BINGLEY NEIGHBOURHOOD PLAN (2023 TO 2038) REGULATION 16 DRAFT (JULY/SEPTEMBER 2025) CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL COMMENTS/OBSERVATIONS

Neighbourhood Development Plan Document

Representation Reference	Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
	General Comment	-	-	It should be noted that the National Planning Policy Framework (NPPF) was revised in December 2024. Prior to publication of the referendum draft and made versions of the neighbourhood plan, the document should be reviewed and updated to refer to this most recent version of the NPPF and, where referenced, NPPF paragraph numbers checked and updated. This applies to all other documentation produced to support the plan including the Design Code, Basic Conditions Statement and supporting evidence base.
	General Comment	-	-	Following completion of the independent examination, the neighbourhood plan (and any relevant supporting documentation) should be updated to reflect the stage it has reached.
	General Comment	-	-	CBMDC welcome the submission of the draft Bingley Neighbourhood Development Plan and its supporting documentation. The Council has sought to work closely with the Town Council in developing the Plan to ensure that it has reached current stage. It is further noted that many of the comments provided in relation to the Regulation 14 of the NDP have been addressed in the current version.
	General Comment	-	-	The inclusion of references to relevant paragraphs of the National Planning Policy Framework (2024), adopted Bradford Core Strategy and emerging Local Plan as well as other relevant policy documents/guidance is welcomed it shows are a clear thread running through the planning policy framework for Bingley.
				However, it should be noted that the policy number/referencing in the emerging Local Plan may be subject to change. These references are drawn from those listed in the Regulation 18 (Preferred Options) version of the emerging Local Plan issued for public and stakeholder consultation in early 2021. Work is ongoing to develop a Regulation 19 (Publication/Submission) version of the emerging Local Plan.
				It may be appropriate to include a note within the NDP document highlighting the above.
	General Comment	-	-	There is no mention of the Wildlife Habitat Network in the Neighbourhood Plan, this is the West Yorkshire-wide network of habitats that provide corridors and connectivity for wildlife.
	Chapter 1 Foreword	4	Sixth Paragraph	This paragraph refers a referendum of Bingley residents and businesses taking place prior to the plan being formally made (adopted).

			The regulations governing neighbourhood plan referendums does make provision for the conduct of additional "business referendums". These are required for a neighbourhood area which has been designated as a Business Area and would be in addition to any residential referendum such an area. In the case of the Bingley Neighbourhood Area, it is not designated as a "Business Area" and as such there will be no "business referendum". The only referendum that will take place is the "Residential Referendum" where those who are entitled to vote if at the time of the referendum, they meet the eligibility criteria to vote in a local election for the area and if they live in the referendum area. Accordingly, this paragraph should be amended to reflect this in the next version of the Plan.
Chapte The Role & So Neighbourh	cope of the	Paragraph 2.7	CBMDC has creating several Development Frameworks for parts of the District including Bingley. A draft version was issued for community and stakeholder engagement in October/November 2023 and was subsequently approved by CBMDC's Executive in April 2025.
			The Development Framework looks to the longer term (next 15 to 20 years) and sets out an overarching vision, objectives and potential interventions for the regeneration of Bingley. The vision, objectives and potential interventions have been shaped by local stakeholders' views.
			As a component of Bradford's Economic Growth Plan, the role of the Development Framework is to act as a guide for development within Bingley, as well as encourage and attract new investment into the area. It provides clear principles which promote social, economic and environmental benefits which are informed by Bingley's local context and are underpinned by the strategic and policy context both nationally and locally.
			It is considered that an additional paragraph titled "Bingley Development Framework" should be inserted between sections 2.7 and 2.8 of the NDP document, providing a short summary of the role of the development framework. The following wording is suggested: "CBMDC has prepared a Development Framework for Bingley to act as a guide for development as well as to encourage and attract new investment over the next 10 to 15 years. It includes vision and objectives and identifies potential development opportunities and interventions, which are indicative only. However, it should be noted that the framework is not a funded programme of activity or a detailed delivery plan".
Chapte Social, Eco Environn Characte	nomic & nental	Figure 4	It should be noted that the date axis pf the graph contains a typographical error – 'Januaray 2003' should be amended to read 'January 2003'
Chapte	er 4 18	Paragraphs 4.5.1 to 4.5.3	Generally, the environmental characteristics section (and in the plan more generally) refers to the built and/or human environment and does not discuss nature, biodiversity or wildlife. It is considered that much more could be made of the potential to protect and enhance areas for nature.

Social, Economic & Environmental Characteristics			
Chapter 4 Social, Economic & Environmental Characteristics	18	Paragraphs 4.5.1 & 4.5.2	It should be noted that the Bradford Pennine Gateway National Nature Reserve (NNR) was formally designated in March 2025 as part of series of NNRs to mark the coronation of the King Charles III. It covers 1,272 hectares across eight sites in the Bradford and South Pennines area including within and adjacent to the designated Bingley Neighbourhood Area. These include Baildon Moor and Shipley Glen, Trench Meadows, Bingley North Bog and the St Ives Estate. Accordingly, it suggested that this section of the draft plan is brought up to date to reflect this important new designation.
Chapter 4 Social, Economic & Environmental	18	Paragraph 4.5.2	The sixth sentence paragraph 4.5.2 refers to the Leeds Liverpool Canal being a designated Local Wildlife Site (LWS). It should be noted that there is a total of fourteen designated LWS's including the Canal within the neighbourhood area. In addition, the neighbourhood area is immediately adjacent to four designated LWS's.
Characteristics			It is recommended that the wording of this sentence be amended to read: "There are also 14 designated Local Wildlife Sites (LWS) within the Bingley area, including the Leeds-Liverpool Canal and Gilstead Moor Edge & Prince of Wales Park amongst them, with a further 4 LWS's immediately adjacent to the neighbourhood area boundary in neighbouring parishes".
			The LWS's within the neighbourhood area are:
			Bingley North Bog
			Cottingley Woods – Black Hills
			Ewe Hills
			Gilstead Moor Edge & Prince of Wales Park
			Graincliffe & Compensation Reservoir
			Great Wood – West Wood
			Hazel Beck
			Hollin Plantation
			Milnerfield Traditional Orchard
			Milnerfield Woods
			Rye Loaf Hill
			Shipley Glen
			St Ives Estate
			Transfield Wood

			The LWS's immediately adjacent to the neighbourhood area are: • Baildon Moor • Hirst Wood • Marley Wood • West of Shipley High Moor It should also be noted that Prince of Wales Park has been designated as a Local Nature Reserve (LNR). See details on the CBMDC and Friends of Prince of Wales Park websites. There is no mention of the Wildlife Habitat Network in the Neighbourhood Plan, this is the West Yorkshire-wide network of habitats that provide corridors and connectivity for wildlife.
Chapter 5 Our Vision & Development Objectives	19	Paragraph 5.1.3	It should be noted that the planning consent for 400 dwellings referred to in the paragraph is an outline planning consent.
Chapter 6 Community Priorities & Aspirations	22 to 32	Paragraphs 6.1.1 to 6.1.7 Table 1	The inclusion of this chapter is welcomed. Previous comments relating the need to highlight that not all the matters/issues/aspirations identified can be addressed via the neighbourhood plan or the planning system have been addressed. It is also helpful to see reference being made in Paragraph 6.1.3 that many of the priorities/aspirations will be delivered working with a range of other groups, bodies or organisations.
Chapter 6 Community Priorities & Aspirations	25	Table 1 – Crossflatts Community & Leisure	This section of the table refers a community aspiration to retain St. Aiden's Church and its associated hall as well as the local over 50's club, public house and social club. The action column lists the public house and social club as being "sui generis" in terms of their use class. It should be noted that "sui generis" is not a use class. It is a term used to cover those uses that do not fit within one of the Use Classes set out in the Use Classes Order 1987 as amended in September 2020, April 2021 and August 2021. There are several circumstances using permitted development rights that those uses within the sui generis category can changes to another use. The wording within this section should be corrected in the referendum draft version of the neighbourhood plan.
Chapter 6 Community Priorities & Aspirations	34 to 36	Policy BING1 & Accompanying Table	The policy and accompanying table set out a range of community facilities falling within Use Classes E and/or F2 as well as those that fall into the "sui generis" category that the plan seeks protect. The latter ("sui generis") is not a use class, it is a term used to cover those uses that do not fit within one of the Use Classes set out in the Use Classes Order 1987 as amended in September 2020, April 2021 and August 2021. The plan should reflect this. This section of the plan should potentially include some explanation of use classes and their role, Also it should acknowledge that change of use can be permitted development within a Use Class, especially Class E. Furthermore, it should be noted that Use Class E does not cover 'community facilities'; that would be Class F:

			'Local Community and Learning'. The list of facilities in the first column of the table should be reviewed to ensure that they fall within the correct Use Class and consequently the correct column in table. For example, the churches listed in Crossflatts (St Aiden's), Gilstead (St Wilfrid's), Cottingley (Littlelands) and Bingley (All Saints) fall within Use Class F1 (Learning & Non-Residential Institutions). Also, the Ryshworth Club in Crossflatts is more likely to be listed as "sui generis".
Chapter 7 Encouraging a Well- Designed Built Environment	39	Table 2 Design Code PR01	The proposed design code makes mention of shared spaces. Active Travel England (ATE) (a key consultee) do not support the provision of shared spaces. As such this should be amended. It should also be noted the Design Code (Appendix C) does not refer to shared space under PR01.
Chapter 7 Encouraging a Well- Designed Built Environment	40	Table 2 Design Code PR09	It is considered that the guidance are all good suggestions for the development to include. CBMDC has a Homes and Neighbourhoods Design Guide which specifies street tree planting, native hedgerows and Sustainable Urban Drainage. These all contribute positively to biodiversity on developments and have benefits for amenity, health and well-being, flood risk and urban heating.
Chapter 7 Encouraging a Well- Designed Built Environment	40	Table 2 Summary of Concept Masterplans	It is noted that the masterplan makes no reference to Green Infrastructure Improvements such as tree planting in urban or rural areas. There is no mention of the protection or enhancement of green corridors like the canal or river. There are no measures to enhance urban areas for nature. There is no mention of the Wildlife Habitat Network in the Neighbourhood Plan, this is the West Yorkshire-wide network of habitats that provide corridors and connectivity for wildlife.
Chapter 7 Encouraging a Well- Designed Built Environment	45	Table 3 Summary of Concept Masterplans Crossflatts	The table contains several proposals and interventions relating to the creation/provision of new transport infrastructure in Crossflatts. Point 2 refers to a "Potential new road connecting south, north and further east", whilst Point refers to a "New cycle route into the site and further east". It is not clear what these proposals/interventions refer to and their location and/or purpose. It is queried whether they related to the proposed development at Sty Lane.
Chapter 7 Encouraging a Well- Designed Built Environment	47	Policy BING2	There two typographical errors with the policy text. There are contained Criterion 1c where 'chracter' should be amended to 'character', and Criterion 4 where 'overaching@ should be amended to 'overarching'.
Chapter 7 Encouraging a Well- Designed Built Environment	47	Paragraphs 7.1.1 to 7.4.3 Policy BING2	It should be noted that CBMDC already has an adopted Shopfront Design Guide Supplementary Planning Document, with should be read in conjunction with the adopted Core Strategy. There is also second SPD entitled The Shopkeepers Guide to Securing Premises. The various Conservation Area Assessments for the neighbourhood area also contain advice/guidance that can be applied to development proposals. Other documents that should also be referenced are the National Design Guide and National Model Design Code. It is therefore suggested that the first paragraph of the policy is amended to read "Where appropriate, proposals for new development to the general design principles and requirements of the Bingley Town Centre and Local

			Centres Design Code, and the Concept Masterplans for the towns and village, as well as the relevant local and national design planning policies and guidance:". The wider policy background should also be referenced in the supporting text. At the very least they should be referred to/listed in the policy links beneath the policy box.
Chapter 8 Improving Bingley Town Centre	50	Chapter 8 Improving Bingley Town Centre	See comments on Paragraphs 7.1.1 to 7.4.3 and Policy BING2 set out above and the need to consider the wider local and national planning policy/guidance context relating to design matters. Again, this wider context should be referenced appropriately within this chapter of the neighbourhood plan.
Chapter 8. Improving Bingley Town Centre	50	Figure 5	The Town Centre Masterplan should show a cycle route running along Main Street
Chapter 8 Improving Bingley Town	50	Figure 5	Agree with the concepts in the Masterplan; however, there is no active consideration of buses. These could be considered more explicitly.
Centre			It is also questioned as to whether encouragement should be given to extending the car park at Bingley Station as this will encourage more traffic. It would be more appropriate to show/encourage the provision of more sustainable transport modes and a mobility hub? Increasing the capacity at the Railway Station Car Park is not supported. The focus should be on improving facilities for buses, pedestrians, and cyclists.
Chapter 8. Improving Bingley Town Centre	51	Figure 6	It would be useful to show the current town centre boundary as defined in the Bradford Replacement Unitary Development Plan (RUDP) alongside the proposed town centre boundary to allow a comparison to be made.
Chapter 8. Improving Bingley Town Centre	51	Figure 6 Paragraph 8.2.9	The proposed Town Centre Boundary excludes the site of the former magistrates' court. It is currently included within the current town centre boundary. This proposed change/omission is objected to as there is not any compelling planning justification for the site's exclusion.
			While currently vacant, the site has active development interest for uses that fall within the definition of 'main town centre uses'. In addition, there is an extant planning permission in place for a residential development intended for retirement living (Use Class C3).
			Town centres are expected to accommodate a wide and complementary mix of uses. According to the National Planning Policy Framework/Guidance residential developments — including specialist housing such as retirement living — are considered appropriate within town centres, as they contribute positively to their vitality. These uses increase footfall, improve access to local services, and support the wider town centre economy.
			For these reasons, it is recommended that the former magistrates' court site remain within the defined town centre boundary.

Chapter 8 Improving Bingley Town Centre	56	Para 8.6.14 Criterion E	This paragraph is referring to better use of the Market Square. Point E refers to recreation proposals at St Ives Estate which is not relevant in this section of the Plan and should be removed or repositioned elsewhere in the document.
Chapter 9 Creating An Attractive Environment For Business Investment	58	Paragraphs 9.2.1 to 9.2.5	These paragraphs highlight those areas/sites that were safeguard or allocated in the Replacement Unitary Development (RUDP) 2005 for employment purposes. The Regulation 18 (Preferred Options) version of emerging Local Plan, published in early 2021, proposed to retain one employment zone in Bingley, previously identified in the RUDP under the reference S/E6.2: Crossflatts (retained under draft Local Plan Policy EC2d) and allocate two sites – BI9/E: Castlefields and BI10/E: John Escritt Road. As correctly identified in the draft neighbourhood plan the Employment Zone reference S/E6.1 has been substantial removed. In relation to the sites referred to as S/E1.10 and S/E1.14, the former has been developed for industrial/employment use, whilst the latter previously formed the overspill car for the adjacent office building. It should be noted that these designations/allocations have yet to be finalised. Work is ongoing to identify future employment land requirements and potential sites to deliver it as part of developing the Regulation 19 (Publication/Submission) version of the emerging Local Plan. This should be highlighted within the Plan to reflect the currently local planning policy background.
Chapter 9 Creating An Attractive Environment For Business Investment	58 & 59	Paragraphs 9.2.8 & 9.2.9	As drafted Paragraph 9.2.9 could appear to be stating that there are no policy mechanisms that would prevent the loss of employment land and/or premises that could be adopted by the neighbourhood plan. It is contrary to the approach outlined in the previous paragraph (Paragraph 9.2.8). The wording of this paragraph should be reconsidered. It is noted that the first sentence of Paragraph 9.2.9 refers to "existing Core Strategy Policy EC3". This should be amended to refer to "Core Strategy Policy EC4".
Chapter 9 Creating An Attractive Environment For Business Investment	58 & 59	Paragraph 9.2.10	It is noted that this paragraph has been expanded to explain what is meant in the policy text in relation to sites/buildings being "positively marketed" and the level of information that may be required as part of any future planning application. This partly addresses comments made at the Regulation 14 stage. It is likely much of this would be covered as part of a planning statement submitted alongside the application, including how any marketing/sales exercise would have been undertaken including methods used. It is suggested that a degree of flexibility is added to the wording of second sentence of this paragraph as not all of the listed methods may be appropriate. Accordingly, the following is suggested: "Applicants will demonstrate the genuine marketing efforts required in Policy BING4 by the following means, where appropriate:". Consideration, however, needs to be given to as to whether the some of the requirements may be too onerous and difficult to enforce/implement through the planning system, in particular the fourth and fifth requirements.

			For example, in the fourth requirement relates to "other suitable alternative uses agreed with the Council" (which it is assumed means the Town Council) and the applicant needing to submit at least three comparable. It is not considered appropriate for the Council to determine which uses may or may not be suitable and goes beyond the provisions of adopted Core Strategy Policy EC4 and does not allow for any flexibility. The wording "agreed with the Council (applicants should submit at least three recent comparables)" be deleted from the text. The fifth requirements may not be able to be enforced as much of this information could be classed as commercially confidential and/or sensitive as it potentially relates to transactions and/or discussions between different parties. As such it is not appropriate to mandate this. Accordingly, this paragraph should be deleted from the neighbourhood plan document. The proposed length that plan requires an employment site/premises to be marketed for a continual period of six months over a 12-month period. This is inconsistent with the requirement of adopted Core Strategy Policy, which requires such sites/premises to be marketed for a two-year period. The timeframe proposed should be explained within the supporting text for the policy.
		Policy BING4	It is suggested that this policy could be include further detail. Accordingly, the following wording is suggested for the policy:
			"Development proposals for new or enhanced employment uses, particular those that improve the attractiveness, functionality and operational effectiveness of existing employment sites, will be supported, subject meeting all other relevant local and neighbourhood plan policies.
			Where possible, the retention of sites and buildings, currently in use for employment in Use Classes E(g), B2 and B8 is encouraged to support local economic development and business growth in the Bingley Neighbourhood Area.
			Proposals for development that results in the loss of such sites and buildings will not be supporting unless it can be demonstrated that it is no longer suitable or viable for employment use in terms of its location, accessibility, environmental impacts and surrounding land uses. Evidence should also be provided showing the site and/or building has been marketed for its current use or suitable alternative employment use consistent with the provisions of Core Strategy Policy EC3".
Chapter 9	59	Policy BING4	The second paragraph of the policy wording contains a typographical error. The word 'funcionality' should be
ating An Attractive onment For Business Investment			amended to read 'functionality'
Chapter 9	59	Policy BING4	The list of strategic planning policies under the policy text for BING4 should refer to "Core Strategy Policy EC4" rather than "Policy EC3".

Creating An Attractive Environment For Business Investment			
Chapter 9 Creating An Attractive Environment For Business Investment	59 & 60	Policies BING4 & BING5	The draft Plan's support for indigenous businesses, protecting existing employment assets and provision of new smaller industrial units are all to be encouraged. This approach is broadly supported.
Chapter 9 Creating An Attractive Environment For Business Investment	60	Policy BING5	It should be noted that the policy wording contains a typographical error. The word "proivision" should be amended to read "provision".
Chapter 9 Creating An Attractive Environment For Business Investment	60	Policy BING5	Reference should be to the Local Plan within the Policy, not the Local Development Plan.
Chapter 9 Creating An Attractive Environment For Business Investment	57 to 60	-	It is noted the draft Plan appears to be light on is the role of the tourism sector within the Bingley area. Whilst there is some recognition the town is visited by tourists there is no commentary on how this could be increased. The number of people taking UK based holidays (long and short breaks) is increasing and expected to continue for the next 5 years, demonstrating strong potential in the market.
			Bingley probably has an untapped market for increased tourism – it is queried what is the market for increasing hotels, B&Bs AirBnBs, caravan, motorhome and camping sites, canal facilities etc? The beneficial effects of tourism with spend in retail shops, bars, restaurants etc could be significant over the period of the plan and this sector of the economy may need some further research to assess whether more detail is required.
Chapter 10 Meeting Local Housing Needs	61	Paragraph 10.1.1	The housing requirement set out for Bingley in the adopted Core Strategy is 1,400 dwellings (between 2013 and 2030) and in the emerging Local Plan is 850 dwellings (between 2020 and 2038), although it is noted that the wording in the second sentence refers to the emerging Local Plan requirement as being 1,000 homes.
			The wording of this paragraph should be corrected to reflect that above and it should be highlighted that the emerging Local Plan has yet to be finalised.
Chapter 10. Meeting Local Housing Needs	64	Policy BING6	It is noted that the supporting text for the policy (Paragraphs 10.7.1 and 10.7.2) refers to adopted Core Strategy Policies HO8 and HO11 in respect of housing mix and affordable housing provision as well as the Strategic Housing Market Assessment.

		Paragraph 10.7.1 & 10.7.2	Paragraph 10.7.2 and the first paragraph of the policy wording could be construed as only requiring a prospective applicant for housing to only have regard to the Bingley Housing Needs Assessment in formulating their proposals. It is suggested that the wording of this paragraph should be amended to better reflect that the applicants should have regarding to the wider policy and evidence context. The following is suggested: "Proposals for new housing in Bingley, subject to viability, should ensure that provision is made for an appropriate mix, size, type and tenure of dwellings, including the provision affordable housing, to meet local needs. Regard should be had to the wider local planning policy context, together with other relevant, robust and up to date evidence of need including the Bradford Strategic Housing Market Assessment and the Bingley Housing Needs Assessment. In particular, the following should be considered:"
Chapter 10. Meeting Local Housing Needs	64	Policy BING6	Criterion 1 of the policy requires affordable housing provision in the Bingley Neighbourhood Plan area to have a tenure split of 65% for rent, with and 35% for affordable home ownership products, based on the recommendations of the Bingley Housing Needs Assessment. It should be noted that Paragraph 5.3.190 of the adopted Core Strategy states that the CBMDC's preferred tenure mix is 70% social/affordable rent to 30% intermediate tenure is the starting point for all affordable housing negotiations. It should be noted that the exact tenure split/mix will be determined as part of the planning application process. Accordingly, the following amendment is suggested to address this and ensure the policy is more flexible in nature:
			"1. Broad Tenure Spilt – where appropriate, affordable housing provision should have a tenure split of 65% for rent and 35% for sale, unless evidence demonstrates that other tenure splits are required"
Chapter 10. Meeting Local Housing Needs	64	Policy BING6	Criterion 2 refers to affordable housing being provided on-site as part of development of more than 15 dwellings. This is broadly in line with Core Strategy Policy HO11. It is suggested that the wording should be amended to read "affordable housing provision" as the use of the word "on-site" is un-necessary as the approach is explained in the subsequent text.
			It must also be highlighted that the adopted Core Strategy Policy HO11 applies a lower threshold of 11 dwellings, where affordable housing will be sought (subject to viability) in Cottingley, which is covered by the neighbourhood development plan. This lower threshold for Cottingley should be reflected within the policy wording and/or within the supporting text for it to ensure consistent with the wider strategic planning context.
Chapter 10. Meeting Local Housing Needs	64	Policy BING6	Criterion 3 states that proposals should demonstrate how it they meet the requirements for the provision of dwellings of various sizes and seeks to limit the number of dwellings with four or more bedrooms on large sites. It is noted that a threshold of 15 dwellings is used to determine a "large site".
			Paragraph 5.3.123 of the adopted Core Strategy (the supporting text for Policy HO8) states that larger sites of 0.4ha or 10 dwellings (or more) are expected to deliver a mix of housing under the policy. The proposed threshold set out in Policy BING6 is inconsistent with adopted local planning policy. The reasoning/justification

			for using a threshold of 15 dwellings to define a "large site" should be set out in the plan. If not, the threshold should be amended to reflect that set out in the Core Strategy.
Chapter 10 Meeting Local Housing Needs	64	Policy BING6	It is noted that Criterion 4 relates to the provision of "Homes for Younger Households", a change from the Regulation 14 draft of the plan, where reference was made to "Newly Forming Households", although the justification for it set out in Paragraphs 10.6.1 and 10.6.2 remains the same It is not clear how such households can or will be determined through the planning system, and whether it can be justified or delivered. Further explanation is needed within the policy and/or the supporting text to explain this including thresholds for determining "younger households" and how it is expected to be demonstrated as part of planning applications.
Chapter 11 Walking, Cycling & Green Infrastructure	66	Paragraph 11.2.1	It is queried whether the cross reference in the first sentence of this paragraph to Figure 5.1 of the Masterplan Supporting Document, should also be linked to Figure 5, shown on Page 50 of the neighbourhood plan document.
Chapter 11 Walking, Cycling & Green Infrastructure	66	Paragraph 11.3.3	This paragraph should make reference to segregated cycleway that has been provided along this route.
Chapter 11 Walking, Cycling & Green Infrastructure	67	Paragraph 11.4.2	The third sentence of the paragraph states that "The Canal and Rivers Trust has highlighted a need for signage and towpath improvements (between Bingley and Crossflatts) to support greater use of the canal route by cyclists". It is worthwhile noting within the neighbourhood plan document that Sustrans are delivering improvements on sections on this route from Bingley 5 Rise to 3 Rise.
Chapter 11 Walking, Cycling & Green Infrastructure	70	Policy BING7	The second sentence of the first paragraph contains a typographical error – "manual for Streets" should be read "Manual for Streets".
Chapter 11 Walking, Cycling & Green Infrastructure	70	Policy BING7	It is considered that the each of the eight routes listed within the policy should be given a number as this would be useful for future reference and aid interpretation. For example, "1. Cottingley Village to Bingley Town Centre" etc.
Chapter 11 Walking, Cycling & Green Infrastructure	70	Policy BING7	It should be noted that criterion a) under the heading Gilstead to Eldwick contains a typographical error – 'Gllstead' should be amended to read 'Gilstead'
Chapter 11	70	Policy BING7	It is queried whether criterion (d) should refer to the canal rather than the River Aire.

Walking, Cycling & Green Infrastructure			
Chapter 11 Walking, Cycling & Green Infrastructure	71 & 72	Paragraph 11.13.1 to 11.13.5 Policy BING8 Paragraphs 11.15.1 to 11.15.7	In relation to green spaces, it should be noted that Gilstead Moor and Bingley North Bog are both Local Wildlife Sites (LWS) designated by West Yorkshire Ecology but still appear with this section of the document. The plan does not mention LWS's except in the description of Gilstead Moor. Additionally, whilst the document does not necessarily concern itself with existing designated sites, the following may be of interest: • The Biodiversity Team is not aware of the Swann Lane Nature Reserve. • There is no mention of the Site of Special Scientific Interest Bingley South Bog in this plan and it is not included in the Green Infrastructure Mapping. • Map below shows Local Wildlife Sites in blue: Female Femal
			 local-wildlife-site-selection-criteria-v125.pdf It could be an aspiration for greenspace management to reach LWS standard.

			Would any amenity grass dominated greenspaces be suitable for tree planting? The Woodland Creation Manager would be interested if the town council deem any suitable.
Chapter 11 Walking, Cycling & Green Infrastructure	72	Policy BING8	The policy wording should be clear that LGS sites can only be developed where proposals are consistent with national and local policy on Green Belt (NPPF paragraph 108). It is suggested that the wording of the policy is amended to read: "The following sites, listed below and shown in Appendix A as well as on the Policies Map, are designated Local Green Spaces:
			1. Lyndale Road playing fields.
			2. Canary Drive wild area.
			3. Swan Avenue nature reserve.
			4. Warren Lane allotments
			5. Giles Wood.
			6. Stanley Street allotments.
			7. Queens Road recreation field, Crossflatts.
			8. Green by canal, Canal Road/Newark Road, Crossflatts.
			9. Bingley Bowling Club.
			10. Rose garden, All Saints Church.
			11. Green area by the Market Cross, Jubilee Gardens.
			12. Recreation field, Cottingley.
			13. Gilstead Moor (The Crags).
			14. Millennium Wood – The Greenwood.
			15. Woodland between Main Street / Oberon Way, Cottingley.
			16. Park between Bradford Old Road and Cottingley New Road.
			17. Beck Lane allotments.
			18. Fields to the north and west of Five Rise Farm (ruins).
			19. Jer Wood to Cat Steps.
			20. North Bog.

			Development proposals within the Local Green Spaces will be consistent with national and local planning policy for Green Belts".
Chapter 11 Walking, Cycling & Green Infrastructure	72	Policy BING8	It is noted that two of the proposed Local Green Space designations listed in Policy BING8 and assessed in the Local Green Spaces Supporting Evidence Documents already benefit other protected designations. As such they should be removed from the policy. These are:
			Proposed LGS 13: Gilstead Moor (The Crags) – this area is a designated Local Wildlife Site (LWS) (Gilstead Moor Edge & Prince of Wales)
			• Proposed LGS 20: North Bog – this area has been part of the designated National Nature Reserve (NNR) (Bradford Pennine Gateway) since March 2025 and is also designated Local Wildlife Site (LWS) (Bingley North Bog).
Chapter 11	73	Policy BING9	It is noted that the second sentence of second paragraph of the policy contains a typographical error
Walking, Cycling & Green Infrastructure			'recoveryand' should be amended to read 'recovery and'
Chapter 11	73	Policy BING9	This is a good policy but due to the previous omissions (mentioned above) lacks direction, specific locations and
Walking, Cycling & Green Infrastructure	,		interventions. Will this policy be applied in the absence of mentions of Green Infrastructure and biodiversity in the discussion of other policies.
Chapter 11	73	Policy BING9	It is queried the whether the section of this policy should include some guidance as to where within the
Walking, Cycling & Green Infrastructure			neighbourhood area land for allotments should be provided and the criteria that could be used to identify them.
Chapter 12	77	Paragraphs	It is noted that the section and policy titles have been amended to include reference to Bingley Non-Designated
Enhancing Bingley's Landscape & Heritage		12.3.1 to 12.2.3	Heritage Assets. However, to ensure full consistency with national and local planning policy, it is recommended that the wording "Local Character Buildings and Structures of Local Heritage Interest" is deleted.
		Figure 8 Policy BING10	
Chapter 12	78	Paragraph	The first sentence of should be amended to ensure the consistent use of terminology. Accordingly, it should be
Enhancing Bingley's Landscape & Heritage		12.3.2	amended to read "Responses from property owners affected by the proposed designation of Non-Designated Heritage Assets were focussed on the proposed designations of walls in Beck Lane, Gawthorpe and Priestthorpe".
Chapter 12	83	Policy BING11	It is noted that neighbourhood plan now includes the policy statements from the Milner Field Estate Special Character Area supporting document (Table 5). It may appropriate to include an additional criterion with Policy

Enhancing Bingley's Landscape & Heritage			BING11 to provide a link to them. The following is suggested: "The area shown on the Policies Map is designated as the Milner Field Estate Special Character Area. Where relevant, proposals for development within the Special Character Area will be supported where they would:
			d) Be consistent with and reflect the policy statements set out in Table 5 and the from the Milner Field Estate Special Character Area supporting document"
Chapter 12 Enhancing Bingley's Landscape & Heritage	89 & 90	Paragraphs 12.5.1 to 12.5.6	It is queried whether the plan text and/or the supporting evidence should refer to the importance of Higher Coach Road, which runs through the proposed Milner Field Special Character Area, as a link between Baildon/Saltaire and Gilstead.
Chapter 12 Enhancing Bingley's Landscape & Heritage	89 & 90	Policy BING11	Part (c) of the policy refers to the list of key buildings, structures, views and vistas set out in Table 5. It is noted that the list of key buildings, structures, views and vistas set out in the policy is inconsistent with those set out Table 5. The policy should be amended to included asset numbers 19 to 24.
Policies Map	-	-	It is suggested that if the colour base map is to be used, the Town Council boundary (and the Neighbourhood Area boundary) should be picked out in black rather than green. This will be clear for the reader as several elements of the map use green shading.
Policies Map	-	-	 In relation to the cycling and walking routes, the following inclusions on/deletions from the Policies Map are suggested: Higher Coach Road through Milner Field should be shown as a walking and cycling route. Heights Lane and Otley Road are not appropriate to be shown on the Policies Map as a walking/cycling route between Eldwick and Micklethwaite as they are busy fast roads with no footways. It is queried whether Lady Lane/Sty Lane would be a better walking/cycling link which is already shown on the Map? The Leeds Liverpool Canal towpath be shown as a walk/cycle route. It is queried whether the Map should show a walking/cycling route to St Ives via Myrtle Park and Beckfoot Lane.
Policies Map	-	Key	It is suggested that the title for BING10 should be amended to read "Non-Designated Heritage Assets".

Strategic Environmental Assessment & Habitat Regulations Assessment Screening

Representation Reference	Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
	Appendix 2a SEA Screening Opinion (May 2022) Chapter 2 Context for the Neighbourhood Plan & Area	7	Paragraph 2.23	The first sentence of the paragraph refers to the Liverpool, Manchester, and West Yorks Green Belt covering most of the Bingley Parish area. This statement is incorrect as only the West Yorkshire Green Belt covers the neighbourhood plan area. This sentence should be amended to read "The West Yorkshire Green Belt also covers".
	Appendix 2a SEA Screening Opinion (May 2022) Chapter 3 Screening Assessment	15	Table 3.1	Under the section on discussing the potential effects of the NDP relating to landscape, refers to the Liverpool, Manchester, and West Yorks Green Belt covering most of the Bingley Parish area. This statement is incorrect as only the West Yorkshire Green Belt covers the neighbourhood plan area. This sentence should be amended to read "The West Yorkshire Green Belt covers".
	Appendix 2b SEA Screening Opinion (June 2022) Chapter 2 Context for the Neighbourhood Plan & Area	7	Paragraph 2.23	The first sentence of the paragraph refers to the Liverpool, Manchester, and West Yorks Green Belt covering most of the Bingley Parish area. This statement is incorrect as only the West Yorkshire Green Belt covers the neighbourhood plan area. This sentence should be amended to read "The West Yorkshire Green Belt also covers".
	Appendix 2b SEA Screening Opinion (June 2022)	15	Table 3.1	Under the section on discussing the potential effects of the NDP relating to landscape, refers to the Liverpool, Manchester, and West Yorks Green Belt covering most of the Bingley Parish area. This statement is incorrect as only the West Yorkshire Green Belt covers the neighbourhood plan area. This sentence should be amended to read "The West Yorkshire Green Belt covers".

Chapter 3			
Screening			
Assessment			

Appendices & Supporting Evidence Documents

Representation Reference	Document Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
	Appendix A Local Green Spaces Supporting Document	-	-	It is suggested that each section and paragraph in the document is given a number. This will assist readers in navigating it.
	Appendix A Local Green Spaces Supporting Document	48	19. Fields to the north of 5 Rise Farm Compliance with NPPF Eight Row – Second Column	It should note that this contains a typographical error. The wording "North Bog SSI" should be amended to read "North Bog SSSI". In addition, wording should be added to reflect the recent National Nature Reserve designation. The following wording is suggested: "Only insofar as the Bradford Pennine Gateway National Nature Reserve and North Bog SSSI borders it to the south".
	Appendix A Local Green Spaces Supporting Document	55	20. North Bog Compliance with NPPF Eight Row – Second Column	It is noted that site's designation as a SSSI. However, this should also be amended to reflect the fact it has recently been designated as part of the Bradford Pennine Gateway National Nature Reserve and is also a designated Local Wildlife Site.
	Appendix A Local Green Spaces Supporting Evidence	59	Original Proposed Sites – Removed	It is queries whether the assessments undertaken for these sites can be made available.

Appendix B Character Buildings & Structure of Local Heritage Interest Supporting Evidence	-	General	It would be appropriate to amend the document title to "Bingley Non-Designated Heritage Assets". A similar amendment should be made within the document itself. This would be more consistent with terminology used in national and local planning policy.
Appendix C Distinctive Views & Vistas Supporting Evidence	3	Introduction Fifth Paragraph	The introduction text refers to policy NE1 rather BING12 – this should be amended. In addition, it may be appropriate to set out the methodology and information sources used to determine which views and vistas should be protected. Furthermore, it is queried whether or not other views/vistas have been considered and discounted. If so, it may be appropriate to include a section within Appendix C listing them and summarising the reasons for their non-inclusion.

OTHER DOCUMENTS

Representation Reference	Document Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
	Basic Conditions Statement	7	Table 1 Policy BING4	It is suggested that Core Strategy Policy EC4 is also referenced. This policy provides the circumstances for dealing with the loss of employment land.
	Basic Conditions Statement	7	Table 1 Policy BING6	It is suggested that Core Strategy Policy HO11 is also referenced. This policy sets out the overall approach for the provision of affordable housing.
	Basic Conditions Statement	9	Table 1 Policy BING7	It is suggested the emerging Local Plan policies TR1, TR3 and DS4 are also referenced.
	Bingley Town Centre & Local Centres – Design Code	-	General	It is noted that the various design codes have been summarised and embedded within the neighbourhood plan document itself. This step is welcomed and ensures a clear link between the plan's policies and the design code document.
	Bingley Town Centre & Local Centres – Design Code	-	General	It is suggested that the design code is brought up to date to reflect the current stage of the neighbourhood plan and any changes that have occurred since it was prepared (2020). The introductory text needs be clear about whether the Design Code is part of the plan itself or just a piece of supporting evidence.
	Bingley Town Centre & Local Centres – Design Code	6	Section 1.1 Introduction & Purpose	The first sentence of the sixth paragraph that the report will "provide mandatory guidance that supplements policies of the Bingley Neighbourhood Plan". It is queried whether guidance can be considered as mandatory.

Bingley Town Centre & Local Centres – Design Code	7	Section 1.2 Planning Context	The first paragraph refers to the 2019 National Planning Policy Framework. This has now been superseded by a new version issued in December 2024 (with update in February 2025). Any references within the Design Code document should be updated to reflect this. Furthermore, reference should be made to the national model design code and national design guide as part of the wider policy context within which the document has been prepared.
			The section covering the local planning policy context should be updated to highlight that CBMDC is currently preparing a new Local Plan for the District that, when adopted will replace the existing Core Strategy and RUDP. In relation to the other documents listed the adopted Homes and Neighbourhoods Design Guide SPD (February 2020) should be included, whilst the reference to the Bradford City Centre Design SPD should be removed. This not relevant to the Bingley area.
			Should it not be possible to edit this document, an addendum should be produced to show potential amendments reflecting the above that should be read alongside.
Bingley Town Centre & Local Centres – Design Code	16 & 17	Section 2.3 Landscape & Open Spaces	It should be highlighted that several of the areas of open space within the neighbourhood areas are also designated Local Wildlife Sites (LWS) (see comments in relation to the NDP document). The Leeds Liverpool Canal is also a designated LWS through the neighbourhood area. It may be appropriate to reference these in the document and/or on Figure 15. Also, it is queried as to none of the open spaces in Cottingley are included. Should it not be possible to edit this document, an addendum should be produced to show potential amendments reflecting the above that should be read alongside.
Bingley Town Centre & Local Centres – Design Code	40	Section 4.10 Environmental & Biodiversity	Reference should be made to new developments delivering Biodiversity Net Gain (BNG). BNG is now mandatory. Further guidance can be found in the Government's on-line Planning Practice Guide.
Bingley Town Centre & Local Centres – Design Code	48	Section 4.14 Improvements to Main Street	The document states that any improvements to Main Street should be approved by the Town Council. It is not clear what the context for this to occur. It is likely that any improvements will be the province of the local planning authority and/or highways authority (CBMDC).
Bingley Town Centre & Local Centres – Design Code	57	Section 5.5 Display Space	It is queried whether a planning policy document such as design code can mandate the way in which a business uses the window display. This may be difficult to enforce.
Masterplan	-	General	It is suggested that the Masterplan is brought up to date to reflect the current stage of the neighbourhood plan and any changes that have occurred since it was prepared (2020), e.g. changes to national policy, the emerging Local Plan and the Development Frameworks.
			The introductory text needs be clear about whether the Masterplan is part of the plan itself or just a piece of supporting evidence. It should be consistent with the contents of the design section of the neighbourhood plan.

			It is understood that it may prove difficult to edit this document, therefore it is suggested that any relevant amendments could be shown in an addendum that should be read alongside the original.
Masterplan	-	General	CBMDC has creating several Development Frameworks for a number of parts of the District including Bingley. The Development Framework look to the longer term (next 15 to 20 years) and sets out an overarching vision, objectives and potential interventions for the regeneration of Bingley. The vision, objectives and potential interventions have been shaped by local stakeholders' views and will continue to be refined following the most recent consultation.
			As a component of Bradford's Economic Growth Plan, the role of the Development Framework is to act as a guide for development within Bingley, as well as encourage and attract new investment into the area. It provides clear principles which promote social, economic and environmental benefits which are informed by Bingley's local context and are underpinned by the strategic and policy context both nationally and locally.
			The proposed interventions as set out within the Development Framework are indicative only. There is no funding commitment at this stage to deliver the vision. If the proposals are supported by stakeholders, a more detailed delivery plan would be considered as funding opportunities arise.
			It may be appropriate for the Masterplan to be reviewed/updated in light the above
Masterplan	8	Section 1.1 Introduction (Study Area)	The second sentence refers to the Masterplan influencing the design of forthcoming enhancement proposals. Further explanation is required in relation to what these proposals are and when they are likely to come forward. It assumed that it is meant to refer to proposals that come forward through the planning system.
Masterplan	12	Section 2.1 Policy Review	The first paragraph refers to the 2019 National Planning Policy Framework. As highlighted previously, this has now been superseded by a new version issued in December 2024 (amended in early 2025). Any references within the Masterplan document should be updated to reflect this. Furthermore, reference should be made to the national model design code and national design guide as part of the wider policy context within which the document has been prepared.
			The section covering the local planning policy context should be updated to highlight that CBMDC is currently preparing a new Local Plan for the District that, when adopted will replace the existing Core Strategy and RUDP.
Masterplan	20	Section 3.1	It is suggested the Masterplan document is updated to refer to the section of segregated cycleway that has just been
		Baseline Study	delivered along the B6265
		(Movement	
		Network –	
		Non-Vehicular	
		Routes)	

Masterplan	20 to	Section 3.1	References to Bradford Wildlife Areas (BWA) and Regionally Important Geological Sites (RIGS) within the Masterplan
Waster plan	23	Baseline Study (Green Infrastructure)	(and other parts of the plan and evidence base) should be removed and replaced with the most up to date terminology – Local Wildlife Sites (LWS) and Local Geological Sites (LGS). This is particularly significant with regards to the impact to Local Wildlife Sites.
		Figures 3.4 & 3.5	Due to the criteria that these sites are expected to fulfil to qualify – Local Wildlife Sites are considered to have a higher level of protection to the Sites of Ecological & Geological Importance (SEGI's) and Bradford Wildlife Areas (BWAs) that they replaced. In addition, it is the duty under the National Planning Policy Framework and the NERC Act 2006 (as opposed to other statutory bodies) to protect these sites.
			The Masterplan document should refer to the fact that there are a number of designated Local Wildlife Sites (LWS) and Local Geological Sites (LGS) within/adjacent to the Bingley neighbourhood plan which together with the SSSI, Registered Parks & Gardens and open spaces form part of the area's Green Infrastructure network. The following sites are designated Local Wildlife Sites within/adjacent to the neighbourhood plan area:
			Baildon Moor
			Bingley North Bog
			Cottingley Woods – Black Hills
			Ewe Hills
			Gilstead Moor Edge & Prince of Wales Park
			Graincliffe & Compensation Reservoir
			Great Wood – West Wood
			Harden Beck
			Hazel Beck, Cottingley
			Hirst Wood
			Hollin Plantation
			Leeds & Liverpool Canal
			Rye Loaf Hill, Cottingley
			Shipley Glen
			St Ive's Estate
			Tong Park with Hawksworth Spring Wood
			Transfield Wood
			West of Shipley High Moor

			The following list of sites are classed as Local Geological Sites (LGS) within/adjacent to the neighbourhood plan area: • Baildon Moor • Eldwick Crag & Quarry • Noon Nick, Shipley • Shipley Glen Citation documents may be obtained from West Yorkshire Ecology. Any mapping used within the neighbourhood plan and Masterplan should show the most up to date designations.
Masterplan	24	Section 3.1 Baseline Study (Topography, Watercourses & Key Views)	The wording and mapping in relation flooding should be review and updated to make sure that the most up to date information is provided. CBMDC have prepared a Level 1 Strategic Flood Risk Assessment (SFRA), dated 2023, as part of the evidence base for the emerging Local Plan. This is available to review on the Council website. In addition, reference is made to the masterplan avoiding considering development within areas of higher flood risk. This is already covered in the national planning policy as well as the adopted Core Strategy and emerging Local Plan. Based on this it is queried whether the Masterplan is seeking to allocate sites or not. Further explanation is required.
Masterplan	31	Section 4.1 Engagement	It is noted that reference was made during workshops sessions to some potential allocated sites. As mentioned above, site allocations will be addressed in the emerging Bradford District Local Plan.
Masterplan	34	Section 5.1 Conceptual Framework	It is noted that the Masterplan's Conceptual Framework proposes to integrate two residential developments into the holistic vision for the area — Sty Lane and Gilstead Water Works. The Sty Lane already benefits from outline planning permission and is currently the subject of pending reserved matters application for over 300 dwellings, whilst Gilstead Water Works is understood to be unavailable for development, based on discussion with its owners. References to the latter should be deleted.
			It would be helpful to understand, whether or not the masterplan/neighbourhood plan is looking to allocate sites for development or whether it is identifying those sites that the community may support, or that it is setting out what could potentially take place in future within the neighbourhood area.
			It should be made clear within the Masterplan that any site allocations will be identified and made via the emerging Bradford District Local Plan. Work is currently ongoing to review site allocations and update the evidence base for it, ahead of the Regulation 19 (Publication) version being drafted and issued to allow formal representations to be made.
Masterplan	36 & 37	Section 5.2 Masterplan	One of the proposed design principles is respond to the proposed residential development with its integration into the wider strategic Masterplan.
		Vision (Proposals & Interventions)	Figure 5.2 shows two potential residential development areas - Sty Lane and Gilstead Water Works. The Sty Lane already benefits from outline planning permission and is currently the subject of pending reserved matters application for over 300 dwellings, whilst Gilstead Water Works is understood to be unavailable for development,

		Figure 5.2	based on discussion with its owners. The document should be updated to reflect this and amended accordingly, with reference to the latter deleted. It should be made clear within the Masterplan that any site allocations will be identified and made via the emerging Bradford District Local Plan. Work is currently ongoing to review site allocations and update the evidence base for it, ahead of the Regulation 19 (Publication) version being drafted and issued to allow formal representations to be made.
Masterplan	44 & 45	Section 5.6 Central Area Villages Appraisal (Higher Communities Village Centre – Gilstead) Figure 5.6	See previous comments in relation to the non-availability of Gilsted Water Works for development.
Masterplan	46 & 47	Section 5.7 Village Centres Concept Masterplan (Higher Communities Village Centre – Gilstead) Figure 5.7	See previous comments in relation to the non-availability of Gilsted Water Works for development.