

Oxenhope Neighbourhood Development Plan

REGULATION 16 CONSULTATION (JULY TO SEPTEMBER 2021)

SUMMARY OF REPRESENTATIONS RECEIVED



Contents

1.	GENERAL COMMENTS	4
2.	SECTION 1.0 INTRODUCTION	8
3.	SECTION 3.5 AIMS AND OBJECTIVES	15
4.	CHAPTER 4.1 GENERAL POLICIES – POLICY GP1 – HIGH QUALITY DESIGN.....	16
5.	CHAPTER 4.1 GENERAL POLICIES – POLICY GP2 – HERITAGE	18
6.	CHAPTER 4.1 GENERAL POLICIES – POLICY GP3 – COMMUNITY FACILITIES	20
7.	CHAPTER 4.1 GENERAL POLICIES – POLICY GP4 – SUSTAINABLE DRAINAGE SYSTEMS (SuDS)	22
8.	CHAPTER 4.1 GENERAL POLICIES – POLICY GP8 – DESIGN AND DEVELOPMENT IN CONSERVATION AREAS	24
9.	CHAPTER 4.2 HOUSING – AIMS AND OBJECTIVES.....	27
10.	CHAPTER 4.2 HOUSING – POLICY H1 - BUILDING FOR A HEALTHY LIFE AND LIFETIME HOMES	27
11.	CHAPTER 4.2 HOUSING – POLICY H2 – BUILDING PERFORMANCE	31
12.	CHAPTER 4.2 HOUSING – POLICY H4 – GREEN INFRASTRUCTURE	32
13.	CHAPTER 4.3 LOCAL ECONOMIC DEVELOPMENT – POLICY ED1 – RETENTION OF BUILDING FOR ECONOMIC USE	35
14.	CHAPTER 4.4 LOCAL GREEN SPACES – POLICY GS1 – LOCAL GREEN SPACES.....	35
15.	CHAPTER 4.5 MOVEMENT AND TRAVEL - POLICY MT1 – RESIDENTIAL PARKING.....	40
16.	CHAPTER 4.5 MOVEMENT AND TRAVEL - POLICY MT2 – FOOTPATHS AND CYCLE NETWORK..	40
17.	CHAPTER 4.5 MOVEMENT AND TRAVEL – POLICY MT3 – NON-RESIDENTIAL PARKING.....	41
18.	CHAPTER 5 MONITORING.....	41
19.	CHAPTER 6.0 APPENDIX.....	41
20.	OXENHOPE NDP – DESIGN GUIDE	42

1. GENERAL COMMENTS

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>The post examination/referendum draft of the plan should be reviewed and updated to ensure that its wording is up-to-date reflecting that stage of the plan. Similarly, the post-referendum (adoption) version should be updated.</p> <p>The numbering of the figures should be updated.</p>			
Full Submission:			
<p>The post examination/referendum draft of the plan should be reviewed and updated to ensure that its wording is up-to-date reflecting that stage of the plan. Similarly, the post-referendum (adoption) version should be updated.</p> <p>The numbering of the figures should be updated.</p>			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>References in the plan to the National Planning Policy Framework should be checked/clarified as the 2021 version has now been published.</p>			
Full Submission:			
<p>References in the plan to the National Planning Policy Framework should be checked/clarified as the 2021 version has now been published.</p>			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>The plan as a whole would benefit from providing consistent paragraph numbering and figures/map referencing. This will allow readers and users of the plan to accurately reference relevant parts of the plan</p>			
Full Submission:			
<p>The plan as a whole would benefit from providing consistent paragraph numbering and figures/map referencing. This will allow readers and users of the plan to accurately reference relevant parts of the plan</p>			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
The plan as a whole would benefit from continuous page numbering which extends into and through the appendix section for ease of referencing.			
Full Submission:			
The plan as a whole would benefit from continuous page numbering which extends into and through the appendix section for ease of referencing.			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
There are several maps within the Neighbourhood Plan that should display the relevant copyright and licencing information. This includes, but is not limited to the Public Rights of Way maps on pages 22 and 23.			
Full Submission:			
There are several maps within the Neighbourhood Plan that should display the relevant copyright and licencing information. This includes, but is not limited to the Public Rights of Way maps on pages 22 and 23.			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>CBMDC notes that on the whole, the Oxenhope Neighbourhood Development Plan and accompanying Design Guide are well presented and illustrated documents and appear to be well researched and responsive to the local Oxenhope context and character.</p> <p>It is noted that many of the comments provided previously have been addressed.</p>			
Full Submission:			
<p>CBMDC notes that on the whole, the Oxenhope Neighbourhood Development Plan and accompanying Design Guide are well presented and illustrated documents and appear to be well researched and responsive to the local Oxenhope context and character.</p> <p>It is noted that many of the comments provided previously have been addressed.</p>			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>The Oxenhope Design Guide has been prepared alongside the Neighbourhood Plan to provide supplementary guidance on key design elements within Oxenhope, particularly in relation to policies GP1, GP4, H4 and within the supporting text to GP8.</p> <p>The Design Guide is presented as Section 7 (of the ONDP). Consideration should be given as to whether it would be beneficial to reference the document on this contents page with a clear demarcation that it is presented as a separate document to the neighbourhood plan.</p>			
Full Submission:			
<p>The Oxenhope Design Guide has been prepared alongside the Neighbourhood Plan to provide supplementary guidance on key design elements within Oxenhope, particularly in relation to policies GP1, GP4, H4 and within the supporting text to GP8.</p> <p>The Design Guide is presented as Section 7 (of the ONDP). Consideration should be given as to whether it would be beneficial to reference the document on this contents page with a clear demarcation that it is presented as a separate document to the neighbourhood plan.</p>			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>Para 1.1.3 - The reference to “Department of Communities and Local Government (DCLG)” should be revised for correctness and replaced with “Ministry of Housing, Communities and Local Government (MHCLG)”.</p>			
Full Submission:			
<p>Para 1.1.3 - The reference to “Department of Communities and Local Government (DCLG)” should be revised for correctness and replaced with “Ministry of Housing, Communities and Local Government (MHCLG)”.</p>			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>Para 1.1.4 - This paragraph (and para. 1.1.5) should be revised to reflect the fact that the CBMDC is now preparing a single Local Plan rather than a Land Allocations Development Plan Document. The following wording should be considered: “The strategic planning policy background to the Neighbourhood Plan is provided by the adopted CBMDC adopted Core Strategy Representation Reference Chapter/Section Page Nos. Policy or Paragraph No. Comment/Observation (2017) and the emerging Bradford District Local Plan covering the period 2030 to 2038.</p>			

Work commenced on a Core Strategy Partial Review (CSPR), which reached its Preferred Options stage in July 2019 and was taken into account when preparing this neighbourhood plan, where necessary, and was intending to produce a separate Allocations DPD. Since that point, it was decided to prepare a single Local Plan covering all policy topics and site allocations.

A Preferred Options version of the new Local Plan was published for community and stakeholder consultation in February and March 2021. This included policies setting out the distribution of development, site allocations and potential changes to the Green Belt as well as a Local Area Strategy for Oxenhope. The emerging Local Plan is still in its early stages and is not yet adopted policy. Work will continue on its preparing over the coming years.”

Other references elsewhere in the neighbourhood plan document to the Core Strategy Partial Review and Allocations DPD should also be updated to make reference to the emerging Local Plan.

Full Submission:

Para 1.1.4 - This paragraph (and para. 1.1.5) should be revised to reflect the fact that the CBMDC is now preparing a single Local Plan rather than a Land Allocations Development Plan Document. The following wording should be considered:

“The strategic planning policy background to the Neighbourhood Plan is provided by the adopted CBMDC adopted Core Strategy Representation Reference Chapter/Section Page Nos. Policy or Paragraph No. Comment/Observation (2017) and the emerging Bradford District Local Plan covering the period 2030 to 2038.

Work commenced on a Core Strategy Partial Review (CSPR), which reached its Preferred Options stage in July 2019 and was taken into account when preparing this neighbourhood plan, where necessary, and was intending to produce a separate Allocations DPD. Since that point, it was decided to prepare a single Local Plan covering all policy topics and site allocations.

A Preferred Options version of the new Local Plan was published for community and stakeholder consultation in February and March 2021. This included policies setting out the distribution of development, site allocations and potential changes to the Green Belt as well as a Local Area Strategy for Oxenhope. The emerging Local Plan is still in its early stages and is not yet adopted policy. Work will continue on its preparing over the coming years.”

Other references elsewhere in the neighbourhood plan document to the Core Strategy Partial Review and Allocations DPD should also be updated to make reference to the emerging Local Plan.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
Para 1.1.5 - As noted above. this paragraph should be revised to reflect the fact that CBMDC is now preparing a single Local Plan for the District rather than a partial review of the adopted Core Strategy. The following wording should be considered: “The Neighbourhood Plan covers the period 2021 to 2030.”			
Full Submission:			
Para 1.1.5 - As noted above. this paragraph should be revised to reflect the fact that CBMDC is now preparing a single Local Plan for the District rather than a partial review of the adopted Core Strategy. The following wording should be considered: “The Neighbourhood Plan covers the period 2021 to 2030.”			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
Para 1.5.9 - Typographical error in the text:- remove the word 'the' before 'designations': "This map illustrates some of the environmental the designations".			
Full Submission:			
Para 1.5.9 - Typographical error in the text:- remove the word 'the' before 'designations': "This map illustrates some of the environmental the designations".			

2. SECTION 1.0 INTRODUCTION

Consultation point:	Introduction		
Representation ID:	29893	Comment Type:	Comment
Respondent:	Highways England	Agent:	-
Summary:			
<p>Whilst gratefully received, having now reviewed the documentation on your website (and being mindful of the extensive Local Plan work I have already undertaken with Bradford Council), there is little formal comment to make at this point on behalf of the Secretary of State for Transport, and their primary interests.</p> <p>It remains that the operation of the Strategic Road Network in the locale is remote from Oxenhope. I have reviewed the Neighbourhood Plan document, and taken regard therein of the proposals to increase housing numbers by 25 units, and sustain the current agricultural and tourism based employment market.</p> <p>At this time therefore, I have no evidence to support that the Neighbourhood Plan (as proposed) would have a significant impact to the continued safe operation of the SRN. Highways England will however remain vigilant to the aggregated impact of all local Parish aspirations, when determining our position on the Local Plan for Bradford Council, now, and in the future</p>			
Full Submission:			
<p>Many thanks for the consultation which I received earlier today, regarding the Oxenhope Neighbourhood Plan consultation.</p> <p>Whilst gratefully received, having now reviewed the documentation on your website (and being mindful of the extensive Local Plan work I have already undertaken with Bradford Council), there is little formal comment to make at this point on behalf of the Secretary of State for Transport, and their primary interests.</p> <p>It remains that the operation of the Strategic Road Network in the locale is remote from Oxenhope. I have reviewed the Neighbourhood Plan document, and taken regard therein of the proposals to increase housing numbers by 25 units, and sustain the current agricultural and tourism based employment market.</p> <p>At this time therefore, I have no evidence to support that the Neighbourhood Plan (as proposed) would have a significant impact to the continued safe operation of the SRN. Highways England will however remain vigilant to the aggregated impact of all local Parish aspirations, when determining our position on the Local Plan for Bradford Council, now, and in the future.</p>			

Consultation point:	Introduction		
Representation ID:	29894	Comment Type:	Comment
Respondent:	Natural England	Agent:	-
Summary:			
<p>Natural England is not able to fully assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes or, provide detailed advice on the application. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice.</p> <p>The lack of detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.</p> <p>Generic advice is provided in the full submission.</p>			
Full Submission:			
<p>Natural England is not able to fully assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes or, provide detailed advice on the application. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice.</p> <p>The lack of detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.</p> <p>Generic advice is provided in the Annex attached.</p> <p>All representations : Oxenhope Neighbourhood Development Plan (Regulation 16) July 2021 Page 19 Annex - Generic advice on natural environment impacts and opportunities</p> <p>Sites of Special Scientific Interest (SSSIs)</p> <p>Local authorities have responsibilities for the conservation of SSSIs under s28G of the Wildlife & Countryside Act 1981 (as amended). The National Planning Policy Framework (paragraph 175c) states that development likely to have an adverse effect on SSSIs should not normally be permitted. Natural England’s SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal. Our initial screening indicates that one or more Impact Risk Zones have been triggered by the proposed development, indicating that impacts to SSSIs are possible and further assessment is required. You should request sufficient information from the developer to assess the impacts likely to arise and consider any mitigation measures that may be necessary.</p> <p>Air quality impacts on SSSIs</p> <p>The interest features of affected designated sites may be sensitive to impacts from aerial pollutants, To determine any likely air quality impacts arising from this proposal, an initial screening for air quality impacts should be completed. Simple screening tools are available via the internet, such as the Simple Calculation of Atmospheric Impact Limits (SCAIL) model: http://www.scail.ceh.ac.uk/. The results of this screening should</p>			

inform the need for any further, more detailed assessment which may be required to fully assess the impacts of the proposal.

Biodiversity duty

Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.

Protected Species

Natural England has produced standing advice^[1] to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. The list of priority habitats and species can be found here^[2]. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Protected landscapes

For developments within or within the setting of a National Park or Area of Outstanding Natural Beauty (AONB), we advise you to apply national and local policies, together with local landscape expertise and information to determine the proposal. The National Planning Policy Framework (NPPF) (paragraph 172) provides the highest status of protection for the landscape and scenic beauty of National Parks and AONBs. It also sets out a 'major developments test' to determine whether major developments should be exceptionally be permitted within the designated landscape. We advise you to consult the relevant AONB Partnership or Conservation Board or relevant National Park landscape or other advisor who will have local knowledge and information to assist in the determination of the proposal. The statutory management plan and any local landscape character assessments may also provide valuable information.

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Heritage Coasts are protected under paragraph 173 of the NPPF. Development should be consistent the special character of Heritage Coasts and the importance of its conservation.

Landscape

Paragraph 170 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in GOV.UK guidance. Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further. Guidance on soil protection is available in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.

- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Consultation point:	Introduction		
Representation ID:	29895	Comment Type:	Comment
Respondent:	The Coal Authority	Agent:	-
Summary:			
<p>Our records indicate that within the Oxenhope Neighbourhood Plan area there are recorded coal mining legacy hazards at the surface and shallow depth which may pose a potential risk to public safety and surface stability. These hazards include; mine entries and probable coal workings at shallow depth.</p> <p>However, having reviewed the Neighbourhood Plan it does not appear to propose to allocate any sites for future development and on this basis we have no specific comments to make.</p>			
Full Submission:			
<p>Thank you for your notification received on the 16 July 2021 in respect of the above consultation.</p> <p>Our records indicate that within the Oxenhope Neighbourhood Plan area there are recorded coal mining legacy hazards at the surface and shallow depth which may pose a potential risk to public safety and surface stability. These hazards include; mine entries and probable coal workings at shallow depth.</p> <p>However, having reviewed the Neighbourhood Plan it does not appear to propose to allocate any sites for future development and on this basis we have no specific comments to make</p>			

Consultation point:	Introduction		
Representation ID:	29896	Comment Type:	Comment
Respondent:	Historic England	Agent:	-
Summary:			
We have considered the Submission Draft and do not wish to comment further on the proposed Neighbourhood Plan. We look forward to being notified of the Making of the Neighbourhood Plan, following the Examination and Referendum			
Full Submission:			
<p>Thank you for consulting Historic England on the Submission Draft of the Oxenhope Neighbourhood Plan.</p> <p>We wrote to Oxenhope Parish Council on 10th September 2019, explaining that we did not wish to comment on detail upon their Pre-submission Draft Neighbourhood Plan.</p> <p>We have considered the Submission Draft and do not wish to comment further on the proposed Neighbourhood Plan. We look forward to being notified of the Making of the Neighbourhood Plan, following the Examination and Referendum</p>			

Consultation point:	Introduction		
Representation ID:	29907	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust	Agent:	-
Summary:			
We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.			
Full Submission:			
<p>Thank you for consulting the Trust on the Oxenhope Neighbourhood Plan.</p> <p>Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.</p> <p>we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.</p> <p>In relation to a number of policies, including but not limited to GP1, GP2, GP3, GP4, Gp8, H1, H4 and GS1, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p>			

- Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: <https://www.buildingwithnature.org.uk>. Yorkshire Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to identify nature conservation sites within and adjacent to the plan area, with Policy GS1 being the only consideration of conservation. Policies should include protections for features including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest and Local Wildlife Sites (LWS), of importance including South Pennine Moors, Black Moor, Ives Plantation, Nan Scar Clough, Brow Moor and Sun Hill Clough. This omission downplays the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites – improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species.

Inclusion of these specific designations will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan.

Furthermore, we would be glad to see consideration for improving the connectivity of greenspaces, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme

Consultation point:	Introduction		
Representation ID:	29908	Comment Type:	Comment
Respondent:	National Grid	Agent:	-
Summary:			
National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.			
Full Submission:			
<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p>			

3. SECTION 3.5 AIMS AND OBJECTIVES

Consultation point:	Aims and Objectives		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
Providing a link between the aims and objectives of the plan and its policies is welcomed. It will allow the reader to understand how they relate to one another.			
Full Submission:			
Providing a link between the aims and objectives of the plan and its policies is welcomed. It will allow the reader to understand how they relate to one another.			

4. CHAPTER 4.1 GENERAL POLICIES – POLICY GP1 – HIGH QUALITY DESIGN

Consultation point:	Policy GP1 – High quality design		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
Reference should be made to CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document as well as the adopted Core Strategy.			
Full Submission:			
Reference should be made to CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document as well as the adopted Core Strategy.			

Consultation point:	Policy GP1 – High quality design		
Representation ID:	29899	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust	Agent:	-
Summary:			
<p>We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. • Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit. • Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live. 			
Full Submission:			
<p>Thank you for consulting the Trust on the Oxenhope Neighbourhood Plan.</p> <p>Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust’s principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.</p>			

we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to GP1, GP2, GP3, GP4, Gp8, H1, H4 and GS1, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

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We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to identify nature conservation sites within and adjacent to the plan area, with Policy GS1 being the only consideration of conservation. Policies should include protections for features including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest and Local Wildlife Sites (LWS), of importance including South Pennine Moors, Black Moor, Ives Plantation, Nan Scar Clough, Brow Moor and Sun Hill Clough. This omission downplays the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites – improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species.

Inclusion of these specific designations will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan.

Furthermore, we would be glad to see consideration for improving the connectivity of greenspaces, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme

5. CHAPTER 4.1 GENERAL POLICIES – POLICY GP2 – HERITAGE

Consultation point:	Policy GP2 – Heritage		
Representation ID:	2900	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust	Agent:	-
Summary:			
<p>We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. • Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit. • Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live. 			
Full Submission:			
<p>Thank you for consulting the Trust on the Oxenhope Neighbourhood Plan.</p> <p>Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust’s principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.</p> <p>we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.</p>			

In relation to a number of policies, including but not limited to GP1, GP2, GP3, GP4, Gp8, H1, H4 and GS1, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

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We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to identify nature conservation sites within and adjacent to the plan area, with Policy GS1 being the only consideration of conservation. Policies should include protections for features including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest and Local Wildlife Sites (LWS), of importance including South Pennine Moors, Black Moor, Ives Plantation, Nan Scar Clough, Brow Moor and Sun Hill Clough. This omission downplays the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites – improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species.

Inclusion of these specific designations will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan.

Furthermore, we would be glad to see consideration for improving the connectivity of greenspaces, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme

6. CHAPTER 4.1 GENERAL POLICIES – POLICY GP3 – COMMUNITY FACILITIES

Consultation point:	Policy GP3 – Community facilities		
Representation ID:	29901	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust	Agent:	-
Summary:			
<p>We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. • Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit. • Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live. 			
Full Submission:			
<p>Thank you for consulting the Trust on the Oxenhope Neighbourhood Plan.</p> <p>Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust’s principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.</p> <p>we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.</p>			

In relation to a number of policies, including but not limited to GP1, GP2, GP3, GP4, Gp8, H1, H4 and GS1, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

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The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme

7. CHAPTER 4.1 GENERAL POLICIES – POLICY GP4 – SUSTAINABLE DRAINAGE SYSTEMS (SuDS)

Consultation point:	Policy GP4 – Sustainable Drainage Systems (SuDS)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>Typographical error in the policy justification text. Replace ‘where’ with ‘were’ after SuDS.</p> <p>Reference should be made to CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document (section 2.7) as well as the adopted Core Strategy.</p>			
Full Submission:			
<p>Typographical error in the policy justification text. Replace ‘where’ with ‘were’ after SuDS.</p> <p>Reference should be made to CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document (section 2.7) as well as the adopted Core Strategy.</p>			

Consultation point:	Policy GP4 – Sustainable Drainage Systems (SuDS)		
Representation ID:	29902	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust	Agent:	-
Summary:			
<p>We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. 			

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Full Submission:

Thank you for consulting the Trust on the Oxenhope Neighbourhood Plan.

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The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme

8. CHAPTER 4.1 GENERAL POLICIES – POLICY GP8 – DESIGN AND DEVELOPMENT IN CONSERVATION AREAS

Consultation point:	Policy GP8 – Design and Development in Conservation Areas		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
Supporting text. This policy references CBMDC’s adopted Core Strategy Policy EN2.E (Biodiversity & Geodiversity). This is an error and reference should be made to Policy EN3. Reference should be made to CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document (section 2.7) as well as the adopted Core Strategy. The reference to Policy SC8 should be deleted as this refers to the South Pennine Moors habitat which is not relevant to this policy.			
Full Submission:			
Supporting text. This policy references CBMDC’s adopted Core Strategy Policy EN2.E (Biodiversity & Geodiversity). This is an error and reference should be made to Policy EN3. Reference should be made to CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document (section 2.7) as well as the adopted Core Strategy. The reference to Policy SC8 should be deleted as this refers to the South Pennine Moors habitat which is not relevant to this policy.			

Consultation point:	Policy GP8 – Design and Development in Conservation Areas		
Representation ID:	29903	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust	Agent:	-
Summary:			
<p>We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. • Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit. • Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live. 			
Full Submission:			
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- Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: <https://www.buildingwithnature.org.uk>. Yorkshire Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to identify nature conservation sites within and adjacent to the plan area, with Policy GS1 being the only consideration of conservation. Policies should include protections for features including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest and Local Wildlife Sites (LWS), of importance including South Pennine Moors, Black Moor, Ives Plantation, Nan Scar Clough, Brow Moor and Sun Hill Clough. This omission downplays the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites – improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions. For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species. Inclusion of these specific designations will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan.

Furthermore, we would be glad to see consideration for improving the connectivity of greenspaces, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme

9. CHAPTER 4.2 HOUSING – AIMS AND OBJECTIVES

Consultation point:	Housing Policies – Aims and Objectives		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>The housing section aims and objectives (5th bullet point) refers to out of date housing design guidance, specifically ‘Lifetime Homes’ and ‘Building for Life’ standards. This bullet point could be usefully updated to refer to the latest guidance and the reference to lifetime homes changed to a more general aim for ‘accessible/adaptable homes’ or reference the optional building standards.</p>			
Full Submission:			
<p>The housing section aims and objectives (5th bullet point) refers to out of date housing design guidance, specifically ‘Lifetime Homes’ and ‘Building for Life’ standards. This bullet point could be usefully updated to refer to the latest guidance and the reference to lifetime homes changed to a more general aim for ‘accessible/adaptable homes’ or reference the optional building standards.</p>			

10. CHAPTER 4.2 HOUSING – POLICY H1 - BUILDING FOR A HELATHY LIFE AND LIFETIME HOMES

Consultation point:	Policy H1: Building for a Healthy Life and Lifetime Homes		
Representation ID:	-	Comment Type:	Support
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>It should be noted that Policy H1 refers to ‘Lifetime Homes’ which still exists as a standard but is no longer referred to in national planning guidance or CBMDC’s emerging Local Plan Policy HO9 (these now refer to the broadly comparable Category M4(2) Accessible and Adaptable Dwellings in the Building Regulations).</p> <p>The policy also refers to a minimum score for new schemes to achieve against the principles in Building for a Healthy Life (BHL) – the new BHL has moved away from the scoring system of its previous iteration (Building for Life 12) and is intended to be more of a tool for informing designs and discussions and to easily identify the qualities or deficiencies of schemes.</p> <p>Neither of these points are critical issues, however consideration could be given to updating the references within this policy.</p> <p>CBMDC is satisfied that the overall ambition of the policy is to achieve high quality design which is supported.</p>			
Full Submission:			
<p>It should be noted that Policy H1 refers to ‘Lifetime Homes’ which still exists as a standard but is no longer referred to in national planning guidance or CBMDC’s emerging Local Plan Policy HO9 (these now refer to the broadly comparable Category M4(2) Accessible and Adaptable Dwellings in the Building Regulations).</p> <p>The policy also refers to a minimum score for new schemes to achieve against the principles in Building for a Healthy Life (BHL) – the new BHL has moved away from the scoring system of its previous iteration (Building for Life 12) and is intended to be more of a tool for informing designs and discussions and to easily identify the qualities or deficiencies of schemes.</p>			

Neither of these points are critical issues, however consideration could be given to updating the references within this policy.
 CBMDC is satisfied that the overall ambition of the policy is to achieve high quality design which is supported.

Consultation point:	Policy H1: Building for a Healthy Life and Lifetime Homes		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-

Summary:

As mentioned above, this policy wording refers to Lifetime Homes which still exists as a standard but is no longer referred to in national planning guidance or within the Council’s emerging Local Plan Policy HO9. Reference should ideally be to the broadly comparable Category M4(2) Accessible and Adaptable Dwellings in the Building Regulations.

CBMDC suggest the following amendments to the policy wording:

H1 ~~LIFETIME~~ ACCESSIBLE HOMES AND BUILDING FOR A HEALTHY LIFE

New housing developments are encouraged to meet ~~Lifetime Homes~~ the 'accessible and adaptable dwellings' optional standard M4(2) as set out in the building regulations standards to ensure properties meet the changing needs of occupants throughout their life. Applications for new developments are encouraged to provide an assessment demonstrating how the proposal meets the principles set out in Building for a Healthy Life (or updated Representation Reference Chapter/Section Page Nos. Policy or Paragraph No. Comment/Observation versions). Proposals that meet the commendation threshold of 9 greens out of 12, with no reds, will be supported.

Adopted Core Strategy HO9 should be referred to in the supporting text for the policy. Other relevant policies include Policies SC9 and DS5.

In addition to the Core Strategy, CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document (sections 2.11, 2.17 and 3.2) provides further guidance on this subject. As such this should be referred to within the supporting text of the policy.

Full Submission:

As mentioned above, this policy wording refers to Lifetime Homes which still exists as a standard but is no longer referred to in national planning guidance or within the Council’s emerging Local Plan Policy HO9. Reference should ideally be to the broadly comparable Category M4(2) Accessible and Adaptable Dwellings in the Building Regulations.

CBMDC suggest the following amendments to the policy wording:

H1 ~~LIFETIME~~ ACCESSIBLE HOMES AND BUILDING FOR A HEALTHY LIFE

New housing developments are encouraged to meet ~~Lifetime Homes~~ the 'accessible and adaptable dwellings' optional standard M4(2) as set out in the building regulations standards to ensure properties meet the changing needs of occupants throughout their life. Applications for new developments are encouraged to provide an assessment demonstrating how the proposal meets the principles set out in Building for a Healthy Life (or updated Representation Reference Chapter/Section Page Nos. Policy or Paragraph No. Comment/Observation versions). Proposals that meet the commendation threshold of 9 greens out of 12, with no reds, will be supported.

Adopted Core Strategy HO9 should be referred to in the supporting text for the policy. Other relevant policies include Policies SC9 and DS5.

In addition to the Core Strategy, CBMDC's Homes and Neighbourhoods Design Guide Supplementary Planning Document (sections 2.11, 2.17 and 3.2) provides further guidance on this subject. As such this should be referred to within the supporting text of the policy.

Consultation point:	Policy H1: Building for a Healthy Life and Lifetime Homes		
Representation ID:	-	Comment Type:	Support
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>The Council wishes to note that Policy H1 refers to a minimum score for new schemes to achieve against the principles of Building for a Healthy Life (BHL).</p> <p>The new BHL has moved away from the scoring system of its previous iteration (Building for Life 12) and it is intended to be more of a tool for informing designs and discussions and to easily identify the qualities and deficiencies of schemes.</p> <p>Whilst this is not a critical issue, the overall ambition of this policy to achieve high quality design is supported.</p>			
Full Submission:			
<p>The Council wishes to note that Policy H1 refers to a minimum score for new schemes to achieve against the principles of Building for a Healthy Life (BHL).</p> <p>The new BHL has moved away from the scoring system of its previous iteration (Building for Life 12) and it is intended to be more of a tool for informing designs and discussions and to easily identify the qualities and deficiencies of schemes.</p> <p>Whilst this is not a critical issue, the overall ambition of this policy to achieve high quality design is supported.</p>			

Consultation point:	Policy H1 – Lifetime Homes and Building for a Healthy Life		
Representation ID:	29904	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust	Agent:	-
Summary:			
<p>We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. 			

- Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Full Submission:

Thank you for consulting the Trust on the Oxenhope Neighbourhood Plan.

Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust’s principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to GP1, GP2, GP3, GP4, Gp8, H1, H4 and GS1, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

- Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
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We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to identify nature conservation sites within and adjacent to the plan area, with Policy GS1 being the only consideration of conservation. Policies should include protections for features including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest and Local Wildlife Sites (LWS), of importance including South Pennine Moors, Black Moor, Ives Plantation, Nan Scar Clough, Brow Moor and Sun Hill Clough. This omission downplays the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major

national asset, essential to nature’s recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites – improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions. For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature’s recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country’s remaining high quality natural habitat and threatened species. Inclusion of these specific designations will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan.

Furthermore, we would be glad to see consideration for improving the connectivity of greenspaces, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme

11. CHAPTER 4.2 HOUSING – POLICY H2 – BUILDING PERFORMANCE

Consultation point:	Policy H2: Building Performance		
Representation ID:	-	Comment Type:	Support
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>The inclusion of this policy is welcomed.</p> <p>In addition to the Core Strategy, CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document (section 3.9) provides further guidance on energy efficient in new residential development. As such this should be referred to within the supporting text of the policy.</p> <p>Consideration should also be given to the outcome of the Government’s consultation Future Homes Standard, which will result in changes to the Parts F and L of the Building Regulations.</p>			
Full Submission:			
<p>The inclusion of this policy is welcomed.</p> <p>In addition to the Core Strategy, CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document (section 3.9) provides further guidance on energy efficient in new residential development. As such this should be referred to within the supporting text of the policy.</p> <p>Consideration should also be given to the outcome of the Government’s consultation Future Homes Standard, which will result in changes to the Parts F and L of the Building Regulations.</p>			

12. CHAPTER 4.2 HOUSING – POLICY H4 – GREEN INFRASTRUCTURE

Consultation point:	Policy H4: Green Infrastructure		
Representation ID:	-	Comment Type:	Support
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>In terms of specific policy, the natural environment appears to be subsumed within policy H4 Green Infrastructure – which relates to new development and the need to protect and enhance biodiversity/green infrastructure.</p> <p>The specific inclusion of biodiversity net-gain within this policy is welcomed. It is worth noting that, as the Environment Bill progresses through Parliament and ultimately becomes law (as seems likely later this year) – the need to provide biodiversity net gain on developments will become mandatory. This policy may therefore need amending from - developments “should seek to achieve net-gain” to “must achieve net-gain”.</p>			
Full Submission:			
<p>In terms of specific policy, the natural environment appears to be subsumed within policy H4 Green Infrastructure – which relates to new development and the need to protect and enhance biodiversity/green infrastructure.</p> <p>The specific inclusion of biodiversity net-gain within this policy is welcomed. It is worth noting that, as the Environment Bill progresses through Parliament and ultimately becomes law (as seems likely later this year) – the need to provide biodiversity net gain on developments will become mandatory. This policy may therefore need amending from - developments “should seek to achieve net-gain” to “must achieve net-gain”.</p>			

Consultation point:	Policy H4: Green Infrastructure		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>The second paragraph of the policy states: “The design and management should respect and...” The policy wording could usefully clarify as to whether reference is being made to the design and management of housing or green infrastructure which is to be provided.</p>			
Full Submission:			
<p>The second paragraph of the policy states: “The design and management should respect and...” The policy wording could usefully clarify as to whether reference is being made to the design and management of housing or green infrastructure which is to be provided.</p>			

Consultation point:	Policy H4: Green Infrastructure		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>Typographical errors within the policy justification text:</p> <ol style="list-style-type: none"> 1. Replace 'responses' with 'response'. 2. Insert 'Wildlife' after 'Bradford' 			
Full Submission:			
<p>Typographical errors within the policy justification text:</p> <ol style="list-style-type: none"> 1. Replace 'responses' with 'response'. 2. Insert 'Wildlife' after 'Bradford' 			

Consultation point:	Policy H4 – Green Infrastructure		
Representation ID:	29905	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust	Agent:	-
Summary:			
<p>We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. • Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit. • Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live. 			
Full Submission:			
<p>Thank you for consulting the Trust on the Oxenhope Neighbourhood Plan.</p> <p>Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.</p>			

we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to GP1, GP2, GP3, GP4, Gp8, H1, H4 and GS1, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

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For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species.

Inclusion of these specific designations will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan.

Furthermore, we would be glad to see consideration for improving the connectivity of greenspaces, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme

13. CHAPTER 4.3 LOCAL ECONOMIC DEVELOPMENT – POLICY ED1 – RETENTION OF BUILDING FOR ECONOMIC USE

Consultation point:	Policy ED1: Retention of building for economic use		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>It is noted that this policies states that support will be given to proposals that retain Pawson’s Mill for non-residential uses and encourages it continued use for economic activities.</p> <p>The term “non-residential uses” covers a wide ranges of uses/activities. If the aim of the policy is to safeguard it for employment/economic development purposes this should be clear.</p> <p>Furthermore, a degree of flexibility should be included setting out those circumstances under which the change of use/loss of any of the sites/premises listed will be permitted. This would be more consistent with Core Strategy EC4.</p>			
Full Submission:			
<p>It is noted that this policies states that support will be given to proposals that retain Pawson’s Mill for non-residential uses and encourages it continued use for economic activities.</p> <p>The term “non-residential uses” covers a wide ranges of uses/activities. If the aim of the policy is to safeguard it for employment/economic development purposes this should be clear.</p> <p>Furthermore, a degree of flexibility should be included setting out those circumstances under which the change of use/loss of any of the sites/premises listed will be permitted. This would be more consistent with Core Strategy EC4.</p>			

14. CHAPTER 4.4 LOCAL GREEN SPACES – POLICY GS1 – LOCAL GREEN SPACES

Consultation point:	Policy GS1: Local Green Spaces		
Representation ID:	-	Comment Type:	Support
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
The inclusion of a Local Green Space policy within the Neighbourhood Plan is welcomed and supported.			

It is noted that the strategic policy reference to NPPF paragraph 100 has changed within NPPF 2021 to paragraph 102. It is recommended that the text is updated to refer to the version of the NPPF quoted.

Full Submission:

The inclusion of a Local Green Space policy within the Neighbourhood Plan is welcomed and supported. It is noted that the strategic policy reference to NPPF paragraph 100 has changed within NPPF 2021 to paragraph 102. It is recommended that the text is updated to refer to the version of the NPPF quoted.

Consultation point:	Policy GS1 – Local Green Spaces		
Representation ID:	29898	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust	Agent:	-

Summary:

The plan fails to identify nature conservation sites within and adjacent to the plan area, with Policy GS1 being the only consideration of conservation. Policies should include protections for features including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest and Local Wildlife Sites (LWS), of importance including South Pennine Moors, Black Moor, Ives Plantation, Nan Scar Clough, Brow Moor and Sun Hill Clough. This omission downplays the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature’s recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites – improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature’s recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country’s remaining high quality natural habitat and threatened species.

Inclusion of these specific designations will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan.

Furthermore, we would be glad to see consideration for improving the connectivity of greenspaces, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Full Submission:

Thank you for consulting the Trust on the Oxenhope Neighbourhood Plan. Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which

work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to GP1, GP2, GP3, GP4, Gp8, H1, H4 and GS1, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

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- Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: <https://www.buildingwithnature.org.uk>. Yorkshire Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to identify nature conservation sites within and adjacent to the plan area, with Policy GS1 being the only consideration of conservation. Policies should include protections for features including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest and Local Wildlife Sites (LWS), of importance including South Pennine Moors, Black Moor, Ives Plantation, Nan Scar Clough, Brow Moor and Sun Hill Clough. This omission downplays the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites – improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and

select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country’s remaining high quality natural habitat and threatened species.

Inclusion of these specific designations will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan.

Furthermore, we would be glad to see consideration for improving the connectivity of greenspaces, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme

Consultation point:	Policy GS1 – Local Green Spaces		
Representation ID:	29906	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust	Agent:	-

Summary:

We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

- Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Full Submission:

Thank you for consulting the Trust on the Oxenhope Neighbourhood Plan.

Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust’s principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to GP1, GP2, GP3, GP4, Gp8, H1, H4 and GS1, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

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- Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: <https://www.buildingwithnature.org.uk>. Yorkshire Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to identify nature conservation sites within and adjacent to the plan area, with Policy GS1 being the only consideration of conservation. Policies should include protections for features including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest and Local Wildlife Sites (LWS), of importance including South Pennine Moors, Black Moor, Ives Plantation, Nan Scar Clough, Brow Moor and Sun Hill Clough. This omission downplays the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites – improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species.

Inclusion of these specific designations will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan.

Furthermore, we would be glad to see consideration for improving the connectivity of greenspaces, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme

15. CHAPTER 4.5 MOVEMENT AND TRAVEL - POLICY MT1 – RESIDENTIAL PARKING

Consultation point:	Policy MT1: Residential Parking		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
<p>It is noted that the policy refers to “CBMDC Core Strategy TR2 and parking standards”. It should also refer to Core Strategy Policy DS4 and Appendix 4.</p> <p>In addition to the Core Strategy, CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document (section 2.15) provides further guidance on residential parking. As such this should be referred to within the supporting text of the policy.</p> <p>CBMDC in its preparation of the emerging Local Plan (Preferred Options, 2021) have proposed updates the parking policy (now TR5 and Appendix 7) which reflects more recent iterations of PPG 13 (2019) and in response to the Climate Change Emergency.</p>			
Full Submission:			
<p>It is noted that the policy refers to “CBMDC Core Strategy TR2 and parking standards”. It should also refer to Core Strategy Policy DS4 and Appendix 4.</p> <p>In addition to the Core Strategy, CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document (section 2.15) provides further guidance on residential parking. As such this should be referred to within the supporting text of the policy.</p> <p>CBMDC in its preparation of the emerging Local Plan (Preferred Options, 2021) have proposed updates the parking policy (now TR5 and Appendix 7) which reflects more recent iterations of PPG 13 (2019) and in response to the Climate Change Emergency.</p>			

16. CHAPTER 4.5 MOVEMENT AND TRAVEL - POLICY MT2 – FOOTPATHS AND CYCLE NETWORK

Consultation point:	Policy MT2: Footpaths and cycle network		
Representation ID:	-	Comment Type:	Support
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
This policy is welcomed and supported.			
Full Submission:			
This policy is welcomed and supported.			

17. CHAPTER 4.5 MOVEMENT AND TRAVEL – POLICY MT3 – NON-RESIDENTIAL PARKING

Consultation point:	Policy MT3: Non-residential parking		
Representation ID:	-	Comment Type:	Support
Respondent:	City of Bradford MDC	Agent:	-
The trust of this policy is supported, however plan makers should consider how to better control on-street parking. For example, would a Controlled Parking Zone type intervention be supported.			
Full Submission:			
The trust of this policy is supported, however plan makers should consider how to better control on-street parking. For example, would a Controlled Parking Zone type intervention be supported.			

18. CHAPTER 5 MONITORING

Consultation point:	Monitoring		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
During earlier stages of plan making CBMDC recommended the Neighbourhood Plan included a section on monitoring. Whilst this has now been included within the Submission Draft no indicators have been provided to set out how the plans effectiveness can and will be monitored.			
Full Submission:			
During earlier stages of plan making CBMDC recommended the Neighbourhood Plan included a section on monitoring. Whilst this has now been included within the Submission Draft no indicators have been provided to set out how the plans effectiveness can and will be monitored.			

19. CHAPTER 6.0 APPENDIX

Consultation point:	Appendix 1: Non Designated Historic Assets		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
There is thorough content on Non-Designated Heritage Assets (NDHAs) within Appendix 1 including assessment criteria and individual evaluation summaries.			
It is however noted that the chosen NDHAs examples are almost totally within the built areas and Conservation Areas within Oxenhope, with almost nothing from the further extremes of the Neighbourhood Plan area such as outlying farms and barns. Also, nothing with regard to more diverse items such as reservoir structures and valve towers (important in Oxenhope at Leeming and Leeshaw), the locally distinctive iron field gates			

recognised in the Representation Reference Chapter/Section Page Nos. Policy or Paragraph No. Comment/Observation first Local Design Guide, post boxes etc. which may have been worthy of a note.

Full Submission:

There is thorough content on Non-Designated Heritage Assets (NDHAs) within Appendix 1 including assessment criteria and individual evaluation summaries.

It is however noted that the chosen NDHAs examples are almost totally within the built areas and Conservation Areas within Oxenhope, with almost nothing from the further extremes of the Neighbourhood Plan area such as outlying farms and barns. Also, nothing with regard to more diverse items such as reservoir structures and valve towers (important in Oxenhope at Leeming and Leeshaw), the locally distinctive iron field gates recognised in the Representation Reference Chapter/Section Page Nos. Policy or Paragraph No. Comment/Observation first Local Design Guide, post boxes etc. which may have been worthy of a note.

Consultation point:	Appendix 2: Local Green Space Assessment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
The NPPF paragraph reference has changed within the newly revised NPPF; change is required to either change the reference or acknowledge the old version of the NPPF. The first bold sentence should be revised as appropriate.			
Full Submission:			
The NPPF paragraph reference has changed within the newly revised NPPF; change is required to either change the reference or acknowledge the old version of the NPPF. The first bold sentence should be revised as appropriate.			

20. OXENHOPE NDP – DESIGN GUIDE

Consultation point:	Design Guide		
Representation ID:	-	Comment Type:	Support
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
The Design Guide supports many of the principles in the Council’s Homes and Neighbourhoods Design Guide SPD and also the new National Model Design Code, and appears to be quite a practical, easy to use document which could be applied to informing and assessing the design of development proposals. The Oxenhope Neighbourhood Plan Design Guide is supported.			
Full Submission:			
The Design Guide supports many of the principles in the Council’s Homes and Neighbourhoods Design Guide SPD and also the new National Model Design Code, and appears to be quite a practical, easy to use document which could be applied to informing and assessing the design of development proposals. The Oxenhope Neighbourhood Plan Design Guide is supported.			

Consultation point:	Design Guide		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>The Oxenhope Design Guide as a whole would benefit from providing consistent paragraph numbering. This will allow readers and users of the document to accurately reference relevant parts of it.</p> <p>The Design Guide is presented as Section 7 (of the ONDP). Consideration should be given as to whether a clear demarcation is included to present as a separate document to the neighbourhood plan.</p>			
Full Submission:			
<p>The Oxenhope Design Guide as a whole would benefit from providing consistent paragraph numbering. This will allow readers and users of the document to accurately reference relevant parts of it.</p> <p>The Design Guide is presented as Section 7 (of the ONDP). Consideration should be given as to whether a clear demarcation is included to present as a separate document to the neighbourhood plan.</p>			

Consultation point:	Design Guide - Introduction		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>It is noted that a number of the paragraphs refer to the document as being a “Handbook”. It is suggested that these references should be amended to “Guidance”.</p> <p>In addition, it is suggested that reference should be included to the Neighbourhood Plan and Design Guide building on the wider strategic national and local planning policy set out in the adopted development plan and Homes & Neighbourhoods SPD</p>			
Full Submission:			
<p>It is noted that a number of the paragraphs refer to the document as being a “Handbook”. It is suggested that these references should be amended to “Guidance”.</p> <p>In addition, it is suggested that reference should be included to the Neighbourhood Plan and Design Guide building on the wider strategic national and local planning policy set out in the adopted development plan and Homes & Neighbourhoods SPD</p>			

Consultation point:	Design Guide - Section 3.2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>It is agreed that Sustrans documents should be used as a template when designing new routes (as well as considering District Council requirements) but any design considerations affecting public rights of way (i.e. footpaths or bridleways) should be a minimum width of 2.4 m for bridleways (including routes used by cyclists)</p>			

with 3m+ being preferred. For footpaths anything that's new should be a minimum width of 2m (if bounded by a wall/hedge etc.) but we could accept slightly less (1.8) if the path remains open on both side.

Full Submission:

It is agreed that Sustrans documents should be used as a template when designing new routes (as well as considering District Council requirements) but any design considerations affecting public rights of way (i.e. footpaths or bridleways) should be a minimum width of 2.4 m for bridleways (including routes used by cyclists) with 3m+ being preferred. For footpaths anything that's new should be a minimum width of 2m (if bounded by a wall/hedge etc.) but we could accept slightly less (1.8) if the path remains open on both side.

Consultation point:	Design Guide - Section 5.3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
Final Bullet Point. See previous comments in respect of Lifetime Homes and accessible/adaptable homes.			
Full Submission:			
Final Bullet Point. See previous comments in respect of Lifetime Homes and accessible/adaptable homes.			