

### WILSDEN NEIGHBOURHOOD DEVELOPMENT PLAN (2020 TO 2038)

### **COMMENTS FORM (FEBRUARY 2024)**

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

This consultation seeks your views on whether the Wilsden Neighbourhood Development Plan meets the Basic Conditions<sup>1</sup> which are that the plan:

- Must be appropriate having regard to National Planning Policy.
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The consultation period starts on **Monday 5**<sup>th</sup> **February** and closes at 5pm on **Monday 18**<sup>th</sup> **March 2024**.

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

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Date Ack.	
Respondent ID	
Representation Ref:	

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	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable,		
Title		MRS		
Full Name		RACHAEL MARTIN		
Job Title (where relevant)		DIRECTOR		
Organisation (where relevant)	AVANT HOMES	ID PLANNING		
Address	C/O AGENT			
Post Code				
Email Address				
Telephone Number				
2. FUTURE NOTIFICATION				
Please tell us if you would like to be notified when City of Bradford Metropolitan District				
Council decide to make the Plan under Regulation 19 (to bring it into legal force after examination and local referendum.				

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### **PART B - YOUR COMMENTS**

3. To which document does your comment relate? Please place an 'X' in one box only						
Neighbourhood De Plan (NDP)	velopment	Х		Basic Condi	tions Stateme	ent
Consultation Stater	ment		Other (please specify)			·y)
4. To which part	of the docum	ent does your con	nment re	ate?		
Whole document		Section			Policy	
Page Number	12	Paragraph				
5. Do you wish t	o? Please plac	e an 'X' in one box	only			
Support	Х	Object			Make an observation	on
				port / object	ion or to mak	ke your observation
6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.  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.						
7. Signature:	R MARTIN			Date	::	13.3.24



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Please tell us if you would Council decide to make th				
examination and local refer	No No			

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Neighbourhood Development Plan (NDP)	Х	Basic Condition	s Statement		
Consultation Statement Other (please specify)					
4. To which part of the docum	ent does your comm	nent relate?			
Whole document	Section		Policy	W/HO1	
Page Number	Paragraph				
5. Do you wish to? Please place	ce an 'X' in one box or	nly			
Support X	Object		Make an observation		
6. Please use the box below to and give details of any sug	give reasons for yogested modifications	our support / objection s.	or to make y	our observation	
6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.  We support proposed Policy W/HO1.					
7. Signature: R MARTIN		Date:		13.3.24	



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### **PART B - YOUR COMMENTS**

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

3. To which document does your comment relate? Please place an 'X' in one box only						
Neighbourhood Dev Plan (NDP)	elopment	X	Basic Conditions Statement			
Consultation Statem	ent		Other (please specify)			
4. To which part of the document does your comment relate?						
Whole document		Section	on 1.4 Policy			
Page Number		Paragraph	'			
5. Do you wish to? Please place an 'X' in one box only						
Support	Х	Object		Make an observation	Х	

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

### Section 1.4 Review of the Green Belt.

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 <u>Draft Local Plan are included</u> within a revised Wilsden Settlement Boundary.

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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.

|--|



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Neighbourhood D Plan (NDP)	evelopment	X Basic Conditions Statement					
Consultation State	ement			Other (	(please sp	ecify)	
4. To which par	t of the docum	ent does your comr	nent re	late?			
Whole document	i	Section		2.2	Po	olicy	
Page Number	20	Paragraph					
5. Do you wish	to? Please plac	e an 'X' in one box o	nly				
Support		Object		Χ	Make obser	an vation	Х
6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.  Section 2.2 Housing Provision, Page 20  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.							
7. Signature:	R MARTIN			Date	):		13.3.24



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Telephone Number					
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Neighbourhood Dev Plan (NDP)	/elopment	х	Basic Conditions Statement				
Consultation Statem	nent			Other (p	please sp	ecify)	
4. To which part of	of the docume	nt does your com	ment re	ate?			
Whole document		Section			Po	licy	W/HO6
Page Number		Paragraph					
5. Do you wish to	? Please place	an 'X' in one box o	only				
Support	Х	Object			Make obser	an vation	Х
				port / objecti	on or to	make y	our observation
6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.  Policy W/HO6 Housing Mix  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 of more dwellings, the policy states housing mix should include no more than 35% of properties of 4 bedrooms or more.  We consider the proposed policy and threshold is acceptable and support the potential for developments to deliver and alternative mix subject to suitable and robust justification.							
7. Signature:	MARTIN			Date			13.3.24



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	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)			
Title		MRS			
Full Name		RACHAEL MARTIN			
Job Title (where relevant)		DIRECTOR			
Organisation (where relevant)	AVANT HOMES	ID PLANNING			
Address	C/O AGENT				
Post Code					
Email Address					
Telephone Number					
2. FUTURE NOTIFICATION					
Please tell us if you would like to be notified when City of Bradford Metropolitan District					
Council decide to make the Plan under Regulation 19 (to bring it into legal force after examination and local referendum.					

### **PART B - YOUR COMMENTS**

3. To willest docu	illielit does yo	our comment relate	er Pleas	e piace ari A	in one box	k Orlly	
Neighbourhood Dev Plan (NDP)	velopment	X		Basic Condi	tions Stater	ment	
Consultation Statem	onsultation Statement Other (please specify)						
4. To which part	of the docum	ent does your com	ment rel	ate?			
Whole document		Section			Poli	су	W/HO7
Page Number		Paragraph				•	
5. Do you wish to	? Please plac	e an 'X' in one box o	only				
Support	Х	Object			Make a observa		Х
				port / objecti	on or to m	nake yo	our observation
The affordable ho to the affordable	6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.  Policy W/HO7 Affordable Housing  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.						
7. Signature:	MARTIN			Date	:		13.3.24



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

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Date Rec.	
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Telephone Number				
2. FUTURE NOTIFICATION	ON			
Please tell us if you would like to be notified when City of Bradford Metropolitan District  Yes  X				
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3. To which document does your comment relate? Please place an 'X' in one box only							
Neighbourhood Dev Plan (NDP)	/elopment	Х	Basic Conditions Statement				
Consultation Statem	nent			Other (	please sp	ecify)	
4. To which part	of the docume	ent does your com	ment re	ate?			
Whole document		Section			Po	licy	W/BH4
Page Number		Paragraph					
5. Do you wish to	? Please plac	e an 'X' in one box o	nly				
Support	Х	Object			Make obser	an vation	Х
and give detail  Policy W/BH4 Dry  The policy states impact on a natural of the development stone wall of equivalent with the policy was a required for the wording should be a manufactured for the word	s of any suggest Stone Walls that development will outweig valent value is colicy in seeking is required amended to the that specific that specific is seen that specific is sea	ment proposals that will only be supported the harm cause is provided in a suitage to ensure that the dot of allow for instants to enable development to enable development the following:  cific technical required of the wall or the following the suitage of the wall or the suitage of the suitage of the wall or the suitage of the suitag	at would rted whed by the table lot hese chances wellopmer	I result in the ere it can be e removal o cation in the naracter feat where the rent. To accounts and/or	e remova e demon r the wal parish. ures are moval of nt for the	retaine parts o	have an adverse that the benefits replacement dry-ed but consider a f a dry stone wall ances, the policy
7. Signature: R	MARTIN			Date	:		13.3.24



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Address	C/O AGENT			
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Telephone Number				
2. FUTURE NOTIFICATION	DN			
Please tell us if you would like to be notified when City of Bradford Metropolitan District				
Council decide to make the Plan under Regulation 19 (to bring it into legal force after examination and local referendum.  No				

### **PART B - YOUR COMMENTS**

3. To which document does your comment relate? Please place an 'X' in one box only							
Neighbourhood De <sup>o</sup> Plan (NDP)	velopment	X Basic Conditions Statement					
Consultation Staten	nent			Other (	please spec	cify)	
4. To which part	of the docum	ent does your com	nment re	late?			
Whole document		Section			Polic	су	W/NE2
Page Number		Paragraph				•	
5. Do you wish to	? Please plac	e an 'X' in one box	only				
Support	Х	Object			Make ar observa		Х
6. Please use the and give detai		give reasons for gested modification		port / object	ion or to ma	ake yo	our observation
Policy W/NE2 Eco	Policy W/NE2 Ecology and Biodiversity						
	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.						
The wording of the policy should be amended to refer to 'as required by CBMDC Development Plan policies'							
7. Signature:	MARTIN			Date	):		13.3.24



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### COMMENT FORM

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Please tell us if you would like to be notified when City of Bradford Metropolitan District  Yes				
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### **PART B - YOUR COMMENTS**

3. To which document does your comment relate? Please place an 'X' in one box only							
Neighbourhood Development Plan (NDP)			Basic Conditions Statement			ement	
Consultation Statement				Other (please specify)			X Design Code
4. To which part	4. To which part of the document does your comment relate?						
Whole document		Section			Po	licy	Code 4
Page Number		Paragraph				·	
5. Do you wish t	o? Please plac	e an 'X' in one box o	only				
Support	Х	Object			Make obser		Х
6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.							
and give details of any suggested modifications.  Code 4- Parking, Gardens and Boundary Treatments  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.							
7. Signature:	R MARTIN			Date	<b>)</b> :		13.3.24



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Please tell us if you would					
Council decide to make the examination and local reference	Into legal force after  No				

For Office Use only:			

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Neighbourhood De	Neighbourhood Development Plan (NDP)			Basic Conditions Statement			
Consultation Stater	nent		Other (please specify)		cify)	X Design Code	
4. To which part of the document does your comment relate?							
Whole document		Section			Polid	су	Code 4E
Page Number		Paragraph				-	
5. Do you wish to	o? Please plac	e an 'X' in one box	only				
Support	Х	Object			Make a observa		Х
6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.							
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.							
7. Signature:	R MARTIN			Date	):		13.3.24