

Addingham Parish Council

Examination of Neighbourhood Plan

As requested in the Examiner's procedural letter dated 23 May 2019, the Parish Council sets out the following answers to the letter's annexed questions relating to the Addingham Neighbourhood Plan.

In doing so, the Parish Council has taken advice from planning consultants, Kirkwells, and will, where indicated below, receive recommendations from the Examiner to make any amendments to the draft Plan, if requested to do so.

Q1 Policy ANDP1 a): To gain the support of the policy, any housing development would have to be on previously developed land. Is that the intention?

This was the intention when the Plan was drafted. However, the Parish Council was aware that this policy was more prescriptive than the NPPF and would consider modifications to the Plan, if so requested.

Q2 Policy ANDP1 b) and paragraph 7.4: To assist developers, the meaning of protected open space will need to be clear. Is this the same as "protected recreation"?

This refers to the protected open land in settlements in the saved RUDP. We could clarify this with inserted wording if necessary.

Q3 Policy ANDP1 c) – "valued views": Are these the same as the views and vistas shown on Policies Map 1?

Yes. Please also see the Landscape Character Assessment, submitted to CBMDC as one of the Reg. 16 evidence base documents.

Q4 Policy ANDP1 e): Is this part of the policy intended to cover all designated heritage assets (not just listed buildings and the Conservation Area)? To aid interpretation (and under Policy ANDP2), should the complete Conservation Area boundary be shown on Policies Map 1?

If need be, we could clarify this by amending the drafting such that the parentheses will begin with "for example". It was decided not to show the Conservation Area to avoid duplication as this is already shown on the RUDP policies map – Figure 4 in the ANDP.

Q5 Would it be appropriate to include a policy acknowledging the need for new development beyond the settlement boundary?

This is not considered appropriate and the approach was agreed with CBMDC. Such land is within the Green Belt and covered by CBMDC policy and national planning policy. (Please see also the answer to Q23 below.)

Q6 Policy ANDP2: The first paragraph of the policy (and criterion k and elsewhere) would require new development to conserve and enhance. This goes beyond the statutory test (Planning (Listed Buildings and Conservation Areas) Act 1990) to conserve or enhance. Is this reasonable?

Policy should be amended to read "conserve or enhance" if so requested.

Q7 Policy ANDP2 b): Should the use of appropriate materials be subject to viability?

This policy covers the Conservation Area and use of appropriate materials is a key way to protect this area from inappropriate development. There should be no compromise on materials.

Q8 Policy ANDP2 c): Would it be reasonable to add that highway safety should not be compromised?

Yes, we agree with the Examiner, and would be prepared to add this.

Q9 Policy ANDP2 f): Clarity will be needed over what is meant by "valued areas of open space" (see Q2 above).

Please see the answer to Q2 above.

Q10 Policy ANDP2 h): Are there instances where a modern shopfront would be justified?

The policy allows for modern shopfronts of traditional construction. Modern shopfronts of non-traditional construction would introduce an alien element into the largely intact village streetscene.

Q11 Policy ANDP3: Developers should be able to rapidly identify local non-designated heritage assets. Are these all listed in Appendix 1?

Appendix 1 is based on the Parish Council's work and the available evidence base, but it does not include all sites in the Historic Environment Record.

Q12 Policy ANDP4 h): Will all applicants know what is meant by "Secure (sic) by Design features"? Should a reference be added?

We would amend the typo, and, if required, could add a reference/explanation for Secured by Design features.

Q13 Paragraph 7.18: Is it clear what is meant by "good practice documents"?

This is left open and flexible given the changing nature of what is considered best or good practice. We could, however, suggest amending the wording to "good practice documents published by government, statutory bodies and recognised institutes".

Q14 Policy ADNP5 d): Is there clarity over the extent of the views?

Yes, we believe the views have been clearly explained, both from the information provided in the ANDP, and in the Landscape Character Assessment report, commissioned by the Parish Council, and included in the evidence base documents at Regulation 16.

Q15 Policy ANDP5 f): Is it clear what is meant by "the area's historic water management systems"?

Yes, but this could be amended if necessary by adding "of rivers, becks and streams".

Q16 Policy ANDP6: Is it clear what is meant by "additional infrastructure provision"? Is the term to be limited to the matters identified in paragraph 7.31?

This broad phrase was used to identify any additional future infrastructure provision associated with a development. It is not limited to those matters identified in para. 7.31.

Q17 Policy ANDP10 would be supportive of any amount of additional parking. Is this reasonable? Should there be some limit (e.g., not exceeding the parking standards of Bradford Council)?

If considered necessary, we could amend ANDP10 to make reference to and take account of CBMDC standards.

Q18 Policy ANDP10: Should there be reference to the needs of cyclists?

No, this is not considered necessary.

Q19 Policy ANDP11 and Appendix 2: Some of the proposed Local Green Spaces (LGS) are already protected by Green Belt or Conservation Area designation. What additional local benefits would be gained by LGS designation?

A full Local Green Space Assessment was prepared and submitted to CBMDC as part of the Regulation 16 submission. The additional local benefits are that the spaces are protected for their own intrinsic value as set out in the Assessment, not for their contribution to the Conservation Area or the aim and purpose of the Green Belt. Were, say, Green Belt boundaries to change, these spaces would still have the same demonstrably special character as Local Green Spaces.

Q20 Policy ANDP11 – Old First School: Should the boundary be amended to take in the whole of the former First School site?

The Neighbourhood Plan Green Space assessment supports local green space designation across the whole site. Housing development on part of the site was consulted on at the preferred options stage, and concerns were expressed about the environmental impact of development here and about identifying an acceptable means of road access to the site.

However, in working on the Reg 14 and Reg 16 drafts, we were advised not to include the whole of this site for LGS, because of objections potentially to be raised by CBMDC. We understand that the objections related to the possible suitability of part of the site for future housing development. The site is owned by CBMDC and is currently allocated for housing under the RUDP.

The Parish Council would accept an amendment to the LGS boundary if considered necessary.

Q21 Paragraph 7.56 – summary of analysis: Appendix 2 does not provide sufficient evidence (for example, type of particular local significance). Further detail is needed.

A full Local Green Space Assessment was submitted to CBMDC as one of the documents included in the Regulation 16 submission.

Q22 Policy ANDP14 b): Should there be reference to the Sequential Approach?

Yes, and we will be happy to amend the draft Plan to include this.

Q23. In the light of the representations, please comment on the adequacy of consultation at the Regulation 14 and 16 stages; also, the decision to omit housing site allocations.

In summary, as set out in the Consultation Statement, the ANDP has been consulted upon in an open, transparent and fair manner that goes significantly beyond the requirements of the NDP Regulations. CBMDC has conducted the Regulation 16 consultation as required by Regulations. The issue of site allocation has been a contentious one, but there is no requirement for an NDP to make site allocations; there is little scope to make site allocations in Addingham beyond looking at Green Belt, for which, at the present time, there is no strategic planning policy support; also, CBMDC are undertaking a selective review of the Core Strategy that will set a new policy framework for any future site allocation or Green Belt review in Addingham. Given that the Parish Council has conducted itself in accordance with written procedures and policy, and taken decisions in open

public meetings, and has also taken advice from professional planning consultants, we are satisfied that the precautionary approach adopted, that would allow for site allocations at a later date, is the correct one.

In view, however, of the quantity of material presented on these issues in the representations, we provide a fuller explanation in answer to this question – please see attached appendix.

Q24 In the light of representations, has appropriate prominence been given to the following matters: All heritage assets; Green Belt; Flood Risk; European Habitats Regulations; Bolton Abbey; and the Yorkshire Dales National Park and Nidderdale Area of Outstanding Natural Beauty?

All heritage assets – yes, appropriate consideration has been given to this matter. The ANDP includes policy for the Conservation Area, non-designated heritage assets and the local landscape. These policies sit alongside and complement those in the Local Plan Core Strategy and saved policies of the RUDP.

Green Belt – yes, appropriate consideration has been given to this matter. It was agreed in developing the plan with CBMDC that Green Belt review was a matter for CBMDC as the strategic policy making body. We note the recent changes to national planning policy in regard to this, but until such a time that Local Plan Core Strategy is changed to allow for changes to Green Belt through NDPs, the position adopted remains unchanged.

Flood risk – yes, appropriate consideration has been given to this matter. This matter is dealt with through Local Plan Core Strategy Policy – Policy EN7. There is no need to duplicate this policy.

European Habitat Regulations – yes. This is dealt with in the submitted Strategic Environmental Assessment and Habitat Regulations Assessment.

Bolton Abbey - yes, appropriate consideration has been given to this matter. Bolton Abbey lies outside and to the north of the neighbourhood area in the Yorkshire Dales National Park. The ANDP proposes no sites, has no major recreation or infrastructure proposals that affect the Abbey. In short, there are no significant cross-boundary issues. Planning policy for the Abbey is adequately addressed by the Park Authority <https://www.yorkshiredales.org.uk/living-and-working/planning-policy-section/local-planning-policy>. It is further noted that the CBMDC Local Plan Core Strategy, that sets the quantum of development for Wharfedale (including Addingham), Sub Area Policy WD1, was assessed in terms of the duty to co-operate and found to be legally compliant. Historic England have raised no issues for the ANDP in regard to this designated heritage asset. The site is not a World Heritage Site.

Yorkshire Dales National Park - yes, appropriate consideration has been given to this matter. The ANDP makes suitable reference to the ANDP. The ANDP proposes no sites, has no major recreation or infrastructure proposals that affect the National Park. In short, there are no significant cross-boundary issues. Planning policy for the National Park is adequately addressed by the Park Authority's planning policy <https://www.yorkshiredales.org.uk/living-and-working/planning>. It is further noted that the CBMDC Local Plan Core Strategy, that sets the quantum of development for Wharfedale (including Addingham), Sub Area Policy WD1, was assessed in terms of the duty to co-operate and found to be legally compliant. The National Park lies outside the neighbourhood area. For this reason, and given the ANDP cannot set policy for this area, it is not appropriate to show the YDNP boundary on the Policies Map. The YDNP has made no objection to the ANDP.

Nidderdale AONB - yes, appropriate consideration has been given to this matter. The AONB lies outside of the neighbourhood area, north of the village boundary formed by the River Wharfe. The

ANDP acknowledges the physical links of the area and includes Policy ANDP5 that has been based, in part, on the Landscape Character Supplementary Planning Guidance produced by CBMDC that also recognises this physical relationship. Policy ANDP5 is considered a suitable approach to help conserve and enhance the AONB's valued landscape, in conjunction with CBMDC Local Plan Core Strategy Policy EN4 Landscape. It is further noted that the CBMDC Local Plan Core Strategy, that sets the quantum of development for Wharfedale (including Addingham), Sub Area Policy WD1, was assessed in terms of the duty to co-operate and found to be sound. For this reason, and given the ANDP cannot set policy for this area, it is not appropriate to show the AONB boundary on the Policies Map. No objection has been made to the ANDP by the Nidderdale AONB officers or Joint Area Committee.

APPENDIX

Section A: Context for Q.23

The summary representations report produced by the planning authority records objections relating to this question made by ■ respondents during (and immediately after the close of) the consultation on the Reg.16 Draft Neighbourhood Plan.

These respondents had also submitted comments during the Reg 14 consultation. These comments, which were substantially similar to those submitted by the same people to the planning authority at Reg 16, were answered by the Parish Council in the Consultation Statement published on the Council's website and included as one of the submission documents for Reg.16. The respondents are all known to the Parish Council – ■ of them being volunteer members of the (now dissolved) Neighbourhood Plan Forum (the working group set up by the Parish Council to assist with the development of the draft Plan), and all of them known to be connected with each other, either through membership of the Addingham Civic Society or by other associations within the local community. The Council has reason to believe that one of the respondents known as ■ is ■, associated with ■ other respondents. ■ has been conducting a campaign, over a lengthy period of time, to undermine the work of the Parish Council, primarily in relation to the Neighbourhood Plan, by means of circulating misinformation in e-newsletters. In December 2018, following a full and documented review of the Clerk's correspondence files, the Council decided publicly to regard ■ of these respondents, including ■ known to the Examiner ■, as vexatious complainants.

The Parish Council has written evidence to support the above statements.

As summarised in Q23, the representations made by these respondents concern:

- the consultation process on the Neighbourhood Plan, and
- the Parish Council's policy decision to remove housing site allocations from the Plan after the Preferred Options consultation stage.

The Parish Council's detailed comments on both these concerns are set out below.

Section B: Consultation Process

Throughout the development of the Neighbourhood Plan, the Parish Council's consultation process has complied with, and at times exceeded, statutory requirements.

The key stages are as follows:

<u>Date</u>	<u>Key Event</u>
Nov 2015	Start of process - questionnaire issued to local groups and residents to identify initial key issues to be included in a Neighbourhood Plan, and to attract volunteers to work on the project
7 Nov 2015	Public launch event – attendees asked to leave comments on Post-it notes and attach to displays at event
18 Nov 2015	Appointment of Kirkwells Planning Consultants to advise on the development of the Plan
2 Dec 2015	First meeting of Addingham Neighbourhood Plan Steering

<u>Date</u>	<u>Key Event</u>
	Group (later to be re-established as Addingham Neighbourhood Plan Forum)
4 Feb 2016	Agreement of preliminary schedule of subjects to be included in the draft Plan (later revised and confirmed in Sept 16)
3 Nov 2016	Publicity to raise awareness and consult on issues to inform the first draft of the Plan – leaflet distribution to all households, followed by consultation event attended by over 260 village residents –inclusion of housing site allocations offered for comment/support
29 Nov 2016	Open meeting to involve new volunteers who had come forward at the 3 Nov consultation event, to work on the development of the Plan
Feb 2017	Decision by PC to include housing site allocations in draft Plan and first outline draft Plan prepared
13 May 2017	Community engagement event on local green spaces at Environment Day (to inform draft Plan policies)
Mar-Sept 2017	Site assessments (housing and green spaces) carried out, based on methodology supplied by planning authority for housing assessments and using NPPF criteria for Local Green Space Designation; process overseen with advice from Kirkwells throughout
May-June 2017	Consultation on Green Spaces, with comments by survey, with option to complete online (via 4 local websites – PC, Civic Society, Addingham Info and Environment Group), via social media, and sent via email to range of village organisations to publicise to their member lists. Over 110 returns, majority online.
June/July 2017	Call for sites issued, and publicised in the village newsletter distributed as hard copy to all households, businesses and landowners in the area, via social media and also by means of letters sent to local estate agents
Sept 2017	City of Bradford MDC Local Plan Core Strategy Development Plan document approved
Jan/Feb 2018	Online business survey carried out
March 2018	SEA/HRA screening carried out and reports sent to consultation bodies (Historic England, Natural England and the Environment Agency)
9 /10 March 2018	Consultation open event on Preferred Options draft Plan, with a period of open consultation, with copies of the Plan available on display for feedback to be sent in until 7 April. Some 255 individuals visited the open event, generating over 210 completed feedback forms (out of over 420 taken for completion)
30 April 2018	Consultation by letter with all owners of non-designated

<u>Date</u>	<u>Key Event</u>
	heritage assets – 4 responses received, 3 supporting principles of the Conservation Area, 1 with comments N/A to this consultation.
June 2018	Detailed feedback received from City of Bradford MDC planning department, raising objections concerning the inclusion of housing site allocation policies in the draft Plan
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 and 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. PC decision publicised to all households, businesses and landowners in the area by leaflet drop, posters around village and press articles.
29 June	Forum meeting on 29 June to review feedback comments and take further advice from planning consultants.
13 July 2018	Formal consultation on draft Addingham Neighbourhood Development Plan for 6- week period to 24 August 2018
22 Aug 2018	Parish Council commissioned landscape character assessment to support landscape policies and green space designations in draft Plan
21 Sept 2018	Informal consultation at primary school to seek views/comments of children and staff
27 Sept 2018	Informal consultation with Addingham Churches Together
30 Sept 2018	Informal consultation with Addingham Environment Group to review comments on draft Plan
9 Oct 2018	Additional informal consultation with business representatives (Totally Locally)

Further comments on publicity and public engagement

Specific representations are made by the respondents as regards the extent and adequacy of the Council's publicity material concerning the revision of the draft Plan to remove the housing site allocations. In addition to taking the relevant decisions in a series of public meetings, publicised in the village as required by law on noticeboards, and also on the Council website, the Parish Council took the following steps:

- kept its own website up to date with information and links to draft documents
- prepared and distributed a flyer delivered by hand to all households in the village by parish councillors
- displayed posters at prominent locations around the village
- published articles in the local press on 28 June 2018 and 13 July 2018, explaining progress and next steps in developing the Plan
- published a full explanation in an article in the village newsletter distributed in September 2018 to every household in the village
- organised and held a series of informal meetings with particular groups around the village, representing the churches, businesses, children and those with interests in the local environment. (NB – this consultative exercise to engage with village groups had not previously been carried out by the volunteer Forum members.)

In addition to this, publicity was also generated by the Civic Society (with a village membership of some 400 local electors). The Trustees issued regular updates (via Monthly Newsletters) to its members during the lengthy Regulation 14 and Regulation 16 processes, including in July last year, when it notified its membership that 'Site Allocations' would be omitted from the current version of the NDP. There were very few comments.

Members of the Civic Society are actively encouraged to spread news in the newsletters throughout the community.

The Parish Council has written evidence to support all of the above statements, and to show that, to the extent that information was then available in the public domain, publicity generated by the Council accurately reported the decisions taken and the reasons for them. The Parish Council refutes categorically some of the representations made as regards the content of the publicity available at the time.

Specific representations are also made by the respondents as regards the adequacy of publicity material during the Reg. 16 consultation. This process was handled by the planning authority, and complied with regulations. The Parish Council's work to publicise the consultation more widely, with posters and with copies of the draft Plan made available in a number of accessible locations, was organised to complement and extend the statutory process to provide greater opportunity for public awareness and engagement.

At both Reg. 14 and Reg. 16 stages, residents' views, as expressed during the informal consultation stages, were taken into account by the Parish Council in progressing the draft Plan:

- i. The Plan retains the important policy, supported by residents during the informal consultations, to support small infill development, within the village envelope, in preference to development of larger sites and sites in the Green Belt.

- ii. Many comments, in both informal consultations, related to aspects of the Plan other than housing site allocations, and these were taken into account in preparing the pre-submission draft plan.
- iii. 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. (NB The Parish Council is still 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.)

Section C: Removal of Housing Site Allocations

The decision to remove housing site allocations was taken by the Parish Council on the professional advice of planning consultants, Kirkwells. The Planning Consultant's advice, provided to Council in two public meetings as well as direct to members of the Forum, confirmed that the removal of site allocation policies was the best course of action for the village at that time, when it was becoming known that the planning authority was about to engage on a review of its own Local Plan, involving detailed reviews and amendments of a number of key policies, including those for the Green Belt and transport. By taking forward the Plan without housing site allocations, the Council was advised that the draft Plan might conceivably reach referendum in 2019, thereby offering the opportunity to put approved policies in place in conformity with the Local Plan even whilst it was under review by City of Bradford MDC. The sequence of events which led to this decision is described in the Explanatory Note below.

Explanatory Note on Key Events from May-July 2018

1. At the annual council meeting held in May 2018, an updated draft Neighbourhood Plan was presented, following a 6-week informal consultation on the Preferred Options Draft (containing housing site allocations), and the Council was invited to consider approving it for the purpose of the formal Reg.14 consultation. Consultee comments had been taken into account in preparing the draft, but comments from the planning authority were yet to be received.
2. In considering this matter, the Council heard a report delivered orally, which relayed information given to Council a few days ago by one of the Ward Councillors, to the effect that Bradford's comments on the draft Plan were likely to be extremely problematic if it was intended to progress a document containing housing site allocations. This was because the planning authority was likely to require considerable further work on the proposed site allocations, and would not be able to take the Neighbourhood Plan forward whilst its own policies of significant relevance to a neighbourhood plan were under review. The Council was told that these factors would delay progress on Addingham's draft Plan for an indeterminate period of time.
3. Everyone involved in the neighbourhood planning process, councillors and Forum volunteer members alike, knew that the current timeline for finalising the Plan anticipated a referendum in Spring 2019. It was a matter of concern that the difficulties likely to be presented by Bradford's comments could cause a delay to this process, when it was in the village's interests to have an approved Plan in place as soon as possible.
4. The proposals considered for decision at the May meeting thus included a request that Council approve the Plan in principle, but also give authority for it to be amended, if necessary, once formal comments had been received from Bradford planning officers. It was made quite clear at the meeting that the proposal potentially to revise the draft Plan was put forward to allow action to be taken between meetings, if necessary, once Bradford's formal comments had been received.
5. Following the meeting, it was made known to the Council that some of the volunteer members of the Forum, who had been present at the Council meeting, were not happy with the decision taken. In view of the sensitivity of the issue, it was therefore felt that an extraordinary Council meeting would need to be called to process the comments from the planning authority (rather than rely on the authority delegated to the Clerk to decide on the extent of amendments required).

6. A meeting of the Forum could not be convened to discuss the matter, because the volunteer members were not available as a body (with holiday and other business commitments) until the date which was already being booked for the extraordinary Council meeting.
7. This meeting therefore went ahead on 4 June, and those volunteer members of the Forum who could attend it were present. The Council's planning consultant was present to advise the meeting. Unfortunately, Bradford's comments had still not been received in writing, but a question and answer session was held with members of the public, including some of the volunteer members of the Forum. The Council's consultant advised that amending the Plan at this stage to remove the housing site allocations, in order to avoid delays and to take it to a referendum, possibly in May 2019, would be the best course of action, in that it would result in having a set of approved policies, forming part of the statutory framework for the consideration of planning applications, at the earliest possible date. (It was always emphasised that the approved Plan could be modified at a later date to include site allocations; the representations put forward by respondents who question this are basing their concern on a misreading of statements made by officers at CBMDC.) Council acted on the advice provided to the meeting, and decided to prepare a revised draft for Reg.14 purposes without housing site allocations.
8. After this meeting, arrangements were made for the next Forum meeting, and Bradford's comments, now received, were considered first at the next Council meeting on 20 June (which was already diarised on the approved annual schedule of meetings) and then at the Forum meeting on 29 June.
9. At the Forum meeting, the consultant was again present, and again advised all members of the Forum why decisions had been taken by Council at the meetings held on 4 and 20 June to revise the draft Plan in the light of Bradford's feedback comments. Some of the volunteer members of the Forum argued for retention of the housing site allocations as part of the neighbourhood planning process, stating their belief that this would be the best means of protecting the village from unwanted developments. The professional adviser provided information to correct this belief. The consultant also explained to the Forum that, even if the comments made by planning officers could be successfully dealt with, it was highly likely that the planning authority would continue to require further work beyond that identified in the comments currently available, meaning that a Plan containing site allocations was likely to face significant delays.
10. Following this meeting, City of Bradford MDC issued public statements to the effect that their own Core Strategy was to be reviewed in respect of district-wide housing numbers. This piece of work would be carried out at the same time as the Green Belt review, a review of the methodology for reviewing the Green Belt (already in progress), and a major review of transport policies.
11. In these circumstances, the Council was advised and remains of the view that the decision to progress with a draft Plan without housing site allocations was the only possible course of action open to the Parish Council in these circumstances, given that it is impossible to have a Plan with site allocations adopted, until such time as our principal authority has completed its reviews and modified its Core Strategy. To update this into the present context, now in June 2019, we know that Bradford has yet to embark on its review of the green belt and has revised its own timetable for the completion of work on reviewing the Local Plan Core Strategy. In challenging circumstances as regards staffing resources, the planning authority has needed some 8 months to take the Reg.16 draft Neighbourhood Plan to its current stage, in spite of our presentation to them of a relatively straightforward set of policies (ie without the housing site allocations).

12. The Parish Council believes, having been advised to this effect, that the only other available option open to it in taking forward the Neighbourhood Plan in summer 2018 would have been to wait and put the Neighbourhood Plan process on hold until Bradford's reviews had been completed. The Parish Council firmly believes that that option is not in the best interests of the village.
13. The Parish Council remains committed to the aim of putting a Plan in place as soon as possible to provide a framework of policies to be taken into account by developers, who may submit applications at any time during the period in which the Core Strategy is being modified.

Notes (with reference to specific comments in the representations):

- a) *The decision to revise the Plan for formal submission purposes was a matter for full Council, as the qualifying body and decision-making body for the Neighbourhood Plan.*
- b) *The Forum was an advisory group, a formally constituted committee of the Council, but with no decision-making powers. The Council had appointed volunteer members to serve on it, at its discretion.*
- c) *The volunteer members of the Forum, including those (and their associates) who have made these representations) were involved in the work of the Forum, at the discretion of the Council, to assist with the development of the Plan.*
- d) *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.*
- e) *Respondents' comments inaccurately refer to "the Forum" when they mean the individual views of some of its volunteer members. Members of the Forum included councillors, and also a number of other volunteer members who do not necessarily hold the same views as those making the representations at Reg. 16 stage.*
- f) *As noted by ██████████ the Forum's TORs have provisions regarding public engagement, but the Forum may only 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 by planning consultants, the Forum as a body was unable to act or to meet effectively.*
- g) *The Forum was dissolved because its aims had been achieved when the Plan had been developed for submission to the planning authority. The Council has now appointed a successor body to take forward the proposed later review of the Plan. The successor group includes some of the volunteer members who were appointed to the original Forum.*

