

PART B – YOUR COMMENTS

Please use a separate Part B sheet for each comment. Additional forms can be downloaded from the web page.

1. To which document does your comment relate? Please place an 'X' in one box only

Submission Neighbourhood Development Plan

Basic Conditions Statement

Consultation Statement

Other (please specify)

2. To which part of the document does your comment relate?

Whole document

Section

Policy

Page Number

Appendix

3. Do you wish to? Please place an 'X' in one box only

Support

Object

Make an observation

4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

1. THE SECTION 14 & 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 SITES ALLOCATIONS WERE UNILATERALLY OMITTED FROM THE PLAN BY THE PARISH COUNCIL WITHOUT NOTICE AND WITHOUT CONSULTING VILLAGE RESIDENTS ON THIS SIGNIFICANT ACTION,

- ATTACHED REPORTS PROVIDE DETAILS ON THE MATTERS,

5. Please place an 'X' in the box if you would like to be notified whether the plan proposal is made (adopted) by the Council or not:

6. Signature:

[Redacted Signature]

Date:

19 DEC 2010

Thank you for your contribution to complete this Comment Form.

The Neighbourhood Planning (General) Regulations 2012

Regulation 16 – Publicising a plan proposal

COMMENT FORM

For Office Use only:	
Date	
Ref	

**PUBLICATION OF THE ADDINGHAM NEIGHBOURHOOD DEVELOPMENT PLAN PROPOSAL
SUBMITTED TO BRADFORD METROPOLITAN DISTRICT COUNCIL FOR EXAMINATION
WEDNESDAY 14TH NOVEMBER TO 2018 TO 12PM WEDNESDAY 9TH JANUARY 2019**

The Addingham Neighbourhood Development Plan, prepared by Addingham Parish Council, has been submitted to Bradford Council for examination. The Council must now publicise the plan proposal and supporting documents and seek comments.

Please use this comment form to submit your views on the proposal. Details of how to view the proposed plan and supporting documents are available on the Council's website: <https://www.bradford.gov.uk/consultations>.

PART A: PERSONAL DETAILS

Response forms must include a name and address otherwise your comments will not be taken into account.

	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title	MC	
Full Name	[REDACTED]	
Job Title (where relevant)	ARCHITECT - F.R.I.B.A.	
Organisation (where relevant)	[REDACTED]	
Address	[REDACTED]	
Post Code	[REDACTED]	
Email Address	[REDACTED]	
Telephone Number	[REDACTED]	

Please return completed comment forms by **12pm Wednesday 9th January 2019** to:

- **E-mail:** planning.policy@bradford.gov.uk
- **Post:** Local Plans Team, Bradford Council,
4th Floor Britannia House, Broadway, Bradford, BD1 5RW

Any comments received after this date will not be accepted.

How we will use your personal details

Bradford Metropolitan District Council has to process information in order to deliver and improve services to our citizens. The Data Protection Regulations 2018 says that any personal data we collect and hold about you has to be:

- processed lawfully, fairly and in a transparent manner, collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up to date, kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

ADDINGHAM NEIGHBOURHOOD DEVELOPMENT PLAN

REGULATION 16 DRAFT DATED OCTOBER 2018. COMMENTS AND OBJECTIONS.

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 and 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 since - particularly regarding subsequent Housing Allocations deletion and the Section 14 Consultation.

The Parish Council have therefore failed to comply with requirements:-

".....a qualifying body must – a) publicise in a manner that is likely to bring it to the attention of people who live, work or carry out business in the area"

The Parish Council 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 failure 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).

"Detailed feedback received from Bradford MDC Planning department , raising objections concerning the inclusion of housing site policies in the Draft Plan"

The feedback comments (appendix 5) do not object to the inclusion of 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 been altered to include only those constructed since 2013 (20) and accept that future windfalls could not be foreseen.

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...."

Residents would only have been aware of these 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 within the minutes that Cllr.Naylor briefed members outside the meeting –there are no records of this "briefing". Hardly "a transparent and open manner".

P19 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.

P19 item 27.Indicates where copies of the Plan could be inspected. None of these locations (except the Co-op) are available in the evenings or weekends and none are suitable to study documents and make

notes. Moreover none of the documents are complete – there is only the Plan document without any addenda sections, in particular the comments section.

P32 **Objections to the 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 then there would have been many more comments.

P33.item 2.The Parish Council response statement claims that “ it will be EXTREMELY UNLIKELY that a draft Plan containing housing allocations could progress through the system in the face of OBJECTIONS from the planning authority...”. There is no evidence to support this statement.

P33.item 3 The Parish Council continues to maintain that it is intended to reinstate the Housing Allocations at a 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 reintroduction process could occur. No work has been carried out on this matter since May 2018.

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 loose £1m. in funding “.The Parish Council have consistently refused to minute this fundamental statement. (I have made a formal complaint in this regard – see Council minutes of the November meeting.) A calculation of potential Parish Council CIL income relating to the number of 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.

P36.item 6 States that “ 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 Old School” site – these related to the extent of any development and how site access could be resolved. These were matters which would have been addressed in the development of the Plan.

P39 Item 19 There is 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.

THE ADDINGHAM NEIGHBOURHOOD PLAN 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.

Terms of reference were provided ; of particular relevance are :-

“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 throughout the Plan making process.”

“ PRINCIPLESencourage widespread participation and giving equal consideration to opinions and ideas from all members of the community.”

Members of the group proceeded with the preparation of the draft plan with 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.

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 supported the principle of including Housing Allocations as one of the primary elements of the Plan. The event was run by the volunteers with little involvement of councillors – few even visited the event.

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 .

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 the 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 that Housing Allocations have been omitted from the Plan because compliance with Bradford requirements – “.....could take months,possibly years” and also that Site Allocations will be reintroduced at some future date.

A Forum meeting was held on 29 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 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 Forum members met on 30 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 the meeting failed to record any of the foregoing – despite subsequent objections as to their accuracy. Several Forum members resigned because of the Parish Council actions and I was debarred from attending 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 discussed 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 members doubts as to the potential for the reintroduction of Housing Allocations. He undertook to contact Bradford M.D.C. and subsequent correspondence from Steve Hartley, the Director of Place, confirms that if allocations are 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, only retaining the 3 Parish Council members.

The ex-Forum members continue to question the actions of the Parish Council and to seek clarification on the intentions for the reintroduction of Housing Allocations.

Throughout the stages of the Neighbourhood Plan development there has been a lack of support by the Parish Council for the work of the Forum . The Forum members have not been allowed to comply with the agreed purpose and principles. The public have therefore not been properly informed, consulted or involved : particularly in the fundamental changes to the Plan. Furthermore they have been misled regarding the reintroduction of Housing Allocations.

[REDACTED]

Neighbourhood Plan - Onwards to Referendum

WHERE ARE WE UP TO?

Well, formally, the path is clear -the latest consultation on our Neighbourhood Plan closed at the end of August, and all comments are being processed so that the next draft, together with a consultation statement, can be drawn up and submitted to our parent authority, City of Bradford MDC. They will consult on it themselves, and then appoint an independent Examiner to review it. If the Plan successfully passes these stages, it will be submitted to voters for approval. There is a lot to do, but we are hopeful that this referendum will take place next May, at the same time as the local elections.

AND WHY HAS THE PLAN CHANGED SINCE THE OPEN EVENT IN THE SPRING?

Those of you who attended our open event in March, and who have since read and perhaps commented on the current consultation draft, may have noticed that it is different. This is because we had to remove the policy which specifically sought to allocate housing sites to accommodate some of the 200 new houses targeted for the village. The Parish Council took the decision to remove the allocation of housing sites, the preferred options, following receipt 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 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 time Bradford may need, in practice, to redo their Core Strategy. The Parish Council has therefore decided to move forward with a version of the Plan without housing site allocations (while continuing to work on the site issues identified by the planning officers in the meantime), in the knowledge that, once Bradford have completed their reviews, and

modified their Core Strategy, we can modify our own Plan and allocate sites at this later stage. We can't possibly know at the moment, but, at this later stage, it may be that our housing target will be different, possibly lower, and/or that we will be allowed to include some additional sites in our assessments.

WHAT ARE THE IMPLICATIONS OF THIS DECISION FOR US NOW?

All the policies to protect our green spaces and the environment appear broadly unchanged in the current draft Plan; moreover, and significantly, the policy for housing growth retains your strong preferences, as expressed to us in all consultations to date, to direct new development into smaller infill sites, wherever possible, and to avoid encroaching into green belt sites. If these policies are adopted at referendum next year, Addingham will benefit from them, and the Neighbourhood Plan will be used by developers and the planning authority in determining planning applications. If we have no Plan, and no policies, because our draft is bogged down in endless delays and negotiations with the planning officers, we have no say at all.

SO WHAT DO WE DO NEXT?

The Parish Council is inviting everyone to understand and support their decision. The current version of the Plan may not be the version we end up with ultimately, as it will be a living document, available for future modification, but for now, it's the best chance we've got of having a set of adopted policies in place in 2019.

Please help us and support the Plan in the referendum next year!

ADDINGHAM NEIGHBOURHOOD DEVELOPMENT PLAN

Your Village, your Vision, your Plan

For further information on the Neighbourhood Plan, please visit

www.addingham-pc.gov.uk

or contact c

ADDINGHAM NEIGHBOURHOOD PLAN

We've consulted everyone – and got your feedback - so
WHAT ARE THE NEXT STEPS?



Your feedback was overwhelmingly positive, and we are working towards putting a Neighbourhood Plan in place which reflects your views and recognises the special quality of our landscape.

However, we also have feedback from our planning authority, City of Bradford MDC, and as our Plan can't progress unless it is in line with their Core Strategy, we have to act on their guidance. While they are very impressed with much of our Plan, especially the work on the landscape and environment, they have asked us to do considerably more technical work on the housing site assessments. This could take months, possibly years, and we will continue to do this to bring forward our Plan with site allocations at a later date. However, to protect our valued landscape and the policies you tell us you want, we have to have an adopted Plan in place much earlier. This means producing an alternative version of the Plan, without housing site allocations at this moment in time, which can move forward more quickly.

The Parish Council has listened to everyone's views on the draft Neighbourhood Plan and we are developing it to help protect the policies you support as soon as we can.

We will be consulting formally on the next version of the Plan in order to take it to a village referendum in May 2019.

View the consultation draft on our website

www.addingham-pc.gov.uk

Details: c

Find messages, documents, photos or people

Keith

Compose

Back

Archive

Move

Delete

Spam

RE: Addingham Parish Council Members complaint
04/2018 3

Yahoo/Inbox

Inbox 318

Unread

Starred

Drafts 84

Sent

Archive

Spam

Deleted Items

Less

Views Hide

Photos

Documents

Travel

Tutorials

Folders Show



2 Jul at 12:34

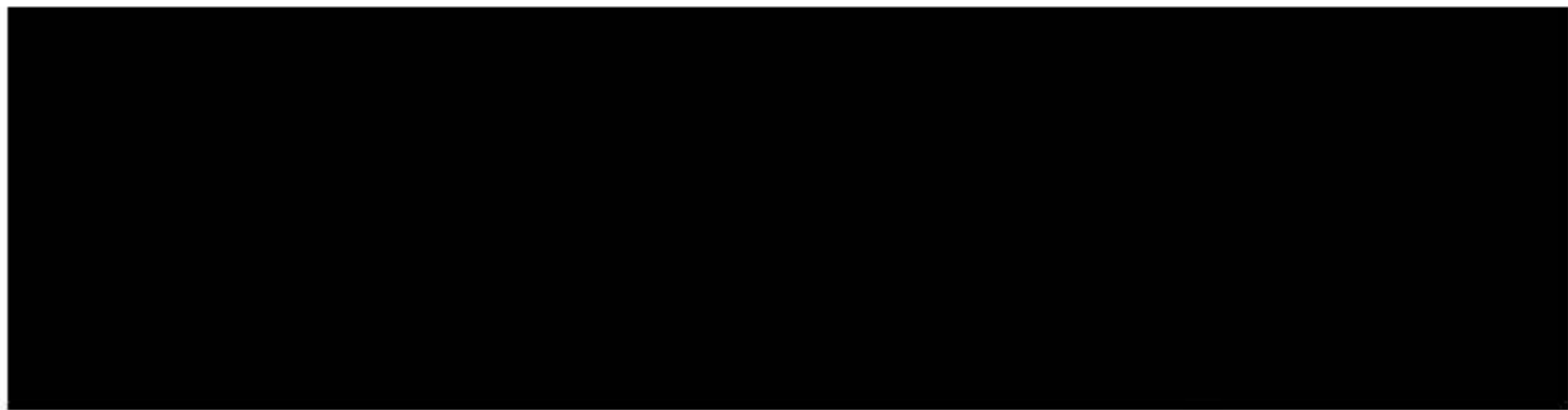
Dear Mr Appleyard,

Thanks for this email, which arrived during my period of annual leave. Your email deals with the accuracy of minutes and suggests that a potential effect of the vote might be that developers would seek to exercise pressure in future to release Green Belt land, and that this might benefit the individual councillors who are the subject of your complaint.

Dealing first with the minutes, I understand that these would have been prepared by the clerk to the meeting, and as the clerk is an employee of the council this would not be a potential subject for a complaint under the members code of conduct.

The potential for councillors to receive a benefit in consequence of a series of future and hypothetical events could not raise issues of misconduct until the events became so likely to occur that a reasonable person would regard them as inevitable. The contingency that you identify appears to be very far from that standard. If matters develop as you suggest, then potential misconduct issues might eventually arise. However, it is not the Council's role to anticipate and prevent future breaches of the code of conduct, and so we cannot take action.

Regards



City of Bradford Metropolitan District Council
Department of Corporate Resources - Legal and Democratic Services

City of Bradford Metropolitan District Council-Room 314-3rd Floor-City Hall-Bradford BD1 1HY

DX 11758 - BRADFORD



