

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 Conditions¹ which are that the plan:

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

The consultation period starts on **Monday 5th February** and closes at 5pm on **Monday 18th March 2024**.

The Plan and supporting documents are available to view electronically at:

www.bradford.gov.uk/consultations as well on the Council's Opus Consult portal:

<https://bradford.oc2.uk/>. Hard copies are available to inspect during normal opening hours at:

- CBMDC Customer Service Centre, Britannia House, Hall Ings, Bradford, BD1 1HX.
- City Library, Centenary Square, Bradford, BD1 1SD.
- Bingley Library, 5 Rise Shopping Centre, Bingley, BD16 1AW.
- Wilsden Post Office, 112 Main Street, Wilsden, BD15 0AB.

How to submit your comments:

Please ensure you complete both parts of this comment form otherwise your comments may not be accepted.

Comments can be submitted:

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

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

Contact Details:

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

- **Telephone:** 01247 433679
- **Email:** planning.policy@bradford.gov.uk

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

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

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

PART A: PERSONAL DETAILS

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

1. PERSONAL / AGENT DETAILS		
	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title		
Full Name	Local Plans Team	
Job Title (where relevant)		
Organisation (where relevant)	City of Bradford Metropolitan District Council	
Address	4 th Floor, Britannia House Broadway Bradford	
Post Code	BD1 4HX	
Email Address	planning.policy@bradford.gov.uk	
Telephone Number		

2. FUTURE NOTIFICATION

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

Yes

No

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

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PART B – YOUR COMMENTS

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

3. To which document does your comment relate? Please place an 'X' in one box only

Neighbourhood Development Plan (NDP)	X	Basic Conditions Statement	
Consultation Statement		Other (please specify)	See attachment

4. To which part of the document does your comment relate?

Whole document	See attachment	Section	See attachment	Policy	See attachment
Page Number	See attachment	Paragraph	See attachment		

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

Support		Object		Make an observation	X
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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.

Please see attached document for details of City of Bradford Metropolitan District Council's comments on the draft Wilsden Neighbourhood Development Plan and its supporting documents.

7. Signature:		Date:	18.03.2024
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WILSDEN NEIGHBOURHOOD PLAN (2020 TO 2038)
REGULATION 16 DRAFT (FEBRUARY/MARCH 2024)
CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL COMMENTS/OBSERVATIONS

Neighbourhood Development Plan Document

Representation Reference	Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
	General Comment	-	-	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.
	General Comment	-	-	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.
	General Comment	5	Abbreviations	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”.
	Introduction	6	Sixth Paragraph	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?
	Introduction	7	Twelfth Paragraph	It is suggested that this paragraph is updated to better reflect the ongoing process of preparing the emerging Bradford District Local Plan.
	1.2	13	Paragraph 1.2.4	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

	Directing Development to the most Sustainable Locations			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.
	1.2 Directing Development to the most Sustainable Locations	13	Paragraph 1.2.9	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. It is recommended that this paragraph be deleted.
	1.3 Development within Wilsden Village	16	Policy W/HO1	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.
	1.4 Review of the Green Belt	16 & 17	Paragraphs 1.4.1 to 1.4.9 Figure 3	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 (W12/H and W13/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.

				<p>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.</p> <p>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.</p> <p>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.</p>
				<p>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.</p> <p>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.</p>
	1.5 Development outside Wilsden Village	18	Policy W/HO2	<p>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.</p> <p>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.</p>
	2 Housing Need	20	Paragraph 2.0.1	<p>This 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</p>

				as an alternative: <i>“Housing including its location and type was highlighted during consultation as an issue of great concern and interest to local people”</i> .
	2.2 Housing Provision	20	Paragraph 2.2.7	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.
	2.3 Providing this Housing Requirement	20 & 21	Paragraphs 2.3.1 & 2.3.2 Figure 4	<p>These paragraphs refer to a site identified within the Draft Local Plan (Draft proposed site allocation W11/H Croke Lane).</p> <p>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.</p> <p>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.</p>
	2.3 Providing this Requirement	20 & 21	Policy W/HO3 Paragraph 2.3.4	<p>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.</p> <p>It should be noted that the planning application referred to in Paragraph 2.3.4 is still pending consideration by the Local Planning Authority.</p>
	2.3 Providing this Requirement	21	Paragraph 2.3.4 Figure 4	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 re-use of the site for residential development is noted. However, its suitability can only be determined when

				<p>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.</p> <p>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.</p> <p>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. As highlighted previously, this work still has some distance to run before final allocations are adopted.</p>
	2.3 Providing this Requirement	21	Paragraph 2.3.4 Figure 4	<p>Figure 4 shows the proposed Local Plan allocation W1/H: Crooke 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.</p> <p>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.</p> <p>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.</p>
	2.4 Design	21 & 22	Paragraph 2.4.2	<p>The second sentence states that “<i>The Wilsden Design Code also incorporates specific design codes for sites within the settlement area and for edge of settlement sites</i>”. It would be more to state these are examples of how the Design Code be applied to different types of sites within the parish area. It should be made clear that work on identifying proposed site allocations is ongoing (see previously comments regarding the status of proposed allocations in the emerging Local Plan).</p>
	2.5 Windfall Development	22 & 22	Policy W/HO5	<p>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.</p>

	2.7 Affordable Housing	24 & 25	Policy W/HO7	<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>
	3.2 Wilsden Non-Designated Heritage Assets Supporting Evidence for Locally Important Buildings and Structures Policies Map	26	Paragraph 3.2.3 Figure 5	<p>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.</p> <p>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: <i>“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.”</i></p>
	3.2 Wilsden Non-Designated Heritage Assets	27	Figure 5	<p>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.</p>

	3.2 Wilsden Important Buildings and Structures	28 & 29	Policy W/BH1	<p>The first paragraph of the policy should be amended to read “The Plan identifies the following buildings and structures (also shown in Figure 5 and on the Policies Map), as Wilsden Non-Designated Heritage Assets....”. 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>
	3.3 Wilsden Conservation Area	32	Policy W/BH2	<p>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.</p> <p>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.</p>
	3.4 Hallas Bridge & Birkshead Special Character Areas	33-35	-	<p>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.</p>
	3.4 Hallas Bridge & Birkshead Special Character Areas	33	Policy W/BH3	<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 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.</p>

	4.1 Important Local Green Spaces	35	Paragraph 4.1.2	The first sentence should be amended to read <i>“The National Planning Policy Framework...”</i>
	4.1	37	Policy W/NE1	The final paragraph should be amended to read <i>“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.”</i> . This would be more consistent with national policy.
	4.1 Important Local Green Spaces	36 & 37	W/NE1-1 Figure 8 & Table 1 Policies Map	<p>Local Green Space W/NE1-1 - Fields to the East /North East of St Matthews Church -</p> <p>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).</p> <p>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.</p> <p>It is believed that the site does not meet that criteria for the following reasons:</p> <ul style="list-style-type: none"> • 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 <p>The Council would be grateful if the points made above are given careful consideration and the proposed designation removed from the Neighbourhood Plan.</p>
	4.1 Important Local Green Spaces	36 & 37	W/NE1-1 Figure 8 & Table 1	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.
	4.1	36 & 37	W/NE1-2	Local Green Space W/NE1-2 - Cricket Pitch & adjacent field –

	Important Local Green Spaces		Figure 8 & Table 1	<p>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.</p> <p>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.</p> <p>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.</p>
			Paragraph 4.2.4	The first sentence should be amended to read "There are two Local Wildlife Sites (LWS) within..."
	4.2 Ecology & Biodiversity	39	Paragraphs 4.2.1 to 4.2.7 Figure 9 Policies Map	<p>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.</p> <p>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.</p> <p>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.</p>
	4.2 Ecology & Biodiversity	39	Policy W/NE2	<p>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.</p> <p>The proposed alternative wording is: <i>"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."</i></p>

				<i>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.</i>
	4.4 Landscape	42	Policy W/NE4	<p>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.</p> <p>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.</p> <p>According, it is suggested that wording of the policy is amended to read as follows: <i>“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.”</i></p>
	4.5 Important Views & Vistas	42-44	Policy W/NE5 Figure 10	There should also be consistency between the policy title and the title of Figure 10. The policy title is worded as follows <i>“Important Open Views and Vista”</i> , whilst Figure 10 is titled as <i>“Important Views and Vistas”</i> . It is suggested that latter is used for the policy title.
	4.6 Areas of Local Separation	43	Paragraphs 4.6.1 & 4.6.2	<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>

	<p>5 Business and Employment</p> <p>5.1 Protecting and supporting existing Employment Uses</p> <p>5.2 Supporting and Nurturing Small Businesses</p>	44 & 45	Policies W/E1 & W/E2	<p>The principal approach in the Wilsden neighbourhood plan as regards employment uses is as follows: <i>"...maintain a mixed economy with continuing employment in a diverse range of small and medium sized enterprises"</i></p> <p>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: <i>"..... 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."</i></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>
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				<p>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.</p> <p>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.</p>
	<p>5.1 Protecting and Supporting Existing Employment Uses</p>	<p>44 & 45</p>	<p>Policy W/E1 Paragraphs 5.1.1 to 5.1.3</p>	<p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
	<p>5.2 Supporting and nurturing Small Businesses</p>	<p>45</p>	<p>Supporting Text</p>	<p>For consistency with the rest of the plan, the paragraphs in this section of the document should be numbered.</p>

	5.2 Supporting and nurturing Small Businesses	45	Policy W/E2	<p>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.</p> <p>It should also be noted that the policy and section title are inconsistent.</p>
	6.1 Important Community Facilities	48	Policy W/CF2	<p>The 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 “<i>a parish need</i>”. 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.</p> <p>The policy could be strengthened by providing more detailed criteria regarding the location and design of new/enhanced community facilities.</p>
	6.1 Important Community Facilities	49	Policy W/CF3	<p>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.</p>
	7.1 Wilsden Local Centre	51 & 52	Paragraphs 7.1.1 to 7.1.3 Figure 12	<p>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.</p>
	7.1 Wilsden Local Centre	52	Policy W/SH1	<p>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:</p> <p><i>“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.</i></p> <p><i>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.</i></p>

				<p>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:</p> <p>(i) the premises are no longer commercially viable for its current use.</p> <p>(ii) the building has been actively marketed for at least six months for its current use.</p> <p>(iii) alternative facilities are available elsewhere in the area in accessible and convenient locations.</p> <p>(iv) the proposed use will make a positive contribution to the viability and vitality of the Local Centre.</p> <p>Development proposals for Class E and Class F2 use will be expected to be located within the Local Centre except where they:</p> <p>(i) meet a village need;</p> <p>(ii) are of appropriate size and scale; and</p> <p>(iii) do not have an adverse impact on the role and function of the Local Centre”.</p>
	7.3 Shop Front Design	53	First Paragraph (2 nd Sentence)	<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>
	7.4 Car Parking within Wilsden Local Centre	53 & 54	Paragraph 7.4.1	<p>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.</p>
	7.4 Car Parking within Wilsden Local Centre	55	Policy W/SH4	<p>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:</p>

				<p><i>“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.</i></p> <p><i>Proposed should not result in an overall reduction in car parking provision in Wilsden Local Centre except where:</i></p> <p><i>(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</i></p> <p><i>(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.”</i></p>
	8 Transport and Accessibility	55 & 56	Policy W/TA1 Paragraphs 8.0.1 to 8.0.8	<p>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’?</p> <p>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.</p>
	8.1 Footpaths, Cycleways & Bridleways	56	Policy W/TA2	<p>It is queried if there any formal cycleways within the parish.</p> <p>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.</p> <p>The plan should include a map within the plan which clearly identifies such routes and where improvements are required.</p> <p>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.</p>

	8.2 Traffic along Main Street, Wilsden	57	Policy W/TA3	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.
	9 Developer Contributions	58 & 59	Supporting Text	For consistency with the rest of the plan, the paragraphs in this section of the document should be numbered.
	9 Developer Contributions	58	Policy W/DC1	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.
	10 Monitoring and Review	59	Supporting Text	For consistency with the rest of the plan, the paragraphs in this section of the document should be numbered.
	10 Monitoring and Review	59	-	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?
	Appendix 1 Listed Buildings in Wilsden (2020)	59	Appendix 1	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.

Strategic Environmental Assessment & Habitat Regulations Assessment Screening

Representation Reference	Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
	3	7	Table 1 Policy W/HO6	Check wording

	Wilsden Neighbourhood Plan (Aim of the Plan)			
	3 Wilsden Neighbourhood Plan (Aim of the Plan)	7	Table 1 Policy W/BH3	Check wording. This should read <i>“Seeks to designate Hallas Bridge and Birkshead as Special Character Areas because of their historic and architectural interest”</i> .
	3 Wilsden Neighbourhood Plan (Aim of the Plan)	7	Table 1 Policy W/NE1	Amend the description of the policy intent to read: <i>“Seeks to protect important Local Green Spaces that are special to the community”</i> . This will better reflect the policy name and is more consistent with the NPPF.
	4 SEA Assessment	9	Table 2 Stage 2	Correct that it is not required by legislation but is subject to legislation if prepared – however, partly contradicts the flow diagram in Figure 1.
	5 Determination of Significant Effects	14	Determination	Generally, agree with the conclusion that the plan is unlikely to result in significant negative environmental impacts.
	6 HRA Screening Assessment	16/17	Table 4	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.
	6 HRA Screening Assessment (Determination of Significant Effects)	18	First to Third Paragraphs	Agree with the conclusions of the HRA Screening Assessment and have no further comments.
	7 Screening Conclusion	18	-	Agree with the conclusion for both SEA and HRA.

Supporting Evidence Documents

Representation Reference	Document Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
	Evidence for Locally Important Buildings and Structures	-	-	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?
	Evidence for Locally Important Buildings and Structures	-	-	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.
	Evidence for Locally Important Buildings and Structures	-	-	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.
	Evidence for Locally Important Buildings and Structures	3 & 4	Introduction – Policy Context First & Second Paragraphs	<p>The references to the NPPF should be updated to reflect the December 2023 version. It should be re-worded as follows:</p> <p><i>“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</i></p> <p><i>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</i></p>

				<i>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."</i>
	Evidence for Locally Important Buildings and Structures	5	Step 1: Identification of potential <u>site</u>	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 - <i>"A total of 39 potential heritage assets were identified..."</i> Instead of <i>"A total of 39 potential assets were identified..."</i> . This term is used within Step 2 and Step 3 and within the assessment.
	Evidence for Locally Important Buildings and Structures	5	Step 2: Establishment of assessment criteria	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> .
	Evidence for Locally Important Buildings and Structures	5	Step 3: Assessment against the selected criteria	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> .

Wilsden Design Code

Comment Source	Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
Local Plans	-	-	General Comment	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.
Local Plans	-	-	General Comment	It is suggested that all maps contained within the Design Code should be labelled as "Figure" 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.

Local Plans	-	-	General Comment	It is suggested that the Design Code includes a Glossary of Terms to aid readers in their understanding of the document and its contents.
Local Plans	-	-	General Comments	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.
Landscape, Design & Conservation	-	-	General Comment	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.
Local Plans	1 Introduction	6	1.6 Planning Context Map showing the neighbourhood plan area of Wilsden	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.
Local Plans	1 Introduction	6-10	1.6 Planning Context	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.
Conservation Team	2 Place Assessment	12	2.1 Historic Evolution & Heritage	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.

			4. Character Areas and Design Codes	
	2 Place Assessment	12	2.1 Historic Evolution & Heritage	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.
Local Plans	2 Place Assessment	13	2.1 Historic Evolution & Heritage Map showing heritage assets, Conservation Area and Special Character Areas	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.
Transport Planning	2 Place Assessment	17	2.3 Route Hierarchy Route Hierarchy Map	<p>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.</p> <ol style="list-style-type: none"> 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.

				<p>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</p> <p>5. The map shows PROW. It would be useful if this could distinguish between footpaths and bridleways</p>
Local Plans	2 Place Assessment	19	2.4 Village & Open Space Structure Village Structure & Open Space Map	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.
Local Plans	2 Place Assessment	20	2.4 Village & Open Space Structure 1ha Housing Density Samples Map	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.
Local Plans	2 Place Assessment	21	2.5 Sense of Place & Wayfinding Sense of Place & Wayfinding Map	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.
Transport Planning	2 Place Assessment	21	2.5 Sense of Place & Wayfinding	<p>The 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.</p> <p>The map shows PROW. It would be useful if this could distinguish between footpaths and bridleways.</p>

			Sense of Place & Wayfinding Map	
Local Plans	4 Character Areas & Design Codes	38 to 59	4.1 to 4.8	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.
Local Plans	4 Character Areas & Design Codes	40	4.3.1 Historic Character Area (3 rd Paragraph)	<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: W11/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>
Local Plans	4 Character Areas & Design Codes	42	4.3.3 Post War/Modern Character Area (2 nd & 3 rd Paragraphs)	<p>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: W11/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</p>

				<p>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>
Local Plans	4 Character Areas and Design Codes	46 - 47	4.4 Code 1 - Sustainability & Climate Change	Should this section include something about pedestrians and cycle access to the site to encourage active travel?
Local Plans	Design Code	46	4.4 Code 1 - Sustainability & Climate Change	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.
Local Plans	4 Character Areas and Design Codes	48	4.5 Code 2 – Landscape, Views and the Settlement Edge Part 2A – Village Separation	It is recognised that maintaining a degree of separation of between Wilsden 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.
Local Plans	4	52	4.6	Sub Heading error – '3b – Sensitive Conservation of Historic Buildings' - should this be 'Conversion'?

	Character Areas and Design Code		Code 3 – Building Design	
Local Plans	4 Character Areas & Design Codes	55	4.7 Code 4 – Parking, Gardens and Boundary Treatments First Paragraph (2 nd Sentence)	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.
Local Plans	4 Character Areas & Design Codes	55	4.7 Code 4 – Parking, Gardens and Boundary Treatment	Part 4A – On-Street Parking (2 nd Sentence) - The wording is agreed, however it is suggested that it could be stronger.
Local Plans	4 Character Areas and Design Code	57	4.7 Code 4 – Parking, Gardens and Boundary Treatments	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.
Local Plans	5 Site Responses	60 to 64	5.1 Possible development site at Crooke Lane (within	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.

			settlement area)	<p>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.</p> <p>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).</p>
Local Plans	6 Next Steps	63	6 Next Steps (4 th , 5 th , 6 th para	<p>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. <i>“As well as using this document, future developers should also make sure that they have observed the <u>latest</u> guidance...”</i></p>
Local Plans	-	63	General Comment	<p>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)</p> <p>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.</p>