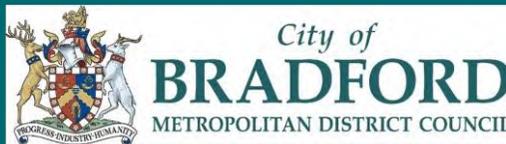


Wilsden Neighbourhood Development Plan

REGULATION 16 CONSULTATION (FEBRUARY/MARCH 2024)

SUMMARY OF REPRESENTATIONS RECEIVED



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1. GENERAL COMMENTS

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	National Highways	Agent:	-

Summary:

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Full Submission:

Having reviewed the documentation via the links provided (and being mindful of the extensive Local Plan work we already undertake with the team), there is little formal comment to make at this point on behalf of the Secretary of State for Transport, and their primary interests.

It remains that any planned development already identified in the wider LP consultations for Bradford Council will have been accounted for in the consultations between National Highways and yourselves, and that the council has our extant comments for the current LP. This will obviously extend forward to the next plan period and the work we will be undertaking together and should include for all the local parish council's own aspirations to be outlined in the neighbourhood plan documents you will receive. Should new developments be publicly forthcoming (which sit outside of the existing LP settlement plans i.e. new housing or employment sites), we would look to review these with the Council in the usual manner, and any supporting mitigation they may require.

The current consultation shows the wider aspirations of the neighbourhood plan in a positive light, and this is welcomed. The proximity of the SRN under my own jurisdiction extends from a distance more to the south east, namely the M606 and M62 corridors. As with all development within the Council boundary, it is expected that the aggregated impact of all neighbourhood plans will link to the growing congestion and impacts on the SRN which the Council will need to continue to address in their wider IDP proposal, to ensure a sound local plan infrastructure offering. At this time therefore, I will continue my work with yourselves to identify any specific sites which may have a significant impact to the continued safe operation of the Strategic Road Network, and furthermore ensure the Council then continues to ensure financial contributions are collected from developers to provide any necessary mitigation on the SRN.

National Highways will remain vigilant to the aggregated impact of all Local Parish Council aspirations, when determining our position on the Local Plan for Bradford and the cyclical PINs reviews of this, now, and in the future.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	Sport England	Agent:	-

Summary:

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Full Submission:

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document - https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded - https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 103 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work - <http://www.sportengland.org/planningtoolsandguidance>.

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes - <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England’s Active Design Guidance: <https://www.sportengland.org/activedesign>

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	Historic England	Agent:	-

Summary:

Full Submission:

When we were consulted upon the Pre-submission Draft of the Neighbourhood Plan, we gave detailed advice in our letter of 25th July 2017 and chose not to offer further advice in in our letter of 14th March 2023, in response to the second Pre-submission consultation. We do not therefore wish to provide further comments in detail upon the draft Neighbourhood Plan, at this stage.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	National Grid Electricity Transmission	Agent:	Avison Young

Summary:

-

Full Submission:

About National Grid Electricity Transmission

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, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (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. NGV is separate from National Grid’s core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure. NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below – www.nationalgrid.com/uk/services/land-and-development/planning-authority/shapefiles/

Please also see attached information outlining guidance on development close to NGET infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk

Further Advice

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	National Gas Transmission	Agent:	Avison Young

Summary:
-
Full Submission:
<p>About National Gas Transmission</p> <p>National Gas Transmission 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>Proposed sites crossed or in close proximity to National Gas Transmission assets:</p> <p>An assessment has been carried out with respect to National Gas Transmission’s assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area. National Gas Transmission provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> • https://www.nationalgas.com/land-and-assets/network-route-maps <p>Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.</p> <p>Distribution Networks</p> <p>Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com</p> <p>Further Advice</p> <p>Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.</p>

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Objection
Respondent:	Wain Estates	Agent:	Avison Young

Summary:

These representations have been submitted by Avison Young, on behalf of Wain Estates, to the Wilsden Neighbourhood Plan Regulation 16 Consultation and relate to Wain Estate’s interest in land to the south of Birkshead Drive, Wilsden, Bradford.

Wain Estates strongly believe that the site should be released from the Green Belt and included within the Neighbourhood Plan as a ‘possible option for change’ allowing for its release from the Green Belt in the emerging Local Plan. The site is a logical and sustainable site which would be able to meet the relevant key objectives of both the WNDP and CBMDC’s Local Plan and provide high quality development on land adjacent to the existing settlement of Wilsden.

Full Submission:

These representations have been prepared by Avison Young (‘AY’) on behalf of Wain Estates and refer to land south of Birkshead Drive, Wilsden, Bradford (‘the site’) as shown on the red edge plan at Appendix I. The site does not currently benefit from an allocation for development within the Reg 16 Wilsden Neighbourhood Development Plan (‘WNDP’) and is therefore proposed to remain within the Green Belt. It is therefore our intention to demonstrate through these representations that the site is suitable for Green Belt release and to promote the site for residential development within the emerging Local Plan period.

It is important to acknowledge that the WNDP is being prepared simultaneously with the City of Bradford Metropolitan District Council (CBMDC)’s new Local Plan which the Council is currently preparing its Regulation 19 stage draft. Both the Local Plan and WNDP once adopted will form the Development Plan against which planning decisions will need to take account of. For this reason, it is highly important that the policies across both align, particularly in this instance on matters relating to the Green Belt and housing need. This is acknowledged by Wilsden Parish Council in the WNDP. We therefore request that the site is included as a ‘possible option for change’ within the WNDP. This will allow the site to be fully assessed for potential Green Belt release and allocated for residential purposes should it be deemed to be a suitable site.

Site Context

The site is approximately 10.87 hectares in size and is located to the southeast of Wilsden Village settlement boundary as shown in Figure 1. It lies to the south of Birkshead Drive, to the east of residential properties along Low Wood and bisected by Shay Lane which runs north to south. There is also a public footpath which runs north to south through the western parcel of land connecting Birkshead Drive with Haworth Road (B6144). A public footpath also runs along the northern boundary of the site.

To the north of the site is the Birkshead Special Character Area. This small group of terrace housing which is thought to pre-date the 1800s falls within the Green Belt but does not form part of the site promoted for release.

The site is mostly green fields divided by dry-stone walls with a limited tree coverage, dry-stone walls also form the site’s boundaries to the adjoining main roads. It slopes slightly north to south and west to east. It is not located within an area at risk of flooding. Approximately 50 metres to the southeast of the

site, across Shay Lane to the south of Salter Royd Equestrian Centre is a “late prehistoric enclosed settlement” which is a scheduled monument as listed under the Ancient Monuments and Archaeological Areas Act 1979.

Green Belt Release

Chapter 13 of the National Planning Policy Framework (NPPF, 2023) relates to Green Belt and states that ‘authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process’ (paragraph 145).

Paragraph 146 states that ‘before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph (145) and whether the strategy:

- a) Makes as much use as possible of suitable brownfield sites and underutilised land;
- b) Optimises the density of development in line with policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.’

As the WNDP is being prepared within a similar timeframe to the CBMDC emerging Local Plan, it has utilised much of the background evidence and research undertaken by the Council to inform the WNDP. Part of the Reg. 18 Draft published by CBMDC has included an assessment and proposed amendments to the Green Belt. This assessment has referenced the same requirements of the NPPF. Their findings state that in order to meet the proposed housing requirements for the

District, as set out in draft Policy SP8 (Housing Growth), they cannot meet the provision for ‘at least’ 27,672 dwellings over the plan period 2020-38 on brownfield land alone. Paragraphs 3.5.4 – 3.5.7 of the CBMDC Reg. 18 draft sets out how the Council has addressed the three criteria above and from their assessment, this has resulted in a requirement for Green Belt release across the District. A summary of this is set out below:

- a) A brownfield land supply assessment has been completed and found that the sum total of maximum development on existing brownfield sites would still fall around 5,000 units short of the identified housing requirements.
- b) The CBMDC assessment of non-Green Belt land capacity takes consideration of density levels compliant with draft Policy HO2, with a significant uplift in urban locations well served by public transport, where this would not have unacceptable adverse consequences. The Local Plan features a very significant focus upon brownfield land redevelopment and regeneration with a strong emphasis on growth within Bradford City Centre and Keighley. However, the possible supply number still falls significantly short of the required housing requirements.
- c) CBMDC have undertaken discussions with neighbouring authorities through the Duty to Co-operate. These discussions have concluded that no adjacent authorities are able to make a contribution towards meeting the District’s remaining housing need.

CBMDC has therefore demonstrated that in order to meet its development needs, exceptional circumstances exist for Green Belt release. The Local Plan's proposed housing requirement will ensure that sufficient homes are provided to support the planned level of economic growth, but this can only be achieved with the release of Green Belt land. In view of the above and despite maximising the capacity of the existing urban area, if Bradford is to meet its housing requirement, it can only do so through the release of Green Belt land to provide for approximately 5,000 new homes. From the information which is available online, it does not appear as though Wilsden Parish Council have prepared their own Green Belt assessment as part of the WNDP preparations.

In terms of how this directly effects Wilsden and the WNDP, draft Policy SP8 of the emerging Local Plan provides details of the Council's preferred distribution of housing growth. For Wilsden, a Local Service Centre, its minimum requirement is 125 new homes over the plan period. Part F of the draft policy states 'the Council will support proposals within Neighbourhood Plans which seek to provide for additional housing development over and above the levels indicated within this policy providing this additional growth can be achieved in a sustainable way'.

Further to the requirements of emerging Local Plan draft Policy SP8, Section 5.27 is specific to Wilsden and confirms its settlement boundary will need to be reviewed to release Green Belt land for residential development to meet this minimum targets.

Wain Estates strongly agree with CBMDC that exceptional circumstances to justify the release of Green Belt land for development exist in line with paragraph 146 of the NPPF. Wain Estates are also strongly supportive of the acknowledgement by Wilsden Parish Council that Green Belt release is necessary to meet housing requirements over the emerging Local Plan period, which is reflected in the draft WNDP.

Location of Green Belt Release

The WNDP shows a commitment to support new residential development as part of the Local Plan. The WNDP also acknowledges that land for future housing development within the existing Wilsden settlement boundary is extremely limited (paragraph 2.2.2).

The Local Plan identifies two sites in Wilsden for possible Green Belt release: WI2/H (Crack Lane) and WI3/H (Moorside Farm). Collectively these site's according to the CBMDC could deliver 120 dwellings. This is acknowledged in the WNDP in Figure 3, but it is not included within the proposed Policies Map. Paragraph 2.3.1 states 'this Neighbourhood Plan did consider allocating land to meet this housing requirement but ultimately determined not to do so'. Wain Estates is supportive of the WNDP acknowledging the need to identify suitable land for Green Belt release.

The site which we are promoting was appraised for potential Green Belt release as part of the CBMDC Local Plan preparation and is included in their evidence base (Green Belt Assessment 3.27, site ref: WI/006). With regards to CBMDC's appraisal of the site (WI/006) it was concluded that it makes a "moderate" contribution to the five purposes of the Green Belt. This was the same overall finding for sites WI2/H and WI3/H, which were both assessed as making a "moderate" contribution.

In matter of fact, of the eight Green Belt sites which were appraised, only three were assessed as being "moderate" with the remainder concluded to make a "major" contribution. No sites were identified as making a "weak" contribution.

We have undertaken our own assessment of the site against the five purposes of the Green Belt as set out in the NPPF (paragraph 143).

- a) ‘To check the unrestricted sprawl of large built-up areas’ – we agree with the CBMDC assessment that there is no contribution to this purpose as the site does not adjoin the defined large built-up area.
- b) ‘To prevent neighbouring towns merging into one another’ – we agree with the CBMDC assessment that the site makes a “low” contribution towards this purpose as there is no second settlement in close proximity to the site.
- c) ‘To assist in safeguarding the countryside from encroachment’ – the CBMDC suggests the site makes a “major” contribution to this purpose. We would disagree with this assessment and consider it makes only a “moderate” contribution due to the existing surrounding built environment. Although the site is undeveloped, there is built development to the north and west, further south and to both the northeast and southeast corners, meaning the site is never viewed in isolation from built development.
- d) ‘To preserve the setting and special character of historic towns’ – the CBMDC consider the site makes a “moderate” contribution to this purpose. However, on reflection of the heritage assets identified within the WNDP, particularly the historic town of Wilsden, Conservation Area and key viewpoints, we note the site is not located in close proximity to the original historic town of Wilsden or any Conservation Area. Nor is it part of an important open view/vista as identified in draft Policy W/NE5 of the WNDP. It is acknowledged that to the north of the site is the Birkshead Special Character Area, in the form of three small rows of terrace housing. However, this does not form part of the site, furthermore the masterplan design for the site would be sensitively designed to enhance the setting of this area, similar to the new residential development across from Birkshead Drive in terms of materiality and unit orientation. We therefore consider that the site makes a weak to moderate contribution towards this purpose.
- e) ‘To assist in urban regeneration, by encouraging the recycling of derelict and other urban land’ – the CBMDC assesses all Green Belt sites as scoring “moderately” against this purpose. We do not challenge this basis, which is a fair assessment.

In addition to the above it is important to factor in the benefits of removing the site from the Green Belt for Wilsden as a whole. The site is larger than the other two ‘possible options for change’ sites in Wilsden, meaning its release would provide a greater benefit in being able to provide more housing in line with the Council’s ‘minimum’ targets for Wilsden set out in the emerging Local Plan. As a larger site, there is also potential for greater contributions towards local services and facilities. There is also extensive research and data published which confirms the economic, social and environmental benefits from the delivery of new residential development including: jobs, service provision, tax income and requirement to deliver on biodiversity net gain to name just a few. These should weigh in favour of positioning Wilsden as a successful and thriving Local Service Centre which supports its community through positive growth rather than only seeking to meet a target in the Local Plan, which the Council explicitly says is a minimum target and would support unit provisions beyond the 125 number given.

In summary, it is considered that the CBMDC have provided sufficient evidence for the requirement to review the Green Belt across the District. This is acknowledged by Wilsden Parish Council. The site scores ‘moderate’ in the Councils Green Belt assessment and should therefore be considered as a third ‘possible option for change’ in order to allow it to be thoroughly explored as a possible future development option through the emerging Local Plan process. We have demonstrated that the site is suitable, available and achievable to accommodate residential development further in this letter below.

Vision for the Site

We request that the site is included as a third 'possible option for change' to the settlement boundary, within the WNDP, in addition to the already proposed sites at Crack Lane and Moorside Farm. The inclusion of the site would significantly strengthen the District's ability to achieve its full housing target through the emerging Local Plan. Wain Estates would seek to secure the delivery of high quality housing suitable to support and further the local community and its economy, whilst assisting the wider region with its housing delivery. The site would make a logical extension to the village that complements and enhances the surrounding area. Below are the 3 main factors when considering whether the site is appropriate for Green Belt release;

1) Suitable

The site is well related to Wilsden's existing built form and is situated in a good location for potential future residents to access the settlements existing services. As previously mentioned, the site was reviewed by CBMDC within their appraisal of the site (WI/006) and it was concluded that the site provided a 'moderate' contribution to the requirements of the Green Belt. The proposed possible options for change were also assessed and have the same 'moderate' contribution, therefore not necessarily making them preferable to the Wain Estates site. In regards to the sites physical suitability, Wilsden is defined as a service village, capable of accommodating housing development over the Plan period. The village has good road links, access to Bingley train station (4km) and a half hourly bus service to both Bingley and Bradford. Each bus stop within the village is accessible on foot with the walking times from the site ranging from 4 to 13 minutes dependent on the stop and the route chosen. The site should therefore be classed as suitable to be put forward as an option for change within the WNDP.

2) Available

The site is currently available for development. Wain Estates have entered into a Promotion Agreement with the landowner to promote the site for residential development through the WNDP and emerging Local Plan process. The site is currently all under one ownership, removing complications associated with land assembly and meaning that a single cohesive planning application could be made bringing forth the site under one scheme rather than on a piecemeal basis.

3) Achievable

If the site were to be included as a 'possible option for change' within the WNDP, this would provide an opportunity for CBMDC to consider the site in their emerging Local Plan as an allocation for housing, assisting the region with its housing delivery and helping to exceed its minimum targets for the Plan Period. Wain Estates have a clear track record and extensive experience in delivering large sites, such as the Carrington Estate; one of the largest regeneration sites in the UK, being promoted for a mix of uses and therefore they are a trustworthy source of delivery. With the available status of the site, as outlined above, it is possible that the site could come forward, in full within the first 5 years of the Plan Period

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	The Coal Authority	Agent:	-

Summary:

-

Full Submission:

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the identified Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including: mine entries and coal workings. These features may pose a potential risk to surface stability and public safety.

It is noted however that the Neighbourhood Plan does not appear to allocate any new sites for future development and on this basis the Planning team at the Coal Authority have no specific comments to make.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	Natural England	Agent:	-

Summary:

-

Full Submission:

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary. Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third-party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment

Consultation point:	General Comment		
Respondent:	Environment Agency	Agent:	-
Summary:			
-			
Full Submission:			
The Environment Agency do not have any objections to the Publication Draft of the Wilsden Neighbourhood Development Plan (NDP). We will take the opportunity to comment on a number of identified elements that fall within both our land-use planning remit and links to wider organisational objectives.			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	Environment Agency	Agent:	-
Summary:			
-			
Full Submission:			
Water Framework Directive			
<p>Any new development should take the objectives of the Water Framework Directive into account. The Water Framework Directive (WFD) is a European Directive that seeks improvements to the water environment to ensure that they are achieving a ‘good’ overall ecological status (or potential). The WFD sets targets for all waterbodies to achieve ‘good’ status or potential by 2027 at the latest (unless a lower status objective is proposed). The WFD is implemented regionally by way of River Basin Management Plans (RBMPs). You can access the details of the relevant catchments and watercourses on our Catchment Data Explorer pages (http://environment.data.gov.uk/catchment-planning/).</p> <p>In order to improve watercourses so that they achieve ‘good’ status, your plan could include a policy encouraging the removal of weirs, installation of fish passes and improvements to the morphology of the rivers. We would strongly support a requirement for developers to carry out WFD actions when they are developing on sites adjacent to the relevant stretches of river.</p>			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	Environment Agency	Agent:	-

Summary:

-

Full Submission:

Water Quality

Effective management is important to protect water quality and as a natural resource, both for groundwater and surface water.

Drainage misconnections can occur in new developments, redevelopments, extensions or through refurbishment. Developers must ensure that they do not connect any foul drainage (including sinks, showers, washing machine/dishwasher outlets and toilets) to a surface water sewer, as this can send polluted water into watercourses. Similarly, developers should ensure that they do not connect surface water drainage (e.g. roof gutter downpipes) into foul sewers as this can cause overloading of the foul sewer during heavy rainfall.

Polluted surface water flows from areas like car parks or service yards should always have sufficient pollution prevention measures in place to ensure the protection of groundwater and watercourses from specific pollutants like petrol (hydrocarbons) and suspended solids. Developers should follow appropriate pollution prevention guidance when designing formal drainage for large areas of hardstanding.

Ideally, applicants should introduce more ‘surface’ or ‘green’ drainage solutions to aid improvements in water quality, such as swales along hardstanding boundaries, or a more advanced reed bed system for larger sites. These solutions are easier to access and maintain than engineered solutions like petrol/oil interceptors, which require regular maintenance to ensure they operate correctly.

We would welcome a policy or clear signposted reference elsewhere which requires a clear pathway in the delivery of and expectations from Biodiversity Net Gain through all development.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	Environment Agency	Agent:	-

Summary:
-
Full Submission:
<p>River Restoration</p> <p>We would welcome the inclusion of a specific river, watercourse or beck policy, addressing the following:</p> <ul style="list-style-type: none"> • Minimum of 8 metre (m) buffer zones for all watercourses measured from bank top to provide an effective and valuable river corridor and improve habitat connectivity. A 5m buffer zone for ponds would also help to protect their wildlife value and ensure that the value of the adjacent terrestrial habitat is protected. • Development proposals to help achieve and deliver WFD objectives. Examples of the types of improvements that we may expect developers to make are: removal of obstructions (e.g. weirs), de-culverting, regrading banks to a more natural profile, improving in-channel habitat, reduce levels of shade (e.g. tree thinning) to allow aquatic vegetation to establish, etc. Proposals which fail to take opportunities to restore and improve rivers should be refused. If this is not possible, then financial or land contributions towards the restoration of rivers should be required. • River corridors are very sensitive to lighting and rivers and their 8m buffer zones (as a minimum) should remain/be designed to be intrinsically dark i.e. Lux levels of 0-2. <p>Where relevant, it may be useful to include ownership information details for landowners, applicants or developers who have a watercourse running through or adjacent to their site. Many people believe that the Environment Agency own ‘main rivers’ which is not the case. Whilst we hold permissive powers to carry out maintenance on main rivers, the site owner is the ‘riparian owner’ of the stretch of watercourse running through their site (whole channel) or adjacent to their site (up to the centre line of the channel) – and this includes culverted watercourses.</p> <p>Our ‘Living on the Edge’ publication provides important guidance for riverside owners.</p> <p>Where feasible, applicants should remove watercourses from existing culverts. This will help to reduce flood risk from blocked or collapsed culverts, while open channels are significantly easier for the landowner to maintain. Moreover, culverts that cause blockages of the watercourse are the responsibility of the owner to repair. Additionally, we will usually object to planning applications that propose new culverts.</p> <p>Where relevant, the Plan should also provide details of ‘buffer zones’ that are left adjacent to watercourses. We will always ask developers to maintain an undeveloped, naturalised, 8 metre buffer zone adjacent to main rivers. We ask that applicants do not include any structures such as fencing or footpaths within the buffer zone as this could increase flood risk - through the inclusion of close-board fencing for example. Any works or structures that applicants intend within 8m of a main river will require a flood defence consent from us, which is separate from and in addition to any planning permission granted.</p> <p>The LLFA may require certain restrictions on other watercourses and becks.</p>

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	Environment Agency	Agent:	-

Summary:

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Full Submission:

Flood Risk

In terms of policy and supporting text, flood risk should be a major consideration in your Plan. This challenge may be of particular relevance to aspects of physical development, such as housing, new business, retail and employment land. Relevant signposting to national and local plan policy and guidance may assist applicants, and should:

- Ensure that new development does not increase flood risk to others
- Emphasise that inappropriate development will not be considered acceptable in areas of high flood risk.
- Address the potential impacts of climate change on flood risk.
- Promote a sequential approach to development layout, to ensure the highest vulnerability development is located in areas at lowest flood risk.
- Highlight, where necessary, the need to also undertake the exception test.
- Where appropriate, outline what is expected in terms of surface water run-off rates (for both Brownfield and Greenfield sites) and sustainable drainage systems.
- Expect development to result in a betterment to the existing flood risk situation.

New development proposals may be required to contribute either financially or through physical works to reduce the flood risk to the wider village.

The Lead Local Flood Authority (LLFA) is now the responsible authority for commenting on the surface water drainage arrangements. We therefore recommend you consult your LLFA regarding the proposed management of surface water within the Plan.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment

Consultation point:	General Comment		
Respondent:	Environment Agency	Agent:	-

Summary:

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Full Submission:

Groundwater

Protecting surface and groundwater from potentially polluting development and activity is a primary responsibility for the Environment Agency. There is a small area in Source Protection Zone (SPZ) 1 within the Plan area.

Sources of groundwater supply will be protected using the SPZs identified in the Environment Agency’s existing mapping. The approach is documented in our Groundwater Protection: Principles and Practice, within SPZ1, we will normally object in principle to certain types of development:

Within Source Protection Zones 2 and 3, a risk-based approach will be applied to the consideration of development proposals. If neither the use of a soakaway or a direct discharge is possible, a system without any discharge (such as a sealed cess pool or chemical toilet) may be considered. Given their capacity to overflow and discharge raw sewage directly into the water environment, such systems are usually a last resort. These types of systems also require regular maintenance, they can create additional carbon emissions through excess traffic movements, which can impact on the overall sustainability of a proposal.

We would welcome these details are reflected in your Plan so that applicants are aware of the most sustainable options for their foul drainage when they are not able to connect to the main foul sewer network. In particular, we would like you to highlight that where a non-mains drainage solution is proposed, the applicant must submit a Foul Drainage Assessment (FDA1) form with their planning application.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	Environment Agency	Agent:	-

Summary:

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Full Submission:

Allocation of Sites

We note that the Plan highlights a review of the CBMDC Local Plan is ongoing and based upon the emerging 2021 allocations a minimum of 125 homes will be required over the period of the Local Plan. Specifically, the housing allocation for Wilsden will be met by a mixture of sites within the Settlement Boundary and those that may be newly released from the review of the Green Belt. The Environment Agency acknowledges that to allocate within this Neighbourhood Plan would only duplicate the allocation carried out by CBMDC.

To this end, the emerging CBMDC Local Plan proposes to allocate one site within the Settlement Boundary. This site, off Crooke Lane, is partially developed and the proposed site allocation is described as WI/1H and shown in Figure 4. This site is partially in the Wilsden Conservation Area is capable of accommodating about 18 dwellings.

Most housing development remains either a more or highly vulnerable land-use classification in terms of flood risk. From an advance stage we would prefer that this highlighted when considering future housing proposals, particularly windfall development.

These comments may be equally applied to new business, retail and employment land

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	Environment Agency	Agent:	-

Summary:

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Full Submission:

Sustainable Construction

You may also positively contribute to your community by reducing costs through sustainable construction. Neighbourhood planning is an opportunity for communities to encourage efficient water and waste management systems in new buildings. You could also help to promote the use of sustainable materials in construction and encourage energy efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for those occupying the building. This will also contribute to the efficient environmental management by reducing emissions and improving air quality.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
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Full Submission:
Each policy within the plan should clearly identify how it links to the adopted Core Strategy policies to allow readers to understand the links between the strategic planning policy context and the neighbourhood plan. For example: <i>“This policy references CBMDC Core Strategy Policies: SC4, DS1, DS2, DS3, DS4, DS5, HO9”</i> Where relevant, links to the specific parts/paragraphs of the NPPF should also be included.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
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Full Submission:
It should be noted that the National Planning Policy Framework (NPPF) was revised in December 2023. Prior to publication of the referendum draft and made versions of the neighbourhood plan, the document should be reviewed and updated to refer to this most recent version of the NPPF and, where referenced, NPPF paragraph numbers checked and updated. This applies to all other documentation produced to support the plan including the Design Code, Basic

Conditions Statement and supporting evidence base. For example, paragraphs 1.4.3 and 1.4.4 refer to NPPF paragraphs 137, 138 and 140. These should be amended to read paragraphs 142, 143 and 145.

2. ABBREVIATIONS

Consultation point:	General Comment		
Representation ID:	-	Representation ID:	-
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
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Full Submission:			
In relation to the RUDP, the plan states that this stands for the “Bradford Revised Unitary Development Plan”, however this should read “Bradford Replacement Unitary Development Plan”.			

3. INTRODUCTION

Consultation point:	Introduction – Sixth Paragraph		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			

It mentions reference to 'Wilsden Community Policies', however there are none within the plan. Should this refer to 'Community Action' points located in various sections of the document?

Consultation point:	Introduction – Twelfth Paragraph		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

It is suggested that this paragraph is updated to better reflect the ongoing process of preparing the emerging Bradford District Local Plan.

4. VISION & OBJECTIVES

Consultation point:	Vision and Objectives		
Representation ID:		Comment Type:	Support
Respondent:	Avant Homes	Agent:	ID Planning

Summary:

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Full Submission:

We support the vision of the plan to sustain and enhance the character of the area. In particular we support the objectives which support the delivery of housing to meet the present and future needs of the community in the right location.

Consultation point:	Vision and Objectives		
Representation ID:		Comment Type:	Comment
Respondent:	Environment Agency	Agent:	-

Summary:

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Full Submission:

The Environment Agency has no critical comment on the Vision or Objectives.

The key observation we would provide is an omission to the likely need for climate change resilience or mitigation. Moreover, given that Wilsden Beck presents a high risk of flooding, there perhaps could be an argument for inclusion as an objective that may also address a likely increase in flood events from all sources of flooding. We note that climate change and flood risk are each considered as major issues for the Bradford area in the Local Plan.

We again underline that there is a missed opportunity to better reflect and promote the valuable natural asset of water resources, while integrating Green-Blue Infrastructure as potential mitigating solutions

5. CHAPTER 1 - A SUSTAINABLE WILSDEN PARISH

Consultation point:	Section 1.1 – Paragraph 1.1.3		
Representation ID:	-	Comment Type:	Comment
Respondent:	Environment Agency	Agent:	-

Summary:

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Full Submission:

The Environment Agency particularly recognises in p.1.1.3 that Wilsden Parish Council reported a Climate Emergency in January 2021. We support this approach and welcome an underlined link between climate change resilience and likelihood of extreme weather episodes, including increased flooding events.

Of importance to the remit of the Environment Agency, we would strongly encourage that in the context of climate change mitigation and/ or resilience, appropriate reference could be provided to adequately reflect measures that seek to conserve and enhance the water environment, natural resources and biodiversity. Such an approach should be updated throughout the SEA and the related NDP, plus all future Local Plan documents.

As a suggestion, policies that may promote an element of Green-Blue Infrastructure could be reinforced and used as a clear justification to combat the negative effects of climate change.

Consultation point:	Section 1.2 – Paragraph 1.2.4		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

The third sentence of this paragraph states that the emerging Local Plan lowers the target for development on previously developed land in Local Services Centres to 30%, a reduction from the 35% set out in adopted Core Strategy Policy HO6. The 30% figure referred to in the emerging Local Plan has not been finalised and may be subject to change as the Plan moves forward through its statutory processes. The neighbourhood plan should be clear about the status of the emerging Local Plan and reference to the figure removed. CBMDC is currently working towards a Regulation 19 (Publication) version of the Local Plan.

Consultation point:	Section 1.2 - Paragraph 1.2.9		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:			
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Full Submission:			
<p>This paragraph needs to be considered in relation to the provisions of the NPPF as well as the saved Replacement Unitary Development Plan (RUDP) Policies GB1 to GB3, which set out the circumstances under which development will be permitted in the Green Belt (including “washed over” settlements). Any development that takes place in the smaller villages/hamlets in the Parish should be in line with them. Saved RUDP Policy GB3 makes specific reference to Harecroft.</p> <p>It is recommended that this paragraph be deleted.</p>			

Consultation point:	Policy W/HO1		
Representation ID:	-	Comment Type:	Comment
Respondent:	Wain Estates	Agent:	Avison Young

Summary:			
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Full Submission:			
<p>If the Council opted to remove our site from the Green Belt for residential development, it should be noted that Wain Estates would design and deliver a scheme that complies with the requirements of this policy.</p>			

Consultation point:	Policy W/HO1		
Representation ID:	-	Comment Type:	Support
Respondent:	Avant Homes	Agent:	ID Planning

Summary:			
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Full Submission:
We support proposed Policy W/HO1.

Consultation point:	Policy W/HO1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
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Full Submission:
Criteria c - The criteria is supported. Criteria e – The policy intent is supported. The wider setting of the Conservation Area (CA) is identified as being an important element of the character and significance of the CA. It supports the Conservation Area Appraisal /assessment documents and Core Strategy Policy EN3.

Consultation point:	Section 1.4		
Representation ID:	-	Comment Type:	Support
Respondent:	Avant Homes	Agent:	ID Planning

Summary:
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Full Submission:

We acknowledge and support the Plan’s aim in seeking to ensure it is consistent with the adopted plan and potential changes associated with the emerging plan. Paragraph 1.4.8 refers to the review of the Green Belt and defines two strong and defensible boundaries to be considered in any changes to the boundary. We support the identified defensible boundaries in the plan (The B6144 and the valley of Wilsden Beck).

Paragraph 1.4.9 acknowledges and supports potential changes to Green Belt boundary as recommended in the Draft Local Plan, site references W12/H and W13/H.

We support the proposed paragraph and figure 3 of the plan which shows the potential sites to be included in the settlement boundary for Wilsden to meet identified housing needs in a sustainable manner.

Additional Text required to paragraph 1.4

We support the proposed text in section 1.4 which supports the inclusion of sites WI3/H and WI2/H in the settlement boundary subject to their removal from the Green Belt via the Local Plan process. The wording of the final sentence of paragraph 1.4.9 is grammatically incorrect and should be amended. The paragraph currently reads as follows, I have underlined the area which does not read correctly:

Based upon the available data we would acknowledge changes to the Green Belt boundary may be required such as the sites designated WI2/H and WI3/H (as shown in Figure 3) recommended in the Draft Local Plan are included within a revised Wilsden Settlement Boundary.

We consider the sentence would read more clearly as follows:

Based upon the available data we would acknowledge changes to the Green Belt boundary may be required as recommended in the Draft Local Plan. The Neighbourhood Plan supports the inclusion of designated sites WI2/H and WI3/H (as shown on Figure 3) within a revised Wilsden Settlement Boundary.

In addition to the proposed amended wording, it is suggested an additional paragraph is included in the Plan to provide a clearer policy framework for the future in the context of sites being removed from the Green Belt and allocated in the emerging Local Plan.

We acknowledge that Policy W/HO1 refers to a definition of the settlement boundary as land not in the Green Belt and shown on Figure 2. However an additional paragraph in section 1.4 would clarify that the policy was relevant to Figure 3. The following paragraph provides suggested wording:

Subject to changes to the Green Belt boundary determined by the CBMDC Local Plan, the settlement boundary as shown in Figure 3 (including sites WI2/H and WI3/H) will be adopted for use in accordance with Policy W/HO1 of this Neighbourhood Plan.

Consultation point:	Section 1.4 & Figure 3		
Representation ID:	-	Comment Type:	Object
Respondent:	Ptarmigan Land North Ltd	Agent:	Lichfields

Summary:
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Full Submission:
<p>Section 1.4 of the draft Neighbourhood Plan makes reference to a review of the Green Belt, with paragraph 1.4.6 of the document acknowledging that he adopted Bradford Core Strategy identifies that, in the context of Wilsden, changes to the adopted Green Belt are required. This is inevitable in the context of the adopted Core Strategy requiring a minimum of 200 homes to be delivered in Wilsden and Bradford Council’s own most recent evidence base identifying a supply of just 23 homes from sites outside of the Green Belt in and around Wilsden.</p> <p>This position is effectively accepted by the Neighbourhood Plan at paragraph 1.4.9, where it states that “<i>based upon the available data we would accept that changes to the Green Belt may be required such as sites WI2/H and WI3/H.</i>” Those two sites are both Green Belt locations that were identified as potential allocations in the separate Regulation 18 draft Bradford Local Plan, but in the context of Wilsden accommodating a lower quantum of housing (125 units) than that set out in the adopted Core Strategy (200 units). These two sites are then shown on Figure 3 of the draft Neighbourhood Plan as representing “<i>possible options for change</i>” to Green Belt boundaries.</p> <p>Ptarmigan strongly objects to the inclusion of this plan at Figure 3 and the specific reference to these two sites on it, as it is wholly misleading insofar as it does not identify all potential options for change, or indeed the likely extent of Green Belt release that will be required to accommodate future housing needs.</p> <p>The review of the Green Belt is an ongoing process being carried out by Bradford Council and the draft Local Plan is subject to extensive objections (including from Ptarmigan) in terms of its approach to District wide housing need, the apportionment to Wilsden and also the draft allocations. It is our client’s position that Wilsden should be accommodating a greater level of housing than is proposed in the Regulation 18 draft Local Plan. This is because Wilsden should be accommodating a proportionate share of what should be a higher District-wide requirement based upon the Standard Method, as set out in national planning policy and guidance, which in the case of Bradford incorporates a 35% uplift, on account of it being one of the 20 largest urban authorities in the country. Bradford Council has failed to demonstrate any exceptional circumstances for its approach set out in its draft Local Plan, which deviates from the Standard Method and which seeks to deliver a requirement considerably below that requirement.</p> <p>Reflecting this, no weight should yet be afforded to the emerging Local Plan given its stage of preparation and the extent of unresolved objection. Certainly, the Neighbourhood Plan, which is at a more advance stage, should not in any way be relying upon it, when it is still subject to further rounds of technical assessment, public consultation and examination.</p> <p>In its current form, by referencing the content and identifying the draft allocations of that Plan, the draft Neighbourhood Plan runs contrary to national planning policy, in contravention of Basic Condition A. It also fails to comply with Basic Condition D (Contributing towards achieving sustainable development), as far as it potentially prejudices an unfettered assessment of the most sustainable options for meeting longer term housing needs in Wilsden. By making explicit reference to the policies of the early draft Local Plan, it further potentially leaves the Neighbourhood Plan exposed to being contrary to that plan, should the</p>

policies of the Local Plan change during the evolution of that document. In this scenario, the draft Neighbourhood Plan will fail to comply with Basic Condition (Conformity with the strategic policies of the Local Plan).

To address these concerns, Ptarmigan considers that Paragraph 1.4.9 and Figure 3 of the draft Neighbourhood Plan are amended to identify all potential options for removing land from the Green Belt to meet housing needs. Those such ‘options’ should include our client’s site as shown above.

Alternatively, Figure 3 should be removed from the Neighbourhood Plan and all references to sites WI2/H and WI3/H be deleted, as the review of the most suitable and sustainable sites options for removing land from the Green Belt to meet Wilsden’s housing needs will correctly form part of the preparation and subsequent examination of the Bradford Local Plan. This will avoid a scenario where there is any future misalignment between what is identified in the Wilsden Neighbourhood Plan and the future adopted Bradford Local Plan.

Consultation point:	Section 1.4 - Paragraphs 1.4.1 to 1.4.9 & Figure 3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

The plan correctly highlights that changes to Green Belt boundaries are a strategic policy matter for the local planning authority with the emerging Local Plan is the mechanism for identifying future Green Belt boundaries.

It is noted that neighbourhood plan and the Parish Council as well as the community have views on how and where any changes may take place, including the potential strong boundaries. It may be appropriate to review this section of the plan. As worded, it would appear to be setting out how it wants new boundaries to be defined. It is understood that the plan is not proposing this, but it should be clearer on this point. It may be more appropriate forming part of a response to any future consultation on the Local Plan.

Paragraph 1.4.9 refers to two of the proposed sites from the emerging Local Plan (WI2/H and WI3/H) which would result in release of Green Belt land for future housing development, if allocated. The emerging Local Plan is still at an early stage in its preparation, having reached the Preferred Options stage

under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and still must complete a number of stages before being given any weight.

The two proposed site allocations identified within the Draft Local Plan and referred to in the text and shown on Figure 3, have not been finalised and may be subject to change as the Plan moves forward through its statutory processes. These are currently the subject of several representations submitted during the Regulation 18 consultation. The neighbourhood plan should be clear about the status of the emerging Local Plan and reference to the proposed site allocations removed.

CMDC are currently working towards a Regulation 19 (Publication) version of the emerging Local Plan, including identifying the level and distribution of housing, as well as site allocations to meet these requirements.

In summary, this section of the plan should be removed or shortened as it repeats national policy (Paragraphs 1.4.2, 1.4.3 and 1.4.4) and encroaches on elements that will be covered by the Local Plan

Consultation point:	Section 1.5 - Paragraph 1.5.3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

This sentence should be amended to highlight that development in the Green Belt will only be permitted in very special circumstances. It should include a link to the very special circumstances test out in the NPPF, which is applied to planning applications for what the NPPF considers inappropriate development within the Green Belt. The test only applies to inappropriate development, not all development. Not all types of development are considered inappropriate and those that are appropriate are defined in the NPPF. This section of the plan should also highlight that exceptional circumstances for the release of Green Belt has already been determined via the adopted Core Strategy. This matter is also being considered via the emerging Local Plan

Consultation point:	Policy W/HO2		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Policy W/HO2		
Respondent:	Wain Estates	Agent:	Avison Young

Summary:

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Full Submission:

This policy supports the designation of the open countryside outside the settlement boundary as Green Belt. It is our suggestion that the settlement boundary be amended to include land to be allocated for residential development, as is required through the CBMDC. Wain Estates request that the site, be considered as a ‘possible option for change’ in the WNDP.

Consultation point:	Policy W/HO2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

The issue of Green Belt designation is a strategic policy matter for the local planning authority to determine via the Local Plan. It is unclear what additional detail this policy is adding above and beyond that in existing Local Plan policy or the NPPF. It is recommended that this policy and supporting text is deleted from the plan.

However, it is recognised that the community has strong wish to protect the countryside and Green Belt within the Parish area. If this policy is to remain within the plan, it should be clear about the type of development that would be permitted in the countryside and the circumstances under which it would be allowed.

6. CHAPTER 2: HOUSING NEED

Consultation point:	Section 2 - Paragraph 2.0.1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

his section cannot consider the amount of housing development – this is a matter that is considered and determined within the adopted Core Strategy, and in future within the new Local Plan. This text is misleading and should be amended or removed from the plan. The following wording could be considered as an alternative: *“Housing including its location and type was highlighted during consultation as an issue of great concern and interest to local people”*

Consultation point:	Section 2.2 - Paragraph 2.2.7		
Representation ID:	-	Comment Type:	Object
Respondent:	Avant Homes	Agent:	ID Planning

Summary:

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Full Submission:

Within Section 2 of the draft Neighbourhood Plan, reference is made at paragraph 2.2.7 to a review of the Bradford Local Plan identifying a need for a minimum of 125 new homes to be delivered in Wilsden between 2020 and 2038.

Similar to the points made above, it is Ptarmigan’s position that no such reference, or reliance, should be made by the draft Neighbourhood Plan to the content of the emerging Local Plan, as it is subject to several further rounds of consultation and examination, particularly when there are unresolved objections and such figures could change. Ptarmigan has made representations previously that Wilsden should be accommodating a greater quantum of

housing, than is presently proposed in that early draft plan. Ptarmigan’s position is that, as a minimum, Wilsden should be accommodating at least 200 new homes in that plan period, in accordance with the position established in the adopted Core Strategy.

Such references to the housing apportionment to Wilsden in the emerging Local Plan should therefore be removed, otherwise the Neighbourhood Plan risks failing to be in conformity with the Strategic Policies of the Local Plan, in contravention of Basic Condition E.

Consultation point:	Section 2.2 - Paragraph 2.2.7		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

The third sentence refers to the proposed housing requirement for Wilsden set out in the emerging Bradford District Local Plan of 125 dwellings between 2020 and 2038. It should be noted that the emerging Local Plan is still at an early stage in its preparation, having reached the Preferred Options stage under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and still must complete a number of stages before being given any weight. This figure has yet to be finalised and may be subject change. CBMDC are working towards a Regulation 19 (Publication) version of the Local Plan that will be set out the overall level and distribution of future housing growth in the District. This paragraph should be amended to reflect this.

Consultation point:	Section 2.2 - Paragraph 2.2.8		
Representation ID:	-	Comment Type:	Object
Respondent:	Avant Homes	Agent:	ID Planning

Summary:

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Full Submission:

Section 2.2 of the Neighbourhood Plan (NP) considers the existing and emerging housing requirement for Wilsden set out in the CBMDC Core Strategy and emerging Local Plan. The text states the emerging Local Plan identifies a requirement of a minimum of 125 homes in Wilsden between 2020 and 2038.

Paragraph 1.3.3 of the NP states the community consultation shows that Wilsden village is generally a more appropriate and sustainable location for development than other parts of the district.

Paragraph 2.2.8 should be deleted or reworded. The language used conflicts with the aims and objectives of the plan and the text included in section 1.3 and 1.4 which acknowledge the importance of the Green Belt but accept and support the need for changes to deliver the housing requirement. The paragraph conflicts with the benefits associated with housing development as referred to in section 2.1.

Changes required

Paragraph 2.2.8 should be deleted from the plan.

Consultation point:	Section 2.3 - Paragraphs 2.3.1, 2.3.2 & Figure 4		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

These paragraphs refer to a site identified within the Draft Local Plan (Draft proposed site allocation WI1/H Crooke Lane).

The site allocations have not been finalised as the Local Plan is in its early stages of preparation. As such it may be subject to change as the Plan moves forward through its statutory processes. The proposed site allocation referenced is currently the subject of a number of representations. The neighbourhood plan should be clear in respect of the status of the proposed Local Plan site allocations and the weight that they carry at this point in time.

The relevant wording in these paragraphs referring to the site should be deleted or amended to reflect this. It should also be removed from Figure 4.

Consultation point:	Policy W/HO3 & Paragraph 2.3.4		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

Full Submission:

The re-use of former mill buildings is supported. It is noted that policy has been amended to include reference to Core Strategy Policy EC4, which sets out CBMBC’s approach towards alternative development of land or buildings that are, or where, last in use for business or industrial purposes, and the circumstances under which this may be permitted. This in part reflects comments provided previously.

It should be noted that the planning application referred to in Paragraph 2.3.4 is still pending consideration by the Local Planning Authority.

Consultation point:	Section 2.3 - Paragraph 2.3.4 & Figure 4		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

It is queried whether the paragraph is required as it primarily sets out the Parish Councils and/or community’s views on potential future use of the Prospect Mill site. The community’s support for the reuse of the site for residential development is noted. However, its suitability can only be determined when a

planning application is assessed the relevant policies of the adopted development plan for the District. As drafted the paragraph suggests that it may be suitable.

The planning application referenced in the paragraph remains pending at this point in time. The wording of this sentence will need to be updated at some point to reflect the outcome of the application.

Alternatively, it should be removed. If wording relating to Prospect Mill is removed, Figure 4 should be deleted.

The process of allocating sites for development in Wilsden to meet the housing requirement will be addressed as part of the emerging Local Plan and will take into account the strategic sources of supply listed in the emerging plan

Consultation point:	Section 2.3 - Paragraph 2.3.4 & Figure 4		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

Figure 4 shows the proposed Local Plan allocation W1/H: Croke Lane. The emerging Local Plan is still at an early stage in its preparation, having reached the Preferred Options stage under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and still has to complete a number of stages before being given any weight.

The proposed site allocations for Wilsden as set out in the emerging Local Plan have not been finalised and may be subject to change as the Plan moves forward through its statutory processes. These are currently the subject of a number of representations.

The neighbourhood plan should be clear in respect of the status of the proposed Local Plan site allocation and the weight that they carry at this point in time.

Consultation point:	Policy W/HO4		
Representation ID:	-	Comment Type:	Support

Consultation point:	Policy W/HO4		
Respondent:	Wain Estates	Agent:	Avison Young

Summary:
-

Full Submission:
We are fully supportive of this policy which requires high quality design to enhance and conserve local distinctiveness in line with the Design Code. We fully acknowledge the importance of good design and have a proven track record of delivering a number of high quality residential developments, each specifically designed to reflect their location.

Consultation point:	Policy W/HO4		
Representation ID:	-	Comment Type:	Comment
Respondent:	Environment Agency	Agent:	-

Summary:
-

Full Submission:
The Environment Agency welcomes the direction presented to developers that all proposals will need to address issues of sustainability. We would like to propose that a positive emphasis here could be revised to promote sustainability opportunities. Further, we also support the direction and drive towards delivering the conservation and enhancement of natural environment elements, With reference to Policy W/HO4, the Plan could still be strengthened however by clearly defining, where and how, tools such as Biodiversity Net Gain and Climate Change Mitigation could deliver meaningful improvement.

Consultation point:	Policy W/HO5		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Policy W/HO5		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

The policy as drafted appears to state only small-scale windfall development would be permitted. In addition, there should be some justification as to why the threshold of five dwellings has been chosen for inclusion in the policy wording. This is contrary to the supporting text in paragraph 2.5.2 which states that such development can also be on a larger scale, subject to the type of site being considered. Accordingly, the policy should be amended to ensure consistency.

Consultation point:	Policy W/HO6		
Representation ID:	-	Comment Type:	Support
Respondent:	Wain Estates	Agent:	Avison Young

Summary:

-

Full Submission:

We fully support the requirement for a mix of housing to support those most in demand. If allocated, Wain Estates would deliver a scheme to comply with the requirements of this policy including provision of smaller dwellings (less than 3 bedrooms) and no more than 35% of properties being 4 bedrooms or more.

Consultation point:	Policy W/HO6		
Representation ID:	-	Comment Type:	Support

Consultation point:	Policy W/HO6		
Respondent:	Avant Homes	Agent:	ID Planning
Summary:			
-			
Full Submission:			
<p>The policy proposes that priority should be given to the provision of smaller dwellings (less than 3 Bedrooms) to meet the needs of young families and older people who wish to downsize. For development proposals of 3 or more dwellings, the policy states housing mix should include no more than 35% of properties of 4 bedrooms or more.</p> <p>We consider the proposed policy and threshold is acceptable and support the potential for developments to deliver an alternative mix subject to suitable and robust justification.</p>			
Consultation point:	Policy W/HO7		
Representation ID:	-	Comment Type:	Comment
Respondent:	Wain Estates	Agent:	Avison Young
Summary:			
-			
Full Submission:			
<p>If allocated for residential development, Wain Estates would ensure an affordable housing provision in line with this policy either through onsite provision or a contribution for off-site, depending on the viability findings.</p>			
Consultation point:	Policy W/HO7		
Representation ID:	-	Comment Type:	Support

Consultation point:	Policy W/HO7		
Respondent:	Avant Homes	Agent:	ID Planning
Summary:			
-			
Full Submission:			
The affordable housing requirements are set out in the Core Strategy and emerging Plan in relation to the affordable housing target and ratio of mix. We support Policy W/HO7 which supports the delivery of affordable housing on site with off site delivery permitted where justified.			

Consultation point:	Policy W/HO7		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			
<p>The support for the provision of affordable housing as part of new developments is welcome, however it is questioned whether the policy provides any additional detail to that already set out in Core Strategy Policy HO11.</p> <p>In a number of neighbourhood plans, references to affordable provision are including within the wider housing mix policies. As such, it may be appropriate to amend Policy W/HO6 to include a require for developments of a certain size to include a mix of housing type, size, and tenure to meet the requirements of the community. Any threshold set would need to be consistent with the provisions of Core Strategy Policy HO8.</p>			

7. CHAPTER 3: BUILT HERITAGE

Consultation point:	Section 3.2 - Paragraph 3.2.3 & Figure 5		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

The first sentence refers to a number of buildings and structures being identified as “Wilsden Character Buildings and Sites”. This is now a legacy term within this plan. It would be useful for continuity if the Plan referred to local heritage assets (Wilsden Character Buildings and Sites) as ‘Wilsden Non-designated heritage assets’ in line with NPPF and Policy EN3 of the adopted Core Strategy. In this light it may also be appropriate to amend the relevant wording in the supporting document – Supporting Evidence for Locally Important Buildings and Structures as well as the Policies Map key. In relation to Figure 5, it should be ensured that the fully wording of the key is visible. References should also be included.

It is noted that the paragraph has been amended to include a link the supporting evidence outline the process for selecting non-designated heritage assets. However, it is considered that the wording could also be amended for clarity and to better reflect national and local planning policy. The following is suggested: *“Through detail consultation and analysis, a number of buildings and structures have been identified as having special importance to the character of the Parish. The Plan seeks to support their conservation, enhancement and appreciation by identifying them as Wilsden Non-Designated Heritage Assets. Details of these buildings and structures are set out in the Supporting Evidence for Locally Important Buildings and Structure document. It provides an overview of approach taken towards designation as well as details of the notable features of each building or structure, the reasons why it is locally valued and what makes its local significance special.”*

Consultation point:	Section 3.2 - Figure 5		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	
-	
Full Submission:	
The Listed Buildings (depicted in purple) shown on the map at Figure 5 do not fully match the extents shown on the dataset held by CBMDC. The map should be updated to reflect the spatial extent (polygons) in the CBMDC dataset. This information can be provided to the Parish Council	

Consultation point:	Policy W/BH1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	
-	
Full Submission:	
<p>The first paragraph of the policy should be amended to read “<i>The Plan identifies the following buildings and structures (also shown in Figure 5 and on the Policies Map), as Wilsden Non-Designated Heritage Assets....</i>”. This provides a degree of clarity as Core Strategy Policy EN3 does not specify any particular asset.</p> <p>It is suggested that the second and third paragraphs should be amended to ensure consistency of terminology and better reflect national and local planning policy. Proposed wording is “<i>Development will not be supported that harm the significance and setting of these Non-Designated Heritage Assets. Proposals should conserve and enhance these assets and take into account their character, context and setting including important views to/from them. Development will be required to be designed appropriately, taking account of local styles, materials, and detailing, together with national and local planning policy in relation heritage and design</i>”.</p>	

Consultation point:	Policy W/BH2		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Policy W/BH2		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

CBMDC are supportive of this policy but would raise a comment in relation to the specified distance of at least 50 metres which is defined as the distance that development outside the conservation area is considered to affect its setting.
 Historic England defines setting as not being fixed and being subject to change as the asset and its surroundings evolve. CBMDC would encourage a more flexible approach to consideration of impacts on the setting of the CA in relation to distance.

Consultation point:	Section 3.4		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

It is recognised that the community engagement activities supporting the plan’s development has highlighted that Hallas Bridge and Birkshead are considered to be areas with special character. In addition to the community engagement, has any further work or evidence been prepared, similar to a conservation area appraisal, to set out the justification, in particular the criteria used for the proposed designation of these areas? If so, it should be referred to in the relevant section of the plan and included as part of the published evidence base.

Consultation point:	Policy W/BH3		
Representation ID:	-	Comment Type:	Objection
Respondent:	Wain Estates	Agent:	Avison Young

Summary:			
-			
Full Submission:			
<p>This policy states: “<i>an important part of the setting of Birkshead is that the open aspect of the fields to the south are retained</i>”. We consider this policy to be unnecessarily restrictive and unjustified. It is possible to preserve and enhance the setting of special character areas surrounding development. We acknowledge the distinctive nature of this small site and that any development would need to be sensitively designed so as not to impact on this. An example of this can be seen by the recent residential development across from Birkshead Drive which uses similar materiality, buff brick and slate roofing, to reflect the older dwellings. There are many examples across the District and country whereby new developments and listed heritage assets can sit harmoniously side by side without a negative impact. It would be wrong and unjustified for the policy to require no development to the south. Rather we would suggest the policy is reworded in a manner that requires any surrounding development to promote the Special Character Area and not detract from key views.</p>			

Consultation point:	Policy W/BH3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:			
-			
Full Submission:			
<p>It is suggested that the second paragraph is not required as this repeats the wording of the supporting text set out in paragraph 3.4.6. The first sentence of the third paragraph describing the relationship between Hallas Bridge and Birkshead, and the Green Belt is also not required. It may be more appropriate to</p>			

include this part of the description of each area in the supporting text. The fourth paragraph again seems to be more a description and/or unfinished. Reference to the setting of these areas may be more appropriately incorporated into the first paragraph.

Consultation point:	Policy W/BH4		
Representation ID:	-	Comment Type:	Support
Respondent:	Avant Homes	Agent:	ID Planning

Summary:

-

Full Submission:

The policy states that development proposals that would result in the removal of or have an adverse impact on a natural stone wall will only be supported where it can be demonstrated that the benefits of the development will outweigh the harm caused by the removal or the wall, or a replacement drystone wall of equivalent value is provided in a suitable location in the parish.

We support the policy in seeking to ensure that these character features are retained but consider a change to the wording is required to allow for instances where the removal of parts of a dry stone wall are required for technical reasons to enable development. To account for these instances, the policy wording should be amended to the following:

“..... demonstrated that specific technical requirements and/or measures required to facilitate development necessitate removal of the wall or the benefits of development will outweigh the harm caused by.....“

8. CHAPTER 4: NATURAL ENVIRONMENT

Consultation point:	Section 4.1 - Paragraph 4.1.2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-
Full Submission:
The first sentence should be amended to read “ <i>The National Planning Policy Framework....</i> ”

Consultation point:	Policy W/NE1		
Representation ID:	-	Comment Type:	Support
Respondent:	Environment Agency	Agent:	-

Summary:
-
Full Submission:
We broadly support Policies W/NE1 and W/NE2 Ecology and Biodiversity and note the links to wider networks and partnerships. The Environment Agency would however welcome that broader scope is provided and expectations are established to reflect that the water environment also forms part of the natural environment. Indeed, watercourses can perform an essential role in the enhancement of biodiversity and ecological habitats. We particularly would like to emphasise that watercourses can also benefit from the application of Biodiversity Net Gain and could perform a key role in the adaptation to and mitigation from climate change.

Consultation point:	Policy W/NE1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:

The final paragraph should be amended to read “*Development of Local Green Spaces will only be supported in very special circumstances and when consistent with national and local planning policy in relation to Green Belt.*”. This would be more consistent with national policy.

Consultation point:	Policy W/NE1-1, Figure 8, Table 1 & Policies Map		
Representation ID:	-	Comment Type:	Object
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-

Full Submission:

Local Green Space W/NE1-1 - Fields to the East /North East of St Matthews Church -

CBMDC formally objects to the inclusion of the Council owned land (identified as in Figure 8 and Table 1, as well as on the Policies Map) being included in the Wilsden Neighbourhood Plan with the proposed designation of Local Green Space (LGS).

National planning rules indicate that the designation should only be used where the land holds a particular local significance, for example, because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife.

It is believed that the site does not meet that criteria for the following reasons:

- It doesn’t have any particular attributes that make it beautiful....it’s a grass paddock
- We are not aware of the site holding any historic significance
- It does not have recreational value given that the entire site has been used in an agricultural capacity for grazing etc. over many years as part of a tenancy/licence which also includes the adjoining barn and outbuildings
- There are no public rights to use or access the paddock
- There is no wildlife present

The Council would be grateful if the points made above are given careful consideration and the proposed designation removed from the Neighbourhood Plan.

Consultation point:	Policy W/NE1-1, Figure 8 & Table 1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-

Full Submission:
It is noted that proposed Local Green Spaces (LGS) W/NE1.1 and W/NE1.2 whilst shown on Figure 8 are not labelled. This should be corrected in order for the reader to understand the link between Table 1 and Figure 8.

Consultation point:	Policy W/NE1-2, Figure 8 & Table 1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-

Full Submission:
It is noted that this proposed Local Green Spaces (LGS) is located entirely within the Green Belt. As such this area already benefits from similar strength of protection within planning policy. Accordingly, it is queried whether any additional benefit would be gained from the additional LGS designation. This set out in the Government’s on-line [Planning Practice Guidance - Paragraph: 010 Reference ID: 37-010- 20140306](#). It is recognised that this area is of particular importance to the local community. Therefore, evidence should be provided as to why it would benefit from the additional designation. It is noted that the Supporting Evidence for Local Green Spaces states that consultation took place in February 2022 with landowners of those sites identified for potential LGS designation. It would be helpful if more details of consultation outcomes were included within the supporting evidence document.

Consultation point:	Section 4.2 - Paragraph 4.2.4		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

The first sentence should be amended to read “*There are two Local Wildlife Sites (LWS) within...*”

Consultation point:	Section 4.2 - Paragraphs 4.2.1 to 4.2.7, Figure 9 & Policies Map		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is noted that plan refers to the sites designated as Local Wildlife Sites (LWS) within the neighbourhood plan area - Goitstock Wood and Grasslands and Cottingley Woods – Black Hills. These should be identified on Figure 9 as LWS and their qualifying features described in text or within a separate appendix. Specific areas within the Bradford and Local WHN could be identified for enhancement (those that are LGS or others) for BNG offsetting of development losses, or simply to improve their condition for the benefit of ecology and local enjoyment.

In terms of the Environment 2021 Act, its primary aim is biodiversity enhancement rather than the creation of new green spaces. This should be clarified within the document. The creation of open space/green space as part of new developments is covered in Core Strategy Policy EN1.

Consultation point:	Policy W/NE2		
Representation ID:	-	Comment Type:	Support
Respondent:	Avant Homes	Agent:	ID Planning

Summary:			
-			
Full Submission:			
<p>We support the thrust of the policy to protect and enhance biodiversity. The policy currently state that all development proposals should deliver biodiversity net gain.</p> <p>The wording of the policy should be amended to refer to <i>'as required by CBMDC Development Plan policies'</i></p>			

Consultation point:	Policy W/NE2		
Representation ID:	-	Comment Type:	Support
Respondent:	Avant Homes	Agent:	ID Planning

Summary:			
-			
Full Submission:			
<p>We broadly support Policies W/NE1 and W/NE2 Ecology and Biodiversity and note the links to wider networks and partnerships. The Environment Agency would however welcome that broader scope is provided and expectations are established to reflect that the water environment also forms part of the natural environment. Indeed, watercourses can perform an essential role in the enhancement of biodiversity and ecological habitats. We particularly would like to emphasise that watercourses can also benefit from the application of Biodiversity Net Gain and could perform a key role in the adaptation to and mitigation from climate change.</p>			

Consultation point:	Policy W/NE2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
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Full Submission:

It is suggested that the wording of the policy is amended to better reflect national and local planning policy. The final sentence of the policy seeks to ensure that any off-site biodiversity net gain is directed to two particular areas within the neighbourhood area (Bilbury Banks and the closed churchyard on Laneside). The most recent Planning Practice Guidance (issued in February 2024) sets out the steps that must be taken in identifying the most appropriate location for biodiversity net gain to be provided.

The proposed alternative wording is: *“The network of local biodiversity features and habitats in Wilsden, including locally and regionally important sites and habitats identified in Figure 8, should be conserved, enhanced and respected when considering development proposals. This network should be protected from inappropriate development having regard to their ecological and biodiversity.”*

The Parish Council is committed to conserving and enhancing biodiversity in the area with particular emphasis on the Local Wildlife Sites at Goitstock Woods and Cottingley Woods – Black Hills along with sites it owns or controls, in particular Bilberry Banks and the closed churchyard on Laneside. All development proposals should deliver biodiversity net gain in line with national policy and guidance”.

Consultation point:	Policy W/NE4: Landscape		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
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Full Submission:

As the drafted, the policy does not add to existing Local Plan and national policies. It may be more appropriate to include some criteria within the policy against which development proposals will be assessed. For example, are there any distinctive landscape features that the community wish to see protected and/or enhanced.

It is noted that that reference is made to details of key landscape characteristics being incorporated within the Design Code and covered in Policy W/HO4. This wording should be strengthened to ensure a clear link between the policy and the Design Code.

According, it is suggested that wording of the policy is amended to read as follows: *“To be supported, development proposals must respect and where possible enhance the quality, character, distinctiveness and amenity value of the local landscape. Applicants should refer to the Wilsden Design Code, Homes and Neighbourhood Design Guide SPD and the adopted Landscape Character Assessment to demonstrate how they have account of the area’s landscapes in defined proposals.”*

Consultation point:	Policy W/NE5 and Figure 10		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

There should also be consistency between the policy title and the title of Figure 10. The policy title is worded as follows *“Important Open Views and Vista”*, whilst Figure 10 is titled as *“Important Views and Vistas”*. It is suggested that latter is used for the policy title.

Consultation point:	Section 4.6 – Paragraphs 4.6.1 & 4.6.2		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Section 4.6 – Paragraphs 4.6.1 & 4.6.2		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			
<p>This paragraph states that existing CBMDC Green Belt planning policies as well as policies contained in this Plan, notably W/HO4, will perform an important role in maintaining the physical separation of these settlements. Policy W/HO4 relates to the implementation of the Wilsden Design Code. Should this reference be deleted from the paragraph?</p> <p>It is noted that the community have prioritised the need to main areas of separation between settlements within and adjacent to the neighbourhood area. The issue of Green Belt is a strategic policy matter falling within the remit of the emerging Local Plan and is being addressed as part of its preparation. In addition, such areas already benefit from strong policy protections in national and local planning policies. It may be more appropriate for this section of the plan to be expressed as a community action.</p>			

9. BUSINESS AND EMPLOYMENT

Consultation point:	Policies W/E1 & W/E2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			

The principal approach in the Wilsden neighbourhood plan as regards employment uses is as follows:

“...maintain a mixed economy with continuing employment in a diverse range of small and medium sized enterprises”

The policies within the plan back up this strategy and it also falls in line with the Bradford District Economic Strategy, the principal aims of which are, inter alia:

“..... grow our economy by increasing the number of productive businesses and supporting young and enterprising people to innovate, invest and build fulfilling lives in the district.”

Wilsden is a relatively remote rural settlement about 5 miles from major centres of employment of Bradford and Keighley, it is also some distance from the principal highways network and motorways. Despite this remoteness a number of people are employed in the village in both general and local community businesses, working from home has increased as a result of Covid and the line between home and office is now blurred.

The village’s historic employment properties were built on the traditional industries which developed in the early 19th century and in particular wool processing which began in the local farms before mills were built and the village as we see now grew around the early woollen mills. As there were no modern transportation systems to provide fast route to market the rural location wasn’t a disadvantage to the mill owners. Access to raw materials and employees was more important.

The majority of employment accommodation is still in the original mill properties and most have been converted over the years. Recent new development is limited, but in the early 2000s there was development on the site of the demolished Birkshead Mill in the form of a small industrial park to complement a number of new residential units. This now provides modern accommodation for small local businesses.

At the time there was some local opposition and questioning as to whether it was justified and would ever attract occupiers, but the development is now delivering exactly what it was intended for – accommodation for small locally based businesses. Occupants include smaller building contractors, air conditioning engineers, motor vehicle repairers and a craft brewery.

Whilst there is currently no evidenced demand for additional similar development in the short term, there should be a flexible approach to maintaining existing employment accommodation as much as possible to ensure those who can work locally continue to do so. Additionally, should a local landowner believe there is demand for additional small units they should have the opportunity to provide them.

Policies W/E1 and W/E2 in the Wilsden Neighbourhood plan therefore seek to address the future provision situation by protecting existing employment sites and offering flexibility to meet future demand should the need be evidenced. Both these policies are welcomed as it will allow Wilsden to remain a village where businesses can continue to operate and provide employment opportunities for village residents.

Consultation point:	Policies W/E1 and Paragraphs 5.1.1 to 5.1.3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

The policy and/or the supporting text should also be clear what is classed as an employment use, perhaps with reference to the updated Use Classes Order (see comments below). It is assumed that by employment, the plan means uses falling in Classes B2, B8 and E(g).

The Use Classes Order 1987 was amended on 1st September 2020. Classes A, B1 and D1, applicable to retail, office and non-residential institutions and assembly and leisure uses respectively, were removed and new use classes introduced in their place. The new Class E encompasses commercial, business and service, while the new F.1 and F.2 apply to learning and non-residential institutions and local community use respectively.

In addition, some uses which were previously given their own use class have been moved into the 'sui generis' category, meaning they will from now belong to no specific class. Changes to and from these uses will be subject to full local consideration through the planning application process.

These changes have meant that development with an authorised Class E use will have much more flexibility to change to another use within Class E without the need for planning permission. This applies provided that no building work is needed to bring about the change, and subject to any conditions on the existing planning permission to restrict the use.

On 1st August 2021, changes were also made to the Permitted Development Rights regime to reflect the “new” use classes, in particular, class MA, which authorises a change of use of any building and land within its curtilage from a use within Class E to a use as a dwelling (Class C3) without the needed for planning permission.

Consultation point:	Section 5.2		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Section 5.2		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

For consistency with the rest of the plan, the paragraphs in this section of the document should be numbered.

Consultation point:	Policy W/E2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

The policy is generally supported, but it could provide more detail/criteria e.g. the type/class of employment uses that would be allowed and what are the amenity considerations that would need to be taken into account when determining a planning application. A useful local example of such a policy in a “made” neighbourhood development plan is Policy ED4 of the Oxenhope Neighbourhood Plan.
It should also be noted that the policy and section title are inconsistent.

10. CHAPTER 6: IMPORTANT COMMUNITY FACILITIES

Consultation point:	Policy W/CF2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

he inclusion of a policy supporting the provision of new or enhanced community facilities is supported. However, further explanation is required of what is meant by meeting “a parish need”. This is necessary in order to provide guidance for developers and decision makers in preparing and determining proposals. For example, is there any evidence to support what would constitute a parish need.

The policy could be strengthened by providing more detailed criteria regarding the location and design of new/enhanced community facilities

Consultation point:	Policy W/CF3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

The policy is broadly supported. Reference should be made in the policy wording that the sports facilities are also identified on the accompanying Policies Map in addition to Figure 11.

11. CHAPTER 7: SHOPS AND SHOPPING

Consultation point:	Section 7.1 – Paragraphs 7.1.1 to 7.1.3 & Figure 12		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			
The retail hierarchy set out in Core Strategy Policy EC5 classes Wilsden as a Local Centre. It was originally intended that the centre boundary would be defined in the Allocations DPD, however this will now take place via the emerging Bradford District Local Plan. Work is ongoing to define the centre boundaries supported by evidence from the Retail and Leisure Study.			
Consultation point:	Policy W/SH1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			

It is noted that the policy properly reflects the most recent Use Classes Order, however it is not clear whether the changes to Permitted Development Rights have been addressed in its wording. Furthermore, there is a degree of repetition in the wording of third sentence of the first paragraph and that of the second paragraph relate to the change of use/loss of class E1 and F2 uses as well as drinking establishments. It is suggested that the policy is amended as follows:

“Development proposals that protect and enhance Wilsden Local Centre’s role in providing retail, retail-related and community services to the village and the wider area will be supported.

Within the defined Wilsden Local Centre (as identified on Figure 12 and the Policies Map), development proposals for the use of premises for Class E1 (retail, employment and the provision of local services), F2 (local community) and Pub or drinking establishments (Use Class Sui Generis) uses will be supported, where appropriate to their scale, location and nature.

Where planning permission is required, proposals for changes of use of premises currently occupied by Class E, F2 and Pub and drinking establishment uses for other uses, including for residential uses, will not be supported unless where it can be demonstrated that:

- i. the premises are no longer commercially viable for its current use.*
- ii. the building has been actively marketed for at least six months for its current use.*
- iii. alternative facilities are available elsewhere in the area in accessible and convenient locations.*
- iv. the proposed use will make a positive contribution to the viability and vitality of the Local Centre.*

Development proposals for Class E and Class F2 use will be expected to be located within the Local Centre except where they:

- i. meet a village need;*
- ii. are of appropriate size and scale; and*
- iii. (iii) do not have an adverse impact on the role and function of the Local Centre”*

Consultation point:	Section 7.3 - Paragraph 7.3.1		
Representation ID:	-	Comment Type:	Comment
Respondent:	West Yorkshire Police	Agent:	-
Summary:			
-			
Full Submission:			

I've looked through the document and note the advice relating to shopfronts on p53, which I fully concur with. *'CBMDC has produced a Shop Front Design SPD and a Shop Front Security SPD, which outline good practice in maintaining the historic features and the streetscape.'*

This advice is based around CPTED - Crime Prevention through Environmental Design.

I advise on developments across the district and base this advice on CPTED.

In summary this looks to influence design in the following areas and inclusion of these points in the Neighbourhood plan might be of use.

1. Surveillance - Residents must be able to survey what is happening in and around public spaces, from inside and outside the properties. This should include:
 - Consideration of the location of windows in active rooms, for example kitchens and living rooms in relation to entrances, play areas, tandem parking bays and footpath routes to increase natural surveillance.
2. Movement control - Creating buildings, enclosures, and spaces, which help the residents of that space to keep out potential offenders. This should include details of:
 - Access control measures on communal entrances, internal communal doors or lifts in larger apartment blocks which can restrict stranger access to both into and around a building.
 - Direct routes whether internally or externally which mark out a route or pathway, and have good connectivity and are overlooked.
3. Management and maintenance - Ongoing Management Plans to be in place to maintain the site appearance and security including:
 - How outdoor green spaces will be maintained to prevent anti-social behaviour such as fly tipping and littering.
 - Any proposals to upgrade building security and the frequency of maintenance checks to ensure that security features are in fully working order.
4. Defensible space - The physical creation of defensible space aims to create the resident's territorial control over that space. This should include details of:
 - Boundary treatments around garden spaces and commercial car parks
 - Security measures such as lockable gates to restrict access into parking area.
 - Planting to be used to create or define areas of ownership for example front boundary treatments and front plot dividers.
 - Any proposed demarcation of private and public areas.
5. Physical security - Includes the initial design of doors, windows, fences and other physical structures or measures to increase the difficulty for offenders in entering a building or space.

Consultation point:	Section 7.3 – Paragraph 7.3.1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
<p>It is considered that the wording of this paragraph should be amended to better reflect the wording of Core Strategy Policies EN3 and DS3.</p> <p>Core Strategy Policy EN3 requires proposals to respect and reinforce the distinctive character of the area within they are located, with consideration being given to relevant CBMDC guidance including Conservation Area Appraisals and Reviews, the Shopfront Design and Security Guides, and other guidance documents. Policy DS3 (part I) seeks to ensure that the design of shopfronts is consistent with character, scale, quality and materials of the existing façade, building and street scene.</p> <p>Consideration will also need to be given in relation to the amendments to permitted development rights that allows retail units (falling with Use Class E) to be redeveloped for residential use.</p>

Consultation point:	Section 7.4 – Paragraph 7.4.1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:

Within fifth sentence it is contended that catering for customers in cars is not the function of village retail. In addition, it is queried whether any surveys on the subject of car parking within the Local Centre has been undertaken to inform the conclusion regarding the lack of provision. If so, it should be referenced within the plan.

Consultation point:	Policy W/SH4		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-

Full Submission:

It is noted that the policy links to CBMDC’s parking standards. However, these references should be clearer in the policy wording. The overall aim of the policy would appear to maintain existing car parking within the Local Centre and support an improvement in its quality and range. Therefore, it is suggested that the policy be reworded as follows:

“Proposals to improve the quality and range of car parking provision to serve Wilsden Local Centre will be supported in principle. Any new or improved car provision should be consistent with the provisions of CMBDC’s parking policy and standards set out Core Strategy Policy TR2 and Appendix 4 respectively and designed to reflect the provisions of Core Strategy Policy DS4 and other relevant national and local design guidance.

Proposed should not result in an overall reduction in car parking provision in Wilsden Local Centre except where:

- i. it can be demonstrated that the loss of parking will not have a severe adverse impact on parking provision and road safety in the Village and/or will not have an adverse impact on the viability of shops within Wilsden Local Centre; or*
- ii. (ii) adequate and suitable replacement car parking provision is provided on the site or a nearby suitable location in or adjacent to Wilsden Local Centre.”*

12. CHAPTER 8: TRANSPORT AND ACCESSIBILITY

Consultation point:	Policy W/TA1 and Paragraphs 8.0.1 to 8.0.8		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

The policy is sensible. It is also good that there is a local ambition for sustainable transport. Would the policy title benefit from rewording to ‘Sustainable modes of travel’?

The plan identifies that local residents wish to reduce their reliance on the car and make some journeys on foot or cycle instead. The plan would be a good place, potentially within the supporting text or an additional community action, to identify opportunities to improve this situation (e.g. by proposing specific improvements to areas of public realm, streets, crossing points, new pedestrian/cycle links etc). This could help to better support the case for funding and developer contributions

Consultation point:	Policy W/TA2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is queried if there any formal cycleways within the parish.

The plan would be a good place, potentially within the support text or an additional community action, to identify opportunities to improve this situation (e.g. by proposing specific improvements to areas of public realm, streets, crossing points, new pedestrian/cycle links etc). This could help to better support the case for funding and developer contributions.

The plan should include a map within the plan which clearly identifies such routes and where improvements are required.

Furthermore, it is suggested that the policy could usefully refer to the development of the missing section of the Great Northern Trail between Hewenden Viaduct and Thornton

Consultation point:	Policy W/TA3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

Traffic management measures are not planning policies and should not be included within the plan as such.
This policy should refer to the safety of cyclists along Main Street.

13. CHAPTER 9: DEVELOPER CONTRIBUTION

Consultation point:	Chapter 9: Developer Contributions		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	
-	
Full Submission:	
For consistency with the rest of the plan, the paragraphs in this section of the document should be numbered.	

Consultation point:	Policy W/DC1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	
-	
Full Submission:	
As drafted, this is not a planning policy and more akin to a Parish Council Action Plan priority list. Further information should be included in respect of how the objectives were devised and whether there is was any evidence produced to support it.	

14. CHAPTER 10: MONITORING AND REVIEW

Consultation point:	Chapter 10		
Representation ID:	-	Comment Type	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent	-

Summary:	
-	

Full Submission:			
For consistency with the rest of the plan, the paragraphs in this section of the document should be numbered.			
Consultation point:	Chapter 10		
Representation ID:	-	Comment Type	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent	-
Summary:			
-			
Full Submission:			
The plan lacks a clear monitoring framework to demonstrate how the plans effectiveness will be monitored. E.g. list of indicators / targets etc. for the plan which will be monitored against. What data will be collected and monitored to ensure the effectiveness of the plan and its policies?			

15. APPENDIX 1: LISTED BUILDINGS IN WILSDEN (2020)

Consultation point:	Appendix 1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			

It is noted Historic England records show that the Wilsden Co-operative Society located on Main Street is classed as a Grade II Listed Building. However, from examining aerial photography and Streetview, there does not appear to be building on the site. It is currently a car park/loading bay for the adjacent Co-op store. It is understood that the original building was demolished in the mid-1980s. However, it is noted that there is a shelter immediately adjacent to the site which contains a number of features relating to the buildings. It is not listed.

16. WILSDEN DESIGN CODE

Consultation point:	Wilsden Design Code		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is noted that each chapter and section of the Design Code has a heading or paragraph number, however it is recommended that every paragraph should be numbered. This will aid navigation of the document and allow ease of reference for decision makers when assessing proposals and their compliance with the Design Code.

Consultation point:	Wilsden Design Code		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:			
It is suggested that all maps contained within the Design Code should be labelled as “ <i>Figure</i> ” and given a number e.g “ <i>Figure 1: Map showing the neighbourhood plan area of Wilsden</i> ”. This will aid navigation. Cross references between the text, maps, diagrams and photographs would also be helpful, where appropriate.			

Consultation point:	Wilsden Design Code		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:			
-			

Full Submission:			
It is suggested that the Design Code includes a Glossary of Terms to aid readers in their understanding of the document and its contents.			

Consultation point:	Wilsden Design Code		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:			
-			

Full Submission:			
Any photographs used within the Design Code that show dwellings or vehicles should be checked to ensure that house numbers/names and number plates are not visible and/or obscured.			

Consultation point:	Wilsden Design Code		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
We consider this to be a well written and comprehensive document, presented in an appealing and easily understandable manner. The use of visuals, photographs, maps and sketches, is well thought out and engaging. We are supportive of the approach taken and the guidance/policies put forward as part of the Design Code.

Consultation point:	Section 1: Introduction - Paragraph 1.6 (Planning Context)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
The Neighbourhood Plan contains a policy W/SH3 Shop Front Design in Wilsden Local Centre. It is suggested that that reference be made to CBMDCs Shop Front Design Guide SPD and the policy to ensure a there is adequate reference between the documents to aid any future use of these documents.

Consultation point:	Section 1: Introduction - Paragraph 1.6 (Planning Context)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

The Neighbourhood Plan Policy W/SH3 seeks to address the concern of the loss of traditional shop frontages in Wilsden. To maintain the linkages with existing planning policy, this section could also usefully reference CBMDCs Shop Front Design Guide SPD.
 The Design Code may even consider expanding on this within the document to demonstrate how a planning proposal should conserve the traditional appearance of the property with a traditional shop frontage.

Consultation point:	Section 2: Place Assessment - Paragraph 2.1 & Section 4: Character Areas & Design Codes		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

The use of the terms ‘Character Areas’ in the Design Guide may cause some confusion with the ‘Special Character Areas’ identified in the Built Heritage section of the Neighbourhood Plan however it is explained in the text. Perhaps an expanded note to clarify what a Special Character Area is could be included within the Design Code document. It is briefly mentioned in section 2.1.

Consultation point:	Section 2: Place Assessment - Paragraph 2.1 (Historic Evolution & Heritage)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

The third sentence of the second paragraph referred to 40 Non-Designated Heritage Assets being identified. The supporting evidence for locally important buildings and structures refers to 39 of the assets being identified. This should be amended for consistency.

Consultation point:	Section 2: Place Assessment - Paragraph 2.1 (Historic Evolution & Heritage and Map Showing Heritage Assets		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is suggested that this shown on an Ordnance Survey base map rather than an aerial photograph. As drawn it is difficult to identify a number of the listed buildings and the conservation area boundary. There should also be some consistency regarding the labelling of the Listed Buildings. It is appreciated that the labels used are intended to the relate to adjacent photographs, however it may be more appropriate to include a table with details of all the Listed Buildings in the neighbourhood plan area and give each a number or letter identifier that could appear on the map. Consideration should be given to the colours used, should aerial photographs continue to be used.

Consultation point:	Section 2: Place Assessment - Paragraph 2.3 (Route Hierarchy & Route Hierarchy Map)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

CBMDC wish to make a number of comments in relation to the route hierarchy set out in section 2.3 and on the accompanying map.

1. Old Allen Road is shown as a “Secondary Route”, but it is considered that this should be a “Primary Route”
2. Back Lane skirts the Parish Boundary to the south – it is queried whether this should be shown as a “Primary Route” on the map.
3. The sixth paragraph refers to National Cycle Network Route 69 as being known as ‘the Alpine Route’. It would be better if it referred to in paragraph as the ‘Great Northern Rail Trail’. It also says it connects to Morecambe with Grimsby (the description from the Sustrans Website). However, the section of NCN69 is not continuous route and only provides traffic route to Cullingworth which would be more relevant to Wilsden and should be referred to.
4. The Blue dotted line on the map is referred to as Bridleway – this is not correct; is the reference being made to the Calder/Aire Link Bridleway – not all of this is Bridleway some of it is highway – therefore the key should give it it’s full name as it is misleading

5. 5. The map shows PROW. It would be useful if this could distinguish between footpaths and bridleways

Consultation point:	Section 2: Place Assessment - Paragraph 2.4 (Village & Open Space Structure) and Village Structure & Open Space Map)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is suggested that this shown on an Ordnance Survey base map rather than an aerial photograph. As drawn, it is difficult to identify a number of the local amenities/facilities. Consideration should be given to the colours used, should aerial photographs continue to be used.

Consultation point:	Section 2: Place Assessment - Paragraph 2.4 (Village & Open Space Structure) and 1ha Housing Density Samples Map.		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:
 It is suggested that this shown on an Ordnance Survey base map rather than an aerial photograph. As drawn it is difficult to identify a number of the local amenities/facilities. Consideration should be given to the colours used, should aerial photographs continue to be used.

Consultation point:	Section 2: Place Assessment - Paragraph 2.5 (Sense of Place & Wayfinding) and Sense of Place & Wayfinding Map		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:
 It is suggested that this shown on an Ordnance Survey base map rather than an aerial photograph. As drawn it is difficult to identify a number of map's features. Consideration should be given to the colours used, should aerial photographs continue to be used.

Consultation point:	Section 2: Place Assessment - Paragraph 2.5 (Sense of Place & Wayfinding) and Sense of Place & Wayfinding Map		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	
-	
Full Submission:	
<p>he text only discusses Sense of Place; it does not refer to Wayfinding. It should discuss Wayfinding of facilities in the village and wayfinding of links to GNRT, the Calder/Aire Link and Millennium Way particularly from the Main Street. The map shows PROW. It would be useful if this could distinguish between footpaths and bridleways.</p>	

Consultation point:	Section 4: Character Areas and Design Codes - Paragraphs 4.1 to 4.8)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	
-	
Full Submission:	
<p>It would be useful to understand how the various codes have been developed and what evidence has been used to underpin them. For example, can they be linked to planning policy, building regulations or good practice. This will assist with implementation via the development management process.</p>	

Consultation point:	Section 4: Character Areas and Design Codes - Paragraph 4.3.1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
<p>It is noted that this section of the Design Guide refers to the proposed site allocation within the emerging Local Plan at Crooke Lane (Ref: WI1/H).</p> <p>With regard to the emerging Local Plan it must be noted that it is still at an early stage in its preparation, having reached the Preferred Options stage under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). There are still a number of stages that need to be completed before it can be given any weight in decision making and in preparing neighbourhood plans (and their associated documents such as Design Guides/Codes). The emerging Local Plan is still the subject of a number of unresolved representations submitted during the consultation on the Preferred Options version.</p> <p>Similarly, the proposed site allocations identified within the Draft Local Plan are in a similar position. Their inclusion within the emerging Design Guide (and neighbourhood plan) would seem predicate the outcome of the Local Plan period. Therefore, it is suggested that they are removed from the document at this point in time.</p> <p>In order to provide clarity for readers, the Design Code, as well as the emerging Neighbourhood Plan, should be clear regarding the current status of the emerging Local Plan and the proposed site allocations.</p>

Consultation point:	Section 4: Character Areas and Design Codes - Paragraph 4.3.3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
It is noted that this section of the Design Guide refers to the proposed site allocations within the emerging Local Plan at Crooke Lane (Ref: WI1/H).

With regard to the emerging Local Plan it must be noted that it is still at an early stage in its preparation, having reached the Preferred Options stage under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). There are still a number of stages that need to be completed before it can be given any weight in decision making and in preparing neighbourhood plans (and their associated documents such as Design Guides/Codes). The emerging Local Plan is still the subject of a number of unresolved representations submitted during the consultation on the Preferred Options version.

Similarly, the proposed site allocations identified within the Draft Local Plan are in a similar position. Their inclusion within the emerging Design Guide (and neighbourhood plan) would seem predicate the outcome of the Local Plan period. Therefore, it is suggested that they are removed from the document at this point in time.

In order to provide clarity for readers, the Design Code, as well as the emerging Neighbourhood Plan, should be clear regarding the current status of the emerging Local Plan and the proposed site allocations.

Consultation point:	Code 1: Sustainability and Climate Change		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is noted that the code refers to the standards for cycling parking/storage provision set out via Core Strategy Policy TR2 & Appendix 4. In addition, the code could usefully refer to CBMDC’s Homes and Neighbourhoods Design Guide SPD Principle 2.15.

Consultation point:	Code 2: Landscape, Views and the Settlement Edge		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Code 2: Landscape, Views and the Settlement Edge		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
It is recognised that maintaining a degree of separation of between Wilstden and its neighbourhood settlements is an important issue for the local community. However, it should be recognised that matters relating to the Green Belt and separation between settlements is a matter for the Core Strategy and emerging Local Plan.

Consultation point:	Code 3: Building Design		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
Sub Heading error – ‘3b – Sensitive Conservation of Historic Buildings’ - should this be ‘Conversion’?

Consultation point:	Code 4: Parking, Gardens and Boundary Treatments		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Code 4: Parking, Gardens and Boundary Treatments		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	-		
Full Submission:	It is recommended that reference is made to Core Strategy Policy TR2 and Appendix 4 in this section to aid future use of the document.		

Consultation point:	Code 4: Parking, Gardens and Boundary Treatments		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	-		
Full Submission:	Part 4A – On-Street Parking (2nd Sentence) - The wording is agreed, however it is suggested that it could be stronger.		

Consultation point:	Code 4: Parking, Gardens and Boundary Treatments		
Representation ID:	-	Comment Type:	Support

Consultation point:	Code 4: Parking, Gardens and Boundary Treatments		
Respondent:	Avant Homes	Agent:	ID Planning

Summary:

-

Full Submission:

Code 4B states that a maximum of 2 adjacent dwellings on a street will be permitted to provide parking in front of dwellings. The proposed wording is too prescriptive and should be amended to provide flexibility and enable a site by site response where such parking may be appropriate. The code wording should be amended as follows:
“Parking provided on driveways directly in front of dwellings should be restricted due to the visual impact that cars have on the street-scene. Where parking is to be provided at the front of a dwelling, front gardens should be a minimum depth of 6m to allow movement around parked vehicles and also be well screened with hedgerows”.

Consultation point:	Code 4: Parking, Gardens and Boundary Treatments		
Representation ID:	-	Comment Type:	Support
Respondent:	Avant Homes	Agent:	ID Planning

Summary:

-

Full Submission:

Code 4E: Boundary Treatments
 The code states that timber fencing will not be an appropriate boundary treatment in future development proposals.

The wording is too prescriptive and should be amended to provide flexibility. Whilst timber fencing is unlikely to be appropriate on site boundaries there may be instances where a suitable fence is appropriate for plot division boundaries. The wording should be amended to enable flexibility for a site by site response.

Consultation point:	Code 4: Parking, Gardens and Boundary Treatments		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

4F – Back Gardens: it states that a minimum size of 50 sq. m should be allowed for gardens and 10mtrs plus length. Larger gardens are good for food growing spaces, sun capture for solar panels and safe children’s play, however it is queried how will this affect the density of all new development in Wilsden and compliance with current and future local planning policy regarding the efficient use of land and housing density.

Consultation point:	Section 5: Site Responses (Paragraph 5.1)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is useful to see how the emerging Design Code could potentially be applied to a proposed site. It is suggested that the heading for paragraph 5.1 is changed to “In settlement scenario”, which would address the above.

The introductory text should be clear that the sites used for the scenarios are only examples of how the Code could be applied to different types of site within the parish area, and in no way implies that either site will be allocated in the emerging Local Plan or that proposals for development will necessarily be approved. In relation to Crooke Lane, it may be best not to name the site.

Any proposals that come forward would be determined on their merits (see previous comments regarding the status of the proposed allocations in the emerging Local Plan).

Consultation point:	Section 6: Next Steps		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
In order to future proof the document, it is recommended that the wording is amended to take account of any future changes to national policy – e.g. “As well as using this document, future developers should also make sure that they have observed the latest guidance...”

Consultation point:	Section 6: Next Steps		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-

Full Submission:

The Design Guide states that it “forms part of the evidence base for the neighbourhood plan and it is recommended that the codes are embedded within the forthcoming plan as policy”. (Page 63)

It is recommended that this paragraph is amended at the next stage to clearly link to the relevant supporting policy (W/HO4) within the neighbourhood plan. This would aid users in referencing the policies and elements of the design code.

17. STRATEGIC ENVIRONMENTAL ASSESSMENT/HABITAT REGULATIONS ASSESSMENT (SEA/HRA) SCREENING

Consultation point:	Strategic Environmental Assessment and Habitats Regulations Assessment		
Representation ID:	-	Comment Type:	Comment
Respondent:	Environment Agency	Agent:	-

Summary:

-

Full Submission:

We acknowledge the approach and methodology applied in undertaking the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). We observe that the Wiltsden NDP will seek to be compliant and in accordance with other City of Bradford Metropolitan District Council (CBMDC) Local Plan documents. Further, the Environment Agency notes that, while underlining valued aims, Neighbourhood Plans in isolation are limited in their overall influence and that the Plan does not allocate sites for development.

Consultation point:	Section 3 – Table 1: Policy W/HO6		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	
-	
Full Submission:	
Check wording	

Consultation point:	Section 3 – Table 1: Policy W/BH3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	
-	
Full Submission:	
Check wording. This should read “Seeks to designate Hallas Bridge and Birkshead as Special Character Areas because of their historic and architectural interest”.	

Consultation point:	Section 3 – Table 1: Policy W/NE1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	
-	
Full Submission:	

Amend the description of the policy intent to read: “*Seeks to protect important Local Green Spaces that are special to the community*”. This will better reflect the policy name and is more consistent with the NPPF.

Consultation point:	Section 4 – Table 2: Stage 2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

Correct that it is not required by legislation but is subject to legislation if prepared – however, partly contradicts the flow diagram in Figure 1.

Consultation point:	Section 5: Determination of Significant Effects - Determination		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

Generally, agree with the conclusion that the plan is unlikely to result in significant negative environmental impacts.

Consultation point:	Section 6: HRA Screening Assessment – Table 4		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
Possibly unnecessary – but more detailed reference could be made to Policy SC8 of the adopted Core Strategy and the recently adopted SPD which provides the strategic mitigation framework for mitigating against recreational pressure as a result of new development.

Consultation point:	Section 6: HRA Screening Assessment (Determination of Significant Effects) – First to Third Paragraphs		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
Agree with the conclusions of the HRA Screening Assessment and have no further comments

Consultation point:	Section 7: Screening Conclusion		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			
Agree with the conclusion for both SEA and HRA.			

18. SUPPORTING EVIDENCE DOCUMENTS

Consultation point:	Evidence for Locally Important & Buildings		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			
Can the list be added to and/or amended as and when required or is it an exhaustive list? If it can be added to, will buildings or structures for consideration be assessed using the same methodology?			

Consultation point:	Evidence for Locally Important & Buildings		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

It may also be worth reconsidering whether some of the buildings/structures in the list should also be identified as being of ‘Architectural interest’ given that many are examples of distinctive building types including local vernacular architecture and 19th century industrial architecture. They are also mostly built using local materials such as local stone, stone slate roofs etc.

Consultation point:	Evidence for Locally Important & Buildings		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

The use of a clear maps showing the location of each asset alongside its assessment form is welcomed ensures that each entry is clearly identified.

Consultation point:	Evidence for Locally Important & Buildings – Introduction – Policy Context		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

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Full Submission:

The references to the NPPF should be updated to reflect the December 2023 version. It should be re-worded as follows:
 “The National Planning Policy Framework (NPPF) recognises the importance of conserving and enhancing the historic environment to an area. Section 16 (paragraphs 195 to 214) of the NPPF covers all aspects of the historic environment. Paragraph 195 makes the Government’s position on heritage very clear, stating “Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”. It also introduces the concept of non-designated heritage assets. A non-designated heritage asset is a building, monument, site, place, area or landscape identified as having a degree of significance, but which is not afforded statutory protection through Listed Building, Scheduled Monument etc. status
 Paragraph 209 of the NPPF provides the following information on non-designated heritage assets: “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

Consultation point:	Evidence for Locally Important & Buildings – Step 1		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Evidence for Locally Important & Buildings – Step 1		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	-		
Full Submission:	It might be helpful if the reference to ‘sites’ is changed to ‘heritage asset’ for clarity and to reflect national/local guidance on such assets. For example - “A total of 39 potential heritage assets were identified....” Instead of “A total of 39 potential assets were identified....”. This term is used within Step 2 and Step 3 and within the assessment.		

Consultation point:	Evidence for Locally Important & Buildings – Step 2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	-		
Full Submission:	For consistency in the use of terminology, the second and third sentences should be amended to read “ <i>This enabled a consistent and transparent methodology for identifying Non-Designated Heritage Assessments in the Parish. Each potential asset was assessed</i> ”.		

Consultation point:	Evidence for Locally Important & Buildings – Step 3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
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Full Submission:			
For consistency in the use of terminology, the wording “ <i>Local Heritage Assets</i> ” in the second sentence of the second paragraph should be amended to “ <i>Non-Designated Heritage Assets</i> ”.			