to part d) of the policy, which now states <i>"the views and vistas within Addingham village and into Addingham village should be retained. Development affecting these views and vistas should be designed in such a way so as not to have a significant adverse impact on their quality and amenity"</i> .						
Whilst our client does not object to the policy in principle and understands the Parish Council's desire to retain such views, there are uncertainties as to how this would be considered in practise for development management purposes. For example, the two plans in the Neighbourhood Plan which indicate the views and vistas are at a large scale making it difficult to fully understand and appreciate the extent of the view. In practical terms, this is important from a developers perspective as they require clarity on the extend of the view and why it is perceived to be important, so that they can ensure that the view is properly accounted for the in the design and layout.						
We would advise that further clarity needs to be provided with the Policy to ensure that it is sound.						
Comment Reference	ANDP011/4					
Respondent ID	011	Name & Organisation	Barton Willmore (for Chartford Homes)		Date Received	1/9/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP11		Nature of Comment	Observation
Comment						
Our client does not object in principle to the introduction of Policy ANDP11, as the NPPF does enable local planning authorities and neighbourhood plans to designate parcels of land as Local Green Spaces.						

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However, it is clear with the NPPF, at paragraph 100, that Local Green Space designations should only be used where the green space is “*demonstrably special to a local community and holds a particular local significance*”.

The justification for Policy ANDP11 states at paragraph 7.56 that an analysis of consultation with residents is provided at Appendix 2. However, the table in Appendix 2 does not provide any clear justification for the designation of sites as Local Green Space, and this does not appear to be robust evidence that such sites meet the tests of paragraph 200. For example, our client has an interest in land at Manor Garth (Local Green Space designation GS7b) and the table simply states that the land is currently designated within the Replacement Unitary Development Plan as village greenspace and is located within a Conservation Area. This is simply making reference to existing planning policy designation and it does not indicate how the site is “*demonstrably special to a local community and holds a particular local significance*”.

Notwithstanding the above, it is noted that where land is designated as Local Green Space, it effectively has the same level of protection as Green Belt. This effectively prevents any development coming forward on such land unless Very Special Circumstances can be demonstrated. We would recommend that a caveat is added to the policy which enables small -scale residential development to come forward on such land providing it delivers 100% affordable housing units (as defined in Annex 2 of the NPPF (July 2018)).

As Policy ANDP1 only supports small scale infill development, there are concerns that opportunities to deliver affordable housing in Addingham will be severely limited due to the 10 unit threshold.

The provision of a caveat as suggested above may assist in ensuring that there is an additional opportunity for affordable housing to be delivered in Addingham, where there is an identified need.

Comment Reference	ANDP011/5
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Respondent ID	011	Name & Organisation	Barton Willmore (for Chartford Homes)		Date Received	1/9/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP14	Nature of Comment	Observation	
Comment						
<p>In principle our client has no objection to the inclusion of a policy which seeks to address the effects of climate change. However, they recommend that a couple of alterations are made to the policy to ensure that it is sound.</p> <p>Part b) of the policy seeks to ensure that regard is had to the vulnerability of development sites to flooding. We would suggest that reference is made to the sequential approach to development within flood zones, with priority given to development in flood zone 1. Alternatively, this could be dealt with via a separate policy.</p> <p>In respect of part f), which requires “<i>house design of a very high standard with respect to roof orientation and suitability for fixing renewable technology</i>” , we would suggest that a caveat is added to state that it would be subject to viability.</p>						
Comment Reference		ANDP011/6				

Respondent ID	012	Name & Organisation	Natural England (Yorkshire & Northern Lincolnshire Team)	Date Received	1/9/2019	
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Document	Draft Neighbourhood Deveopent Plan	Section, Policy or Paragraph	General Comment	Nature of Comment	Observation
Comment					
<p>Thank you for your consultation on the above dated 14 November 2018</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish Councils where they consider our interests would be affected by the proposals made..</p> <p>Natural England has commented previously on the Addingham Neighbourhood Plan in our letter dated 15 May 2018 (our ref 243093, attached for your ease of reference) and our email dated 17 August 2018 (attached). We broadly welcome the updated Addingham Neighbourhood Plan and are satisfied with the supporting Strategic Environmental Assessment and Habitats Regulations Assessment but have no further comments to make</p> <p><i>E-mail: 17th August 2018</i></p> <p>Thank you for consulting Natural England on the updated Addingham Neighbourhood Plan. Natural England notes the changes made to the plan and assessments and has no further concerns. We welcome the updated references to Bradford Core Strategy Policy CS8 in paragraphs 4.20 regarding biodiversity and 7.4 concerning Policy ANDP1 New Housing Development within Addingham Village which addresses the comments made in our letter dated 15 May 2018 (our ref 243093). We also broadly welcome chapter 4 of the plan which identifies key issues pertaining to our strategic environmental interests and objective 3 to conserve and enhance the area’s natural environment. However we have no detailed comments to make.</p> <p><i>Letter: 15th May 2018</i></p> <p>Planning consultation: Addingham Neighbourhood Development Plan SEA/HRA Screening</p> <p>Thank you for your consultation on the above dated 29 March 2018 which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the Strategic Environmental Assessment and Habitats Regulations Assessment screening assessments provided and broadly agrees with the conclusions. We note that the reference to policy SC8 of the Bradford Core Strategy in relation to the assessment of potential impacts from plan allocations on the South Pennine Moors Special Area of Conservation and South Pennine Moors Phase 2 Special Protection Area with regards to recreational disturbance and loss of functionally linked land for Special Protection Area birds. We advise that you consider including specific reference to Bradford Core Strategy policy SC8 in the Neighbourhood Plan in relation to the allocations and the reasons for this as set out in the Habitats Regulations Assessment Screening.</p>					
Comment Reference		ANDP012/1			

Addingham Neighbourhood Development Plan

Respondent ID	013	Name & Organisation	Addingham Civic Society	Date Received	1/12/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	General Comment	Nature of Comment	Support
Comment					
<p>Addingham Civic Society is a thriving, and active Village organisation with 400 members. It is an important voice in the Village. The Board of Trustees of the Society wish to make the following comments:</p> <ol style="list-style-type: none"> 1. We strongly support the plan's vision, objectives and policies for the village and surrounding countryside. 2. Addingham is located in an environmentally sensitive part of the Wharfe Valley. It adjoins the Nidderdale AONB and is less than a kilometre from the Yorkshire Dales National Park. The River Wharfe green infrastructure corridor runs through the Parish on the northern boundary of the village, and virtually all of the Parish is within the 2.5km foraging habitat protection zone for the South Pennine Moors or the North Pennine Moors Special Protection Area, qualifying species. The quality and character of the landscape setting is strongly evidenced in the Landscape Character Assessment of the Neighbourhood Plan Area commissioned by our Parish Council. The Parish also has a significant number of built heritage assets, with a large Conservation Area. 3. We also strongly support the Local Green Space Designations in Policy ANDP11. The preferred options plan community consultation demonstrated overwhelming support for this policy, which was based on detailed assessments against NPPF criteria of the special qualities of these sites and their significance and value to the local community. The Civic Society's Environment Group with a membership of over 100 volunteers played a major role in co-ordinating this work. The Group includes a range of ecological and environmental specialists and is headed up by Professor Rick Battarbee a leading authority on Environmental Change. 4. The Neighbourhood Plan Forum carried out detailed work on housing site assessments. The housing site allocations at the preferred options plan stage were presented to the village in a comprehensive exhibition, receiving strong support from the local community. The Trustees regret that our Parish Council decided to exclude the housing allocations from the Plan prior to the local Regulation 14 Consultation. We consider that this has weakened the plan although we do welcome the general housing Policy ANDP1, supporting the use of small infill sites. All the community consultations carried out during the preparation of the plan showed a clear preference for small infill developments rather than larger sites. 5. Finally, we believe that although the housing allocations have been excluded from Addingham's Neighbourhood Plan it is essential that the current Draft Plan progresses through its remaining stages and is adopted at local referendum. This will ensure that any new small scale development is of high, sustainable quality and will not detract from the significant environmental and landscape value of the Neighbourhood Plan area. <p>Please Note that the above comments have been taken from a letter the Society (from Vice Chair) has just sent to Andrew Marshall for his personal attention.</p>					
Comment Reference	ANDP013/1				
Respondent ID	014	Name & Organisation	Gladman Developments Ltd	Date Received	1/14/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	General Comment	Nature of Comment	Observation

	Paragraph			
Comment				
<p>This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation of numerous plans across the country, it is from this experience that these representations are prepared.</p>				
Legal Requirements				
<p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the ANP must meet are as follows:</p>				
<p><i>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i> <i>(d) The making of the order contributes to the achievement of sustainable development.</i> <i>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i> <i>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</i></p>				
Revised National Planning Policy Framework				
<p>On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper.</p>				
<p>Paragraph 214 of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Given the date of this consultation, the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2012. National Planning Policy Framework and Planning Practice Guidance</p>				
<p>The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.</p>				
<p>At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.</p>				
<p>The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.</p>				
<p>The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans,</p>				

including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG). On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the ANP's ability to meet basic condition (a) and this will be discussed in greater detail throughout this response.

Relationship to Local Plan

To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.

The current adopted plan that covers the Addingham Neighbourhood Plan area, and the development plan which the ANP will be tested against, is the Bradford Core Strategy DPD (BCS). The document sets out the visions, objectives, spatial strategy and overarching policies to guide development in the authority up to 2030. As well as the BCS, a number of policies from the Replacement Unitary Development Plan 2005 (RUDP) are still relevant to the preparation of the ANP. However, it is worth noting these policies are now significantly out of date against the requirements of the Framework.

It is important to note that the City of Bradford Metropolitan District Council (CBMDC) is currently preparing a Land Allocations DPD to accompany the Core Strategy, this document will allocate land to meet the authorities needs over the period to 2030. The document is still in the initial stages of preparation with 'Further Issues and Options' consultation closing in January 2018. CBMDC have also launched an initial consultation on a partial review of the BCS. The review, deemed necessary following recent updates to national planning policy, will align with work on the Land Allocations DPD.

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With two emerging planning documents, the Parish Council should pay close attention to the preparation of these to ensure any policies contained within the ANP are not ultimately superseded upon the adoption of said documents, as section 38(5) of the Planning and Compulsory Purchase Act 2004 states; *“If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be).”*

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

Comment Reference	ANDP014/1
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Respondent ID	014	Name & Organisation	Gladman Developments Ltd		Date Received	1/14/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP1		Nature of Comment	Object
Comment						
<p>Policy ANDP1: New Housing Development within Addingham Village Policy ANDP1 states that within the defined settlement boundary of Addingham, development will be supported providing it meets certain criteria.</p> <p>As stated in our regulation 14 response, Gladman consider it necessary that a certain degree of flexibility is incorporated within the policy to ensure the ANP will be supportive of any future decision by CBMDC to release land from the Green Belt in the emerging Site Allocations DPD. Gladman note that CBMDC are considering allocating land in the Green Belt around the settlement and we believe a simple element of flexibility within the policy would ultimately safeguard the policy from potentially conflicting with the emerging Site Allocations DPD.</p>						
Comment Reference	ANDP014/2					

Respondent ID	014	Name & Organisation	Gladman Developments Ltd		Date Received	1/14/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP11		Nature of Comment	Object
Comment						
<p>Policy ANDP11: Local Green Spaces Policy 11 identifies twelve sites to be designated as Local Green Spaces. Gladman note that 3 of the sites are already designated as Green Belt, therefore the designation of these sites as Local Green Space would be unnecessary. We suggest the Parish Council has regard to paragraph 010 of the PPG (ID37-010)1 which states; <i>‘If land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.’</i></p>						
Comment Reference	ANDP014/3					

Respondent ID	015	Name & Organisation	Jarvis,		Date Received	1/14/2019
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Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Objective 6, Policy ANDP10, Paragraphs 7.47 to 7.52	Nature of Comment	Observation
Comment					
<p>The Addingham NDP appears to me to be a thorough and commendable plan. However, as someone who has cycled for many years for daily transport, as well as recreation, I am surprised that cycle provision does not feature more significantly. I quite understand the need for more parking and the proposal to provide electric car charging points. Would it not be productive to also consider providing cycle parking facilities and cycle lanes to encourage the use of cycles for transport around the village? My observation in Holland and Denmark is that, where cycling provision is safe and comprehensive, bikes are not just ridden by 'cyclists' - they are ridden by people who cycle (to school, to work, to the shops etc etc). In particular, I am sure I am not alone in thinking that a safe cycle route to Ilkley, avoiding the need to cycle on the A65, would encourage many people to cycle to our nearest town.</p> <p>Having lived and commuted by bike in Birmingham for 33 years I am now looking forward not only to recreational cycle trips in the Dales, but to using my bike safely and enjoyably for local transport.</p>					
Comment Reference	ANDP015/1				

Respondent ID	016	Name & Organisation	City of Bradford Metropolitan District Council (Local Lead Flood Authority)	Date Received	1/15/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP14	Nature of Comment	Observation
Comment					
<p>I have looked over the Addingham NDP and it includes policies that promote the reduction of flood risk and takes account of impacts from climate change to the village. Policy 14 includes references to national and development plan policy when determining development sites and how they may mitigate against flood risk and climate change. It also discusses the work the Addingham 4 Becks project is doing in the village which the Drainage Department sit on as a member.</p> <p>Overall I am content the plan takes account of flood risk and does not contradict any of our existing strategies or policies.</p>					
Comment Reference	ANDP016/1				

Respondent ID	017	Name & Organisation	Local Resident	Date Received	1/15/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP1	Nature of Comment	Support
Comment					
<p>While I give my general support to policies in the Plan particularly ANDP1, which seeks to ensure that new development meets the stated criteria and also the Local Green Spaces designation in Policy ANDP11 which, if adopted, could provide some level of protection I remain of the opinion that the decision to remove Housing Site Allocations from the Plan has weakened it. Moreover, in view of the comments made by Steve Hartley, Strategic Director of the Department of Place, relating to the Local Development Scheme timetable some clarification is surely necessary regarding the Parish Council's continued assertion about reinstating a policy for Housing Site Allocations after the proposed May 2019 Referendum?</p>					

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I am also concerned about the scale (or lack) of publicity regarding this Consultation. Although there are A4 posters around the village the design is so similar to previous ones that I doubt whether much attention is paid to them. Perhaps more could have been done to make villagers aware of this important next stage?	
Comment Reference	ANDP017/1

Respondent ID	017	Name & Organisation	Local Resident		Date Received	1/15/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP11		Nature of Comment	Support
Comment						
<p>While I give my general support to policies in the Plan particularly ANDP1, which seeks to ensure that new development meets the stated criteria and also the Local Green Spaces designation in Policy ANDP11 which, if adopted, could provide some level of protection I remain of the opinion that the decision to remove Housing Site Allocations from the Plan has weakened it. Moreover, in view of the comments made by Steve Hartley, Strategic Director of the Department of Place, relating to the Local Development Scheme timetable some clarification is surely necessary regarding the Parish Council's continued assertion about reinstating a policy for Housing Site Allocations after the proposed May 2019 Referendum?</p> <p>I am also concerned about the scale (or lack) of publicity regarding this Consultation. Although there are A4 posters around the village the design is so similar to previous ones that I doubt whether much attention is paid to them. Perhaps more could have been done to make villagers aware of this important next stage?</p>						
Comment Reference	ANDP017/2					

Respondent ID	018	Name & Organisation	Addingham Civic Society - Environment Group		Date Received	1/15/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Whole Document		Nature of Comment	Support
Comment						
<ol style="list-style-type: none"> 1. Addingham Civic Society's Environment Group strongly supports the plan's vision, objectives and policies for the village and surrounding countryside. We particularly welcome the objective, through the plan's vision and policies, of addressing climate change and strengthening resilience to the impacts of climate change across the Neighbourhood Plan area. We consider that if the plan is adopted at referendum, it will ensure that any new small-scale development is of high, sustainable quality, will have minimal impact on local biodiversity and will not detract from the very significant environmental and landscape value of the Neighbourhood Plan area. 2. In light of the recent IPCC report which was published after the NDP was finished, showing the urgency of action to reduce greenhouse gas emissions within the next 12 years, we would like to see Objective 8 strengthened to include a commitment to 'To minimise our carbon footprint' as well as 'strengthen resilience to the impact of climate change'. We consider that there should be an aspiration in the NP for all new development not just to lower emissions but to be carbon neutral. 3. Addingham is located in an environmentally sensitive part of the Wharfe Valley. It adjoins the Nidderdale AONB and is less than a kilometre from the Yorkshire Dales National Park boundary. The River Wharfe green infrastructure corridor runs through the Parish on the northern boundary of the village, and almost all the Parish is within the 2.5km foraging habitat protection zone for either the South Pennine Moors or the North Pennine Moors Special Protection Area qualifying species. The quality and character of the landscape setting is strongly evidenced in the Landscape Character Assessment of the Neighbourhood Plan Area commissioned by our Parish Council. Any new development must respect these constraints. 						

4. We also strongly advocate that any new development and transport infrastructure should aspire to the highest environmental and sustainability standards. We would like to see policies strengthened with developers being required to work to zero carbon standards.
5. The Neighbourhood Plan area’s substantial green infrastructure assets have an important part to play in reducing vulnerability to flooding both locally and in the wider Wharfe Valley, through natural flood management measures and sustainable urban drainage systems (SuDS), both in new developments and by retrofitting in existing built-up areas. The Addingham 4Becks Project that includes partners from Bradford Council and the Environment Agency is working actively on these issues with grant funding support from the Wharfe Flood Partnership Resilience and Stewardship Programme. It is critically important that any new development incorporates the use of SuDS, ensuring surface water is prevented from entering neither the foul-water sewer nor the becks.

Comment Reference	ANDP018/1
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Respondent ID	018	Name & Organisation	Addingham Civic Society - Environment Group	Date Received	1/15/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP11	Nature of Comment	Support
Comment					
<ol style="list-style-type: none"> 1. Addingham Civic Society’s Environment Group strongly supports the Local Green Space Designations in Policy ANDP11. The preferred options plan community consultation demonstrated overwhelming support for this policy, which was based on detailed assessments against NPPF criteria of the special qualities of these sites and their significance and value to the local community. 2. The AEG Steering Committee wish to propose a modification to the boundary of ANDP11/11 to take in the whole of the former First School site, for the following reasons: <ol style="list-style-type: none"> a. At the Preferred Options Plan Community Consultation stage, support for a housing allocation on the footprint of the school buildings, was much less strong (153 respondents in favour, 48 against), compared to the two other sites put forward for which there was very strong support (187 in favour of each and 12 and 23 against). Those objecting to housing, had strongly held views relating to vehicle access to the site and its environmental and wildlife value. b. The Green Space Assessment for the site found that: <ol style="list-style-type: none"> 1. Following closure of the school, the site is rewilding and has a mosaic of habitats including the running water of the beck on two sides, woodland along the edge of Back Beck, boundary hedgerows with hedgerow trees, and tussocky grassland, with a wet flush. 2. These habitats support highly diverse wildlife populations. The Wharfedale Naturalists butterfly recorder has shown this to be one of the best sites for butterflies in the Village both in abundance and it is a peaceful, tranquil site where the sound of bird song dominates. 3. There is evidence, on the ground, that the site is used creatively by local children for informal play activities. Informal grass paths across the site suggest a significant amount of use by walkers. This is supported by the Green Spaces consultation survey results, with 45% of respondents (50 out of 111) frequently using 					

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this area, taken together with the Methodist Graveyard and footpaths up to the Golf Course, and a further 33% (37) using it occasionally. 55% of respondents (61 out of 111) regarded the site as of high importance as a Village amenity with a further 23% (25 respondents) considering it as of medium value.

4. It is close to the village Primary School and could become an excellent educational resource for young people, supporting the science curriculum and helping young people learn about nature.
 5. The site forms part of the Back Beck 'green infrastructure' corridor linking the green spaces within the village to the open countryside upstream.
- c. The Landscape Character Assessment of the Neighbourhood Plan Area commissioned by the Parish Council as part of the evidence base, supports the importance of the whole site as part of the Addingham Enclosed Pastures landscape character area, now that the site is rewilding.

Comment Reference	ANDP018/2
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Respondent ID	019	Name & Organisation	Pegasus Group (for Snell Developments Ltd)		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Policy ANDP1		Nature of Comment	Object
Comment						
<p>I am instructed to make representations to the Addingham Draft Neighbourhood Plan on behalf of my client, Snell Developments Limited. These representations relate primarily to matters surrounding housing development and promotes the site North of Moor Lane, Addingham, as a proposed housing allocation.</p> <p>Pegasus Group recognise and support the opportunity provided by neighbourhood planning to create a positive planning framework at a local level that supports sustainable development. Indeed, Pegasus Group are actively involved in the preparation of neighbourhood plans nationally and have significant expertise in this regard. This response is intended to provide constructive feedback on the Neighbourhood Plan as drafted.</p> <p>The Addingham Neighbourhood Plan has been prepared by Addingham Parish Council, who form an appropriate qualifying body. The qualifying body submitted an application for the designation of the Addingham Neighbourhood Area on 20th January 2015. This was subject to consultation following which, Bradford Metropolitan District Council approved the designation of the neighbourhood area on 23rd June 2015.</p> <p>In accordance with Regulation 14, Addingham Parish Council produced a draft version of their Neighbourhood Development Plan which was the subject of a formal consultation for 6 weeks from 13 July to 7 August 2018. Addingham Parish Council has now submitted its proposed Neighbourhood Development Plan to the Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012. In accordance with Regulation 16 (Publicising a plan proposal), the Council would like to invite comments from organisations and individuals on the submitted Neighbourhood Plan and supporting documents. The consultation period runs from 14 November 2018 to 12pm 16 January 2019.</p> <p><u>Planning Policy Context</u> Paragraph 11 of the National Planning Policy Framework (NPPF) states:</p>						

“11. Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a. plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area ; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

Paragraphs 12 and 13 of the NPPF make clear that the ‘presumption in favour of sustainable development’ applies to neighbourhood planning. As explained by NPPF paragraph 13, critically this means neighbourhoods should ‘support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.’

General Comments

It is a requirement of Neighbourhood Plans to conform with the adopted Development Plan. In this case, the Bradford Local Plan Core Strategy Development Plan Document (DPD) adopted at Full Council on 18th July 2017. This document forms part of the Local Plan for Bradford that will, following its progression, be read in line with the Allocations DPD.

With respect to housing provision, Policy WD1 of the Core Strategy identifies that Wharfedale will accommodate 1,600 dwellings and approximately 5ha of new employment land in the period up to 2030. In accordance with this policy Addingham will accommodate 200 new residential units by 2030.

The Council’s most recent SHLAA is the Second Update dated July 2015. The document identifies that of the 18 sites submitted for Addingham, 3 sites are suitable now and have the capacity of being able to yield 78 units. Each of these sites have existing planning permissions therefore are not contested in terms of their provision. Taking into account that 78 units were accepted to be suitable now, this resulted in a total of 122 units to still be delivered. Although this number may have reduced by a minor amount through recent planning permissions, the vast majority has not and the exact location of this development is to be determined as part of the Allocations DPD.

Policy ANDP1 of the Neighbourhood Plan relates to new housing development within the village. The policy states that within the existing built-up area of Addingham, new development for housing will be supported, subject to meeting certain criteria.

The principle of supporting housing development within the settlement limits is in accordance with national policy. However, Policy ANDP1 is silent on housing

development located outside of the settlement limits. It is considered that the Neighbourhood Plan needs to be clearer on how such development would be assessed. This is particularly relevant to Addingham given that the housing requirement for the settlement (as identified in the adopted Core Strategy) is such that it would necessitate housing development to be located outside of the current development limit boundaries.

Whilst it is understood that the Council are currently reviewing the settlement boundaries through the production of their Allocations DPD, to date the development limits have not been altered since the Replacement Unitary Development Plan (RUDP) in 2005. Therefore, by supporting housing development within the development limits only, the Neighbourhood Plan would result in a conflict with the adopted Development Plan which requires the village to accommodate 200 new residential units over the plan period.

It is noted that the Neighbourhood Plan does not propose any housing allocations, and it is felt that the Parish Council are missing the opportunity to direct small scale housing development to most appropriate locations across the village. It is therefore considered that the Neighbourhood Plan should provide a more proactive approach to accommodating future housing development. Paragraph 69 of the NPPF supports this approach by stating that:

69. Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area.

On this basis, we would encourage that the Parish Council give consideration to the possibility of allocating housing sites across the village, and request that consideration is given to the site at North of Moor Lane, Addingham.

Moor Lane, Addingham

The site is located at land to the north of Moor Lane, Addingham. The total area of the site is approximately 0.91 hectares, which comprises of agricultural land. A site location plan of the site is provided below:

The southern boundary abuts Moor Lane which is an adopted highway that was truncated by construction of the Addingham By Pass in the mid-1980s, located on the western boundary of the parcel. To the east is existing residential development. A stream located on the northern boundary separates the site from the open countryside beyond. On the southern side of Moor Lane there is new residential development which is currently being built for 11 residential units (Planning ref. 14/01233/OUT and 15/05738/REM). Moor Lane itself has been recently upgraded in order to serve this development. To the north, established tree planting will protect the site from long distance views and impacts.

It is believed that this site would be entirely appropriate for housing. The site accommodates development on three sides in the form of existing residential dwellings to the east, the new development on Moor Lane to the south and the A65 by pass to the west. Since the original designation of the Green Belt there has been a material change in character of the site through the construction of the bypass and the dwellings to the south. As such, it is now considered that the site lends itself to infilling and the 'rounding off' of this part of the village. This part of the current Green Belt is clearly outdated and the proposals will provide a clear and defensible boundary to the Green Belt to the north.

The site is of a scale (less than 1 hectare) which the NPPF encourages Neighbourhood Plans to promote. The site benefits from the fact that it would not impact upon

Addingham Neighbourhood Development Plan

protected open or Local Green Spaces in the village, lead to the loss of an identified community recreation facility and would preserve the designated heritage assets across the settlement, including the Addingham Conservation Area. Indeed, many of the other sites put forward as part of the Council's SHLAA are within the village Conservation Area or immediately adjacent to it. They would therefore materially impact on the Conservation Area, where as the site North of Moor Lane would have no impact whatsoever.

A key element of the NPPF published in July 2018 relates to the deliverability of housing sites which is fundamental to Council's meeting their housing need. In this case, the site has key infrastructure already in place and excellent access from the recently improved Moor Lane. The site is also free from any significant constraints, such as flood risk or designated heritage assets. The site also benefits from a willing land owner, who has a renowned reputation and track record for building new and converted homes of the highest quality in the local area. This site is therefore considered to be highly deliverable.

Overall, whilst our client is supportive of the draft Neighbourhood Plan, it is felt that revisions should be made in accordance with the comments above. There is an opportunity which is not being realised for the Neighbourhood Plan to direct the allocation of housing across the village, and we would encourage that the Neighbourhood Plan takes advantage of this.

We would request that consideration is given to the allocation of the site North of Moor Lane which is of a scale that can be delivered and can contribute an appropriate level of housing to the village without any material impacts on the village or its residents.

Comment Reference	ANDP019/1
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Respondent ID	020	Name & Organisation	Environment Agency		Date Received	1/16/2019
Document	Strategic Environmental Assessment	Section, Policy or Paragraph	Strategic Environmental Assessment		Nature of Comment	Observation

Comment

Strategic Environmental Assessment

We note that the City Council has a responsibility to advise the Parish Council if there is a need for formal Strategic Environmental Assessment of the draft Neighbourhood Plan. You are seeking our views in order to inform the Council's decision on this matter.

We have considered the draft plan and its policies against those environmental characteristics of the area that fall within our remit and area of interest.

Having considered the nature of the policies in the Plan, we consider that it is unlikely that significant negative impacts on environmental characteristics that fall within our remit and interest will result through the implementation of the plan.

We have no further comments to make in this instance.

Comment Reference	ANDP020/1
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Respondent ID	020	Name & Organisation	Environment Agency		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Paragraph 4.25		Nature of Comment	Observation

Addingham Neighbourhood Development Plan

		Paragraph			
Comment					
Neighbourhood Plan					
We have no objections to the currently and have the following comments to make:					
Note the section on Natural environment and climate change and agree that vulnerability and flood risk / climate change should be addressed.					
Comment Reference	ANDP020/2				

Respondent ID	020	Name & Organisation	Environment Agency		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Paragraph 4.26		Nature of Comment	Observation
Comment						
Issues for new housing development to mitigate against. Could be an opportunity to mention following the sequential approach (ST) to flood risk. Pleased to see mention of green infrastructure, biodiversity improvements and also NFM being mentioned.						
Comment Reference	ANDP020/3					

Respondent ID	020	Name & Organisation	Environment Agency		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Paragraph 7.1		Nature of Comment	Observation
Comment						
Could be an opportunity to mention ST again. Could be included in b) eg. New development would be supported when it avoids areas of flood risk.						
Comment Reference	ANDP020/4					

Respondent ID	020	Name & Organisation	Environment Agency		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Paragraph 7.15		Nature of Comment	Observation
Comment						
k) mention retaining areas of flowing water. Again could tie in avoiding flood risk areas						
Comment Reference	ANDP020/5					

Respondent ID	020	Name & Organisation	Environment Agency		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Paragraph 7.22		Nature of Comment	Observation
Comment						
a) Not sure about the wording flood plain pastures at low risk of flooding. Flood plain is generally an area at risk of flooding. Maybe separate flood plain / flood zones and						

Addingham Neighbourhood Development Plan

use something like 'wetland pasture'?						
Comment Reference	ANDP020/6					
Respondent ID	020	Name & Organisation	Environment Agency		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Paragraph 7.64		Nature of Comment	Support
Comment						
Pleased to see a policy on green infrastructure						
Comment Reference	ANDP020/7					
Respondent ID	020	Name & Organisation	Environment Agency		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Paragraph 7.69		Nature of Comment	Support
Comment						
Pleased to see the policy addressing climate change (and maybe flood risk?) Direct reference is made from policy ANDP5 a) on housing that flood risk issues are addressed in this policy. Again no mention of Sequential approach ST/ET to layout and site selection. However we are pleased to see a policy on addressing and considering flood risk and climate change, maybe suggest the best way is to firstly direct development to those areas at least risk of flooding (Sequential approach).						
Link to the latest climate change allowances web site: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances						
Comment Reference	ANDP020/8					
Respondent ID	021	Name & Organisation	Local Resident,		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Objective 2, Policies ANDP2 & ANDP 4, Paragraphs 7.8 to 7.20		Nature of Comment	Object
Comment						
NOTES ON ADDINGHAM DRAFT NEIGHBOURHOOD DEVELOPMENT PLAN: JAN 2018 VERSION.						
Note for public consultation: submitted to Addingham Parish Council on 16th January 2019.						
Sent to parish council under cover of e-mail. Reference regulation 16 consultation						
1.0 CONSERVATION AREA AND HERITAGE ASSESTS						
1.1 Character and protection of the Addingham Conservation Area						
Throughout the draft ADNP there is a noticeable absence of statutory protection for the Addingham Conservation area.						

It should be noted that that the Addingham Conservation area is probably the most unspoilt and complete conservation areas to be found anywhere in the UK.

Indeed – because of this factor - a photo of Addingham used to appear on the front cover of the older English Heritage statutory guide sent to all UK Local Authorities about how they should deal with planning permissions within designated conservation areas! (note: this particular statutory guidance document was replaced a few years ago. The new one has the same content, but a different front cover).

This sheer quality and quality of an unspoilt conservation area is highly unusual: and this, coupled with the numbers of unaltered listed buildings, it is what makes Addingham uniquely special and primarily gives it all of its character as a village. There are a number of issues with regards to the ADNP that need to be changed within the ADNP; so as to increase the protection of this quite unique conservation area.

There is also the need to protect the views to and from the conservation area: which are all a key part of the statutory conservation area assessment.

I suggest adding in the following wording:

- A. A much stronger statement about the particular national importance of this conservation area be added to the document: probably worded something along the lines of what I have said in the paragraph above.
- B. A map of the just the Conservation Area boundaries should be added to the ADNP
- C. much stronger statement should be added to say “all developments within and immediately adjacent to the conservation area; shall strictly comply with the design code for new buildings and shall only use traditional material and design features”.
- D. A statement added to the ANDP that *“only single one-off developments – i.e. one dwellings or one businesses - will be allowed within or adjacent to the conservation area”*
- E. No major developments shall be allowed within or adjacent to the Conservation Area (with “adjacent” being defined as “within 100m of the boundary”: and “major development” being the usual legal definition of “ten or more houses”).
- F. Key views to and from the conservation area should be defined within the ADNP.
- G. Key green spaces should also be cross -referenced to the Conservation area
- H. Compliance with the proposed design code should be mandatory for all new development

Furthermore, the most recent and current Bradford Council Addingham Conservation area assessment document should be added to the ADNP as an appendix: it would

therefore become part of the finalised neighbourhood plan.

1.2 Article 4 Directions: Protection of Conservation Areas

Following on from the comments made in 1.1 above about protection of the conservation area and heritage assets.

I would note that no Article 4 directions (removal of normal permitted development rights) are suggested nor proposed within the ADNP. This is a very strange and very unusual omission.

I would suggest that the draft ADNP has added into it a number of “draft article 4 directions”. This would mean that a number of new article 4 directions would remove almost all permitted development rights. These Article 4 direction removes some, or all, permitted development rights. This introduction of Article 4 directions would cover – all in one go – most or all of the minor issues that are a concern to residents and the parish council.

Accordingly, items that are a concern to the parish council: such as conservatory’s and dry-stone walls and solar panels: these would deal with by the new statutory powers. This is all very simply done by Article 4 removing permitted development rights.

I am very surprised that neither Bradford Council, nor indeed the parish councils own planning consultants, have ever mentioned to the parish councillors that all other conservation areas throughout the UK (except throughout Bradford!) use Article 4 directions to enhance the statutory protection of conservation areas. As it stands at the moment: this is a very curious and worrying omission from the ADNP!

1.3 Design Codes and Codes Standards

It is very welcome that the ADNP proposes to introduce design standards. However this section of the design standards in the ADNP needs to be spilt cleanly into two parts;

- Design standards within (and probably immediately adjacent to) the Conservation Area.
- Design standards outside the Conservation Area.

The ADNP should be reworded make it far clear that a very high standard of traditional design is required (please note: this added emphasis is absolutely essential).

The ADNP should also explicitly refer to the very good guidance documents about building and repair work in conservation areas. These are the Bradford “good practice guides”- ones which Bradford Council already produce. These give many good examples of good and bad practice. These documents should go in as an appendix.

Then under NPPF 130; it should be made explicitly clear in the ADNP that poor quality development which does not comply with the new design code should be refused, ideally by quoting NPPF para 130 word for word:

“NPPF Para 130. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents”.

Adding both Article 4 directions and also this wording into the ADNP would, at stroke, both comply with NNPPF and also meet the parish councils' objectives for many minor items.

1.4 Views from and into the Conservation Area

Again throughout the ADNP document the importance of these views to and from the Addingham Conservation Area are completely missed out. These views are a vitally important part of the overall protection of the Addingham Conservation Area.

The ANDP should specifically identify these key views, and also then cross-reference these important views to the statements made in Bradford Council's current Addingham Conservation area assessment.

1.5 Protecting the Conservation Area from Unauthorised Development

There is nothing within the ADNP to protect against unauthorised development commencing in the conservation area in advance of planning permission and/or listed building consent being granted. This is a practice which seems to be endemic both in Addingham and within Bradford City generally. However it is not tolerated throughout the rest of the UK.

A statement to this effect needs adding into the ANDP. I suggest adding in a line which states that "no development shall be allowed to commence construction works until planning permission (and where necessary listed building consent) has been obtained"

1.6 Listed Buildings and Setting of Listed Buildings

Throughout the draft ADNP there is a noticeable absence of protection to the settings of listed buildings: both those inside the conservation area and the few that lie outside it.

This is a statutory requirement that is of vital importance to any future development; and thus it should be specifically referred to in the ADNP

1.7 Possible Nearby World Heritage Site (WHS): Bolton Abbey

I would suggest that a completely new section needs to be added into the ANDP about nearby Bolton Abbey being a site of national importance and also that it has in the past been considered as a possible World Heritage Site (WHS): accordingly Bolton Abbey is certainly a historic site of national importance and probably also of world importance.

If Bolton Abbey is in the future made a World Heritage site (WHS) then it would be fully protected under UNESCO World Heritage laws (obviously only if it became a World Heritage Site (WHS).

However, regardless of whether or not Bolton Abbey is actually is ever granted status of a world heritage site (or not) the simple fact that it has in the past been considered/shortlisted as a World Heritage Site should mean that Bradford Council must recognise (in all of its development plans) the importance of both the Abbey ruins themselves (over the border in North Yorkshire) and in particular the landscape and setting of the whole surrounding area as being an area of extremely important

landscape.

Therefore this plan needs to be revised in accordance with NPPF para 184 (see below)

As such; the entire surrounding area and landscape around Bolton Abbey, including the entire parish of Addingham, might possibly in the near future falls under the remit of these WHS requirements.

However, regardless of any actual WHS requirement, it is still a vitally important site.

I believe that the Addingham neighbourhood plan should refer to Bolton Abbey and all of the surrounding landscape and viewpoints as being of national and possibly world importance.

In particular reference might need to be made to the statutory management plan (the unique plan) for all WHS: as this is a mandatory requirement for development control. This would offer the entire surrounding area a far higher standard of protection than UK law on its own. Whilst enforcement would be under normal UK planning and building law: UNESCO rules usually insist on a far higher standard of care: particularly with the surrounding environment and landscape.

Therefore the new paragraph in the ANDP needs to explicitly refer both to Bolton Abbey, its national importance and the possible requirements if the UNESCO WHS requirements; (i.e. to state under what laws are implemented- and the impacts of this law).

This is highly unlikely to affect small developments of one or two houses in Addingham. However, it could be extremely significant and would be extremely wide-ranging implication. For example; a large development in Addingham might affect affecting the views to or from the Bolton Abbey

Please note that as Bolton Abbey is in North Yorkshire County Council area and their planning authority is Harrogate Council, which means there needs to be (and should already have been) coordination with the neighbouring local authority.

In preparing this new policy within the ADNP, the parish council should take account of the requirements of the NPPF for the Bolton Abbey site; which clearly states that;

“NPPF para 184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”.

This clause is probably worth quoting in full in the revised ANDP. It will have massive bearing on whether – or not – large developments are even allowed in Addingham

(Footnote: I am more than a little bit concerned that both Bradford Council and the planning consultant both missed the overriding importance of the proximity of Bolton Abbey. That is simply and utterly professionally incompetence!)

Comment Reference	ANDP021/1
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Respondent ID	021	Name & Organisation	Local Resident,	Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Objective 6, Policy ANDP10, Paragraphs 7.74 to 7.52	Nature of Comment	Object
Comment					
<p>2.0 VILLAGE INFRASTRUCTURE - HIGHWAYS</p> <p>2.1. Missing Information on Key Infrastructure I shall start this section on infrastructure by referring to the key part of the NPPF:</p> <p><i>“NPPF Para 43. The right information is crucial to good decision-making, particularly where formal assessments are required (such as Environmental Impact Assessment, Habitats Regulations assessment and flood risk assessment)”</i></p> <p>Quite simply, throughout the entire draft ADNP, there has been, to date, a totally inadequate level of information supplied to the parish council with regards to highways and transport: flooding and all other key infrastructure needed to properly support new developments. I would note that this has happened because of a number of serious errors and omissions made by Bradford City Council. It is not the fault of the Addingham parish council: who have tried to do the best they can, however with a totally inadequate amount of technical information.</p> <p>2.2. Highway - Basic Principles I shall start this section on infrastructure by referring to the key part of the NPPF:</p> <p><i>“NPPF Para 102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</i></p> <ul style="list-style-type: none"> <i>a) the potential impacts of development on transport networks can be addressed;</i> <i>b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised- for example in relation to the scale, location or density of development that can be accommodated;</i> <i>c) opportunities to promote walking, cycling and public transport use are identified and pursued”</i> <p>The NPPF then goes onto say that the importance of transport:</p> <p><i>“NPPF par 110: Within this context, applications for development should:</i></p> <ul style="list-style-type: none"> <i>a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second so far as possible to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;</i> 					

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient location”*

Therefore throughout the ADNP the parish council need to address all of these key issues on roads.

2.3 Main Street

I would point out that any new major suburban development on the outskirts of Addingham (i.e. something similar to the existing Clays estate) would inevitably significantly increase the amount of traffic, and in particular the amount of parking, that would be needed on Main Street.

This increase in through traffic on Main Street would be a severe detriment to the quality of life for both existing businesses and existing residents. This would therefore have a severely detrimental effect on the quality of the heritage assets and the conservation area as a whole.

Furthermore, as noted above, main street is the heart of the village, with almost all of the conservation area and again almost all of the businesses. Therefore Main Street not being reduced to a “busy through route” should be a key priority of the ADNP.

Accordingly, it should made be explicitly clear that these types of suburban developments, which generate large amounts of car traffic for short trips, are not required in the village.

Then the ADNP needs to explicitly answer the question – “what is Main Street for?”

2.4 Current ADNP Wording about Traffic is Muddled

There are a number of sentences within the draft ADNP about traffic which could easily be read to be mutually contradictory “increase the amount of parking” and “allow improvements in traffic” throughout the village are mutually contradictory. These need to be reviewed and where necessary corrected.

2.5 Through Lorry Traffic

There is clearly a existing problem in Addingham with large numbers of lorries, including some articulated lorries “rat-running” through the village.

Accordingly the ADNP should explicitly support proposals by the highways authority (Bradford Council) to restrict and minimise the numbers of lorries. For example, this may include a proposed ban on all articulated lorries: or all lorries over 7.5T (except for public service vehicles).

2.6 Traffic Calming Measures

There is clearly a existing problem in Addingham with large numbers of vehicles, including some articulated lorries, speeding through the village.

The ADNC should will support proposals by the highways authority to introduce traffic calming. In particular the ADNP should be amended to read that it will support proposals to reduce traffic speeds through Main Street. However this should not include speed humps or speed tables- as these will damage historic buildings by excessive vibrations.

2.7 Transport Planning Map

There is factually incorrect statement with regards to the map that has been supplied to the parish council by Bradford Council. This map is the aspirations for public transport: not the current reality. Therefore the map and the wording, all provided by Bradford Council, should be withdrawn from the ADNP as “non-compliant” with the requirements of the neighbourhood planning: ie remove map from document.

2.8 New Development Locations all need to be Close to Bus Routes

Bradford Council have a long-standing policy that, quite correctly, states that all new housing should be built within 400m of an existing bus route. This is for good sustainability reasons.

This allows for both sustainability and accessibility of the new housing: in particular to give access to public transport who may not have access to, or may not be able to use, a car.

Therefore, to comply with Bradford Council Policy about all new development being within 400m of a bus route (Bradford Council Policy no tbc) this policy should be added into the ADNP.

2.9 Allocations of Sites for Sustainable Development

(also known as “Consideration of new Development sites with regards to transport”)

The NPPF specifically requires that consideration be given to transport when sites are allocated. The NPPF states that:

“NPPF 108. In assessing sites that may be allocated for development in plans, or specific applications for development,

- a) appropriate opportunities to promote sustainable transport modes can be or have been taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

Therefore, the ADNP should identify potential development sites that have good transport access: so as to comply with NPPF clause 108.

2.10 Commuting Patterns

The statement made in para 4.2 that Addingham is a “desirable commuter settlement” is at odds with other statements made in the document: in particular the ones made about the high proportions of families and old age pensioners living in the village. For this statement about “commuters” to remain in the ADNP, I believe that it should be numerally justified with both the number of commuters - and where they travel to work - both explicitly stated in the document.

However, I would note that if large suburban housing developments are built: then this would attract a type of new resident who might well want to use the train to travel to work in Leeds. Therefore, these new residents would probably want to travel by car to park near to the station Ilkley: which would significantly increase traffic levels in the village: especially along Main Street.

Therefore the numbers of commuters should be examined and justified.

Comment Reference	ANDP021/2
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Respondent ID	021	Name & Organisation	Local Resident,	Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Objective 4, Policy ANDP6, Paragraphs 7.30 to 7.33	Nature of Comment	Object
Comment					
3.0 VILLAGE INFRASTRUCTURE – BASIC SERVICES					
3.1 Broadband (Business Use)					
In the section in the ADNP about existing businesses, and encouraging existing businesses, a sentence needed to be added about the importance of broadband, in particular super-fast broadband, to all small, medium and micro businesses. (note: the rest of the items in the ADNP about encouraging businesses in this section are fine).					
3.2 Broadband Infrastructure					
To date, there has been nor assessment by Bradford City Council as to whether (or not) the existing broadband supply, managed by BT Openreach and Virgin (footnote; check all cable ownership), is adequate to allow expansion of the number of houses in the village					
Therefore, the ADNP should state that “no major developments should be allowed until after an assessment of the village’s broadband supply has been completed. This is required to ensure that there is adequate broadband capacity in the villages communication system to supply all residents and to maintain adequate telecoms and broadband services to all existing residents.					
This is especially important because of the poor or non-existent TV coverage in the village: therefore some residents <u>rely</u> on cable connections. (note: this point should be added into the ADNP)					

3.3 Electricity Infrastructure

To date, there has been no assessment by Bradford City Council as to whether (or not) the existing electricity supply, managed by northern power grids, is adequate to allow expansion and new development.

Therefore, the ADNP should state that "no major developments should be allowed until after an assessment of the village's electricity supply has been completed.

3.4 Gas Infrastructure

To date, there has been no assessment by Bradford City Council as to whether (or not) the existing gas system, managed by Transco, is adequate to allow expansion and new housing developments.

Therefore, the ADNP should state that "no major developments should be allowed until after an assessment of the village's gas supply has been completed. This is required to ensure that there is adequate gas supply, with adequate pressure in the pipework system remains to supply all residents and businesses.

3.5 Water Services Infrastructure

To date, there has been no assessment by Bradford City Council as to whether (or not) the existing drinking waters, managed by Yorkshire water, is adequate to allow expansion.

Therefore, the ADNP should state that "no major developments should be allowed until after an assessment of the village's water supply has been completed. This is required to ensure that there is adequate drinking water supply: adequate pressure in the pipework system to supply all residents and to maintain a supply of water to the fire brigade"

3.6 Sewerage System

3.6.1 Assessments of Existing Sewerage System

To date, there has been no assessment by Bradford City Council as to whether (or not) the existing sewerage system, both surface, foul and combined systems, managed by both Yorkshire Water and the council themselves, is adequate to allow expansion and more development in the village.

Therefore, the ANDP should state that "no major developments should be allowed until after an assessment of the village's sewerage systems has been completed". This assessment needs to include all the statutory requirements which are required to ensure that there is adequate capacity in all sewerage systems.

3.6.2 Four Becks Project

The ANDP has a section in it about the Four Becks project. Under the Four Becks project: this issue has already been identified by the parish council. However, it must be stressed that flooding is solely the responsibility of Bradford Council to sort out! (not the parish council). See section 4 below. (Incidentally the Four Becks project is great as a wildlife and conservation project: it is just that it must not become the "default" village flood risk management project by mistake!)

Therefore the wording of the ANDP should be corrected to read that the Four Becks project is a wildlife and conservation project – not a flood risk prevention project!

3.7 All Infrastructure- Resilience during Flooding

As part of any development plan, it is vitally important that the effect of all new development is considered with how it will affect the resilience of existing infrastructure (a listed in 3.1 to 3.6 above plus also the main roads in the village). In particular I would note that it is mandatory government requirement that Bradford City Council, as the Lead Local Flood Risk Authority (LLFRA) under the 2010 Act, assesses the resilience of all local infrastructure against the threats from flooding. This requirement is to ensure that all infrastructure continues to operate in the event of severe flooding.

This assessment of the resilience of infrastructure is especially important in Addingham, as there are a number of elderly residents who’s health could be severely affected if, in addition to the flooding, they also lost the uses of electricity and gas for heating during flooding if it happened again in winter. The resilience of infrastructure during flooding is therefore a “health and safety issue”, as well as a “property protection issue” (footnote: we were very lucky with the Boxing Day floods: the lights generally stayed on!)

I would note that, to date, the authors of the ADNP have not yet received from Bradford Council (as the Lead Flood Risk Authority (LLFRA)) any of the information necessary to inform the resilience assessment: which should be a complete assessment of the existing infrastructure. This is particularly worrying because, as the village is concentrated around Main Street, the key infrastructure which is most liable to flooding is all located close to Town Beck: which floods!

Comment Reference	ANDP021/3
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Respondent ID	021	Name & Organisation	Local Resident,	Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Objective 8, Policy ANDP8, Paragraphs 7.69 to 7.74	Nature of Comment	Object

Comment

4.0 VILLAGE INFRASTRUCTURE: FLOODING AND FLOOD RISK

4.1 Introduction

The village of Addingham has suffered repeatedly from very serious flooding, which has caused severe property loss – as well as much emotional trauma to many residents. It is therefore absolutely essential that any and all new developments must not worsen the situation with regards to flood risk. This key principle must be stated in the ADNP.

Indeed, it could easily be argued that no new major development should be allowed until after the existing flood risk situation has been properly assessed.

It could also be easily argued that no development should take place until after major flood risk measures have been put into place to protect existing residents.

4.2 Key Planning Policies Relating to Flood Risk

I shall now quote from the following key parts of the NPPF:

- A. *“NPPF para 149. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood*

risk”

- B. *“NPPF para 163. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere”.*
- C. *“NPPF para 155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”*
- D. *“NPPF para 162. Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.”*
- E. *“NPPF 156. Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards”*

All of the above, and more, all apply to Addingham.

4.3 Alternative Housing and Development Sites

As all of Addingham is currently defined as a high-risk flood area, by both Bradford Council (LLFRA) and the Environment Agency, it could easily be argued that (under section 155 of the NPPF) that all new development should, according to the sequential test for flood risk, be mandated to be directed away from the village i.e. built elsewhere! This note should be added to the ADNP.

4.4 Definitions of Rivers

The ANDP should be revised to make clear that there are two types of river within Addingham:

- major rivers (controlled by the EA): the River Wharf and branches off it.
- minor rivers and streams (controlled by Bradford council as the Lead Local Flood Risk authority); mostly all four becks.

By not making this distinction there has been a serious error crept into the draft ADNP: which is that the comments made about flood plains have been incorrectly allocated the responsibilities. Therefore there is a change required to existing wording of ADNP.

However most flooding in Addingham and it is a serious problem; occurs as a result of minor rivers flooding; especially Town Beck. The responsibility for this flooding is solely with Bradford Council as the Lead Local Flood Risk Authority (LLFRA).

4.5 Flood Maps

Flood Maps should be added into the ADNP (or a separate flood plan made an appendix to the ADNP). These should include both surface water flooding and groundwater

flooding.

4.6 Error in Advice Received from Bradford Council about Flood Risk Responsibility

There is a serious error in the comments which have been made by Bradford Council about the draft plan. Therefore the advice from Bradford Council given to the parish council is simply wrong.

Their comments about sequential tests for flooding within UK national planning policy (NPPF) apply only to the selection of new sites on greenfield land (i.e. SLLAA and similar). However these comments do not apply to brownfield sites within existing built up areas; which is clearly the case in Addingham. This Para 163 of NPPF – as quoted above- applies in this case.

Therefore there is a need for separate flood risk policy within the Addingham NDP

4.7 Missing Strategic Flood Risk Assessment

Furthermore, Bradford Council have not yet completed a strategic flood risk assessment document for the village. This is the essential document that must define all the key actions. This is a specific requirement of the Lead Local Flood Risk Authority to complete, under the 2010 Act.

Therefore, the ADNP should not be adopted or implemented until a strategic flood risk assessment for Addingham has been completed by Bradford Council. Therefore, the ANDP should not be adopted or implemented until after a strategic flood risk assessment for Addingham has been completed by Bradford Council. Then within this flood risk assessment land that may be required for flood relief or flood mitigation has been identified (see below).

Alternatively, the ADNP could be worded to say that no major development shall be allowed until after the village flood risk plan has been surveyed, assessed and completed.

4.8 Climate Change: Effect on Flooding

The ADNP has not picked up the advice from Department for Environment and Environment Agency about the effects of climate change on flood risk. Therefore, the effects of flooding on existing properties in Addingham – especially those near Town Beck – also need modelling for climate change. This needs to be in accordance with the specific and detailed requirement under the NPPF which states that:

“NPPF 157. All plans should apply a sequential, risk-based approach to the location of development taking into account the current and future impacts of climate change

Therefore the existing flood risk assessment should be assessed first: then the effects of climate change modelled and added to the existing risk, need to be put into the ADNP.

4.9 Safeguarding of Land required for Flood Relief

Responsibility for flood risk assessments lies with Bradford Council, who frankly should have given Addingham parish council far better information.

It is nowadays common good practice that land required for future flood risk management should be specifically identified in the local plan. This is essential to comply with NPPF, which states;

“NPPF para 157 b) safeguarding land from development that is required, or likely to be required, for flood relief”

The ADNP should adopt this good practice. In particular I would note that this clause in the NPPF could easily apply to the land surrounding the steams which feed down into Town Beck from neighbouring agricultural land. Town Beck is obviously the source of much existing flooding in the village.

Therefore, the flood precautions, which are needed to prevent flooding in central Addingham, may require the prevention of development on these fields. To identify this land is again the responsibility of Bradford council as LLFRA, under the 2010 Act.

4.10 Capacity of Existing Flood Infrastructure and Resilience
 The ANDP should be revised to read that:

“no major development of ten or more houses shall be allowed anywhere in Addingham until after a programme of planned flood prevention works have been completed within the village: as necessary to reduce and minimise existing flood risk to the existing community and existing buildings: i.e. a programme of works that to reduce the risk of existing buildings within Addingham being flooded down to the normally accepted 1 in 200 year flood risk period”

This is some suggested wording. Other similar wording may be appropriate.

Comment Reference	ANDP021/4
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Respondent ID	021	Name & Organisation	Local Resident,	Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Objective 3, Policy ANDP5, Paragraphs 7.22 to 7.29	Nature of Comment	Object
Comment					
5.0 LANDSCAPE (Including GREENBELT’S AND EUROPEAN HABITATS)					
5.1 GREEN BELT					
5.1.1 Definition of Addingham Green Belt and Greenbelt Boundaries					
The existing Addingham greenbelt boundary should be uniquely defined on a separate plan either within the plan itself OR in the appendix. This is being recommended so that there is no doubt about what is defined as being the village greenbelt.					
5.1.2 Future Changes to the Addingham Greenbelt Boundary.					
Furthermore, to accord and align with the provisions of the NPPF, the wording of ADNP should be made clearer, to say that no “development” will be supported in the greenbelt whatsoever: except if it meets the “exceptional or special test”					

This is because the NPPF rules for greenbelts clearly state that:

“NPPF 136. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.”

This clause should be cross-referenced in the ADNP.

5.1.3 Possibly Incorporate the Village into The Greenbelt

I would draw the parish council’s attention to part of the NPPF, which could easily be applied to the Addingham village greenbelt:

“NPPF para 140. If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt”.

As the open character of the village includes the green spaces which are continuous with the green spaces which run contiguously into the historic Addingham Conservation Area: for example the field behind the Sailor Public House.

Therefore it is recommended that the ADNP should consider whether to define the whole of the village of Addingham to be included within the greenbelt (i.e. bringing the village all into the greenbelt)

5.1.4 Future Changes to Greenbelt Boundaries

Furthermore, the ADNP should be additionally be worded that the statement *“no alterations to greenbelt boundaries are neither planned; nor required nor desirable during the period of this plan”*

Furthermore, the ADNP should be worded to say that any proposed changes to the Addingham greenbelt should be consulted upon in consultation and coordinated with other planned developments in Ilkley; Burley and Menston: i.e. the towns of Wharfedale. This is necessary to preserve the views of all of Wharfedale from the Nidderdale AONB and Yorkshire Dales National Park

Furthermore, it should be a requirement, to comply with NPPF that all changes to Addingham shall be consulted upon with Harrogate and NYCC and NYDNP.

Again this is a very curious omission that neither the planning consultant nor the Bradford council have picked up upon.

5.2. Principles of Identification of Natural Resources and Wildlife

The draft ADNP has already got a lot of very good words in it that, in general terms, support the keeping and development of the natural resources in and around the village.

Unfortunately, in the draft there is a lack of definition of the key statutory requirements that need to be complied with. Therefore, there are some “serious gaps” in the wording of the current document.

To quote from the NPPF:

“NPPF 174. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation”*

Therefore to comply with the NPPF, five specific maps should be added to the ADNP to show the following key items of statutory wildlife and natural areas which are protected:

1. South Pennine Moors
2. North Pennine Moor
3. All sites of Special Scientific Interest (SSSI)
4. Special Protection areas (SPA)
5. SAC

The specific requirements of NPPF are quoted as follows;

“NPPF 174. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation and*
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the (gap)and recovery of priority species; (gap)and pursue opportunities for securing measurable net gains for biodiversity”*

Thus, all key sites of wildlife and scientific interest should be **identified** within the ADNP

5.4 Coordination with Yorkshire Dales National Park and Nidderdale AONB

Again, this is a very curious omission that neither the planning consultant nor the Bradford council have picked up upon. The landscaping section of the ADNP must be amended to include the association with both of the adjacent areas: The Yorkshire Dales National Park (YDNP) and Nidderdale Area of Outstanding Natural Beauty

(NAONB).

Therefore, to introduce this section, I shall gain quote from the NPPF:

“NPPF 172. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”

Please note the statutory references to “great weight”. However, at this moment in time, the ADNP does not have this emphasis, emphasis which needs to be added into the ADNB document.

Then it needs to be recognised that Addingham lies immediately outside and bordering both of these two areas; which both have the highest status of protection to landscapes that English Law can provide.

The ADNP needs to be redrafted so that:

- The boundaries of the Nidderdale AONB are shown on the plans.
- The boundaries of the Yorkshire Dales National Park are shown on the plans.
- The key views are identified to and from Addingham into NAONB and YDNP.

There then needs to be an explicit requirement in the ADNP to consider the effect of all developments on Nidderdale AONB and the Yorkshire Dales National parks – i.e. protection of landscape, in relation to these issues.

5.5 Statutory Duty to Cooperate with Neighbouring Planning Authorities

I will then draw your specific attention to the Local Government Act 1972 and also the wording of NPPF Para 24; which I quote as:

“Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.”

Therefore, as Addingham is becoming, with the introduction of the ADNP a “mini-planning authority” and also that this area of Bradford City lies right on the borders of Harrogate Council and YDNP; statutory consultation with both neighbouring planning authorities should have been undertaken as part of this plan preparation.

(Note: therefore can Addingham Parish Council please confirm that Bradford Council have consulted with Harrogate and YDNP).

After the Addingham neighbourhood plan is adopted, there is therefore a statutory duty to consult with Harrogate Local Planning Authority (Harrogate Council) about all developments in Addingham that affect the Nidderdale AONB and Yorkshire Dales National Park.

5.6 Special Sites of Natural and Wildlife Interest

These need to be *specifically identified* in the ADNP.

5.7 European Habitat Regulations: Protected Species and Habitats.

NPPF clearly states the following about Special Protection Areas classified under regulation 15 of Conservation of Habitats and Species Regulations 2017: *“sites which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds”*.

European Habitat Regulations (protected species and habitats) need to be identified within the ADNP entirely separately from the more general clauses about other wildlife and natural features.

This is essential because these “European Species and Sites” have a far higher level of statutory protection against development. Both those on the North Pennines and South Pennines *need to be identified*.

Therefore, to accord with UK and EU law; the ADNP should be rewrite to state that “no development shall be allowed on land which has been identified as habitats for protected species”

5.8 Identification of SPA, SAC and Foraging Areas for Protected Species

Furthermore, to comply with European Regulations, the areas covered by the habitat regulations, and special protection areas, including foraging areas, should be defined by plans in the ADNP.

These plans may well need to extend beyond the parish boundary.

5.9 Notes about Bradford Council Policy SC8

As background information: Bradford Council seem to have got themselves into a right mess with this one. Bradford Council policy SC8: is simply illegal. (footnote: SC8 is a council planning policy which was recently rewritten by developer CEG).

Under the European Habitat Law and all of the Associate Regulations - mitigation is not allowed for any housing development sites whatsoever(footnote: the mitigation is only allowed for major infrastructure projects).

5.10 Coordination with other Developments affecting European Protected Sites

It should be noted that the European Habitat regulations require the cumulative effect of all developments that affect one protected site.

Therefore, for example developments at the other end of Wharfdale will need to be fully coordinated with developments in Addingham. This is to represent the cumulative effect on the protected European habitat areas and protected areas.

Comment Reference	ANDP021/5
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Respondent ID	021	Name & Organisation	Local Resident,		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan		Section, Policy or Paragraph	Objective 1/Policy ANDP1/Paragraphs 7.1 to 7.7	Nature of Comment	Object
Comment						
<p>6.0 HOUSING ALLOCATIONS</p> <p>6.1 Locations of New Housing Sites: Residents Preference for Small and Medium Sized Sites In the draft plan that went out to consultation in spring 2018, there was clearly a specific set of allocations of small and medium sized housing site. Furthermore, this is what the public universally wanted during the consultation. This was subsequently removed from the plan that is now out to consultation under regulation 16.</p> <p>A clause to the effect that “small and medium sized sites are preferred needs to be introduced, to reflect public opinion.</p> <p>6.2 Small Sites Preferred by NPPF However I will point out that NPPF clear states that organisations such as Addingham Parish Council should allocate small sites. The two key parts the NPPF are:</p> <p><i>“NPPF para 68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”.</i></p> <p><i>NPPF 69. Neighbourhood planning groups should also consider the opportunities for allocating small and medium- sized sites (of a size consistent with paragraph 68a) suitable for housing in their area”</i></p> <p>(footnote; Therefore the advice recently given to Addingham Parish council by both Bradford council and their planning consultants are both wrong in law. The parish council in the ADNP can express a preference for smaller site: however it cannot rule out larger development sites).</p> <p>6.3 Brownfield Register This Brownfield register should be requested from Bradford Council.</p> <p>6.4 Brownfield Sites To comply with the spirit of the NPPF and also general government guidelines, a substantial proportion of the new development should be built on brownfield sites (note: this is normally defined either as existing sites OR undeveloped sites within the settlement area boundary).</p> <p>The NPPF requires that four key steps are undertaken:</p> <p><i>“To promote the development of a good mix of sites local planning authorities should:</i></p> <p>a) <i>identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;</i></p>						

- b) *use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;*
- c) *support the development of windfall sites through their policies and decisions giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
- d) *work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*

Also NPPF para 118-part c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Therefore the ADNP should be redrafted to reflect the preference within the NPPF for smaller sites (however, to stay legal, this clause should not rule out the use of larger sites)

6.5 Identifying Land of Least Amenity and Environment Value

Currently in the ADNP there is not the statutory requirement to identify sites for housing (and other development) that are of the least environmental impact. However the NPPF requires this:

“NPPF para 171. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework ; take a strategic approach to maintaining and enhancing net works of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight” (note : highlighting in yellow by me: not in the original document)

Therefore, as there are a very large number of potential development sites in the Addingham area which are of very high environmental or amenity value; the ADNP should be amended so as to specifically describe sites which are of low amenity value

6.6 Rural Exception sites

To comply with NPPF, the ANDP needs to be redrafted to comply with the rural exception housing sites Please note that some of these could be “over the Border In Harrogate”, but fulfill a local need.

“NPPF Para 77. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this”.

6.7 Need for Local Housing: Coordination with Adjacent Towns

Housing Developments in Ikley, Silsden, Keighley and Skipton will all affect the need for housing in Addingham. It should be noted that Addingham is only a short journey and distance from four other major towns. Therefore Addingham Parish Council and Bradford City Council should be able to demonstrate that they have coordinated this

Addingham Neighbourhood Development Plan

housing need with housing now being built elsewhere. Please note that both Ikley and Skipton both have excellent rail links into both central Leeds and Bradford: and therefore, both towns are thus far more sustainable towns for commuter housing.

“NPPF 137 (about sites for development) part c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”

Comment Reference	ANDP021/6
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Respondent ID	021	Name & Organisation	Local Resident,		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	General Comment - Parking Standards		Nature of Comment	Object
Comment						
<p>7.1 Parking Standards for New Developments</p> <p>The ADNP has not yet considered parking standards. The NPPF requirements are as follows;</p> <p><i>“NPPF Para 105. If setting local parking standards for residential and non-residential development, policies should take into account:</i></p> <ul style="list-style-type: none"> <i>a) the accessibility of the development;</i> <i>b) the type, mix and use of development;</i> <i>c) the availability of and opportunities for public transport;</i> <i>d) local car ownership levels”</i> <p>This information on design requirements for all new developments of both housing and businesses should be mandatory; in order to avoid pressure on existing on street parking: especially within the conservation area.</p> <p>In particular this policy should be designed to prevent the parking issues within the Addingham Conservation area (see above) becoming any worse</p> <p>Accordingly, it would be highly beneficial if the design codes mentioned above also included parking standards. Again these new parking standards might need to be split between <i>“conservation area”</i> and <i>“outside conservation area”</i></p> <p>7.2 Parking Standards: Numbers of Cars Owned by Residents</p> <p>Also, to comply with clause (d) of para NPPF 105, the ADNP should include a note about car ownership levels.</p>						
Comment Reference	021/7					

Respondent ID	021	Name & Organisation	Local Resident,		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	General Comments - Environment, Pollution & Health		Nature of Comment	Object

Comment
<p>7.3 Intrinsically Dark Areas: Dark Skies</p> <p>As Addingham is on:</p> <ul style="list-style-type: none"> • the edge of the both Yorkshire Dales National Park. • borders the Nidderdale Outstanding Natural Beauty (NAONB). • flightpaths for European protected bird species. <p>The issue of Dark Skies” needs to be considered.</p> <p>These two areas of YDNP and NAONB both contain significant large areas of officially designated “dark-skies”: therefore the ADNP should be revised to comply with clause 180 of NPPF:</p> <p><i>NPPF para 180 c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.</i></p> <p>This will affect the lighting used on all new developments in Addingham; especially streetlighting.</p> <p>7.4 Noise Pollution (including Identifying tranquil areas in the ADNP)</p> <p>Completely missing from the ADNP is any reference to noise and possible noise pollution arising from new developments; especially major developments. This is need to comply with NPPF clause 173, which states in part:</p> <p><i>“NPPF 173 para (b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason</i></p> <p>Therefore, the ADNP should be revised to comply with clause 173 of NPPF; and both identify existing tranquil are and also specifically identify areas where increasing noise may be a concern if a large new development is built. This is probably best done by a table of sites in the appendices</p> <p>7.5 Pollution and Health Issues (following on from paragraph 7.4 above)</p> <p>Completely missing from the ADNP is any reference to pollution and possible health issues arising from new developments; especially major developments. This is needed within the ADNP to comply with NPPF clause 180 - which states (in part):</p> <p><i>“NPPF 180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account of the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:</i></p> <p>a) <i>mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts</i></p>

on health and the quality of life

Therefore, the ADNP should be revised to comply with clause 180 of NPPF; and both identify where issues with health and living conditions will be a concern if a large new development is built. This is probably best done by a table of sites in the appendices.

Comment Reference ANDP021/8

Respondent ID	021	Name & Organisation	Local Resident,		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	Section 4, Paragraph 4.5 - Population Information		Nature of Comment	Object
Comment						
7.6 Population Numbers						
The draft ADNP does not contain a proper population tabulation. This is essential.						
Comments made in Para 4.5 are factually incorrect. It should be noted that the population increase did not come about as the result of changing employment pattern: instead the increase in population was because of the development of new suburban housing on the outskirts of the village: in particular the "clays estate " off Big Meadow Drive. This wording should therefore be amended.						
Comment Reference	ANDP021/9					

Respondent ID	021	Name & Organisation	Local Resident,		Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan	Section, Policy or Paragraph	General Comments - Process & Procedure		Nature of Comment	Observation
Comment						
8.0 NEXT STEPS TO COMPLETE THE DOCUMENT						
8.1 Layout of The Finalised Addingham Neighbourhood Development Plan Document						
Once the above changes have been made: I would recommend that the document be revised so that the importance of the six key issues is made more prominent:						
<ol style="list-style-type: none"> 1. All heritage assets (including listed builds and conservation areas) 2. Greenbelt 3. Flood Risk 4. European Habitat Regulations 5. World Heritage Site at Bolton Abbey 6. Yorkshire Dales National Park and Nidderdale AONB 						
Are six need to be properly reflected as the key issues that all developers need to be aware of.						

8.2 Future Conflicts with the Finalised Addingham Neighbourhood Development Plan Document

The final document should contain a quote directly from part of NPPF;
 NPPF Para 12 ; “Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted”.

8.3 Future Precedence of the Addingham Neighbourhood Plan

Finally I draw your specific attention to the wording of NPPF para 30.

“NPPF para 30 - Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently”.
 This statement should be included in the final Addingham Neighbourhood Development Plan Document.

Comment Reference	ANDP021/10
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Respondent ID	021	Name & Organisation	Local Resident,	Date Received	1/16/2019
Document	Draft Neighbourhood Development Plan; Consultation Statement	Section, Policy or Paragraph	Procudure	Nature of Comment	Object

Comment

9.0 SIGNIFICANT PROCEDURAL ERRORS MADE DURING PUBLIC CONSULTATION

9.1 Introduction

There have been four very serious procedural errors in preparing this version of the plan.

9.2 No Justification for Imposing Housing Numbers into Addingham

Bradford Council has imposed on Addingham Parish Council a requirement to build at least 200 new houses in this small village. This number of new houses is a key part of the neighbourhood plan: indeed this one number “200” thus informs every aspect of this plan.

However it has been / still is a major procedural error that no justification whatever has been given for the proven need for this number of new houses. Quite simply: no supporting information has ever been provided by Bradford Council to justify this number of new houses. There was /is, quite simply, no surveys and no reports to justify this requirement.

Accordingly: Before the Addingham Neighbourhood Development Plan is adopted: Bradford Council need to justify this number of new houses being required /needed in Addingham

9.3 Deletion of Housing Allocation

In their initial advice given to Addingham Parish Council – right at the start of the neighbourhood planning process - Bradford council planning officers clearly advised the parish council (both verbally, in writing and in minutes of formal meetings) that specific and detailed housing site allocations should be made. This advice was discussed

more than once. Furthermore it was made quite clear by Bradford council planning officers to the Addingham Parish Council (and its expert advisors) that those people's developing the neighbourhood plan should be identifying /allocating specific housing sites within the village.

Thus the Addingham Neighbourhood Forum Advisory Group (working directly under the parish council's clear written directions and remit) then did a considerable amount of detailed work to identify and justify where a number of small -scale housing sites around the village could be built upon. Their work then formed the basis of the public consultation exercises held in the summer of 2018.

However specific housing site allocations (i.e. identifying all small sites) was all subsequently deleted (at the last minute) from this version of plan (as submitted under Regulation 16).

As a retired expert in this field: I personally consider the whole process regarding how this deletion of specific housing allocations has occurred is "definitely suspect" (see below).

Therefore the recent decision made by Addingham Parish Council to delete the housing allocations (ie deletion of specifically identified housing sites) was probably – and especially bearing in mind what had previously been said formally during all of the public consultations to villagers - "probably unlawful".

9.5 Evidence (submitted to) and Responses given during Public Consultation

During the public consultation of summer of 2018 it was clearly stated (as shown on all display boards and handouts) that all of the new housing sites would be small scale and I – stress- allocated! Also during the responses to this excellent public consultation, it was made very clear by all villagers that they did not want any large new housing sites developed. That requirement was explicitly made clear by those villagers who were consulted to those persons preparing that version of the neighbourhood development plan. Thus only specific small-scale housing sites were put into the early version.

However the Addingham Parish Council has now deleted all of the housing site allocations.

This deletion of specific housing site allocations was decided upon by the Addingham Parish Council wholly and solely on the basis of verbal advice given to all of the parish councillors by just one Bradford City councillor. Thus the recent advice given to all of the parish council, by just one councillor, completely contradicted all of the earlier formal advice given by Bradford Council's own professional planning officers.

However this decision has now left the Addingham Development Plan "wide open" to having large housing sites developed. Accordingly, this is now clearly not the same version of neighbourhood plan as the one which all villagers were originally consulted upon!

9.6 Advisory Forum (Following on from 9.5 directly above)

For the last two years, the Addingham Parish Council has been advised by a separate panel of experts during the preparing process. I understand (from others) that this forum was mostly comprised of retired experts (in this field). It is clearly recorded that this panel of experts was dismayed by the actions of Addingham Parish Council to ignore their advice to include specific housing sites. I believe these entire expert forum members all strongly protested this decision and that at least four resigned.

I am further led to believe that this advisory forum was then dissolved by Addingham Parish Council simply in order to drive through this big change to the housing allocation: and thus allowing the unwanted prospect of several large-scale housing sites being developed.

9.6 Conclusion

Very few villagers knew of the significance of this one big change to the housing allocations – this change made just before the Regulation 16 consultation document was submitted. This failure to notify villagers is a “serious flaw in the public consultation process”.

Therefore this very significant change was not properly publically consulted upon before the Reg 16 neighbourhood plan was finalised: which I consider to “bad practice and probably illegal”. These points about how villagers have been grossly misled are highly-significant.

Furthermore there is very strong case to say that this one city councillor misled (or that he deliberately lied to) the other members of Addingham Parish Council about this key issue

Comment Reference	ANDP021/11
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Respondent ID	022	Name & Organisation	Local Resident,	Date Received	1/18/2019
Document	Consultation Statement	Section, Policy or Paragraph	Whole Document	Nature of Comment	Object
Comment					
<p>I object to the Addingham Neighbourhood Plan on the grounds that without the inclusion of housing site allocations it fails to protect the village from uncontrolled development.</p> <p>It would appear that I am one of few Addingham residents who has a “misunderstanding” of the how the present Neighbourhood Plan has been arrived at.</p> <p>The facts are as follows:</p> <p>September 2016 - a presentation was held by David Wilson Homes at the Memorial Hall, outlining plans for development of 200+ homes in the village. The Parish Council had been in discussion with them prior to this.</p> <p>March 2018 - A Parish Council led Forum, comprising several professionally qualified residents produced a draft Neighbourhood Plan which included proposals for site allocations. It was exhibited to the village in a detailed and comprehensive way, and was met with general approval.</p> <p>May 2018 - without warning or consultation the Parish Council removed section on Housing Site Allocations, citing CBMDC's advice that supplying details for these could delay the plan by 'up to 2 years'. CBMDC has since denied this. Reassurance was given, and continues to be given, that the Site Allocations can be reintroduced at a later date. CBMDC has confirmed this will not be possible.</p> <p>The adverse implications of this change have never been explained to residents, and objections to it in Parish Council Meetings have not been minuted. No further public</p>					

consultation has been held in the village since March 2018.

The Parish Council expressed fears that delays would jeopardise funding of £1m, an assertion withdrawn in August 2018 as an 'error'. However further mention has since been made of this funding, stating that 'should development occur before the Plan is modified' (highly likely without the protection of Housing Site Allocations), then it will be used to 'benefit the village'. I believe the real benefit to the village would be to have a comprehensive Plan, complete with Housing Site Allocations, without which it is unprotected from speculation from developers.

I should be grateful to know precisely what part of this process I have failed to understand.

Comment Reference	ANDP022/1
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Respondent ID	023	Name & Organisation	Local Resident	Date Received	
Document	Draft Neighbourhood Development Plan; Consultation Statement	Section, Policy or Paragraph	-	Nature of Comment	Object
Comment					
<p>This email is not a Section 16 Consultation response. It is now being included after correspondence with Andrew Marshall (see email dated 17th January 2019). We believe that it is important to put the current situation (end December 2018) onto the record as a contribution to steering the Neighbourhood Plan towards a proper path. We believe that, as things stand, the Plan will fail to satisfy proper examination. We set out below issues which have become apparent during the Section 16 Consultation period</p> <p>OVERALL</p> <p>This is to record with CBMDC, that other Parish Council members and residents have been and continue to be misled by the Parish Council. The council has made numerous statements - including key statements during the consultation periods. The record includes those in the Autumn 2018 newsletter. Typically--- --- the Chairman states "the draft Plan (section 16 draft) will move out of our hands,and further consultation will be organised by Bradford". and -----page 6 includes "...the next draft can be drawn-up and submitted to our parent authority, CBMDC. They will consult on it themselves....."</p> <p>Apart from Website information- the Parish council has confined its' inputs to the Section 14 and 16 processes to a few notices placed randomly around the village.The wording of the Notices is inappropriate and questionable. These actions identify that the root of the many of the fundamental problems which have emerged during the Consultation processes, lies in the PC's failure to understand and respond properly to it's role and duties.</p> <p>As far as the current consultation is concerned. there are several Issues of immediate concern.</p> <p>ISSUE 1</p> <p>in response to the duty to properly consult the wider public regarding the Section 14 and 16 Drafts, the Parish Council failed/fails to "provide variety of means, including written consultations, events, meetings and so on". The consultation process was/is not "carefully designed with clear questions asked, and with people given easy-to-understand instructions to identify which parts of the draft Neighbourhood Plan or the accompanying documents they should comment upon". The public was/is not made aware of the which documents they should comment on. The accompanying documents were/are not available at the "various" places in the village referred to in notices.</p>					

ISSUE 2

The Consultation Statement reveals an extraordinary action by named members of the Parish Council and a District Councillor, referred to as "Informal Consultation". Three appendices are attached to the document recording and illustrating that meetings were held outside the official periods (October 2018) with selected parties. The Meetings were neither authorised by Council nor given any prior publicity. Residents and groups who had responded to the Section 14 Draft Consultation were neither informed of the activity nor offered the same opportunity. The remaining members of the inactive Neighbourhood Plan Forum were also excluded.

ISSUE 3

Modifications to the Section 14 draft display that the " Informal Consultation meetings" resulted in a number of inputs and modifications to the Section 16 draft (example- references to burial grounds). The section 16 draft does not result from a properly conducted transparent consultation process as prescribed.

ISSUE 4

leading up to and throughout the Sections 14 and 16 Consultation processes, both Parish Councillors and residents, have been misled by numerous, repeated statements in the name of the Council. The Statements contradict the expressed opinions of professional members of the Forum who were engaged properly in the earlier work. The statements lead people to believe that the sections in the Preferred Options draft referring to Sites and Allocations which had been removed by the Council without consultation- will be inserted into a "modified plan " at some future date.

Responding to requests from residents, John Grogan MP sought clarification to questions raised - Steve Hartley's reply to the Member is unequivocal. for example --Most recently, since the section 14 consultation period -the APC Autumn Newsletter states (p6) "once Bradford have completed their reviews, and modified their Core Strategy, we can modify our own Plan and allocate sites at a later stage".

-at the December 2018 meeting of the Parish Council a member, acting as Chair of the Council's newly formed, (yet-unexplained) "Neighbourhood Plan Review Group" reported to Council. Members of the public were present. The member's report identified that -" the group's future work programme included "further work on sites and allocations" The notes can now be found at---"<http://www.addingham-pc.gov.uk/wp-content/uploads/2016/01/1812-Review-Group-meeting-Dec-2018-1.pdf> The notes raise serious questions about the origins purposes membership competence and conduct of the group.

ISSUE 5

leading up to and throughout the Sections 14 and 16 Consultation processes, both Parish Councillors and residents, have been misled by numerous, repeated statements in the name of the Council reporting "advice" received from CBMDC. No evidence is presented, however members and residents are led to believe that CBMDC officers have advised the Parish Council

Amongst other claims - the Parish Council argues that advice from CBMDC reinforces the "wisdom" of the PC's decision in June. Steve Hartley's letter to John Grogan MP is the only reference on the subject which we have. The disparities are clear.

-the Autumn newsletter p6 records -- " the Parish Council took the decision to remove the allocation of housing sites, the preferred options, following the result of consultation feedback from Bradford our planning authority. We are clearly advised that, given the work Bradford would require from us and in the light of the uncertainty

introduced by their decision to review their Local Plan Core Strategy while simultaneously preparing a district-wide Site Allocations plan and carrying out a Green Belt review, this is the best course of action for us at this time. If we were to continue to work on a version of the plan containing site allocations, even if we could deal with the specific issues and objections raised by Planning officers, the process could be delayed by an indeterminate period, possibly for a couple of years."

We request that CBMDC publishes a statement to resolve the disparity between the Strategic Director's written advice and the Parish Council's claims regarding "officers unrecorded advice"

ISSUE 6

This statement, with others, is a retrospective argument. More it is evidence of the council's actions in concealing key facts from residents.

- a. Professional members of the Forum openly expressed opinions during Forum proceedings in June 2016. It is now clear that the record of the dispute in the Forum was suppressed and concealed by the council until after the publication of the Section 14 draft. The record of proceedings has been disputed since June 2018. The matter was referred into the council's complaints procedure, the Complaints procedure was modified during the determination of the complaint. The resulting rejection of the complaint was followed by a Freedom of Information request for related correspondence. There is an appeal pending regarding the council's rejection of the FOI request
- b. these retrospective arguments conceal the fact that the Council's unilateral decision in June 2018 was taken for reasons which remain unclear. The record remains a matter of dispute. There is not a single document to display that the decision was evidence-based.

The record of proceedings displays that Parish Council members took the decision on the basis of verbal reports -even off-the-record briefings by the District Councillor

- a. in the case of the AGM -from a Parish council member reporting verbally and off-agenda, regarding his unrecorded conversation with a District Councillor referring to unrecorded verbal advice received by the DC from officers.
- b. in the case of the EGM- from the District Councillor referring to unrecorded verbal advice received from officers.

As stated earlier - this is not a Section 16 consultation response. We wish to register resident's ongoing confusion resulting from the absence of proper, sound, authoritative, attributable advice and the required guidance through the Section 14 and 16 Consultation processes.

Further- in the course of ongoing Wharfedale group exchanges -our attention has been drawn to the confused record of the development of the Burley NP. We wish to avoid repetition of the outcomes.

We have learned and applaud that the Council has decided to extend the Section 16 Consultation process as a result of an input from a resident. We conclude that this is a commendable example of Localism at work.

There is now a general questioning of the wisdom of proceeding with the Section 16 process against the background which we have set out. There is an argument

developing that the Section 16 process should be suspended until the issues which we record here are resolved.

Whether this and the emerging record is an indication of more serious issues remains to be seen .

Comment Reference ANDP023/1

Respondent ID	023	Name & Organisation	Local Resident	Date Received	1/16/2019
Document	Consultation Statement	Section, Policy or Paragraph	-	Nature of Comment	Object
Comment					
INTERIM Comments on the Addingham Parish Council’s Consultation Statement					
<p>The comments refer to references reproduced in red</p> <p><u>Front cover</u></p> <p>Note 1 - this page is misleading - the photograph was taken at the preferred options consultation which was properly conducted there was no corresponding consultation activity with residents at either the section 14 or the section 16 consultation stages the council rejected a proposal by forum members to organise an open meeting event for the public at the section 14 stage</p> <p>Note 2 - there is no record of the council approving this document</p> <p>4. Since designation the Parish Council has been working on the preparation of the document and has engaged stakeholders and local residents in the neighbourhood development planning process throughout. This statement is untrue — at the May AGM the council displayed that it had ceased to consult the forum regarding potential structural changes to the preferred options draft – neither the forum members nor the public were consulted about the proposal or options</p> <p>5 A Neighbourhood Plan Steering Group was established by the Parish Council in November 2015, comprising councillors and volunteers from the local community. In September 2016, this was replaced by a Neighbourhood Plan Forum, again with membership comprising councillors and local residents, and with formal Terms of Reference approved by the Parish Council (Appendix 1). The statement omits to record that the Forum did not function properly after a dispute between elected members and resident members following the council’s actions at the May AGM and June EGM.</p> <p>All notes of meetings were published on the Parish Council web site (http://www.addinghampc.gov.uk/neighbourhood-plan/). This enabled all interested parties to track progress on the ANDP. This is untrue - on 29th July I wrote to the clerk requesting copies of a number of documents including the notes of a meeting of the Forum held on 29th June 2018. The notes were concealed on the basis that they were “disputed”.</p>					

An FOI request for copies of correspondence between the clerk and a representative of the dissatisfied ex and remaining members of the Forum was refused. The matter remains the subject of on-going complaint proceeding's.

The notes were rewritten. The revised notes were "approved" by the remnants of the Forum after the section 14 after the section 14 consultation.

The minute record shows that the Parish Council concealed from residents:

- the failure to continue with a proper engagement with the forum members
- disputed notes
- and the resignations of respected professional members of the forum, until after the section 14 consultation

6. Throughout the stages of developing the document, a number of events and other activities have been organised by the Parish Council itself, or by the Forum on its behalf.

This is untrue. There have been no "events" since the Preferred Options successful consultation meeting/exhibition. The most questionable action of the council is that of imposing a major structural change to the preferred options draft, without proper consultation and display of options. Given the agendas published for the meetings - the argument that ordinary meetings of the council were "consultation activities" is outrageous' it is for the examiner to decide whether the other, previously unannounced, selective initiatives - outside the formal consultation were lawful

Page 9 4 June 2018-20 June 2018 Parish Council decision taken at 2 meetings, held in public, and with advice from planning consultants (Kirkwells), to remove site allocation policies from the draft Plan in the light of feedback from the planning authority ...

The decisions were taken without written published motions. This represents a breach of standing orders

The AGM decision was taken on the basis of an off-agenda account of a conversation with a district councillor. The district councillor gave a verbal report to the EGM.

We have written to both Kirkwells and council officers – the replies we have do not support this statement.

by leaflet drop, posters around village and press articles

The leaflet drop was incomplete, posters and press articles were misleading.

later public statements issued by local authority giving notice of a review of the Core Strategy to be carried out at the same time as a review of the Green Belt

"later public statements" have no bearing on the decision made in June. The review has no bearing on the neighbourhood plan process.

Page 10

The section14 consultation process did not comply with guidance. Resident members of the Forum were not engaged in this and other "consultation processes" up to 9

Oct 2018. Other groups were not consulted. There was no corresponding consultation process with residents. The council refused forum members' proposals to organise an open event for the public. This consultation was selective and representative of an interest group resident members of the forum were not engaged in this and other "consultation processes" up to 9 Oct 2018. Other groups were not consulted

Page12 Para 10

Not true - disputed minutes were concealed --the reaction of resident members of the Forum to the council's unilateral decision was concealed by the Parish Clerk - exchange of letters with chairman of the Civic Society - acting for resident forum members concealed -- FOI request refused

Page 16 CBMDC also provided a detailed of comments. These are set out in Appendix 5 of this Statement alongside the final Parish Council response and action

This is untrue - the decision to remove the sections of the plan was taken on the basis of verbal reports from one District councillor and one Parish councillor

22. To ensure that the changes to the Preferred Option draft and the decision not to proceed with housing site allocations were taken in a transparent and open manner, The key issue is the lack of consultation - residents were presented with a matter of fact. We understand that a matter of this magnitude in the process should have been the subject of a separate round of consultation on the issue and the options

Two Parish Council meetings were organised on 4 and 20 June respectively. Residents were notified of these meetings and their significance by using a leaflet, posters and articles in the local press.

This is wholly misleading - the agendas* indicate that the 4th June meeting was an EGM, ***Neighbourhood Plan - "To receive an update from the councillor members of the Neighbourhood Plan Forum, review the draft policies of the Neighbourhood Plan prepared for Regulation 14 consultation, agree amendments as necessary, and decide any other action as required"**. The ordinary meeting of 20th June approved a motion to have a leaflet printed. The EGM agenda read ***(-UNDER MATTERS ARISING) Neighbourhood Plan – to receive a report on progress and consider proposals for communicating recent developments to village resident**

At the same time...

This is misleading the green belt review methodology had been widely consulted upon. Other reviews were long expected and widely regarded as overdue

CBMDC had committed to an early review of the CSLP

We cannot find any explanation of the abbreviation on the Bradford website

Which was to run in tandem with the preparation of the Site Allocations Plan. This was a significant change in circumstances affecting the preparation of the ANDP, particularly any site allocations, had they still been included in the draft plan

This is an astonishing statement for a responsible body to make and argue retrospectively. It is a clear indication of the council's failure to recognise the well-understood question of precedence when neighbourhood plans proceed more quickly than local plans. It conceals from residents the importance and weight which the emerging plan carries.

Page 18 23. A final meeting of the Forum was held to agree the Regulation 14 Draft Plan and to agree the Regulation 14 consultation on 29 June

This is untrue. The notes of the meeting establish that neither document had been finalised -- "the draft would then be published for formal consultation over the summer

period"

Page 19 24. The public consultation on the draft Neighbourhood Plan was carried out pursuant to the Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Pt 5 Pre-submission consultation and publicity, Regulation 14.

Notices did not specify

- I. details of the proposals for a neighbourhood development plan [F2or modification proposal];
 - II. details of where and when the proposals for a neighbourhood development plan [F2or modification proposal] may be inspected;
 - III. details of how to make representations; F3..
- A. Memorial Hall - this venue is only open for events and bookings
 - B. Community Library - Opening hours: Monday - Closed, Tuesday - 9am to 12 Noon, Wednesday - Closed, Thursday - 2pm to 6pm, Friday - Closed, Saturday - 9.30am to 12pm, Sunday – Closed
 - C. Medical Centre and D. Rowlands Pharmacy (by the Medical Centre) - Closed Evenings and all day Saturday and Sunday
 - E. Telephone kiosk on Church St. F. CO-OP G. Post Office. This cannot be taken seriously
 - F COOP - Nowhere to sit
 - G POST OFFICE - Closed evenings and Sat and Sun PM

Equally importantly - residents were not informed of the questions and issues which they are being consulted upon.

29. Prior to formal consultation, the Parish Council had circulated a leaflet to all homes and businesses in the area, explaining revisions that had been made to the draft following the final informal consultation. Posters and press articles were also used to publicise the changes and give advance information on the forthcoming formal consultation

This is not true -- council minutes record that the purposes of the leaflet were " to publicise the preparation of a new draft of the Neighbourhood Plan"

31. Publicity material, letters, the Parish Council website and the Regulation 14 Draft all contained the relevant details of where and when the proposals for a neighbourhood development plan could be inspected; details of how to make representations; and the date by which those representations must be received were included. Note 27

Other than a website post and a few misleading posters there was no "publicity material" produced after the limited circulation leaflet in late June which clearly does not "contained the relevant details of where and when the proposals for a neighbourhood development plan could be inspected; details of how to make representations; and the date by which those representations must be received...."

Page 21-

38. The detailed representations received and the responses to them are set out in the Consultation Response Table, Table 3 of this Consultation Statement

This is misleading –there is no analysis to support the assertion regarding “broadly commented” and “same issue”? There is much evidence to display that representations have not been properly reported

40. following the formal consultation, the parish council consulted a number of representative groups in the village

This statement has shocked residents. There is no record that the process was authorised by council. Forum members were excluded there is no evidence to display that the process, timing and selection of “consultees” was anything other than selective and unrepresentative the process seems to have been unstructured

Page 25-

The Parish Councils response to the Highway Authority comment “No housing allocations included in ANDP – comment noted.” does not address the issue raised. The (frequently used (>20 occasions) term “noted” is meaningless without a defined consequential action.

Page 26

The response to West Yorkshire Police inputs fails to address - items 1, 3,4,5 and 6

Page 28

The councils reply to the input from Gladmans fails to address the argument for robust and proportionate evidence to support the policy. The statement is confusing – the landscape study is complete

Page 29

The reply to Barton Wilmore is untrue - the Parish Council is able but unwilling to address the new powers on planning for Green Belt emerging from the revised NPPF.

The statement “and has decided not to proceed at this time with site allocations”. Infers that site allocations will be revisited in future. --- the council has been informed that this is not possible yet continues to misinform residents

Page 32- I)This objection is based on a misunderstanding, on the part of a few village residents, of the Parish Council’s reasons for revising the draft Plan.

This statement is a clear indication of the Parish Council’s failure to adhere to the basic requirement for engagement and consultation. If there is a misunderstanding --the council has failed to communicate, engage consult and, inform. The misunderstanding is not confined to a few village residents. Since the council side-lined the forum in May, residents have been denied many key elements for communication and engagement which were established in the resident membership of the forum.

2.The PC is aware that, in spite of NPPF guidance, it will be extremely unlikely that a draft Plan containing housing site allocations could progress through the system in the face of objections from the planning authority and at a time when the planning authority is engaged on a review of its own district-wide housing numbers and a review of the Green Belt.

If the council wishes to guide development -- the mechanism is through a neighbourhood plan which includes site studies and allocations. This process is becoming commonplace in many situations where neighbourhood plans are progressing faster than local plans. The council has provided no evidence to support the assertions "In spite of NPPF guidance," " it will be extremely unlikely" " that a draft Plan containing housing site allocations could progress through the system in the face of objections from the planning authority"

Page 33

3. The PC intends to modify the Plan at a later stage, when the planning authority's reviews have been completed, and it is possible to put a housing site allocation policy in place in a neighbourhood plan which can be in conformity with the Local Plan.

This is just one of many examples of the PC ignoring and concealing the facts about "modifying the Plan" (letter from the Strategic Director to John Grogan MP). Deliberately misleading residents

4. In the meantime, the PC is advised that the best protection for the village against "aggressive developers" is the existing Green Belt boundary. The PC has not produced, identified or published any foundation, origin, evidence to illustrate illustrating the source of the advice

Page 34 the PC wishes to take advantage of the increase in CIL funding

This statement is the only reliable evidence base for the isolated actions and arguments of the PC since May 2018. It is evident that fiscal considerations are the only credible basis for the council's actions in May/June2018. Even prioritising fiscal considerations over the unsupportable analysis/record of planning considerations raises legal issues.

The statement in response to Barton Wilmore **The Parish Council cannot allocate this site.....** Is untrue

Until the Green Belt review is completed by CBMDC, Addingham NDP cannot address this issue-

This is untrue -- changes made to the NPPF in 2018 provide neighbourhood plan makers with extended powers

Page 36 The mechanisms for modification of an NDP are set out in Regulations. Residents did not "vote" at the informal consultation stage; the overwhelming support shown for the draft Plan was in relation to its policies as a whole, not just the housing site policy. A significant number of residents opposed the policy in respect of one of the 3 sites proposed.

This comment is irrelevant unrepresentative and an argumentative insult to the many people who are genuinely concerned

Page 39 –

Issues are not addressed

Page 41 Implementation will be matter for the planning authority

The matter which was raised has not been addressed

PAGE 42 –

The consultees' input reinforces points i have made about the requirement for a dedicated distinct consultation process to deal with the options and outcomes associated with the matter of deleting housing sites and allocation

Page 43 Specific comments relating to the housing site allocations may be reflected in later modifications of the Plan when it is possible to bring forward a policy for housing site allocations again.

The statement is unsupportable , grossly misleading

Addingham residents have been given the *full* facts relating to the development of the neighbourhood plan at *each stage* in the process. In all, we have held 3 council meetings, all in public, *to debate* the approval and publication of the Reg14 Draft Plan. We have sent a printed flyer to *every* household in the village explaining the reasons for amending the draft presented for informal consultation.

There is a considerable body of evidence to the contrary.

The statement about "explaining the reasons for amending..." Is confirmation that the council failed to understand the requirements for proper consultation

It is the view of the Council that the comments listed in the Response Table are not representative of the vast majority of village residents.

There is no record of the council's consideration of this question

Page 44 The Parish Council is not in a position to provide clear details about when and how the Plan would/could be modified to include a policy on housing site allocations, as this process is subject to statutory guidelines and will need to take place in such a way that the Neighbourhood Plan remains in conformity with the Local Plan

We question how a responsible body could publish this incompetent statement

Page 45 None of the members of the Forum were working for the Council as "professionals"

There are many undertones in this statement - particularly the term "working for". It is evidence of irrational unreasonable conduct by the council in it's' dealings with the members of the Forum who challenged the unilateral, undemocratic, unevidenced decision taken at the EGM. It displays the councils shift in stance May/June 2018 emphasising "advisory" – a contradiction of the consensus principles built into the Neighbourhood Plan Act

Page 46 K) This objection is based on a misunderstanding of the role, composition and powers of the Forum.

Evidence to support the issue highlighted above

Residents' comments inaccurately refer to "the Forum" when they mean the individual views of some of its volunteer members. Members of the Forum also include councillors and the view of "the Forum" is the view of the whole body reached at one of its meetings.

This comment has no place in the NP process – it illustrates fundamental problems underlying many of the issues being dealt with

PAGE 46 The decision to revise the Plan for formal submission purposes was a matter for full Council. The volunteer members of the Forum were not, however, excluded from the process - the meetings at which the Parish Council made its decision were held in public and Forum members, both councillor members and volunteer members

were present (see the Consultation Statement for the full sequence of events).

To argue that Forum members were included in a decision taken by the Parish Council is not worthy of consideration. It is simply wrong for the parish council to assert that any form of engagement with the forum took place leading up to or at either the AGM or the EGM.

Page 47 The Parish Council's consultant had advised that the additional work required by the planning authority was likely to take considerable time and resource, and even when and if completed, could be followed by a request for further work to be carried out.

The council fails to register the judgement given by professional members of the forum that the work and process could be completed in a matter of weeks

The consultant has failed answer written request for evidence of or addition detail regarding advice given to the council. The planning authority has made specific statements and explanations in response to requests which do not support the conclusion reached

As noted by one respondent, the Forum's TORs have provisions regarding public engagement, but the Forum must act as a body within a properly constituted meeting. Once the volunteer members had disagreed with the Council's decision, in spite of the professional advice provided to it, the Forum as a body was unable to meet effectively

This is a clear illustration of the council's concealment of important matters from the public. The public has not been made aware of the issue at the root of the disagreement. It is unacceptable that a local Government body, working under legislation, with public money, was incapable of properly managing and finding a solution to a simple difference of opinion, within a properly constituted body.

Unfortunately, individual ex-members of it may have publicised and sought to justify this disagreement publicly, to the detriment of the Council's aims for public engagement.

That a responsible public body publishes this rumour-mongering, accusative, inaccurate, statement leaves residents with questions concerning governance and lawfulness. It now remains with the examiner to answer these questions

PAGE 48 Comment 4

I was shocked at the decision by the PC to omit the HA from the NP. I believe this decision was arrived at without real agreement of the Forum. I was also aware that as a Forum member (communications) I was excluded from the involvement in the flyer's message out to the village. I consider that my exclusion left me with no reason to remain as a member of the Forum. My main concern is the major decision made re HA was made without the agreement of the Forum and made public with no mention of the Forum's opposition!

Is not addressed

Page 55 resident 3-

The council's response to the detailed points made regarding consultation avoids and evades the issues

However, the council's handling of the consultees' input regarding proper consultation about major changes quoting **[1]sedley lj in r (bapio action limited) v secretary of state for the home department [2007] ewca civ 1139 at [43][47]* seems to have been been misread and misquoted the consultee did not refer to any immigration case

The council's response is unintelligible. It is troubling that the council wastes its own time, that of residents and the examiner by this argumentative stance – if clarification of an issue is required it can be delivered without conflict at an early stage

From pages 55 onwards it is not possible to connect/correlate consultation inputs, council responses and resultant actions reliably without making assumptions because of the layout -lack of separation mal-alignment of the columns. It is not clear which consultation responses are being addressed

For the time being, the following comments are provisional until the problem is resolved

Page 56 The Parish Council's consultation has met the 4 requirements of procedural fairness, in that the consultation, carried out pursuant to the 2012 Regulations:

Residents have been informed that CBMDC's Statement of Community Involvement governs how consultation on elements of the local plan will be conducted. The parish council's actions do not comply with the SCI.

The council frequently refers to advice from consultants and officers — there is no written record for the references

Retrospective statements attempting to explain and justify a decision do not constitute consultation

Is incomprehensible -- it is impossible to correlate across columns – it would be irresponsible to assume connectivity

The absence of any contemporary written evidence/ reports/analysis/meeting papers is problematical at the examination stage - where the evidence base will be sought.

On pages 59/60 a resident records

Para 4.25 is misleading and badly informed. Vulnerability to flooding is governed by a number of factors including infrastructure geography, geology, new development and climate change. The plan is not informed by the work required by law of the lead local flood authority to produce records of flooding, a register of structures, to investigate flooding incidents, to assess local flood risks and to produce local flood risk management plans The plan should register the lack of such information and establish appropriate precautions to avoid inappropriate development.

This paragraph is an illustration of the complete inappropriateness of including statements about flood risk management in a neighbourhood plan. In law the duty and responsibility for local flood risk management rests with the lead local flood authority. The Parish Council has no locus in the matter. The parish council is not competent to discharge the flood risk management function. Works On ordinary water courses are controlled by the LLFA If the council intends to leave any mention of flood risk management in the plan, then the legal consequences of doing so should be explored and displayed. It is likely that any engagement or action in this sphere or statements inferring so would be ultra vires

The council's response on page 59 is "noted no action". Residents conclude that the frequently used term "noted no action" means more than "ignored" – that would be improper.

IN GENERAL

Throughout the document, the council displays that it failed to properly engage residents , even the forum, in the design, content and structure of the section 14 draft

The section 16 draft includes changes which do not derive from the section 14 and earlier consultation

The consultation report illustrates that the council has failed to properly address issues raised by consultees

The council has ignored protests from many individuals and groups regarding the falsehood in repeated statements referring to "future work on site allocations" and "modifying the plan."

The public was excluded from observing or attending forum meetings

The public has been misled repeatedly since April 2018

The council dissolved the Forum at the beginning of the section 16 consultation period. The decision was made in council without a written motion - contravening standing orders. This mechanism conceals council's intentions and prohibits public engagement and consultation

Appendix 11

There was no corresponding consultation process with residents

The council refused forum member' proposal to organise an open event for the public at the section 14 consultation stage

The refusal effectively silenced the dissenting members of the Forum

This consultation was too late in the day - post section 14 consultation - to have any real purpose or real influence.

There appears to be no outcome

Comment Reference

ANDP023/2