

OXENHOPE NEIGHBOURHOOD DEVELOPMENT PLAN (2021 TO 2030) COMMENTS FORM (JULY 2021)

The Oxenhope Neighbourhood Development Plan has been submitted to City of Bradford Metropolitan District Council (CBMDC). The Council is now required to consult on the plan for a period of 6 weeks. The Plan and supporting documents are available to view electronically at: www.bradford.gov.uk/consultations as well on the Council's Opus Consult portal: <https://bradford.oc2.uk/>. Hard copies are available to inspect during normal opening hours at:

- CBMDC Customer Service Centre, Britannia House, Hall Ings, Bradford, BD1 1HX
- City Library, Centenary Square, Bradford, BD1 1SD
- Keighley Library (Local Studies), North Street, Keighley BD21 3SX
- Keighley Town Hall, Bow Street, Keighley, BD21 3PA

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

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

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

The consultation period starts on **Friday 16th July** and closes at 5pm on **Friday 10th September 2021**.

How to submit your comments

Comments can be submitted via the following:

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

Completing the Comments Form

There are two parts to this form:

- Part A: Personal/Agent Details
- Part B: For Comment

Contact Details:

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

- **Telephone:** 01247 433679
- **Email:** planning.policy@bradford.gov.uk
- **Address:** Local Plan Team, City of Bradford Metropolitan District Council, 4th Floor, Britannia House, Hall Ings, Bradford, BD1 1HX

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

NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012
REGULATION 16: PUBLICISING A PLAN PROPOSAL
OXENHOPE NEIGHBOURHOOD DEVELOPMENT PLAN (2020 TO 2030)
COMMENT FORM

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

PART A: PERSONAL DETAILS

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

You and/or your appointed agent (if relevant) can request to be notified once City of Bradford Metropolitan District Council has decided to “make” the Ilkley Neighbourhood Development Plan, following the Independent Examination and local referendum. This decision is the final statutory stage in adopting the Neighbourhood Development Plan. Please indicate below whether or not you wish to be notified.

1. PERSONAL / AGENT DETAILS		
	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title		
Full Name		
Job Title (where relevant)		
Organisation (where relevant)	Local Plans Team, City of Bradford Metropolitan District Council	
Address		
Post Code		
Email Address		
Telephone Number		

2. FUTURE NOTIFICATION

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

Yes

No

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

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PART B – YOUR COMMENTS

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

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

4. To which part of the document does your comment relate?					
Whole document	See Attachment	Section	See Attachment	Policy	See Attachment
Page Number		Paragraph			

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

6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.	
<p>City of Bradford Metropolitan District Council has a number of comments/observations on the draft Oxenhope Neighbourhood Development Plan. These centre on matters of presentation, typographical amendments, policy content and areas where further clarification is sought. These are detailed on the attached grid.</p>	

7. Signature:		Date:	10.09.21
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Oxenhope Neighbourhood Development Plan
Regulation 16 Consultation (July to September 2021)
City of Bradford Metropolitan District Council Comments/Observations

Representation Reference	Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
	General comment	-	-	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. The numbering of the figures should be updated.
	General comment	-	-	References in the plan to the National Planning Policy Framework (NPPF) should be checked/clarified as the 2021 version has now been published.
	General comment	-	-	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.
	General comment (Appendix)	72 to end	-	The plan as a whole would benefit from continuous page numbering which extends into and through the appendix section for ease of referencing.
	General comment	-	-	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.
	General comment	-	-	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. It is noted that many of the comments provided previously have been addressed.
	General comment	4	Contents Page	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. 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.
	General comment	6	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)".
	General comment	6	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: <i>"The strategic planning policy background to the Neighbourhood Plan is provided by the adopted CBMDC adopted Core Strategy</i>

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				<p>(2017) and the emerging Bradford District Local Plan covering the period 2030 to 2038.</p> <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.</p> <p>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.”</p> <p>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.</p>
	General comment	6	1.1.5	<p>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:</p> <p><i>“The Neighbourhood Plan covers the period 2021 to 2030.”</i></p>
	General comment	20	1.5.9	<p>Typographical error in the text:- remove the word ‘the’ before ‘designations’: <i>“This map illustrates some of the environmental the designations”</i>.</p>
	Section 1.6 (Introduction) Public Rights of Way	22		<p>Section 1.6 shows the local public rights of way network. In addition to these networks, the moors around Oxenhope and included within the Neighbourhood Plan area boundary are designated as “open country” under the Countryside and Rights of Way Act 2000 – and therefore the public enjoy a “right to roam” on foot, which is a valuable local asset over and above the statutory public rights of way network – these moors form a significant proportion of the Neighbourhood Plan area.</p> <p>Locally, there are promoted recreational walks in the area (Calder Aire Link, Millennium Way, Railway Children’s Walk etc) as well as various ‘Permissive’ paths (on Yorkshire Water Land) that can also be used and should be referred to within the Plan.</p> <p>It would be beneficial for the neighbourhood plan to reference these additional rights of way features.</p>
	Section 3.5 (Aims & Objectives)	38 & 39	Aims & Objectives	<p>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.</p>
	Section 4.1 (General Policies)	42	Policy GP1	<p>Reference should be made to CBMDC’s Homes and Neighbourhoods Design Guide Supplementary Planning Document as well as the adopted Core Strategy.</p>
	Section 4.1 (General Policies)	49	Policy GP4	<p>Typographical error in the policy justification text. Replace ‘where’ with ‘were’ after SuDS.</p>

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				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.
	Section 4.1 (General Policies)	52	Policy GP8: 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.
	Section 4.2 (Housing Policies)	54	Aims & Objectives	The housing section aims and objectives (5 th 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.
	Section 4.2 (Housing Policies)	55	Policy H1	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). 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. 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.
	Section 4.2 (Housing Policies)	55	Policy H1	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 <i>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</i>

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				<p>versions). Proposals that meet the commendation threshold of 9 greens out of 12, with no reds, will be supported.</p> <p>Adopted Core Strategy HO9 should be referred to in the supporting text for the policy. Other relevant policies include Policies SC9 and DS5</p> <p>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.</p>
	Section 4.2	55	Policy H1	<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>
	Section 4.2 (Housing Policies)	55	Policy H2	<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>
	Section 4.2 (Housing Policies)	56	Policy H4	<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>
	Section 4.2 (Housing Policies)	56	Policy H4	<p>The second paragraph of the policy states: <i>“The design and management should respect and...”</i></p> <p>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>
	Section 4.2 (Housing Policies)	56	Policy H4 – supporting text	<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'.

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	Section 4.3 (Local Economic Development Policies)	59	Policy ED1	<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>
	Section 4.4 (Local Green Space Policy)	64	Policy GS1	<p>The inclusion of a Local Green Space policy within the Neighbourhood Plan is welcomed and supported.</p> <p>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.</p>
	Section 4.5 (Movement & Transport)	67	Policy MT1	<p>It is noted that the policy refers to “<i>CBMDC Core Strategy TR2 and parking standards</i>”. 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>
	Section 4.5 (Movement & Transport)	68	Policy MT2	This policy is welcomed and supported.
	Section 4.5 (Movement & Transport)	68	Policy MT3	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.
	Monitoring	70	-	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.
	Appendix 1 – Non-Designated Historic Assets	73	-	<p>There is thorough content on Non-Designated Heritage Assets (NDHAs) within Appendix 1 including assessment criteria and individual evaluation summaries.</p> <p>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</p>

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				first Local Design Guide, post boxes etc. which may have been worthy of a note.
	Appendix 2 – Local Green Space Assessment	98	-	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.
	Oxenhope Design Guide	-	-	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.
	Oxenhope Design Guide	-	-	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. 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.
	Oxenhope Design Guide	3	Introduction/ Design Guidance	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". 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.
	Oxenhope Design Guide	28	Section 3.2	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.
	Oxenhope Design Guide	45	Section 5.3 Final Bullet Point	See previous comments in respect of Lifetime Homes and accessible/adaptable homes.