



10 July 2024

Mr D Kaiserman  
Penny O'Shea Consulting

Dear Mr Kaiserman

**OVER HULTON NEIGHBOURHOOD PLAN**

The Over Hulton Neighbourhood Forum (NF) has provided a response to you dated 28 June 2024.

I make the following points for your consideration.

1. The Forum (and Bolton Council) are seeking guidance from you on the extent of likely modifications. Until the draft plan has been formally and transparently examined a substantive answer to this question will not be possible. The areas of your initial concern have been clearly set out and I have set out my own in the letter of 18 June 2024.

In summary it is my submission that the draft Neighbourhood Plan (NP) does not meet the required basic tests in that it is not in accordance with the development plan and national guidance and much of its drafting does not meet the requirements for development plan land use policy-making. My representations provide the detail. The scale of modifications required would amount to a re-write of the plan which is not the role of an examiner.

2. The NF and Bolton Council have accepted your offer of a pre-examination meeting. The format is suggested as representatives from the NF (with professional advisor) and the Council with all other parties as observers. Given that NF and the Council are supporting the draft plan this would mean that any party who has submitted objections or other qualifying comments would be excluded at a critical stage. In my opinion this would not be an equitable or acceptable approach and I seek to be able to contribute without restriction.
3. I have requested that the NF notify its members of the examination-related correspondence but they have refused to do so, without giving any reasons. I would have thought that a NF would wish to provide the widest possible briefing and take views of members into account. The wider forum membership and community in general are therefore not advised or aware of the process that is taking place including the reservations that are being raised and under discussion. This is, not for the first time, an avoidable lack of transparency and accountability. This reinforces my representation that the Forum committee is not representative enough of its membership or the wider community and is averse to scrutiny.

Would you please take these matters into account in how the proposed examination process moves forward.

Thank you.

Yours sincerely



**Rob Lucas**  
**BSc DipTP**

cc: OHNF  
Bolton Council