

Thank you for the informative email of Nov 16th. It has clarified understanding of the ownership of the key role in the Section 14 and 16 Consultations. We have also referred to

<https://www.planninghelp.cpre.org.uk/improve-where-you-live/shape-your-local-area/neighbourhood-plan/step6-consultation-and-submission>

and

<https://www.gov.uk/guidance/neighbourhood-planning-2> -- and

<https://www.bradford.gov.uk/planning-and-building-control/planning-policy/statement-of-community-involvement/>

which, we read together as benchmarks for proper process and guidance to residents about reasonable expectations.

This email is not a Section 16 Consultation response. 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

**OVERALL -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....."

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 its role and duties.

**As far as the current consultation is concerned, there are several issues of immediate concern.**

ISSUE 1- 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.

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 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 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.

We would be happy to talk these issues through  
regards