

BINGLEY NEIGHBOURHOOD DEVELOPMENT PLAN (2023 TO 2038) COMMENTS FORM (JULY 2025)

Bingley Town Council has submitted their proposed Neighbourhood Development Plan to City of Bradford Metropolitan District Council (CBMDC). The Council is now required to consult on the plan for a period of 6 weeks in accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended).

This consultation seeks your views on whether the Bingley Neighbourhood Development Plan meets the Basic Conditions¹ which are that the plan:

- Must be appropriate having regard to National Planning Policy.
- Must contribute to the achievement of sustainable development.
- Must be in general conformity with the strategic policies in the development plan for the local area.
- Must be compatible with human rights requirements.
- Must be compatible with EU obligations.

The consultation period starts on **Monday 21st July** and closes at 5pm on **Monday 1st September 2025**.

The Plan and supporting documents are available to view electronically at: www.bradford.gov.uk/consultations as well on the Council's Opus Consult portal: <https://bradford.oc2.uk/>. Hard copies are available to inspect during normal opening hours at:

- CBMDC Customer Service Centre, Britannia House, Hall Ings, Bradford, BD1 1HX.
- City Library, Centenary Square, Bradford, BD1 1SD.
- Bingley Library, 5 Rise Shopping Centre, Bingley, BD16 1AW.

How to submit your comments:

Please ensure you complete both parts of this comment form otherwise your comments may not be accepted.

Comments can be submitted:

- **Online at:** <https://bradford.oc2.uk/> (*Registration is required*)
- **Email to:** planning.policy@bradford.gov.uk
- **Post to:** Local Plan Team, City of Bradford Metropolitan District Council, 4th Floor, Britannia House, Broadway, Bradford, BD1 1HX (*Please ensure that there is sufficient time to guarantee delivery to our offices by the closing date for comments*)

All comments received will be sent to an independent examiner who will examine the plan. If the examiner determines that the plan meets the basic conditions, then a local referendum shall be held on whether to 'make' the Neighbourhood Plan.

Contact Details:

If you have any questions, comments or queries please contact the Local Plan Team using the details below:

- **Telephone:** 01274 433679
- **Email:** planning.policy@bradford.gov.uk

¹ <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012
REGULATION 16: PUBLICISING A PLAN PROPOSAL
BINGLEY NEIGHBOURHOOD DEVELOPMENT PLAN (2023 TO 2038)
COMMENT FORM

For Office Use only:	
Date Rec.	
Date Ack.	
Respondent ID	
Representation Ref:	

PART A: PERSONAL DETAILS

Please provide your personal contact details. If an agent is appointed to represent you, then they would need to provide their full contact details in addition to your title, full name and organisation (where relevant). This information is required to enable the independent examiner and/or the Council to contact you for further information if required during the examination of the Neighbourhood Plan.

1. PERSONAL / AGENT DETAILS		
	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title		Mr
Full Name		Andrew Windress
Job Title (where relevant)		Director
Organisation (where relevant)	The Kingsbridge Directors Pension Scheme	ID Planning
Address		
Post Code		
Email Address		
Telephone Number		

2. FUTURE NOTIFICATION

Please tell us if you would like to be notified when City of Bradford Metropolitan District Council decide to make the Plan under Regulation 19 (to bring it into legal force after examination and local referendum).

Yes

☒

No

☐

Data Protection Statement - Any information we receive will be processed in accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018. A Local Plan Privacy Statement sets out CBMDC Local Plan Team processes your personal data. This notice should also be read in conjunction with the Council's Corporate Privacy notice and other specific service notices, which are available at <https://www.bradford.gov.uk/privacy-notice/>

NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012
REGULATION 16: PUBLICISING A PLAN PROPOSAL
BINGLEY NEIGHBOURHOOD DEVELOPMENT PLAN (2023 TO 2038)
COMMENT FORM

For Office Use only:	
Date Rec.	
Date Ack.	
Respondent ID	
Representation Ref:	

PART B – YOUR COMMENTS

If responding using this form, please use a separate Part B sheet for each different part of the Plan or supporting document that you are commenting on, and clearly state to which part of the document it relates.

3. To which document does your comment relate? Please place an 'X' in one box only			
Neighbourhood Development Plan (NDP)	X	Basic Conditions Statement	
Consultation Statement		Other (please specify)	

4. To which part of the document does your comment relate?					
Whole document		Section		Policy	BING11
Page Number	83	Paragraph	12.6		

5. Do you wish to? Please place an 'X' in one box only					
Support		Object	X	Make an observation	

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

Introduction

This representation is submitted on behalf of my client The trustees of Kingsbridge Directors Pension Scheme, the owner of Milner Field Estate. The site is in private ownership, and the majority of the site is currently used for agricultural purposes.

Part of the site has been promoted for development through the Bradford Local Plan and the landowner does intend to submit representations to the emerging Bradford Local Plan at the next consultation stage in support of development within suitable areas of the Estate.

Response to Policy BING11 – Milner Field Estate Special Character Area

This representation provides a response to proposed Neighbourhood Plan Policy BING11 which identifies the Milner Field Estate as a Special Character Area and states that where relevant, proposals for development within the Special Character Area will be supported where they would:

- Improve public awareness and understanding of the historical significance of the Special Character Area described in the Milner Field Estate Special Character Area Supporting Document.**
- Improve recreational and heritage tourism use of the Milner Field Estate.**
- Maintain or enhance the character features of key buildings, structures, views and vistas that are listed within the policy.**

Our client supports the acknowledgement in the policy that development within the Special Character Area can be supported in principle. However, we are concerned that in its current form, Policy BING11 is overly restrictive and does not provide the necessary flexibility to support development that could provide the

NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012
REGULATION 16: PUBLICISING A PLAN PROPOSAL
BINGLEY NEIGHBOURHOOD DEVELOPMENT PLAN (2023 TO 2038)
COMMENT FORM

For Office Use only:	
Date Rec.	
Date Ack.	
Respondent ID	
Representation Ref:	

necessary funding to improve the awareness of the historical significance of the Estate and assist in maintaining the character features and key buildings.

Need for flexibility to support development

The consultation document states that the aim of the policy is to secure the preservation and enhancement of the historic features within this area and highlights that the estate is in danger of significant deterioration.

As a privately owned estate, any enhancement works would require funding and therefore the policy should provide clear support for development that could provide the necessary capital receipt to fund these works. The consultation document highlights the site has a low profile locally and nationally. The estate is not within a Conservation Area and therefore the requirements of the policy need to be proportionate.

The principle of enabling development, as recognised in the National Planning Policy Framework (section 16) and the Historic Environment Good Practice Advice in Planning Note 4, provides an accepted planning mechanism whereby carefully managed development is permitted to secure heritage benefits that would not otherwise be achievable.

Our client supports the overarching aim of Policy BING11 to support development and raise the profile of the Estate in principle, but the requirements need to be proportional and acknowledge that even to preserve the existing features could incur significant cost. The policy should therefore expressly support enabling development, that would allow for the prospect of development on the site and provide an opportunity to highlight the history of the site and maintain historical features of the site where feasible and viable.

Our client has enabled some clearance and exposing of the area of Milner Field Mansion which is ongoing and significant features are being exposed and preserved.

Our client is very interested in preserving the industrial heritage of the area and this would be included in any future development.

National Policy and Local Policy

The NPPF states that policies should be positively prepared and support opportunities for sustainable development that contribute to the conservation of heritage assets. Paragraph 221 states *"Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies."*

Braford's Local Plan contains policies that allow for enabling development in appropriate circumstances, provided proposals are robustly justified and deliver demonstrable heritage benefits.

To ensure consistency with national and local level policy, Policy BING11 should be amended to support enabling development where it would support the preservation or enhancement of the Milner Field Estate.

Proposed Amendment to Policy BING11

Kingston Directors Pension Scheme are seeking the following amendments to proposed Policy BING11 (changes are shown underlined)

- **BING11 – Milner Field Estate Special Character Area**

The area shown on the policies map is designated as the Milner Field Estate Special Character Area. Proposals for development within the Special Character Area will be supported, particularly where they would:

NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012
REGULATION 16: PUBLICISING A PLAN PROPOSAL
BINGLEY NEIGHBOURHOOD DEVELOPMENT PLAN (2023 TO 2038)
COMMENT FORM

For Office Use only:	
Date Rec.	
Date Ack.	
Respondent ID	
Representation Ref:	

a) Comprise enabling development to improve public awareness and understanding of the historical significance of the Special Character Area described in the Milner Field Estate Special Character Area Supporting Document; or

b) Improve recreational and heritage tourism use of the Milner Field Estate; or

c) Maintain or enhance the character features of key buildings, structures, views and vistas described in Table 5 and set out below, where technically feasible and viable:

- Asset Number 1: North Lodge and Gateposts
- Asset Number 2: South Lodge and Gateposts
- Asset Number 3: Garden House
- Asset Number 4: Milner Field Villas
- Asset Number 5: Farm Lodge
- Asset Number 6: Farm House
- Asset Number 7: Farm Buildings
- Asset Number 8: Main House Ruins
- Asset Number 9: Conservatory Mosaic Floor
- Asset Number 10: Orangery
- Asset Number 11: Arch to Courtyard
- Asset Number 12: Steps to Old Milner Field Mansion
- Asset Number 13: Stables and Old Coach House
- Asset Number 14: Lake, Trout Hatchery and Stream Conduits
- Asset Number 15: Ha-Ha Wall
- Asset Number 16: Field Walls
- Asset Number 17: Boundary Wall, Primrose Lane
- Asset Number 18: Kitchen Garden Heated Wall

Justification for the Proposed Amendment

The proposed amendment to Policy BING11 would provide flexibility for development within the Special Character Area and would support the aims of the policy which is to secure the preservation and enhancement of historic features within the area.

The associated criteria within Policy BING11 need to be proportional to the site's existing context. The site is not within a Conservation Area and for the policy to be deliverable it is essential that development can be viably delivered alongside enhancements to improve public awareness of the history of the site and the maintenance of assets within the site.

Conclusion

Our client supports the recognition within Policy BING11 that proposals for development within the Milner Field Estate Special Character Area would be supported in principle, but the associated criteria require amendments to ensure flexibility for the landowner as without development there would be no funding for the preservation or enhancement of the Estate. There is national policy support for enabling development and this should be reflected in the policy in acknowledgement that the site is in private ownership.

By ensuring the policy is worded flexibly, the Bingley Neighbourhood Plan will support development on the site providing an opportunity to improve public awareness of the site's history and preserve features within the Milner Field Estate Special Character Area where possible.

7. Signature:

Date:

1/9/2025