

**HAWORTH CROSS ROADS AND STANBURY PARISH COUNCIL**

**HAWORTH CROSS ROADS AND STANBURY  
NEIGHBOURHOOD DEVELOPMENT PLAN**

**CONSULTATION STATEMENT**

**JUNE 2019**

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## 1. Introduction

This Consultation Statement has been prepared to meet the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Haworth Cross Roads and Stanbury Neighbourhood Development Plan (NDP).

The legal basis of the statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a Consultation Statement should:

- Contain details of the persons and bodies who were consulted about the proposed NDP;
- Explain how they were consulted;
- Summarise the main issues and concerns raised by the persons consulted;
- Describe how those issues and concerns have been considered and, where relevant, addressed in the proposed NDP.

This statement:-

- Sets out the aims of the consultation process;
- Summarises the approach to consultation;
- Details the consultees;
- Sets out the consultation stages, the issues and concerns raised at each stage and the way in which they have been addressed.

## **2. Consultation Aims**

Throughout the Neighbourhood Plan consultation process, the aims have been:-

- To involve the community so that the plan was informed by, and took account of, the views of local people living, working and carrying out business in the Neighbourhood Area;
- To involve a wide range of statutory and non-statutory bodies in the development of the plan at key stages;
- To consult with landowners whose interests were affected by plan policies and proposals;
- To ensure that consultation took place at critical points in the process where decisions needed to be taken;
- To consult regularly and closely with officers of City of Bradford Metropolitan District Council (CBMDC) to ensure that the plan was developing in line with legal requirements.

### **3. Background to Neighbourhood Plan Consultation**

The decision to develop a Neighbourhood Plan was taken by Haworth Cross Roads and Stanbury Parish Council on 26<sup>th</sup> November 2012. A Neighbourhood Plan was seen as an opportunity to have a direct influence on planning policy. It was felt that Haworth's dependence on its historic appearance and literary connections, to sustain one of its key income drivers – tourism - needed to be taken seriously; that the viability of Cross Roads' civic identity should be maintained; and that Stanbury should continue to be conserved as an outstanding example of a South Pennine hill village. At the same time, the need to sustain the whole parish's business community, and by definition jobs, was also clearly recognised. The parish council was of the opinion that the community's views on planning matters often lacked weight when planning applications within the parish were considered by CBMDC and that producing an NDP would give the community a louder voice at city hall.

The first step in the neighbourhood planning journey was to define the extent of the area the plan would cover ('The Neighbourhood Area'). An application to CBMDC for the designation of the Neighbourhood Area was made on 7th March 2013. The Neighbourhood Area was approved by the council on 5th November 2013. In parished areas, it is normal to approve the whole of the parish as the Neighbourhood Area and this was the case with Haworth, Cross Roads and Stanbury.

Following this decision, the parish council, which had been driving the project forward hitherto, decided to hand over the work to a steering group involving both councillors and interested community members. It also resolved to merge already ongoing work on a 'community plan' into the work of the NDP steering group. Once properly constituted, the parish council devolved budgetary and decision-making powers down to the group and work gathered momentum. The early work of the group was guided by Planning Aid England, including agreement regarding terms of reference (see Appendix 1) and the initiation of a programme of initial public consultation meetings.

From this point onwards, consultation with the community commenced and progressed through the following stages over the period 2014 to 2018:-

- Spring 2014 – initial newsletter to all homes and associated publicity, leading to village consultation meetings and face-to-face/written engagement with a range of stakeholders;
- September 2015 – consultation with community, stakeholders and CBMDC on a 'Policy Intentions Document', including 3 supporting community drop-in events;
- February/March 2018 – informal sites consultation with landowners and wider community, including 3 community drop-in events;
- October-December 2018 – statutory Regulation 14 consultation on the Pre-Submission Neighbourhood Plan, including 3 community drop-in events.

#### **4. Neighbourhood Plan Consultees**

Over the six plus years of the Neighbourhood Plan preparation process, a wide range of people and bodies have been consulted at the various preparation stages. These may be summarized as follows:-

- All residents in the Neighbourhood Area
- All businesses and landowners in the Neighbourhood Area
- All community and voluntary groups in the Neighbourhood Area
- Statutory consultees
- A range of non-statutory consultees, e.g. Sustrans, West Yorkshire Combined Authority, Welcome to Yorkshire and various pub chains,

A full list of statutory and non-statutory consultees can be found at Appendix 2.

## **5. Consultation Stages and Issues Raised**

### **Initial Engagement**

An engagement plan (see Appendix 3) was prepared setting out different engagement approaches to a wide range of stakeholders, including the initiation of a programme of community consultation meetings.

The consultation meetings were the main focus of the steering group's early work. As a matter of policy and equity it was decided that the consultation meetings should be staged in all three village centres so that every part of the community had an opportunity to be involved in the process. Banners, posters, press releases, social media and a specially-designed website were the tools used to provide maximum exposure for the project. The parish council's newsletter that is delivered to every household in the parish also carried information and requests for information.

At the consultation meetings, attendees were asked to feedback their comments on general planning topics via a system of 'dotmocracy'. This system of giving attendees ten coloured dots, which they placed against issues they thought to have the highest priority, enabled the steering group to focus their thinking in terms of the key issues which NDP planning policies needed to address. A total of 51 people attended the 4 consultation meetings.

Approaches were also made to businesses, developers, landowners, environmental groups, heritage groups, churches/chapels, school heads and pupils and senior citizens. Reports of the consultation outcomes are included at Appendices 4A and 4B, including findings from 16 business representatives and 3 school heads.

### **Policy Intentions Document Consultation**

In 2014, the parish council engaged a planning consultant which led to the production of a Policy Intentions Document in spring 2015, based on an analysis of initial community engagement work. This document set out what the parish council was minded to include in a final draft neighbourhood plan. The 'document', together with a questionnaire (hard copy and Survey Monkey version - see Appendix 5), was circulated to all households, as well as to local businesses and CBMDC. Three supporting drop-in events were also held – one in each of the parish's three villages – attended by 49 people.

The questionnaire was completed by 286 respondent households - a roughly 9% response rate. A summary of the results is included as Appendix 6, with the full Survey Monkey results report at Appendix 7.

The responses to the consultation on the Policy Intentions Document were ultimately used to guide detailed evidence gathering and to develop a first full draft Neighbourhood Plan. However, a lengthy time lapse occurred between this consultation and the next stages of plan preparation and consultation due to the loss of technical consultancy support, the delay in identifying and appointing a replacement and then a period of ‘treading water’ and slow progress until the appointment of new consultants in summer 2017.

### **Informal Sites Consultation**

In the second half of 2017 a first full Pre-Submission draft plan emerged, based on Policy Intention Document consultation findings and subsequent evidence gathering. This plan now contained a number of policies and proposals (for Local Green Space, Non-Designated Heritage Assets, community facilities and private non-residential car parks) relating to individual sites and buildings within the Neighbourhood Area. As such, it was considered necessary to carry out a targeted informal consultation with those with legal interests in these sites/buildings, as well as giving local people the opportunity to comment on these detailed proposals. The full draft was also submitted at this stage to CBMDC for informal comment.

The Informal Sites Consultation ran from February 19<sup>th</sup> until March 12<sup>th</sup> 2018. Those with identified legal interests were consulted by e-mail, post or hand-delivered correspondence (see Appendices 8A and 8B for sample notification letter and response form). Three widely-advertised ‘drop-in’ consultation events were held in the three villages from 6<sup>th</sup> to 8<sup>th</sup> March as part of the consultation process, to allow both targeted consultees and the general public to find out more and to have their say. These were attended by 17 people.

The consultation attracted responses from 35 separate sources, together covering 40 of the 125 consultation sites and additionally putting forward 6 further sites for consideration. A summary of the consultation results with recommended action is included at Appendix 9.

Responses from this consultation, combined with those from the earlier ‘Policy Intentions Document’ consultation, informed the finalisation of the Pre-Submission Draft Neighbourhood Plan for the statutory Regulation 14 consultation.

### **Statutory Regulation 14 Consultation on Pre-Submission Draft Plan**

On the 26<sup>th</sup> October 2018, the Pre-Submission draft of the Haworth Cross Roads and Stanbury Neighbourhood Development Plan was published for the statutory Regulation 14 public consultation. This consultation ran until 7<sup>th</sup> December 2018. The consultation was carried out in accordance with regulations and involved all those identified in the list at Appendix 2.

Documentation comprised the full draft plan, a plan summary and questionnaire (see Appendices 10A and 10B). These were also available online, and on the CBMDC website, along with all previous documents from the NDP process. A copy of the full plan was made available in over 20 locations around the area. As part of this consultation, three 'drop-in' community events were held in the three villages on 12<sup>th</sup>, 13<sup>th</sup> and 22<sup>nd</sup> November, where people were given the opportunity to drop in, look at the full plan and ask questions as well as fill out and/or drop off questionnaires. Forty three people attended the drop-ins.

There were 44 separate detailed representations from a range of statutory consultees, organisations and individuals, via Survey Monkey, e-mail and written submissions. Full details of all comments made, together with responses and agreed actions are provided in the 'results grid' at Appendix 11.

All representations were carefully considered and agreed actions in response reflected in the final submission plan.

## **Summary of Main Issues Raised At Each Stage and How They Were Addressed**

### Initial Engagement

The community raised many issues and concerns:-

- A more active conservation programme for the parish's heritage;
- Protection of Green Belt;
- Protection of greenfield land/green fields, countryside, open hills, views, landscape and 'village-scapes';
- Importance of green open spaces and outdoor recreation;
- Improved parks;
- More sporting and playing field facilities;
- More for young people;
- Importance of essential community infrastructure – community centre, schools, indoor recreation, fire station;
- Lack of library, leisure centre, young people facilities, Stanbury facilities;
- The scale and possible location (both general and specific) of any new housing;
- Need for brownfield focus for development;
- Transport, education and health infrastructure, plus accessibility to other community infrastructure, as determining factors in permitting further housing;
- Housing type and size relative to local needs;
- Empty homes;
- Secure and growing local employment opportunities;
- Improved tourist signage;
- Road traffic/car parking issues, notably Haworth village centre and primary school congestion;

- Public transport shortcomings;
- Desire for more cycling opportunities, including proposed Oxenhope to Keighley cycle route, via Haworth;
- Traffic congestion generally; speeding; road surface conditions; HGV traffic; improved school crossing provision, 'walking buses' and 'park 'n' stride' initiatives; Weaver's Hill car park improvements.

With the exceptions below, the Submission Neighbourhood Plan addresses the above through the inclusion of policies BHDD1-8, GE1-4, CF1-2, H1-4, H6-8, E1-2, HT1-7:-

- Green Belt – this is an excluded matter for NDPs, although Policy H7, by encouraging high density development on identified housing sites, does indirectly mitigate against Green Belt land take in favour of brownfield;
- Community infrastructure: fire station – the decision to close Haworth's fire station has already been taken, so the NDP is powerless to exert any policy influence;
- Empty homes – this is not a land use planning issue, but is covered by a 'community action';
- Securing/growing local employment opportunities – with the exception of tourist employment (Policies E1 and E2), the NDP is silent on these issues as it is considered that it cannot strengthen/add to adopted Core Strategy policies, without specifically allocating new employment sites. No such sites were advanced by the community and the parish council has no appetite for site allocation generally or the commissioning of essential underpinning evidence/site assessments;
- Improved tourist signage - this is not a land use planning issue, but is covered by a 'community action';
- Traffic congestion generally; speeding; road surface conditions; HGV traffic; improved school crossing provision, 'walking buses' and 'park 'n' stride' initiatives; Weaver's Hill car park improvements – these are not land use planning issues, but are covered by 'community actions'.

#### Policy Intentions Document Consultation

In all cases over 80% and generally over 90% of consultation respondents agreed with the policy intentions in respect of built heritage/development and design; community facilities; green space; housing; employment and tourism and traffic and transport.

The main detailed consultation comments received relating to planning issues were as follows:-

- More detail on policy intentions required;
- How will renewable energy schemes (e.g. turbines, solar panels) fit with conservation area policies;

- Railway Children Walk – walk already exists; not sure what is missing;
- Nothing about rural broadband;
- Too much on Haworth at the expense of Cross Roads;
- A variety of views on affordable housing;
- More information needed on ‘allocated housing sites’;
- Maximisation of brownfield land;
- Resistance to new house building;
- Empty homes.

With the exceptions below, the Submission Neighbourhood Plan addresses the above through policies H1-4, HT4, BHDD1-8, CF1, GE2, CF3, H8 (underpinned by local housing needs assessment), H6, H7, E1, E2, HT1 and HT2. It is also considered that the translation of generic policy intentions to detailed planning policies addresses the perceived imbalance between Haworth and Cross Roads issues.

- Renewable energy schemes/conservation areas – covered by national planning policy and practice guidance;
- Railway Children Walk – intention not translated into policy as on further investigation clear that walk is already complete;
- Affordable housing – intention not translated into policy as on further investigation, clear that local issues already adequately addressed by adopted Core Strategy policy;
- Empty homes - this is not a land use planning issue, but is covered by a ‘community action’.

Regarding concerns in respect of ‘allocated housing sites’, the NDP adopts the pragmatic approach of attempting to anticipate, based on formerly identified/allocated housing sites and the most up-to-date SHLAA (Strategic Housing Land Availability Assessment), those sites most likely to be allocated in the emerging Land Allocations Plan and to set out development requirements in respect of those sites.

Regarding new house building generally (NB over and above any sites that may be allocated in the Land Allocations Plan), the NDP includes Policy H6 (New Housing Development on Non-Allocated Sites) which effectively seeks to set ‘sustainability tests’ in order to determine the acceptability for development of further proposed housing sites.

### Informal Sites Consultation

Comments were sought and received in respect of site-specific proposals for:-

- Candidate Local Green Spaces;
- Non-Designated Heritage Assets;

- Community Facilities;
- Private Non-Residential Parking Areas.

As a result of comments received, both in objection and support, together with suggestions regarding additional sites, action has been taken as follows:-

- Candidate Local Green Spaces (LGS) – 4 sites were commented on, as a result of which:-
  - Site 7 Murgatroyd Wood was re-named ‘Land Adjacent to Longacres Park’ and its boundary amended;
  - The actual Murgatroyd Wood was assessed as a candidate LGS and included in the Pre-Submission NDP. It was also assessed as a possible Local Heritage Area or Non-Designated Heritage Asset and subsequently formed the basis of the Murgatroyd Local Heritage Area in the Pre-Submission plan.
- Non-Designated Heritage Assets – 13 sites were commented on, as a result of which:-
  - Site 88 Lees Village Institute – name amended to Former Lees Village Institute (East Lees Hall).
  - Site 90 Myrtle House Gatehouse – name amended to Myrtle Lodge (Myrtle House Gatehouse).
  - Site 104 Spring House – name amended to Spring Mount.
  - Site 106 The Toll House – further research undertaken to strengthen assessment in order to combat objection, including assertion that asset was not a toll house.
  - Sites 108 Halifax Road Vicarage – name amended to Former St James Vicarage (Halifax Road).
  - Site 112 Cold Knoll Farm – deleted from the plan based on architectural and age evidence provided.

A further 7 sites were commented on, as a result of which:-

  - Site 105 (Cross Roads Vicarage, Cross Roads) was re-named The Vicarage, Haworth Road (‘Woodbine Cottage’).
  - Vale Farm, ‘Oldgate’ Packhorse Track and Lower Laithe Reservoir Railways were included in the Pre-Submission NDP, following assessment.
- Community Facilities – 8 sites were commented on, as a result of which:-
  - Site 32 Three Sisters & Bronte View Care Home – a separately identified facility within the same complex, i.e. The Discovery Centre, was included in the Pre-Submission NDP.
  - Site 59 The Friendly, Stanbury was deleted from the plan based on evidence provided by the owner that it did not qualify as a valued community facility.
- Private Non-Residential Parking Areas – no sites were commented on, so no changes were made.

## Statutory Regulation 14 Consultation

The main consultation comments related to the following:-

- Out-of-date referencing of 2012 NPPF rather than new 2018 NPPF;
- Need for policy wording changes to improve conformity with national and strategic local planning policy, and to improve clarity/workability;
- Lack of consistency between the two conservation area policies (BHDD1 & 2) and other wording weaknesses;
- Need for views/vistas of/from conservation areas and proposed Local Heritage Areas to be cited in NDP policies;
- Suggestions regarding additional Non-Designated Heritage Assets;
- The robustness of Local Green Space (LGS) assessments/justifications, relative to NPPF criteria, and the accuracy of some site boundaries and site labelling on the NDP Policies Map;
- Suggestions regarding additional LGS sites;
- Local issues not reflected in housing development requirements/aspirations policies;
- The opportunity for an additional Employment and Tourism policy covering visitor accommodation;
- Lack of clarity regarding NDP car park designations;
- No site numbering cross-referencing policies with the NDP Policies Map;
- Lack of boundaries and poor map scale affecting clarity/understanding of the location/extent of green infrastructure on the NDP Policies Map.

The 'results grid' at Appendix 11 sets out individual comments in respect of these matters and the detailed responses to them.

The most significant changes to the plan as a result of the above were:-

- Policy justifications amended to reflect and reference 2018 NPPF provisions;
- Wording of the following policies amended in order to improve higher level policy conformity and clarity/workability:- GE3, GE4, GE5, CF1, H5, H7, H8, E1, HT3, HT5, HT6 and HT7;
- Conservation area policies BHDD1 and 2 radically changed in order to provide cross-policy consistency in line with CBMDC comments;
- A detailed 'Views and Vistas' appendix, with photographs and brief descriptions of all specified views, added to the plan and referenced from conservation area policies BHDD1 and 2. New views and vistas clauses added to Local Heritage Area policies BHDD4-7;
- Suggested additional Non-Designated Heritage Assets assessed, resulting in 7 additions to the BHDD8 policy list and NDP Policies Map;

- All LGS sites re-assessed using a new pro-forma clearly aligned to NPPF LGS criteria (ref Submission Plan Appendix 5), resulting in the deletion of 10 sites from the GE2 policy list and NDP Policies Map. Site boundaries and labelling amended on the NDP Policies Map;
- Suggested additional LGS sites assessed, resulting in 3 additions to the GE policy list and NDP Policies Map;
- A new clause addressing highways issues added to housing policy H3 (Baden Street, Haworth);
- A new policy (E2: Visitor Accommodation) added to the Employment and Tourism section of the plan;
- An additional private non-residential car park added to the HT2 policy list and NDP Policies Map;
- Additional public car parks added to the NDP Policies Map;
- All sites consistently numbered in policies lists and on NDP Policies Map and in appendices;
- NDP Policies Map revised in order to better represent green infrastructure.

## **6. Conclusion – Reflection on Consultation Process and Outcomes**

### **The Process**

In general terms, it is the parish council's view that the overall consultation process, over a period of some four and a half years, has provided regular and ample opportunity for local community and wider stakeholder engagement, involving three non-statutory consultation stages (initial engagement, Policy Intentions Document and informal sites consultation), leading up to the final statutory Regulation 14 consultation. This has been supplemented throughout by the opportunity to attend regular and frequent NDP Steering Group meetings and full parish council meetings where the NDP has been a regular agenda item.

What has been noticeable over the plan preparation period is a generally consistent, if modest level, of public interest and overall involvement at initial engagement, informal sites consultation and Regulation 14 stages, but peaking noticeably at Policy Intentions Document stage. Here, almost 10% of households responded, expressing significantly high levels of support across the board for expressed policy intentions. This clear majority support for what was then largely translated into the Pre-Submission NDP may explain the return to a more modest level of response at the subsequent statutory consultation stage. Inevitably, 'plan fatigue' is also likely to account for a degree of 'dropping-off' at the final stage, plus the absence, for the most part, of controversial issues of particular concern to the local community. Where local issues did exist, e.g. in relation to the Baden Street and Ebor Mills housing sites (Policies H3 and H4), this was reflected in local drop-in attendance and in formal responses to the plan subsequently received.

What is also noticeable is the healthy response from statutory consultees and other stakeholders at the Regulation 14 stage, building from the more limited involvement earlier in the process.

What could perhaps have been done better over the preparation process was the specific targeting of older, younger and disabled interests within the community, in order to better establish their specific needs. That said, it is fair to say that younger people's interests are clearly identified under 'community actions' in the 'Community Facilities and Services' section of the Neighbourhood Plan (i.e. Chapter 5 – Section 5.3) and in Policy CF2 – Provision of New Community Facilities. Both the older population and disabled interests were felt to be already well-catered for and their facilities clearly protected through the provisions of Policy CF1.

### **The Outcomes**

As a result of the consultation process, the parish council is satisfied that Neighbourhood Plan policies:-

- reflect key majority concerns as expressed at initial issues and policy intentions stages;
- respond positively to objections and comments received at subsequent 'Informal Sites' and Regulation 14 consultation stages, where considered to be appropriate and feasible.

Additionally, Neighbourhood Plan 'community actions' take on board many of the community's non-planning concerns, as expressed via consultations and as filtered by the parish council in the light of up-to-date circumstances and knowledge.