

# INDEPENDENT EXAMINATION OF THE HARDEN

## NEIGHBOURHOOD PLAN

EXAMINER: Andrew S Freeman BSc (Hons) DipTP DipEM FRTPI

Ken Eastwood  
Clerk to Harden Village Council

Iain Cunningham  
Senior Planning Officer  
Bradford Metropolitan District Council

Examination Ref: 01/AF/HNP

16 January 2023

Dear Mr Eastwood and Mr Cunningham

### HARDEN NEIGHBOURHOOD PLAN EXAMINATION

Following the submission of the Harden Neighbourhood Plan (the Plan) for examination, I would like to clarify several initial procedural matters. I also have 14 preliminary questions for Harden Village Council and one for Bradford Metropolitan District Council, to which I would like to receive a written response(s) **by Monday 30 January 2023**.

#### 1. Examination Documentation

I can confirm that I am satisfied that I have received a complete submission of the draft Plan and accompanying documentation, including the Basic Conditions Statement, the Statement of Community Consultation, the Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Determination Statement and the Regulation 16 representations, to enable me to undertake the examination.

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

#### 2. Site Visit

I will aim to carry out a site visit to the neighbourhood plan area in the week beginning 30 January 2023. The site visit will assist in my assessment of the draft Plan, including the issues identified in the representations.

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

I may have some additional questions, following my site visit, which I will set out in writing should I require any further clarification.

#### 3. Written Representations

At this stage, I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. However, I will reserve the option to convene a hearing

should a matter(s) come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

#### 4. Further Clarification

From my initial assessment of the Plan and supporting documents, I have identified a number of matters where I require some additional information from the Village Council and Bradford Metropolitan District Council, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response(s) **by Monday 30 January 2023**.

#### 5. Examination Timetable

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

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

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter and any subsequent response is placed on the Village Council and Local Planning Authority websites.

Thank you in advance for your assistance.

Your sincerely

*Andrew Freeman*

Examiner

## ANNEX

From my initial reading of the Harden Neighbourhood Plan and the supporting evidence, I have one question for Bradford Metropolitan District Council and 14 questions for Harden Village Council. I have requested the submission of response(s) **by Monday 30 January 2023**, although an earlier response would be much appreciated.

### Questions for City of Bradford Metropolitan District Council

1. What stage has been reached in progressing the draft Bradford District Local Plan?

### Questions for Harden Village Council

2. Is the Plan to be called the Harden Neighbourhood Plan or the Harden Village Neighbourhood Plan?
3. Policy HNDP1: I presume that the first paragraph relates to housing developments. Is that correct?
4. Policy HNDP1 – on-site energy generation from renewable sources: Please supply some text (for the supporting justification) to explain the sort of things that you have in mind.
5. Policy HNDP1: Does the second paragraph refer to the proposals for on-site energy generation (first paragraph) or to something else? Please explain.
6. Policy HNDP1 – third paragraph: Should there be reference to other sources of best practice and examples (see comments of Bradford Council)? What is the justification for alleviating surface water?
7. Policy HNDP2: How will the housing mix operate where there is both market and affordable housing within the scheme?
8. Policy HNDP3: I presume that the policy relates to housing developments. Is that correct?
9. Policy HNDP3 – second paragraph: Should there be reference to other sources of policy and guidance (see comments of Bradford Council)?
10. Policy HNDP6: Does the policy relate to broadband (only) or is it intended to cover other types of high-quality communications infrastructure to both new homes and the village as a whole?
11. Policy HNDP7: The policy wording suggests that Harden to Bingley active travel needs to be a consideration in planning applications and that design provision (and perhaps contributions) will be sought. Please explain what is required.
12. Policy HNDP16: Where are the biodiversity objectives for each site to be found?
13. Policy HNDP18: Are any of the proposed sites privately owned? If so, have the owners been specifically consulted on the proposed designation from an early stage (see PPG Reference ID: 37-019-20140306)?<sup>1</sup> Have there been objections to the proposed designation from owners? If so, please provide details and comment thereon.

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<sup>1</sup> Planning Practice Guidance (PPG) section on *Open space, sports and recreation facilities, public rights of way and local green space*.

- 14.** Policy HNDP18 – sites in the Green Belt (B and C): Bearing in mind guidance in PPG (Reference ID: 37-010-20140306)<sup>2</sup>, what additional local benefit would be gained by designation as Local Green Space given the protection that is already afforded by Green Belt policy?
- 15.** Policy HNDP22 – first paragraph: Is support to be given in all circumstances?

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<sup>2</sup> See footnote 1.