

# **Harden Neighbourhood Development Plan - Summary of Representations**

---

**REGULATION 16 CONSULTATION (JUNE TO AUGUST 2022)**

**SUMMARY OF REPRESENTATIONS RECEIVED**





**Contents**

1.	INDEX OF REPRESENTATIONS RECEIVED .....	4
2.	GENERAL COMMENTS .....	5
3.	CHAPTER 1 - INTRODUCTION.....	8
4.	CHAPTER 2: HOUSING - POLICY HNDP1: SUSTAINABLE DESIGN AND RENEWABLE ENERGY.....	11
5.	CHAPTER 2: HOUSING - POLICY HNDP2: HOUSING MIX.....	13
6.	CHAPTER 2: HOUSING - POLICY HNDP3: HIGH QUALITY DESIGN .....	17
7.	CHAPTER 2: HOUSING - POLICY HNDP4: HOMEWORKING.....	21
8.	CHAPTER 2: HOUSING - POLICY HNDP5: BUILDING FOR A HEALTHY LIFE AND ACCESSIBLE HOMES .....	25
9.	CHAPTER 2: HOUSING - POLICY HNDP6: HIGH SPEED BROADBAND.....	29
10.	CHAPTER 3: TRANSPORT – POLICY HNDP7: HARDEN TO BINGLEY ACTIVE TRAVEL .....	30
11.	CHAPTER 3: TRANSPORT – POLICY HNDP8: ELECTRIC VEHICLE CHARGING POINTS.....	30
12.	CHAPTER 3: TRANSPORT – POLICY HNDP10: PEDESTRIAN & CYCLE CONNECTIONS .....	31
13.	CHAPTER 4: COMMUNITY FACILITIES & SERVICES – POLICY HNDP13: COMMUNITY FACILITIES & SERVICES.....	31
14.	CHAPTER 4: COMMUNITY FACILITIES & SERVICES – POLICY HNDP14: ENHANCING THE VILLAGE CENTRE .....	32
15.	CHAPTER 5: GREEN SPACES – POLICY HNDP15: GREEN INFRASTRUCTURE .....	32
16.	CHAPTER 5: GREEN SPACES – POLICY HNDP17: TREE PLANTING.....	33
17.	CHAPTER 5: GREEN SPACES – POLICY HNDP18: LOCAL GREEN SPACES.....	33
18.	CHAPTER 6: HERITAGE – POLICY HNDP19: HERITAGE.....	34
19.	CHAPTER 6: HERITAGE - POLICY HNDP20: STONE WALLS.....	35
20.	CHAPTER 6: HERITAGE - POLICY HNDP21: KEY VIEWS .....	38
21.	CHAPTER 7: BUSINESS & EMPLOYMENT - POLICY HNDP22: BUSINESS & EMPLOYMENT.....	43
22.	APPENDIX 9 - 9.1 LOCAL GREEN SPACE ASSESSMENTS.....	43
23.	APPENDIX 9 - 9.3 KEY VIEW ASSESSMENT.....	45
24.	HARDEN DESIGN GUIDE .....	45

1. INDEX OF REPRESENTATIONS RECEIVED

Table 1: Harden Neighbourhood Plan – Index of Representations Received

No.	Respondent ID	Respondent Name	Representation References	NDP Section/Policy
1	7327	Sport England	30364	Neighbourhood Plan - General (No specific comments – general advice)
2	1339	Resident	30365	Appendix 9.1 – Local Green Space Assessment – Section G
3	7372 (7371)	Astrum Planning on behalf of client	30366	Policy HNDP1: Sustainable Design & Renewable Energy
	7372 (7371)	Astrum Planning on behalf of client	30367	Policy HNDP2: Housing Mix
	7372 (7371)	Astrum Planning on behalf of client	30368	Policy HNDP3: High Quality Design
	7372 (7371)	Astrum Planning on behalf of client	30369	Policy HNDP4: Homeworking
	7372 (7371)	Astrum Planning on behalf of client	30370	Policy HNDP5: Building for a Health Life & Accessible Homes
	7372 (7371)	Astrum Planning on behalf of client	30371	Policy HNDP20: Stone Walls
	7372 (7371)	Astrum Planning on behalf of client	30372	Policy HNDP21: Key Views
4	101	Historic England	30373	Neighbourhood Plan – General (No further comments); SEA Determination Statement (Concur with conclusion)
5	2869	Coal Authority	30374	Neighbourhood Plan – General (No specific comments)
6	2747	Resident	30375	Policy HNDP17: Tree Planting
	2747	Resident	30376	Policy HNDP20: Stone Walls
	2747	Resident	30377	Policy HNDP21: Key Views
	2747	Resident	30378	Appendix 9.1: Local Green Space Assessment – Section H
	2747	Resident	30379	Appendix 9.3: Key View Assessment
	2747	Resident	30380	Policy HNDP10: Pedestrian & Cycle Connections.
7	7376	Natural England	30381	Neighbourhood Plan – General (No specific comments)
9	7378 on behalf of 86	Avison Young on behalf of National Grid	30382	Neighbourhood Plan – General (No specific comments – general advice)
10	-	City of Bradford MDC	-	Various

2. GENERAL COMMENTS

<b>Consultation point:</b>	General Comment		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>CBMDC notes that on the whole, the Harden Neighbourhood Development Plan and accompanying Design Guide are well presented and illustrated documents and appear to be well researched and responsive to the local Harden context and character. The documents have been considered by the Council and the comments below provided.</p>			

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

<b>Consultation point:</b>	General Comment		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>The Harden Design Guide has been prepared alongside the Neighbourhood Plan to provide supplementary guidance on key design elements within Harden, particularly in relation to policies HN1, HN3, HN9 and within the supporting text to HN5.</p> <p>Consideration should be given as to whether it would be beneficial to reference the Design Guide document on the contents page with a clear demarcation that it is presented as a separate document to the neighbourhood plan.</p>			

<b>Consultation point:</b>	General Comment		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>It may be helpful to include a Glossary of Terms to explain some of the language and more technical terms used in the neighbourhood plan.</p>			

**HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS**

<b>Consultation point:</b>	General Comment - Page 6, Para 1.3		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
It may be useful here to refer to the “National Planning Policy Framework (NPPF) (2021)” and the “Ministry of Housing, Communities and Local Government (now the Department for Levelling Up, Housing and Communities)” to ensure the plan’s wording is up to date.			

<b>Consultation point:</b>	General Comment		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
The plan as a whole would benefit from providing consistent titling and referencing, particularly to maps within the plan. This will allow readers and users of the plan to accurately reference relevant parts of the plan.			

<b>Consultation point:</b>	General Comment – Maps		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
The inclusion of the various map is helpful for the reader in providing spatial context for the relevant policy. Each map should be consistently referenced and titled in order assist the reader and decision maker in using the plan, as to meet accessibility criteria. The following format is suggested: <i>“Figure 1: Harden Neighbourhood Plan – Designated Neighbourhood Area Boundary”</i> .			
Furthermore, it is suggested that the policy wording and support text, where reference is made to any of the maps, should be amended to refer to the figure number. The following wording is suggested as should be used as appropriate – <i>“as shown on Figure X”</i> or <i>“..(see Figure X)”</i> .			

<b>Consultation point:</b>	General Comment – Neighbourhood Plan & Design Guide		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
The Harden Design Code is referred to at several points in the text for the Neighbourhood Plan, but rarely features in the wording of the policies. It must be better embedded in the Neighbourhood Plan show a clear connection between the documents, and provide greater clarity for applicants, the community and decision makers. It would be helpful there could be cross-referencing between the policies and the relevant sections of the Design Code.			
It is strongly suggested that the Summary in the design code needs to be expressed as a Policy in the Plan.			
<i>“New developments in Harden will be expected to conform with the principles set out in the Harden Design Code document supporting this Plan, and applications should demonstrate how development proposals respond to</i>			

## HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS

<b>Consultation point:</b>	General Comment – Neighbourhood Plan & Design Guide		
<p><i>and reinforce the principles identified within that Code and thereby reinforce and enhance the character of the village”.</i></p> <p>In addition, there needs to clarity over the Design Guide/Design Code and it the use of terminology and application. This is particularly important given the Government’s new approach to Design Coding.</p>			

<b>Consultation point:</b>	General		
<b>Representation ID:</b>	30381	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	7376 – Natural England	<b>Agent:</b>	-
<b>Summary:</b>			
Natural England does not have any specific comments on the Harden Neighbourhood Plan.			
<b>Full Submission:</b>			
<p>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.</p> <p>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.</p> <p>Natural England does not have any specific comments on the Harden Neighbourhood Plan.</p>			

<b>Consultation point:</b>	General		
<b>Representation ID:</b>	30382	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	86 - National Grid	<b>Agent:</b>	Avison Young
<b>Summary:</b>			
<p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p>			
<b>Full Submission:</b>			
<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NNG) 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>			

<b>Consultation point:</b>	General
<p>National Grid Ventures (NGV) is separate from National Grid’s core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area. National Grid provides information in relation to its assets at the website below. - <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></p> <p>Please also see attached information outlining guidance on development close to National Grid infrastructure. Distribution Networks Information regarding the electricity distribution network is available at the website below: <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p>	

**3. CHAPTER 1 - INTRODUCTION**

<b>Consultation point:</b>	Introduction		
<b>Representation ID:</b>	30364	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	7327 - Sport England	<b>Agent:</b>	-
<b>Summary:</b>			
<p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>			



<b>Consultation point:</b>	Introduction
<p>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.</p> <p>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.</p>	
<b>Full Submission:</b>	
<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>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.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. 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. <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>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. <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 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.</p> <p>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. <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p>	

**HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS**

<b>Consultation point:</b>	Introduction		
<p>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. <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>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.</p> <p>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.</p> <p>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: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England’s Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p>			

<b>Consultation point:</b>	Introduction		
<b>Representation ID:</b>	30373	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	101 – Historic England	<b>Agent:</b>	-
<b>Summary:</b>			
<p>We have considered the Submission Draft and do not wish to comment further on the proposed Neighbourhood Plan; we also note and concur with the Strategic Environment Assessment Determination Statement.</p>			
<b>Full Submission:</b>			
<p>Thank you for consulting Historic England on the Submission Draft of the Harden Neighbourhood Plan. We wrote to the consultants for Harden Parish Council on 7th April 2021, explaining that we did not wish to comment on detail upon their Pre-submission Draft Neighbourhood Plan.</p> <p>We have considered the Submission Draft and do not wish to comment further on the proposed Neighbourhood Plan; we also note and concur with the Strategic Environment Assessment Determination Statement.</p> <p>We look forward to being notified of the Making of the Neighbourhood Plan, following the Examination and Referendum.</p>			

<b>Consultation point:</b>	Introduction		
<b>Representation ID:</b>	30374	<b>Comment Type:</b>	Comment

## HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS

<b>Consultation point:</b>	Introduction		
<b>Respondent:</b>	2869 – The Coal Authority	<b>Agent:</b>	-
<b>Summary:</b>			
<p>Our records indicate that within the identified Neighbourhood Plan area there are no recorded coal mining features present at surface or shallow depth which may pose a risk to surface stability and public safety. On this basis the Planning team at the Coal Authority have no specific comments to make on the Neighbourhood Plan.</p>			
<b>Full Submission:</b>			
<p>Thank you for your notification received on the 20th June 2022 in respect of the above consultation.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy &amp; Industrial Strategy. 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.</p> <p>Our records indicate that within the identified Neighbourhood Plan area there are no recorded coal mining features present at surface or shallow depth which may pose a risk to surface stability and public safety. On this basis the Planning team at the Coal Authority have no specific comments to make on the Neighbourhood Plan.</p>			

### 4. CHAPTER 2: HOUSING - POLICY HNPD1: SUSTAINABLE DESIGN AND RENEWABLE ENERGY

<b>Consultation point:</b>	Policy HNPD1: Sustainable Design & Renewable Energy		
<b>Representation ID:</b>	30366	<b>Comment Type:</b>	Object
<b>Respondent:</b>	7371	<b>Agent:</b>	7370 – Astrum Planning
<b>Summary:</b>			
<p>The policy sets a list of requirements a development proposal must achieve. This includes:</p> <ul style="list-style-type: none"> <li>• New development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions. This includes the provision of on-site energy generation from renewable sources:</li> <li>• Proposals should be accompanied by a visual impact assessment that demonstrates renewable energy provisions would not cause visual harm and/ or do not detract from the visual amenity of its location.</li> <li>• Where appropriate, developments should include sustainable drainage systems (SuDS) and rainwater harvesting to help mitigate flooding and alleviate surface water. Best practice and examples are provided in the Harden Design Code (further comments below on Design Code) and should be referred to in applications.</li> </ul> <p>Our client recognises the importance of delivering sustainable development, and meeting the Government’s aspirations to achieve carbon zero. Overall, we are supportive of the above policy and introduction of a design code, but question the need for a visual impact assessment for renewable energy provision on an allocated site. Especially, as this would have been considered as part of the evidence base to enable release. As such we consider that this policy should be revisited.</p>			
<b>Full Submission:</b>			
<p>The policy sets a list of requirements a development proposal must achieve. This includes:</p>			

<b>Consultation point:</b>	Policy HNPD1: Sustainable Design & Renewable Energy
<ul style="list-style-type: none"> <li>• New development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions. This includes the provision of on-site energy generation from renewable sources:</li> <li>• Proposals should be accompanied by a visual impact assessment that demonstrates renewable energy provisions would not cause visual harm and/ or do not detract from the visual amenity of its location.</li> <li>• Where appropriate, developments should include sustainable drainage systems (SuDS) and rainwater harvesting to help mitigate flooding and alleviate surface water. Best practice and examples are provided in the Harden Design Code (further comments below on Design Code) and should be referred to in applications.</li> </ul> <p>Our client recognises the importance of delivering sustainable development, and meeting the Government’s aspirations to achieve carbon zero. Overall, we are supportive of the above policy and introduction of a design code, but question the need for a visual impact assessment for renewable energy provision on an allocated site. Especially, as this would have been considered as part of the evidence base to enable release. As such we consider that this policy should be revisited.</p>	

<b>Consultation point:</b>	Policy HNPD1: Sustainable Design & Renewable Energy		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>The policy as drafted would seem to cover three particular topic areas:</p> <ul style="list-style-type: none"> <li>• Building Performance/Sustainable Construction &amp; Design</li> <li>• Renewable Energy</li> <li>• Flood Risk/Sustainable Drainage</li> </ul> <p>Therefore, it may be appropriate to consider dividing this up into three separate, but linked, policies to provide clarity. If it this is not considered suitable, it may be useful to include sub-headings for each paragraph.</p> <p>In addition, clarification is required as to the type of development the policy applies to. Does it solely relate to new housing development or every type of development? For example, Policy HNPD3 is more precise in its wording. Policy HNPD1 should be similarly precise.</p> <p>It also needed to be clarified what a “<i>high level of sustainable construction and design</i>” means. As worded it suggests that that this would be measured against a target or indicator, whilst it would be useful if some explanation is given regarding the meaning of “<i>sustainable construction and design</i>”. The policy could usefully refer to the types of methods that could be used to meet the requirements.</p> <p>The policy wording relating to the provision of on-site energy generation from renewable sources is also imprecise, particularly in relation to potential technologies that may be used and how they would fit with other policies within the plan.</p> <p>It is not clear whether the second paragraph relates to the renewable energy provision that may be included within new residential development or proposals for renewable energy development within the neighbourhood area. If it is latter, additional wording is required to reflect this. Also it needs to be clear regarding the requirement for a visual impact assessment.</p> <p>The Homes &amp; Neighbourhoods Design Guide SPD also includes a sections on energy efficiency and sustainable drainage and should be referenced in the policy together with national design guidance.</p> <p>Based on the above, and subject to further clarification it is suggested that the policy is amended as follows:</p> <p><b><u>“Sustainable Construction &amp; Design</u></b></p>			

<b>Consultation point:</b>	Policy HNPD1: Sustainable Design & Renewable Energy
<p>New <b>housing</b> development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions. This includes the provision of on-site energy generation from renewable sources, <b><u>subject to be being consistent with relevant design and heritage policies of the plan.</u></b></p> <p><b><u>Renewable Energy</u></b></p> <p>Proposals <b><u>incorporating small-scale renewable energy technologies and infrastructure will be supported.</u></b> <b><u>These</u></b> should be accompanied by a visual impact assessment that demonstrates renewable energy provisions would not cause visual harm and/or do not detract from the visual amenity of its location.</p> <p><b><u>Sustainable Drainage</u></b></p> <p>Where appropriate, developments should include sustainable drainage systems (SuDS) and rainwater harvesting to help mitigate flooding and alleviate surface water.</p> <p><b><u>Best practice and examples are provided in the Harden Design Code and the Homes and Neighbourhoods Design Guide Supplementary Planning Document which should be referenced in applications. Regard should also be had to the National Design Guide and the National Model Design Code"</u></b></p>	

## 5. CHAPTER 2: HOUSING - POLICY HNPD2: HOUSING MIX

<b>Consultation point:</b>	Policy HNPD2: Housing Mix		
<b>Representation ID:</b>	30367	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	7371	<b>Agent:</b>	7370 – Astrum Planning
<b>Summary:</b>			
<p>The policy states for new housing development of 10 or more dwellings will be required to provide a mix of house types and sizes to meet the needs of the local community, including i) a minimum of 35% dwellings of no more than 2 bedrooms; and ii) a minimum of 30% 3 bedrooms. The remainder of the mix can be determined by the applicant to ensure the proposal is viable and meets local needs.</p> <p>To maintain flexibility in a changing local market; we agree that it will be important that the housing mix prescriptions are revised in line with up- to-date evidence. It is therefore important that this is reflected within the policy wording</p>			
<b>Full Submission:</b>			
<p>HARDEN NEIGHBOURHOOD PLAN CONSULTATION (REGULATION 16)</p> <p>Representation on behalf of</p> <p>1.1 We are writing to you to provide a representation to the current consultation on the Harden Neighbourhood Plan, on behalf of our client Louise Hobson.</p> <p>REPRESENTATION</p> <p>Compliance with Emerging Bradford Local Plan</p> <p>1.2 The Neighbourhood Plan Area (NPA) was formally approved by City of Bradford Metropolitan District Council (Bradford Council) on Wednesday 30 August 2017 in accordance with the Localism Act, 2011, and the Neighbourhood Planning (General) Regulations, 2012.</p> <p>1.3 The strategic planning policy background to the Neighbourhood Plan (as outlined in the consultation documents) is provided by the adopted Bradford Council Core Strategy (2017), Bradford City Centre Area Action Plan, Shipley and Canal Road Area Action Plan, the Waste Management DPD, and the Bradford Homes and</p>			

<b>Consultation point:</b>	Policy HN2P2: Housing Mix
<p>Neighbourhoods Design Guide. The Neighbourhood Plan covers the same period as the Bradford Council Core Strategy to 2030.</p> <p>1.4 It is noted that Bradford Council in the process of preparing a New Local Plan, which is moving towards the more advanced stages of preparation. As such, we consider that the NDP should seek to align with the New Local Plan. This will ensure it is up-to-date and reflective of strategic priorities coming forward. A failure to do so, could result in the need for a review of the Plan being considered in-effective. On this point, we do note that the NPA does refer to the fact that Bradford Council are reviewing land for allocation in the assessment of land for local green space in justifying certain parcels from being allocated for this purpose.</p> <p>1.5 Expanding on the above, we note that the NPA does not allocate land for development, but includes policies linked to future development in the Harden Area. Linking to para 1.4 above; we draw reference to ‘Preferred Option – Policy SP8 Housing Growth’ of the emerging Bradeord Local Plan, which outlines the ‘draft’ proposed housing requirement for the district.</p> <p>1.6 Harden has been identified within Draft Policy SP8 (at time of representation) to deliver 60 dwellings, with land allocated to deliver this ‘need’. However, importantly, the Policy states under criterion (F) – 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 and that proposed sites according with the policies within this plan’. Clearly, there is a requirement for Neighbourhood Plans to also look at delivering development. Ensuring that the NPA aligns with the emerging</p> <p>1.7 Bradford Local Plan, rather than the current adopted Plan which will be superseded - is therefore essential. Land at Long Lane/ Hill End Lane, Harden</p> <p>1.8 Our client owns land located to the south of Hill End Lane. The site is located within the Green Belt, and adjoins land south of Long Lane, east of Dale Bank, which is currently allocated for housing in Bradford’s emerging Local Plan.</p> <p>1.9 Representation has been made through the preparation of the emerging Local Plan, outlining the ‘suitability’ and ‘availability’ of the site to accommodate development. We still consider this to be the case. Indeed, the site forms a natural extension to the settlement, and given its size, has more flexibility to delivering other essential requirements, such as those linked to the environment and social requirements.</p> <p>1.10 We note that the Council’s Green Belt Assessment, did not recommend the parcel for release for development, as it was considered as a standalone location and as such would not result in a pattern of sustainable development. However, as noted above land adjoining has secured a draft allocation for housing and as such forms a natural extension. On this point, we draw attention to the Green Belt Assessment, which states that if the site was combined with HR/0006 then a new assessment would be required for the larger site. Given that the site has been actively promoted - consideration should be given to undertaking this assessment. We note that an initial assessment was conducted as part of a local plan representation made by Bowcliffe for the site and attached to this representation.</p> <p>1.11 Draft Policy HN2P21 ‘Key Views’ is noted. With views to the south of my client’s land identified as a view which should be retained. The policy states “The views and vistas within Harden village and into Harden village should be retained. Development affecting these views and vistas should be designed in such a way so as not to have a significant adverse impact on their visual quality and amenity. Applications should demonstrate any impact development proposals may have on the views identified below...5. View south from Long Lane towards Wilsden’</p> <p>1.12 The supporting text notes that the elevation and topography of the site in question, provides uninterrupted views southwards, over Goit Stock Woods and Harden Beck towards Wilsden, which incises the valley and then rises up again. The landscape is dominated by pasture which is divided by traditional stone walls and/or hedgerows and vegetation. Firstly, we note that the policy does not preclude development, a fact</p>	



<b>Consultation point:</b>	Policy HN2P2: Housing Mix
<p>supported by the allocated of land to the east. Overall, we consider that a sensitive development could be delivered, which consider retain views extending southwards. We also note that views can still be obtained from Leech Lane which runs along the western boundary.</p> <p>Comments on Draft Planning Policies</p> <p>1.13 We set out our comments herewith on the relevant policies contained within the pre-submission version of the NPA and responds accordingly to ensure that the Neighbourhood Plan is positively prepared, justified, effective and consistent with local and national planning policy.</p> <p><b>DRAFT POLICY 'HN2P1: SUSTAINABLE DESIGN &amp; RENEWABLE ENERGY'</b></p> <p>The policy sets a list of requirements a development proposal must achieve. This includes:</p> <ul style="list-style-type: none"> <li>• New development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions. This includes the provision of on-site energy generation from renewable sources:</li> <li>• Proposals should be accompanied by a visual impact assessment that demonstrates renewable energy provisions would not cause visual harm and/ or do not detract from the visual amenity of its location.</li> <li>• Where appropriate, developments should include sustainable drainage systems (SuDS) and rainwater harvesting to help mitigate flooding and alleviate surface water. Best practice and examples are provided in the Harden Design Code (further comments below on Design Code) and should be referred to in applications.</li> </ul> <p>Our client recognises the importance of delivering sustainable development, and meeting the Government's aspirations to achieve carbon zero. Overall, we are supportive of the above policy and introduction of a design code, but question the need for a visual impact assessment for renewable energy provision on an allocated site. Especially, as this would have been considered as part of the evidence base to enable release. As such we consider that this policy should be revisited.</p> <p><b>DRAFT POLICY 'HN2P2: HOUSING MIX'</b></p> <p>The policy states for new housing development of 10 or more dwellings will be required to provide a mix of house types and sizes to meet the needs of the local community, including i) a minimum of 35% dwellings of no more than 2 bedrooms; and ii) a minimum of 30% 3 bedrooms. The remainder of the mix can be determined by the applicant to ensure the proposal is viable and meets local needs.</p> <p>To maintain flexibility in a changing local market; we agree that it will be important that the housing mix prescriptions are revised in line with up- to-date evidence. It is therefore important that this is reflected within the policy wording.</p> <p><b>DRAFT POLICIES and HN2P 'HIGH QUALITY DESIGN' &amp; 'HN2P4: HOMEWORKING'</b></p> <p>Our client is supportive of these policies, and introduction of a Design Code. However, we note that the design code states that 'new dwellings' should avoid creating north-facing habitable rooms, and that the overuse of north facing glazing that is likely to make homes cold in the winter. We question the impact of this requirement on any land allocated to the south of Harden - especially where the Design Code wants the principal elevation of a property to front onto the main street frontage.</p> <p>We also note that the design code also seeks to deliver areas of play. However, this will only be achievable/viable on large sites allocated. Currently, land allocated in the forthcoming Local Plan comprises small parcels. The allocation of additional large parcels could as part of the Local Plan and/or neighbourhood plan could address this requirement and we would recommend the consideration of land in the ownership of our client.</p> <p>The preference for stone is acknowledged. However, key is ensuring that materials utilised are sympathetic and complementary to the character of the area. This could also include reconstituted stone and render, which are also typical of the area. Restricting materials to the use of stone only, could impact on the viability of a project</p>	

<b>Consultation point:</b>	Policy HN2P2: Housing Mix		
<p>and thus deliverability. We request that this element of the policy is revisited and other materials local to the area also identified for inclusion.</p> <p><b>DRAFT POLICY 'HN2P5: BUILDING FOR A HEALTHY LIFE &amp; ACCESSIBLE HOMES'</b></p> <p>The policy states that new housing developments of 10 or more dwellings should be accompanied by a Building for a Healthy Life assessment that demonstrates the proposals will result in high quality sustainable development. All new homes are encouraged to be developed to Accessible and Adaptable Dwellings Standards.</p> <p>This policy includes requirements for all new dwellings within major schemes to meet building regulation standards M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings'. M4(2) standards are met, where reasonable provision is made for most people to access the dwelling. This can include ensuring there is step free access to the dwelling, car park space, communal space and WC.</p> <p>In addition, ensuring that the dwelling is capable of being adapted in the future. M4(3) standards occur where a new dwelling makes reasonable provision for a wheelchair user to live in the dwelling and use associated private and outdoor space, parking and communal facilities that may be provided for the use of the occupants. This policy seeks to provide a choice of suitable housing so as to enable people to live for longer within their own homes.</p> <p>Our client is supportive of the above. However, we question the need for all new dwellings to meet this standard. The approach and percentage adopted is normally informed by an up-to-date Strategic Housing Market Assessment; and/or a caveat in the supporting text that development proposals should be informed by needs identified in the SHMA. We therefore request that the wording of this policy is revisited.</p> <p><b>DRAFT POLICY 'HN2P20: STONE WALLS'</b></p> <p>The policy states that stone walls, including areas of historic dry-stone wall should be retained and restored using local stone and traditional techniques wherever possible in new developments or in refurbishments. The policy is welcomed. However, where partial loss is required to facilitate access and thus much needed development – this should not seek to prevent development.</p> <p><b>OTHER DRAFT POLICIES</b></p> <p>The ethos and wording of other policies are supported by our client.</p> <p>Summary</p> <p>1.14 If you wish to discuss the contents of this letter further, please do not hesitate to contact me via the details outlined below. We would welcome continued dialogue.</p>			

<b>Consultation point:</b>	Policy HN2P2: Housing Mix		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>The plan indicates that an independent housing needs assessment (HNA) has been undertaken which informs the policy development. This should be provided by the Qualifying Body.</p> <p>This supports Core Strategy Policy HO8, which seeks to ensure that large developments incorporate a mix of housing types, sizes, prices and tenures. The exact mix should be determined on both market demand and evidence of local need within the District's Strategic Housing Market Assessment (the most recent of which was published in 2019) together with any other robust local evidence or information. The location and nature of the site and its surroundings as well as the profile of existing dwelling stock in the area should also be considered.</p>			



<b>Consultation point:</b>	Policy HN2P2: Housing Mix
<p>Paragraph 5.3.125 also states that when an appropriate mix of housing on site is being negotiated, decisions should take account of local market demand, the balance between general market supply and demand and evidence of local need to ensure the site contributes to the overall mix of housing in the locality. The viability of achieving an appropriate housing mix should also be considered. The SHMA, and any more detailed and localised evidence of housing need and demand, such as local or village needs surveys, will form the main basis on which the creation of an appropriate and sustainable mix of house types within larger sites will be judged both at the level of plan making and in considering planning applications.</p> <p>The policy and supporting text needs to reflect the above. It is suggested that the policy is amended as follows:  <i>“<b>Subject to the findings of the latest housing needs assessment</b>, new housing developments of 10 or more dwellings will be required to provide a mix of house types, sizes <b>and tenures (both market and affordable)</b> to meet the needs of the local community...”</i></p>	

**6. CHAPTER 2: HOUSING - POLICY HN2P3: HIGH QUALITY DESIGN**

<b>Consultation point:</b>	Policy HN2P3: High Quality Design		
<b>Representation ID:</b>	30368	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	7371	<b>Agent:</b>	7370 – Astrum Planning
<b>Summary:</b>			
<p>Our client is supportive of these policies, and introduction of a Design Code. However, we note that the design code states that ‘new dwellings’ should avoid creating north-facing habitable rooms, and that the overuse of north facing glazing that is likely to make homes cold in the winter. We question the impact of this requirement on any land allocated to the south of Harden - especially where the Design Code wants the principal elevation of a property to front onto the main street frontage.</p> <p>We also note that the design code also seeks to deliver areas of play. However, this will only be achievable/viable on large sites allocated. Currently, land allocated in the forthcoming Local Plan comprises small parcels. The allocation of additional large parcels could as part of the Local Plan and/or neighbourhood plan could address this requirement and we would recommend the consideration of land in the ownership of our client.</p> <p>The preference for stone is acknowledged. However, key is ensuring that materials utilised are sympathetic and complementary to the character of the area. This could also include reconstituted stone and render, which are also typical of the area. Restricting materials to the use of stone only, could impact on the viability of a project and thus deliverability. We request that this element of the policy is revisited and other materials local to the area also identified for inclusion.</p>			
<b>Full Submission:</b>			
<p>HARDEN NEIGHBOURHOOD PLAN CONSULTATION (REGULATION 16)</p> <p>Representation on behalf of</p> <p>1.1 We are writing to you to provide a representation to the current consultation on the Harden Neighbourhood Plan, on behalf of our client Louise Hobson.</p> <p>REPRESENTATION</p> <p>Compliance with Emerging Bradford Local Plan</p>			

<b>Consultation point:</b>	Policy HNDP3: High Quality Design
<p>1.2 The Neighbourhood Plan Area (NPA) was formally approved by City of Bradford Metropolitan District Council (Bradford Council) on Wednesday 30 August 2017 in accordance with the Localism Act, 2011, and the Neighbourhood Planning (General) Regulations, 2012.</p> <p>1.3 The strategic planning policy background to the Neighbourhood Plan (as outlined in the consultation documents) is provided by the adopted Bradford Council Core Strategy (2017), Bradford City Centre Area Action Plan, Shipley and Canal Road Area Action Plan, the Waste Management DPD, and the Bradford Homes and Neighbourhoods Design Guide. The Neighbourhood Plan covers the same period as the Bradford Council Core Strategy to 2030.</p> <p>1.4 It is noted that Bradford Council in the process of preparing a New Local Plan, which is moving towards the more advance stages of preparation. As such, we consider that the NDP should seek to align with the New Local Plan. This will ensure it is up-to-date and reflective of strategic priorities coming forward. A failure to do so, could result in the need for a review of the Plan being considered in-effective. On this point, we do note that the NPA does refers to the fact that Bradford Council are reviewing land for allocation in the assessment of land for local green space in justifying certain parcels from being allocated for this purpose.</p> <p>1.5 Expanding on the above, we note that the NPA does not allocate land for development, but includes policies linked to future development in the Harden Area. Linking to para 1.4 above; we draw reference to ‘Preferred Option – Policy SP8 Housing Growth’ of the emerging Bradeord Local Plan, which outlines the ‘draft’ proposed housing requirement for the district.</p> <p>1.6 Harden has been identified within Draft Policy SP8 (at time of representation) to deliver 60 dwellings, with land allocated to deliver this ‘need’. However, importantly, the Policy states under criterion (F) – 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 and that proposed sites according with the policies within this plan’. Clearly, there is a requirement for Neighbourhood Plans to also look at delivering development. Ensuring that the NPA aligns with the emerging</p> <p>1.7 Bradford Local Plan, rather than the current adopted Plan which will be superseded - is therefore essential. Land at Long Lane/ Hill End Lane, Harden</p> <p>1.8 Our client owns land located to the south of Hill End Lane. The site is located within the Green Belt, and adjoins land south of Long Lane, east of Dale Bank, which is currently allocated for housing in Bradford’s emerging Local Plan.</p> <p>1.9 Representation has been made through the preparation of the emerging Local Plan, outlining the ‘suitability’ and ‘availability’ of the site to accommodate development. We still consider this to be the case. Indeed, the site forms a natural extension to the settlement, and given its size, has more flexibility to delivering other essential requirements, such as those linked to the environment and social requirements.</p> <p>1.10 We note that the Council’s Green Belt Assessment, did not recommend the parcel for release for development, as it was considered as a standalone location and as such would not result in a pattern of sustainable development. However, as noted above land adjoining has secured a draft allocation for housing and as such forms a natural extension. On this point, we draw attention to the Green Belt Assessment, which states that if the site was combined with HR/0006 then a new assessment would be required for the larger site. Given that the site has been actively promoted - consideration should be given to undertaking this assessment. We note that an initial assessment was conducted as part of a local plan representation made by Bowcliffe for the site and attached to this representation.</p> <p>1.11 Draft Policy HNDP21 ‘Key Views’ is noted. With views to the south of my client’s land identified as a view which should be retained. The policy states “The views and vistas within Harden village and into Harden village should be retained. Development affecting these views and vistas should be designed in such a way so as not to have a significant adverse impact on their visual quality and amenity. Applications should demonstrate any</p>	

<b>Consultation point:</b>	Policy HNNDP3: High Quality Design
<p>impact development proposals may have on the views identified below...5. View south from Long Lane towards Wilsden'</p> <p>1.12 The supporting text notes that the elevation and topography of the site in question, provides uninterrupted views southwards, over Goit Stock Woods and Harden Beck towards Wilsden, which incises the valley and then rises up again. The landscape is dominated by pasture which is divided by traditional stone walls and/or hedgerows and vegetation. Firstly, we note that the policy does not preclude development, a fact supported by the allocated of land to the east. Overall, we consider that a sensitive development could be delivered, which consider retain views extending southwards. We also note that views can still be obtained from Leech Lane which runs along the western boundary.</p> <p>Comments on Draft Planning Policies</p> <p>1.13 We set out our comments herewith on the relevant policies contained within the pre-submission version of the NPA and responds accordingly to ensure that the Neighbourhood Plan is positively prepared, justified, effective and consistent with local and national planning policy.</p> <p><b>DRAFT POLICY 'HNNDP1: SUSTAINABLE DESIGN &amp; RENEWABLE ENERGY'</b></p> <p>The policy sets a list of requirements a development proposal must achieve. This includes:</p> <ul style="list-style-type: none"> <li>• New development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions. This includes the provision of on-site energy generation from renewable sources:</li> <li>• Proposals should be accompanied by a visual impact assessment that demonstrates renewable energy provisions would not cause visual harm and/ or do not detract from the visual amenity of its location.</li> <li>• Where appropriate, developments should include sustainable drainage systems (SuDS) and rainwater harvesting to help mitigate flooding and alleviate surface water. Best practice and examples are provided in the Harden Design Code (further comments below on Design Code) and should be referred to in applications.</li> </ul> <p>Our client recognises the importance of delivering sustainable development, and meeting the Government's aspirations to achieve carbon zero. Overall, we are supportive of the above policy and introduction of a design code, but question the need for a visual impact assessment for renewable energy provision on an allocated site. Especially, as this would have been considered as part of the evidence base to enable release. As such we consider that this policy should be revisited.</p> <p><b>DRAFT POLICY 'HNNDP2: HOUSING MIX'</b></p> <p>The policy states for new housing development of 10 or more dwellings will be required to provide a mix of house types and sizes to meet the needs of the local community, including i) a minimum of 35% dwellings of no more than 2 bedrooms; and ii) a minimum of 30% 3 bedrooms. The remainder of the mix can be determined by the applicant to ensure the proposal is viable and meets local needs.</p> <p>To maintain flexibility in a changing local market; we agree that it will be important that the housing mix prescriptions are revised in line with up- to-date evidence. It is therefore important that this is reflected within the policy wording.</p> <p><b>DRAFT POLICIES and HNNDP 'HIGH QUALITY DESIGN' &amp; 'HNNDP4: HOMEWORKING'</b></p> <p>Our client is supportive of these policies, and introduction of a Design Code. However, we note that the design code states that 'new dwellings' should avoid creating north-facing habitable rooms, and that the overuse of north facing glazing that is likely to make homes cold in the winter. We question the impact of this requirement on any land allocated to the south of Harden - especially where the Design Code wants the principal elevation of a property to front onto the main street frontage.</p> <p>We also note that the design code also seeks to deliver areas of play. However, this will only be achievable/viable on large sites allocated. Currently, land allocated in the forthcoming Local Plan comprises small parcels. The allocation of additional large parcels could as part of the Local Plan and/or neighbourhood</p>	

<b>Consultation point:</b>	Policy HNNDP3: High Quality Design		
<p>plan could address this requirement and we would recommend the consideration of land in the ownership of our client.</p> <p>The preference for stone is acknowledged. However, key is ensuring that materials utilised are sympathetic and complementary to the character of the area. This could also include reconstituted stone and render, which are also typical of the area. Restricting materials to the use of stone only, could impact on the viability of a project and thus deliverability. We request that this element of the policy is revisited and other materials local to the area also identified for inclusion.</p> <p><b>DRAFT POLICY 'HNNDP5: BUILDING FOR A HEALTHY LIFE &amp; ACCESSIBLE HOMES'</b></p> <p>The policy states that new housing developments of 10 or more dwellings should be accompanied by a Building for a Healthy Life assessment that demonstrates the proposals will result in high quality sustainable development. All new homes are encouraged to be developed to Accessible and Adaptable Dwellings Standards.</p> <p>This policy includes requirements for all new dwellings within major schemes to meet building regulation standards M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings'. M4(2) standards are met, where reasonable provision is made for most people to access the dwelling. This can include ensuring there is step free access to the dwelling, car park space, communal space and WC.</p> <p>In addition, ensuring that the dwelling is capable of being adapted in the future. M4(3) standards occur where a new dwelling makes reasonable provision for a wheelchair user to live in the dwelling and use associated private and outdoor space, parking and communal facilities that may be provided for the use of the occupants. This policy seeks to provide a choice of suitable housing so as to enable people to live for longer within their own homes.</p> <p>Our client is supportive of the above. However, we question the need for all new dwellings to meet this standard. The approach and percentage adopted is normally informed by an up-to-date Strategic Housing Market Assessment; and/or a caveat in the supporting text that development proposals should be informed by needs identified in the SHMA. We therefore request that the wording of this policy is revisited.</p> <p><b>DRAFT POLICY 'HNNDP20: STONE WALLS'</b></p> <p>The policy states that stone walls, including areas of historic dry-stone wall should be retained and restored using local stone and traditional techniques wherever possible in new developments or in refurbishments. The policy is welcomed. However, where partial loss is required to facilitate access and thus much needed development – this should not seek to prevent development.</p> <p><b>OTHER DRAFT POLICIES</b></p> <p>The ethos and wording of other policies are supported by our client.</p> <p>Summary</p> <p>1.14 If you wish to discuss the contents of this letter further, please do not hesitate to contact me via the details outlined below. We would welcome continued dialogue.</p>			

<b>Consultation point:</b>	Policy HNNDP3: High Quality Design		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>The aim of the policy is broadly supported and is noted as being on the few that reference the Harden Design Code as an expression of local distinctiveness. However, it needs to be clearer whether it relates to housing/residential development or all types of development.</p>			

## HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS

<b>Consultation point:</b>	Policy HNNDP3: High Quality Design
<p>It is suggested the policy title is changed to “ENCOURAGING HIGH QUALITY AND LOCALLY DISTINCTIVE DESIGN”. It may be appropriate to include that the second paragraph is amended to require applicants to demonstrate how their proposal responds to its wider context as well as the principles set out in the Harden Design Code and other relevant policy/guidance such as the Homes &amp; Neighbourhoods SPD, the National Design Guide and National Model Design Code</p>	

<b>Consultation point:</b>	Policy HNNDP3: High Quality Design – Policy references		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>(Page 18) In addition to Core Strategy DS1, reference should also be include to Core Strategy Policies HO9, DS3, DS4, DS5 and SC9 as well as the relevant sections of the Homes and Neighbourhoods Design Guide SPD.</p>			

### 7. CHAPTER 2: HOUSING - POLICY HNNDP4: HOMEWORKING

<b>Consultation point:</b>	Policy HNNDP4 – Homeworking		
<b>Representation ID:</b>	30369	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	7371	<b>Agent:</b>	7370 – Astrum Planning
<b>Summary:</b>			
<p>Our client is supportive of these policies, and introduction of a Design Code. However, we note that the design code states that ‘new dwellings’ should avoid creating north-facing habitable rooms, and that the overuse of north facing glazing that is likely to make homes cold in the winter. We question the impact of this requirement on any land allocated to the south of Harden - especially where the Design Code wants the principal elevation of a property to front onto the main street frontage.</p> <p>We also note that the design code also seeks to deliver areas of play. However, this will only be achievable/viable on large sites allocated. Currently, land allocated in the forthcoming Local Plan comprises small parcels. The allocation of additional large parcels could as part of the Local Plan and/or neighbourhood plan could address this requirement and we would recommend the consideration of land in the ownership of our client.</p>			
<b>Full Submission:</b>			
<p>HARDEN NEIGHBOURHOOD PLAN CONSULTATION (REGULATION 16)</p> <p>Representation on behalf of</p> <p>1.1 We are writing to you to provide a representation to the current consultation on the Harden Neighbourhood Plan, on behalf of our client Louise Hobson.</p> <p>REPRESENTATION</p> <p>Compliance with Emerging Bradford Local Plan</p> <p>1.2 The Neighbourhood Plan Area (NPA) was formally approved by City of Bradford Metropolitan District Council (Bradford Council) on Wednesday 30 August 2017 in accordance with the Localism Act, 2011, and the Neighbourhood Planning (General) Regulations, 2012.</p>			

<b>Consultation point:</b>	Policy HNPD4 – Homeworking
<p>1.3 The strategic planning policy background to the Neighbourhood Plan (as outlined in the consultation documents) is provided by the adopted Bradford Council Core Strategy (2017), Bradford City Centre Area Action Plan, Shipley and Canal Road Area Action Plan, the Waste Management DPD, and the Bradford Homes and Neighbourhoods Design Guide. The Neighbourhood Plan covers the same period as the Bradford Council Core Strategy to 2030.</p> <p>1.4 It is noted that Bradford Council in the process of preparing a New Local Plan, which is moving towards the more advance stages of preparation. As such, we consider that the NDP should seek to align with the New Local Plan. This will ensure it is up-to-date and reflective of strategic priorities coming forward. A failure to do so, could result in the need for a review of the Plan being considered in-effective. On this point, we do note that the NPA does refers to the fact that Bradford Council are reviewing land for allocation in the assessment of land for local green space in justifying certain parcels from being allocated for this purpose.</p> <p>1.5 Expanding on the above, we note that the NPA does not allocate land for development, but includes policies linked to future development in the Harden Area. Linking to para 1.4 above; we draw reference to ‘Preferred Option – Policy SP8 Housing Growth’ of the emerging Bradeord Local Plan, which outlines the ‘draft’ proposed housing requirement for the district.</p> <p>1.6 Harden has been identified within Draft Policy SP8 (at time of representation) to deliver 60 dwellings, with land allocated to deliver this ‘need’. However, importantly, the Policy states under criterion (F) – 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 and that proposed sites according with the policies within this plan’. Clearly, there is a requirement for Neighbourhood Plans to also look at delivering development. Ensuring that the NPA aligns with the emerging</p> <p>1.7 Bradford Local Plan, rather than the current adopted Plan which will be superseded - is therefore essential. Land at Long Lane/ Hill End Lane, Harden</p> <p>1.8 Our client owns land located to the south of Hill End Lane. The site is located within the Green Belt, and adjoins land south of Long Lane, east of Dale Bank, which is currently allocated for housing in Bradford’s emerging Local Plan.</p> <p>1.9 Representation has been made through the preparation of the emerging Local Plan, outlining the ‘suitability’ and ‘availability’ of the site to accommodate development. We still consider this to be the case. Indeed, the site forms a natural extension to the settlement, and given its size, has more flexibility to delivering other essential requirements, such as those linked to the environment and social requirements.</p> <p>1.10 We note that the Council’s Green Belt Assessment, did not recommend the parcel for release for development, as it was considered as a standalone location and as such would not result in a pattern of sustainable development. However, as noted above land adjoining has secured a draft allocation for housing and as such forms a natural extension. On this point, we draw attention to the Green Belt Assessment, which states that if the site was combined with HR/0006 then a new assessment would be required for the larger site. Given that the site has been actively promoted - consideration should be given to undertaking this assessment. We note that an initial assessment was conducted as part of a local plan representation made by Bowcliffe for the site and attached to this representation.</p> <p>1.11 Draft Policy HNPD21 ‘Key Views’ is noted. With views to the south of my client’s land identified as a view which should be retained. The policy states “The views and vistas within Harden village and into Harden village should be retained. Development affecting these views and vistas should be designed in such a way so as not to have a significant adverse impact on their visual quality and amenity. Applications should demonstrate any impact development proposals may have on the views identified below...5. View south from Long Lane towards Wilsden’</p>	



<b>Consultation point:</b>	Policy HNPD4 – Homeworking
<p>1.12 The supporting text notes that the elevation and topography of the site in question, provides uninterrupted views southwards, over Goit Stock Woods and Harden Beck towards Wilsden, which incises the valley and then rises up again. The landscape is dominated by pasture which is divided by traditional stone walls and/or hedgerows and vegetation. Firstly, we note that the policy does not preclude development, a fact supported by the allocated of land to the east. Overall, we consider that a sensitive development could be delivered, which consider retain views extending southwards. We also note that views can still be obtained from Leech Lane which runs along the western boundary.</p> <p>Comments on Draft Planning Policies</p> <p>1.13 We set out our comments herewith on the relevant policies contained within the pre-submission version of the NPA and responds accordingly to ensure that the Neighbourhood Plan is positively prepared, justified, effective and consistent with local and national planning policy.</p> <p><b>DRAFT POLICY 'HNPD1: SUSTAINABLE DESIGN &amp; RENEWABLE ENERGY'</b></p> <p>The policy sets a list of requirements a development proposal must achieve. This includes:</p> <ul style="list-style-type: none"> <li>• New development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions. This includes the provision of on-site energy generation from renewable sources:</li> <li>• Proposals should be accompanied by a visual impact assessment that demonstrates renewable energy provisions would not cause visual harm and/ or do not detract from the visual amenity of its location.</li> <li>• Where appropriate, developments should include sustainable drainage systems (SuDS) and rainwater harvesting to help mitigate flooding and alleviate surface water. Best practice and examples are provided in the Harden Design Code (further comments below on Design Code) and should be referred to in applications.</li> </ul> <p>Our client recognises the importance of delivering sustainable development, and meeting the Government’s aspirations to achieve carbon zero. Overall, we are supportive of the above policy and introduction of a design code, but question the need for a visual impact assessment for renewable energy provision on an allocated site. Especially, as this would have been considered as part of the evidence base to enable release. As such we consider that this policy should be revisited.</p> <p><b>DRAFT POLICY ‘HNPD2: HOUSING MIX’</b></p> <p>The policy states for new housing development of 10 or more dwellings will be required to provide a mix of house types and sizes to meet the needs of the local community, including i) a minimum of 35% dwellings of no more than 2 bedrooms; and ii) a minimum of 30% 3 bedrooms. The remainder of the mix can be determined by the applicant to ensure the proposal is viable and meets local needs.</p> <p>To maintain flexibility in a changing local market; we agree that it will be important that the housing mix prescriptions are revised in line with up- to-date evidence. It is therefore important that this is reflected within the policy wording.</p> <p><b>DRAFT POLICIES and HNPD ‘HIGH QUALITY DESIGN’ &amp; 'HNPD4: HOMEWORKING'</b></p> <p>Our client is supportive of these policies, and introduction of a Design Code. However, we note that the design code states that ‘new dwellings’ should avoid creating north-facing habitable rooms, and that the overuse of north facing glazing that is likely to make homes cold in the winter. We question the impact of this requirement on any land allocated to the south of Harden - especially where the Design Code wants the principal elevation of a property to front onto the main street frontage.</p> <p>We also note that the design code also seeks to deliver areas of play. However, this will only be achievable/viable on large sites allocated. Currently, land allocated in the forthcoming Local Plan comprises small parcels. The allocation of additional large parcels could as part of the Local Plan and/or neighbourhood plan could address this requirement and we would recommend the consideration of land in the ownership of our client.</p>	

<b>Consultation point:</b>	Policy HNPD4 – Homeworking		
<p>The preference for stone is acknowledged. However, key is ensuring that materials utilised are sympathetic and complementary to the character of the area. This could also include reconstituted stone and render, which are also typical of the area. Restricting materials to the use of stone only, could impact on the viability of a project and thus deliverability. We request that this element of the policy is revisited and other materials local to the area also identified for inclusion.</p> <p>DRAFT POLICY 'HNPD5: BUILDING FOR A HEALTHY LIFE &amp; ACCESSIBLE HOMES'</p> <p>The policy states that new housing developments of 10 or more dwellings should be accompanied by a Building for a Healthy Life assessment that demonstrates the proposals will result in high quality sustainable development. All new homes are encouraged to be developed to Accessible and Adaptable Dwellings Standards.</p> <p>This policy includes requirements for all new dwellings within major schemes to meet building regulation standards M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings'. M4(2) standards are met, where reasonable provision is made for most people to access the dwelling. This can include ensuring there is step free access to the dwelling, car park space, communal space and WC.</p> <p>In addition, ensuring that the dwelling is capable of being adapted in the future. M4(3) standards occur where a new dwelling makes reasonable provision for a wheelchair user to live in the dwelling and use associated private and outdoor space, parking and communal facilities that may be provided for the use of the occupants. This policy seeks to provide a choice of suitable housing so as to enable people to live for longer within their own homes.</p> <p>Our client is supportive of the above. However, we question the need for all new dwellings to meet this standard. The approach and percentage adopted is normally informed by an up-to-date Strategic Housing Market Assessment; and/or a caveat in the supporting text that development proposals should be informed by needs identified in the SHMA. We therefore request that the wording of this policy is revisited.</p> <p>DRAFT POLICY 'HNPD20: STONE WALLS'</p> <p>The policy states that stone walls, including areas of historic dry-stone wall should be retained and restored using local stone and traditional techniques wherever possible in new developments or in refurbishments. The policy is welcomed. However, where partial loss is required to facilitate access and thus much needed development – this should not seek to prevent development.</p> <p>OTHER DRAFT POLICIES</p> <p>The ethos and wording of other policies are supported by our client.</p> <p>Summary</p> <p>1.14 If you wish to discuss the contents of this letter further, please do not hesitate to contact me via the details outlined below. We would welcome continued dialogue.</p>			

<b>Consultation point:</b>	Policy HNPD4 – Homeworking		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>This is an aspirational desire that lacks precise meaning and does not deal with the actual delivery of measures for home working. It may be appropriate to reword the policy as follows:</p> <p><i>"All new housing developments are encouraged to provide space to support and facilitate homeworking, with flexible space adaptable to a home office".</i></p>			



8. CHAPTER 2: HOUSING - POLICY HNDP5: BUILDING FOR A HEALTHY LIFE AND ACCESSIBLE HOMES

<b>Consultation point:</b>	Policy HNDP5: Building for a healthy life and accessible homes		
<b>Representation ID:</b>	30370	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	7371	<b>Agent:</b>	7370 – Astrum Planning
<b>Summary:</b>			
<p>The policy states that new housing developments of 10 or more dwellings should be accompanied by a Building for a Healthy Life assessment that demonstrates the proposals will result in high quality sustainable development. All new homes are encouraged to be developed to Accessible and Adaptable Dwellings Standards.</p> <p>This policy includes requirements for all new dwellings within major schemes to meet building regulation standards M4(2) ‘accessible and adaptable dwellings’ and M4(3) ‘wheelchair user dwellings’. M4(2) standards are met, where reasonable provision is made for most people to access the dwelling. This can include ensuring there is step free access to the dwelling, car park space, communal space and WC.</p> <p>In addition, ensuring that the dwelling is capable of being adapted in the future. M4(3) standards occur where a new dwelling makes reasonable provision for a wheelchair user to live in the dwelling and use associated private and outdoor space, parking and communal facilities that may be provided for the use of the occupants. This policy seeks to provide a choice of suitable housing so as to enable people to live for longer within their own homes.</p> <p>Our client is supportive of the above. However, we question the need for all new dwellings to meet this standard. The approach and percentage adopted is normally informed by an up-to-date Strategic Housing Market Assessment; and/or a caveat in the supporting text that development proposals should be informed by needs identified in the SHMA. We therefore request that the wording of this policy is revisited.</p>			
<b>Full Submission:</b>			
<p>HARDEN NEIGHBOURHOOD PLAN CONSULTATION (REGULATION 16)</p> <p>Representation on behalf of</p> <p>1.1 We are writing to you to provide a representation to the current consultation on the Harden Neighbourhood Plan, on behalf of our client Louise Hobson.</p> <p>REPRESENTATION</p> <p>Compliance with Emerging Bradford Local Plan</p> <p>1.2 The Neighbourhood Plan Area (NPA) was formally approved by City of Bradford Metropolitan District Council (Bradford Council) on Wednesday 30 August 2017 in accordance with the Localism Act, 2011, and the Neighbourhood Planning (General) Regulations, 2012.</p> <p>1.3 The strategic planning policy background to the Neighbourhood Plan (as outlined in the consultation documents) is provided by the adopted Bradford Council Core Strategy (2017), Bradford City Centre Area Action Plan, Shipley and Canal Road Area Action Plan, the Waste Management DPD, and the Bradford Homes and Neighbourhoods Design Guide. The Neighbourhood Plan covers the same period as the Bradford Council Core Strategy to 2030.</p> <p>1.4 It is noted that Bradford Council in the process of preparing a New Local Plan, which is moving towards the more advance stages of preparation. As such, we consider that the NDP should seek to align with the New Local Plan. This will ensure it is up-to-date and reflective of strategic priorities coming forward. A failure to do so, could result in the need for a review of the Plan being considered in-effective. On this point, we do note that the NPA does refer to the fact that Bradford Council are reviewing land for allocation in the assessment of land for local green space in justifying certain parcels from being allocated for this purpose.</p>			

<b>Consultation point:</b>	Policy HNNDP5: Building for a healthy life and accessible homes
<p>1.5 Expanding on the above, we note that the NPA does not allocate land for development, but includes policies linked to future development in the Harden Area. Linking to para 1.4 above; we draw reference to ‘Preferred Option – Policy SP8 Housing Growth’ of the emerging Bradeord Local Plan, which outlines the ‘draft’ proposed housing requirement for the district.</p> <p>1.6 Harden has been identified within Draft Policy SP8 (at time of representation) to deliver 60 dwellings, with land allocated to deliver this ‘need’. However, importantly, the Policy states under criterion (F) – 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 and that proposed sites according with the policies within this plan’. Clearly, there is a requirement for Neighbourhood Plans to also look at delivering development. Ensuring that the NPA aligns with the emerging</p> <p>1.7 Bradford Local Plan, rather than the current adopted Plan which will be superseded - is therefore essential. Land at Long Lane/ Hill End Lane, Harden</p> <p>1.8 Our client owns land located to the south of Hill End Lane. The site is located within the Green Belt, and adjoins land south of Long Lane, east of Dale Bank, which is currently allocated for housing in Bradford’s emerging Local Plan.</p> <p>1.9 Representation has been made through the preparation of the emerging Local Plan, outlining the ‘suitability’ and ‘availability’ of the site to accommodate development. We still consider this to be the case. Indeed, the site forms a natural extension to the settlement, and given its size, has more flexibility to delivering other essential requirements, such as those linked to the environment and social requirements.</p> <p>1.10 We note that the Council’s Green Belt Assessment, did not recommend the parcel for release for development, as it was considered as a standalone location and as such would not result in a pattern of sustainable development. However, as noted above land adjoining has secured a draft allocation for housing and as such forms a natural extension. On this point, we draw attention to the Green Belt Assessment, which states that if the site was combined with HR/0006 then a new assessment would be required for the larger site. Given that the site has been actively promoted - consideration should be given to undertaking this assessment. We note that an initial assessment was conducted as part of a local plan representation made by Bowcliffe for the site and attached to this representation.</p> <p>1.11 Draft Policy HNNDP21 ‘Key Views’ is noted. With views to the south of my client’s land identified as a view which should be retained. The policy states “The views and vistas within Harden village and into Harden village should be retained. Development affecting these views and vistas should be designed in such a way so as not to have a significant adverse impact on their visual quality and amenity. Applications should demonstrate any impact development proposals may have on the views identified below...5. View south from Long Lane towards Wilsden’</p> <p>1.12 The supporting text notes that the elevation and topography of the site in question, provides uninterrupted views southwards, over Goit Stock Woods and Harden Beck towards Wilsden, which incises the valley and then rises up again. The landscape is dominated by pasture which is divided by traditional stone walls and/or hedgerows and vegetation. Firstly, we note that the policy does not preclude development, a fact supported by the allocated of land to the east. Overall, we consider that a sensitive development could be delivered, which consider retain views extending southwards. We also note that views can still be obtained from Leech Lane which runs along the western boundary.</p> <p>Comments on Draft Planning Policies</p> <p>1.13 We set out our comments herewith on the relevant policies contained within the pre-submission version of the NPA and responds accordingly to ensure that the Neighbourhood Plan is positively prepared, justified, effective and consistent with local and national planning policy.</p> <p>DRAFT POLICY 'HNNDP1: SUSTAINABLE DESIGN &amp; RENEWABLE ENERGY'</p>	

<b>Consultation point:</b>	Policy HN5P: Building for a healthy life and accessible homes
<p>The policy sets a list of requirements a development proposal must achieve. This includes:</p> <ul style="list-style-type: none"> <li>• New development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions. This includes the provision of on-site energy generation from renewable sources:</li> <li>• Proposals should be accompanied by a visual impact assessment that demonstrates renewable energy provisions would not cause visual harm and/ or do not detract from the visual amenity of its location.</li> <li>• Where appropriate, developments should include sustainable drainage systems (SuDS) and rainwater harvesting to help mitigate flooding and alleviate surface water. Best practice and examples are provided in the Harden Design Code (further comments below on Design Code) and should be referred to in applications.</li> </ul> <p>Our client recognises the importance of delivering sustainable development, and meeting the Government’s aspirations to achieve carbon zero. Overall, we are supportive of the above policy and introduction of a design code, but question the need for a visual impact assessment for renewable energy provision on an allocated site. Especially, as this would have been considered as part of the evidence base to enable release. As such we consider that this policy should be revisited.</p> <p><b>DRAFT POLICY ‘HN5P: HOUSING MIX’</b></p> <p>The policy states for new housing development of 10 or more dwellings will be required to provide a mix of house types and sizes to meet the needs of the local community, including i) a minimum of 35% dwellings of no more than 2 bedrooms; and ii) a minimum of 30% 3 bedrooms. The remainder of the mix can be determined by the applicant to ensure the proposal is viable and meets local needs.</p> <p>To maintain flexibility in a changing local market; we agree that it will be important that the housing mix prescriptions are revised in line with up- to-date evidence. It is therefore important that this is reflected within the policy wording.</p> <p><b>DRAFT POLICIES and HN5P ‘HIGH QUALITY DESIGN’ &amp; ‘HN5P4: HOMEWORKING’</b></p> <p>Our client is supportive of these policies, and introduction of a Design Code. However, we note that the design code states that ‘new dwellings’ should avoid creating north-facing habitable rooms, and that the overuse of north facing glazing that is likely to make homes cold in the winter. We question the impact of this requirement on any land allocated to the south of Harden - especially where the Design Code wants the principal elevation of a property to front onto the main street frontage.</p> <p>We also note that the design code also seeks to deliver areas of play. However, this will only be achievable/viable on large sites allocated. Currently, land allocated in the forthcoming Local Plan comprises small parcels. The allocation of additional large parcels could as part of the Local Plan and/or neighbourhood plan could address this requirement and we would recommend the consideration of land in the ownership of our client.</p> <p>The preference for stone is acknowledged. However, key is ensuring that materials utilised are sympathetic and complementary to the character of the area. This could also include reconstituted stone and render, which are also typical of the area. Restricting materials to the use of stone only, could impact on the viability of a project and thus deliverability. We request that this element of the policy is revisited and other materials local to the area also identified for inclusion.</p> <p><b>DRAFT POLICY ‘HN5P5: BUILDING FOR A HEALTHY LIFE &amp; ACCESSIBLE HOMES’</b></p> <p>The policy states that new housing developments of 10 or more dwellings should be accompanied by a Building for a Healthy Life assessment that demonstrates the proposals will result in high quality sustainable development. All new homes are encouraged to be developed to Accessible and Adaptable Dwellings Standards.</p> <p>This policy includes requirements for all new dwellings within major schemes to meet building regulation standards M4(2) ‘accessible and adaptable dwellings’ and M4(3) ‘wheelchair user dwellings’. M4(2) standards</p>	

## HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS

<b>Consultation point:</b>	Policy HNDP5: Building for a helathy life and accessible homes		
<p>are met, where reasonable provision is made for most people to access the dwelling. This can include ensuring there is step free access to the dwelling, car park space, communal space and WC.</p> <p>In addition, ensuring that the dwelling is capable of being adapted in the future. M4(3) standards occur where a new dwelling makes reasonable provision for a wheelchair user to live in the dwelling and use associated private and outdoor space, parking and communal facilities that may be provided for the use of the occupants. This policy seeks to provide a choice of suitable housing so as to enable people to live for longer within their own homes.</p> <p>Our client is supportive of the above. However, we question the need for all new dwellings to meet this standard. The approach and percentage adopted is normally informed by an up-to-date Strategic Housing Market Assessment; and/or a caveat in the supporting text that development proposals should be informed by needs identified in the SHMA. We therefore request that the wording of this policy is revisited.</p> <p>DRAFT POLICY 'HNDP20: STONE WALLS'</p> <p>The policy states that stone walls, including areas of historic dry-stone wall should be retained and restored using local stone and traditional techniques wherever possible in new developments or in refurbishments. The policy is welcomed. However, where partial loss is required to facilitate access and thus much needed development – this should not seek to prevent development.</p> <p>OTHER DRAFT POLICIES</p> <p>The ethos and wording of other policies are supported by our client.</p> <p>Summary</p> <p>1.14 If you wish to discuss the contents of this letter further, please do not hesitate to contact me via the details outlined below. We would welcome continued dialogue.</p>			

<b>Consultation point:</b>	Policy HNDP5: Building for a helathy life and accessible homes		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>To allow for a degree of flexibility to address any changes in circumstances, it is suggested that additional wording is included in the first paragraph in order to allow for any change to the Building for a Healthy Life principles. The wording should be as follows: <i>“New housing developments of 10 or more dwellings should be accompanied by a Building for a Healthy Life assessment <b>(or updated versions)</b> that demonstrates the proposals will result in a high quality sustainable development”</i>.</p> <p>The second paragraph should also refer to the relevant sections of the building regulations. It should be reworded as follows: <i>“All new homes are encouraged to be developed to Accessible and Adaptable Dwellings Standards <b>set out in Part M4(2) and M4(3) of the Building Regulations, in order to ensure that dwellings meet the changing needs of occupants throughout their life”</b></i>.</p> <p>Cross referencing either in the policy and/or supporting text to the relevant section of the Harden Design Code would also be useful.</p>			

<b>Consultation point:</b>	Supporting text to Policy HNDP5: Building for a helathy life and accessible homes		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-

## HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS

<b>Consultation point:</b>	Supporting text to Policy HNDP5: Building for a healthy life and accessible homes		
<b>Full Submission:</b>			
Page 19 - Paragraph 2.2.12 - Third Sentence			
This sentence should be deleted as applicants should be able to engage appropriately qualified person/organisation to undertake a Building for a Healthy Life assessment.			

<b>Consultation point:</b>	Supporting text to Policy HNDP5: Building for a healthy life and accessible homes		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
Page 19 - Paragraph 2.2.14 – Second Sentence			
Bradford Council’s adopted Homes & Neighbourhoods Design Guide Supplementary Planning Document, also include guidance on Lifetime Homes and accessible homes, and as such should be referenced. Therefore it is suggested that the following wording is added to the end of the sentence: <b><i>“...and the Homes and Neighbourhoods Design Guide Supplementary Planning Document”</i></b> .			

<b>Consultation point:</b>	Supporting text to Policy HNDP5: Building for a healthy life and accessible homes		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
Page 19 – Policy References			
In addition to Core Strategy HO9, reference should also be included to Core Strategy Policies DS1, DS3, DS4, DS5 and SC9 as well as section 3.2 of the Homes and Neighbourhoods Design Guide SPD.			

### 9. CHAPTER 2: HOUSING - POLICY HNDP6: HIGH SPEED BROADBAND

<b>Consultation point:</b>	Policy HNDP6: High Speed Broadband		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
The policy as drafted would appear to cover two separate issues – designing future residential development to connect to the high quality communications infrastructure (i.e. broadband) and supporting proposals that would lead to improved/additional connectivity for the village, subject to meet other relevant material considerations.			
The aim of the policy would appear to be ensure that future residential development is future-proofed by requiring the infrastructure associated within the installation of high speed broadband to be provided at the build stage, rather than post construction. As such it should be more clear in its intention.			

## HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS

<b>Consultation point:</b>	Policy HNPD6: High Speed Broadband
<p>It may therefore be more appropriate to amend the first paragraph to read as follows: <i>“All new housing development should be designed to include the necessary infrastructure to allow the provision of connections to high speed broadband”</i></p> <p>In respect of the second paragraph, it needs to be clear regarding the type of communications infrastructure that it will support. Does it relate to improvements to the broadband network or the mobile telecommunication network/5G network, or both?</p>	

### 10. CHAPTER 3: TRANSPORT – POLICY HNPD7: HARDEN TO BINGLEY ACTIVE TRAVEL

<b>Consultation point:</b>	Policy HNPD7: Harden to Bingley Active Travel		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>Core Strategy policies TR1 and TR3 support the development/improvement of walking and cycling infrastructure within the District, an approach that has been carried forward into the emerging Local Plan.</p> <p>As drafted the policy appears to be more of an aspiration and not clear how it will be delivered. It may be more appropriate to provide additional wording seeking to ensure that new developments should be connected to existing walking/cycling networks and/or contribute towards enhanced infrastructure. It could also express support for proposals to provide new/enhanced active travel infrastructure linking Harden with Bingley.</p> <p>This should also be linked to Core Strategy Policy TR3.</p>			

### 11. CHAPTER 3: TRANSPORT – POLICY HNPD8: ELECTRIC VEHICLE CHARGING POINTS

<b>Consultation point:</b>	Policy HNPD8: Electric Vehicle Charging Points		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>Core Strategy policy TR1 aims to reduce in the demand for travel, encourage and facilitate the use of sustainable travel modes, limit traffic growth, reduce congestion and improve journey time reliability. Criteria F of the policy highlights the need to provide appropriate infrastructure to encourage to the wider take up of alternative fuels, technologies and vehicle ownership use/models. This includes the provision of Electric Vehicle (EV) charging points via the development process and where viable.</p> <p>The Homes and Neighbourhoods Design Guide SPD – section 2.15 - also includes a requirement for 1 EV charging point to be provided per unit (a dwelling with dedicated parking) or 1 charging point per 10 spaces (unallocated parking). NPPF paragraph 112(e) also encourages new development to be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.</p> <p>Based on the above, it is questioned this policy is necessary and adds to existing policy.</p>			

**12. CHAPTER 3: TRANSPORT – POLICY HNNDP10: PEDESTRIAN & CYCLE CONNECTIONS**

<b>Consultation point:</b>	Policy HNNDP10: Pedestrian & Cycle Connections		
<b>Representation ID:</b>	30380	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	2747	<b>Agent:</b>	-
<b>Summary:</b>			
<p>There is a public right of way not showing on your map which runs along the boundary of the field identified as greenbelt plot i adjacent to Chelston and green belt land identified as plot G. The public right of way runs uphill toward the marked footpath and follows the edge of plot I. This has been used for many years and does need to be included although the land forms part of Ivy House Farmland.</p>			
<b>Full Submission:</b>			
<p>There is a public right of way not showing on your map which runs along the boundary of the field identified as greenbelt plot i adjacent to Chelston and green belt land identified as plot G. The public right of way runs uphill toward the marked footpath and follows the edge of plot I. This has been used for many years and does need to be included although the land forms part of Ivy House Farmland.</p>			

**13. CHAPTER 4: COMMUNITY FACILITIES & SERVICES – POLICY HNNDP13: COMMUNITY FACILITIES & SERVICES**

<b>Consultation point:</b>	Policy HNNDP13: Community Facilities & Services		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>This policy as drafted does not reflect the reality of Planning Use Class E introduced by Government in September 2020.</p> <p>The community facilities identified as A, F and G by the Harden Neighbourhood Plan are used for purposes that have been subsumed into Use Class E and so their change of use to numerous other residential, commercial and business uses would not need planning permission. For example, the Local Planning Authority could not prevent Harden Post Office or Harden Pharmacy changing use to a café or restaurant. The policy and supporting text needs to reflect these circumstances.</p>			

<b>Consultation point:</b>	Supporting text to Policy HNNDP13: Community Facilities & Services		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>Page 26 - Paragraph 4.2.7 - Second Sentence</p> <p>The reference to paragraph 28 of the NPPF should be amended to "<i>Paragraph 84(d)</i>" in order to reflect the most recent edition published in July 2021.</p>			



**14. CHAPTER 4: COMMUNITY FACILITIES & SERVICES – POLICY HNPD14: ENHANCING THE VILLAGE CENTRE**

<b>Consultation point:</b>	HNPD14: Enhancing the Village Centre		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>Proposals to enhance the appearance and functionality of the village centre are desirable. Rather than stating they will be “<i>encouraged and supported</i>”, the Plan should to explain how new development proposals (planning applications) will be expected to help deliver those enhancements. Accordingly, it is suggested that policies wording is revised to be clear in this regard. The following revised wording is proposed:</p> <p><i>“New developments in the village centre will be expected to incorporate and make provision for appropriate improvements to:</i></p> <ul style="list-style-type: none"> <li>• <i>Public realm, street furniture and hard landscaping;</i></li> <li>• <i>Green infrastructure;</i></li> <li>• <i>Pedestrian and cycle safety; and/or</i></li> <li>• <i>Parking management.</i></li> </ul> <p><i>Where such improvements are necessary to create safe and workable developments that integrate with, and enhance the character of the village centre and its enjoyment by all users”.</i></p>			

**15. CHAPTER 5: GREEN SPACES – POLICY HNPD15: GREEN INFRASTRUCTURE**

<b>Consultation point:</b>	HNPD15: Green Infrastructure		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>The policy is broadly supported, however it needs to be clear regarding the type of development to which is applies and how it will be delivered. Does it for example apply to new housing developments or all types of development. It may also be useful to set some thresholds above it would apply as it may be difficult to apply to single dwellings or residential extensions.</p> <p>The work should also be strengthened. For example, it may be more appropriate to state that “<i>new developments should...</i></p> <ul style="list-style-type: none"> <li>• <i>Include provision of green infrastructure....”</i></li> </ul> <p>It is also suggested that some examples of the types of green infrastructure that may be encourage e.g. open spaces, wildlife corridors or buffers.</p> <p>A cross reference should be included within the policy linking it to Policy HNPD16 and the map on page 33 which lists and shows the Local Wildlife Sites and Bradford Wildlife Habitat Network within/adjacent to the parish area.</p> <p>It may be appropriate to refer to a 10% biodiversity net gain.</p> <p>Reference should be made to the green infrastructure being delivered in line with the guidance/principles provided on infrastructure provision set out in the Harden Design Code (pages 30 to 35).</p>			



**16. CHAPTER 5: GREEN SPACES – POLICY HNDP17: TREE PLANTING**

<b>Consultation point:</b>	HNDP17: Tree Planting		
<b>Representation ID:</b>	30375	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	2747	<b>Agent:</b>	-
<b>Summary:</b>			
Land adjacent to Chelston Park is not showing as deciduous and and yet this plot of land is completely surrounded by existing varied mature specimens that should be protected.			
<b>Full Submission:</b>			
Land adjacent to Chelston Park is not showing as deciduous and and yet this plot of land is completely surrounded by existing varied mature specimens that should be protected.			

<b>Consultation point:</b>	HNDP17: Tree Planting		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
Core Strategy Policy EN5 seeks to preserve and enhance the contribution that trees and woodland cover makes to the character of the district and to ensure that this is taken into account in the appraisal of individual proposals for development.			
It also seeks to ensure that trees/woodlands that contributes towards the character of a settlement or its setting or amenity of the built up area, valued landscapes or wildlife habitats are protected. The policy, as a drafted, states that mature trees should be “retained”, which is inconsistent with Policy EN5.			
In terms of the “3 for 1” approach to replacing trees that may be removed, this may not always be possible and vary from site to site. This should be acknowledged.			
It may also be appropriate to refer to the use of “street trees” in new developments, as set out in NPPF paragraph 131.			

**17. CHAPTER 5: GREEN SPACES – POLICY HNDP18: LOCAL GREEN SPACES**

<b>Consultation point:</b>	HNDP18: Local Green Spaces		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
The policy protects the identified local green spaces from future development. As two of the proposed sites are existing playing fields, there needs to be an exception where essential development is required which supports and sustains the sporting, recreational and green space use. Further explanation regarding the type of development that may be acceptable should be included within the policy or supporting text.			

<b>Consultation point:</b>	HNDP18: Local Green Spaces & Appendix 9.1		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>Pages 36-37 &amp; 53-81</p> <p>The Green Space Assessment fails to provide information relating to the existing land designations of the suggested sites in the RUDP 2005.</p> <p>For information, the current land designations of the sites are as follows:</p> <ul style="list-style-type: none"> <li>• Site A – No designation</li> <li>• Site B – Recreation Open Space</li> <li>• Site C – Playing Fields (Cricket)</li> <li>• Site D – Playing Fields (Football)</li> <li>• Site E – Village Greenspace</li> </ul> <p>In addition, each of the above have considered as part of the Open Space Assessment that supports the emerging Local Plan.</p> <p>It should be noted that sites B and C are both located within the Green Belt and benefit from this protection.</p>			

**18. CHAPTER 6: HERITAGE – POLICY HNDP19: HERITAGE**

<b>Consultation point:</b>	HNDP19: Heritage		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>It is noted that this policy focusses solely on non-designated heritage assets and makes no reference to the various designated heritage assets present in the neighbourhood area, such as the St. Ives Estate.</p> <p>In addition, permitted development rights apply to many of the non-designated heritage assets listed in the policy. These allow for numerous alterations and extensions to be undertaken without the need for planning permission.</p> <p>The policy should also be consistent NPPF paragraph 203.</p> <p>Accordingly, a number of amendments are suggested in order to reflect the points set out above:</p> <p><i>“New developments will be expected to <b>preserve</b>, protect and <b>enhance designated and non-designated heritage assets in the Harden Neighbourhood Area</b> and their settings <b>in line with Core Strategy Policy EN3</b>. The level of protection should be commensurate with the level of the designation of the asset.</i></p> <p><i>Proposed developments or alterations to non-designated heritage assets <b>that require planning permission</b> should be undertaken sensitively, respecting the historical and architectural integrity. Proposals to restore non-designated heritage assets and original features will be supported, provided that all other material planning considerations are satisfied.</i></p> <p><i><b><u>In considering planning applications for development that directly or indirectly affect a non-designated heritage asset, balanced judgement will be made having regard to the scale of any harm or loss caused by any development and the asset’s significance.....”</u></b></i></p>			

19. CHAPTER 6: HERITAGE - POLICY HNPD20: STONE WALLS

<b>Consultation point:</b>	Policy HNPD20: Stone walls		
<b>Representation ID:</b>	30371	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	7371	<b>Agent:</b>	7370 – Astrum Planning
<b>Summary:</b>			
<p>The policy states that stone walls, including areas of historic dry-stone wall should be retained and restored using local stone and traditional techniques wherever possible in new developments or in refurbishments. The policy is welcomed. However, where partial loss is required to facilitate access and thus much needed development – this should not seek to prevent development.</p>			
<b>Full Submission:</b>			
<p>HARDEN NEIGHBOURHOOD PLAN CONSULTATION (REGULATION 16)</p> <p>Representation on behalf of</p> <p>1.1 We are writing to you to provide a representation to the current consultation on the Harden Neighbourhood Plan, on behalf of our client Louise Hobson.</p> <p>REPRESENTATION</p> <p>Compliance with Emerging Bradford Local Plan</p> <p>1.2 The Neighbourhood Plan Area (NPA) was formally approved by City of Bradford Metropolitan District Council (Bradford Council) on Wednesday 30 August 2017 in accordance with the Localism Act, 2011, and the Neighbourhood Planning (General) Regulations, 2012.</p> <p>1.3 The strategic planning policy background to the Neighbourhood Plan (as outlined in the consultation documents) is provided by the adopted Bradford Council Core Strategy (2017), Bradford City Centre Area Action Plan, Shipley and Canal Road Area Action Plan, the Waste Management DPD, and the Bradford Homes and Neighbourhoods Design Guide. The Neighbourhood Plan covers the same period as the Bradford Council Core Strategy to 2030.</p> <p>1.4 It is noted that Bradford Council in the process of preparing a New Local Plan, which is moving towards the more advance stages of preparation. As such, we consider that the NDP should seek to align with the New Local Plan. This will ensure it is up-to-date and reflective of strategic priorities coming forward. A failure to do so, could result in the need for a review of the Plan being considered in-effective. On this point, we do note that the NPA does refers to the fact that Bradford Council are reviewing land for allocation in the assessment of land for local green space in justifying certain parcels from being allocated for this purpose.</p> <p>1.5 Expanding on the above, we note that the NPA does not allocate land for development, but includes policies linked to future development in the Harden Area. Linking to para 1.4 above; we draw reference to ‘Preferred Option – Policy SP8 Housing Growth’ of the emerging Bradeord Local Plan, which outlines the ‘draft’ proposed housing requirement for the district.</p> <p>1.6 Harden has been identified within Draft Policy SP8 (at time of representation) to deliver 60 dwellings, with land allocated to deliver this ‘need’. However, importantly, the Policy states under criterion (F) – 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 and that proposed sites according with the policies within this plan’. Clearly, there is a requirement for Neighbourhood Plans to also look at delivering development. Ensuring that the NPA aligns with the emerging</p> <p>1.7 Bradford Local Plan, rather than the current adopted Plan which will be superseded - is therefore essential. Land at Long Lane/ Hill End Lane, Harden</p>			

<b>Consultation point:</b>	Policy HN20: Stone walls
<p>1.8 Our client owns land located to the south of Hill End Lane. The site is located within the Green Belt, and adjoins land south of Long Lane, east of Dale Bank, which is currently allocated for housing in Bradford’s emerging Local Plan.</p> <p>1.9 Representation has been made through the preparation of the emerging Local Plan, outlining the ‘suitability’ and ‘availability’ of the site to accommodate development. We still consider this to be the case. Indeed, the site forms a natural extension to the settlement, and given its size, has more flexibility to delivering other essential requirements, such as those linked to the environment and social requirements.</p> <p>1.10 We note that the Council’s Green Belt Assessment, did not recommend the parcel for release for development, as it was considered as a standalone location and as such would not result in a pattern of sustainable development. However, as noted above land adjoining has secured a draft allocation for housing and as such forms a natural extension. On this point, we draw attention to the Green Belt Assessment, which states that if the site was combined with HR/0006 then a new assessment would be required for the larger site. Given that the site has been actively promoted - consideration should be given to undertaking this assessment. We note that an initial assessment was conducted as part of a local plan representation made by Bowcliffe for the site and attached to this representation.</p> <p>1.11 Draft Policy HN21 ‘Key Views’ is noted. With views to the south of my client’s land identified as a view which should be retained. The policy states “The views and vistas within Harden village and into Harden village should be retained. Development affecting these views and vistas should be designed in such a way so as not to have a significant adverse impact on their visual quality and amenity. Applications should demonstrate any impact development proposals may have on the views identified below...5. View south from Long Lane towards Wilsden’</p> <p>1.12 The supporting text notes that the elevation and topography of the site in question, provides uninterrupted views southwards, over Goit Stock Woods and Harden Beck towards Wilsden, which incises the valley and then rises up again. The landscape is dominated by pasture which is divided by traditional stone walls and/or hedgerows and vegetation. Firstly, we note that the policy does not preclude development, a fact supported by the allocated of land to the east. Overall, we consider that a sensitive development could be delivered, which consider retain views extending southwards. We also note that views can still be obtained from Leech Lane which runs along the western boundary.</p> <p>Comments on Draft Planning Policies</p> <p>1.13 We set out our comments herewith on the relevant policies contained within the pre-submission version of the NPA and responds accordingly to ensure that the Neighbourhood Plan is positively prepared, justified, effective and consistent with local and national planning policy.</p> <p><b>DRAFT POLICY 'HN21: SUSTAINABLE DESIGN &amp; RENEWABLE ENERGY'</b></p> <p>The policy sets a list of requirements a development proposal must achieve. This includes:</p> <ul style="list-style-type: none"> <li>• New development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions. This includes the provision of on-site energy generation from renewable sources:</li> <li>• Proposals should be accompanied by a visual impact assessment that demonstrates renewable energy provisions would not cause visual harm and/ or do not detract from the visual amenity of its location.</li> <li>• Where appropriate, developments should include sustainable drainage systems (SuDS) and rainwater harvesting to help mitigate flooding and alleviate surface water. Best practice and examples are provided in the Harden Design Code (further comments below on Design Code) and should be referred to in applications.</li> </ul> <p>Our client recognises the importance of delivering sustainable development, and meeting the Government’s aspirations to achieve carbon zero. Overall, we are supportive of the above policy and introduction of a design code, but question the need for a visual impact assessment for renewable energy provision on an allocated site.</p>	

<b>Consultation point:</b>	Policy HN20: Stone walls
<p>Especially, as this would have been considered as part of the evidence base to enable release. As such we consider that this policy should be revisited.</p> <p><b>DRAFT POLICY 'HN20: HOUSING MIX'</b></p> <p>The policy states for new housing development of 10 or more dwellings will be required to provide a mix of house types and sizes to meet the needs of the local community, including i) a minimum of 35% dwellings of no more than 2 bedrooms; and ii) a minimum of 30% 3 bedrooms. The remainder of the mix can be determined by the applicant to ensure the proposal is viable and meets local needs.</p> <p>To maintain flexibility in a changing local market; we agree that it will be important that the housing mix prescriptions are revised in line with up- to-date evidence. It is therefore important that this is reflected within the policy wording.</p> <p><b>DRAFT POLICIES and HN20 'HIGH QUALITY DESIGN' &amp; 'HN20: HOMEWORKING'</b></p> <p>Our client is supportive of these policies, and introduction of a Design Code. However, we note that the design code states that 'new dwellings' should avoid creating north-facing habitable rooms, and that the overuse of north facing glazing that is likely to make homes cold in the winter. We question the impact of this requirement on any land allocated to the south of Harden - especially where the Design Code wants the principal elevation of a property to front onto the main street frontage.</p> <p>We also note that the design code also seeks to deliver areas of play. However, this will only be achievable/viable on large sites allocated. Currently, land allocated in the forthcoming Local Plan comprises small parcels. The allocation of additional large parcels could as part of the Local Plan and/or neighbourhood plan could address this requirement and we would recommend the consideration of land in the ownership of our client.</p> <p>The preference for stone is acknowledged. However, key is ensuring that materials utilised are sympathetic and complementary to the character of the area. This could also include reconstituted stone and render, which are also typical of the area. Restricting materials to the use of stone only, could impact on the viability of a project and thus deliverability. We request that this element of the policy is revisited and other materials local to the area also identified for inclusion.</p> <p><b>DRAFT POLICY 'HN20: BUILDING FOR A HEALTHY LIFE &amp; ACCESSIBLE HOMES'</b></p> <p>The policy states that new housing developments of 10 or more dwellings should be accompanied by a Building for a Healthy Life assessment that demonstrates the proposals will result in high quality sustainable development. All new homes are encouraged to be developed to Accessible and Adaptable Dwellings Standards.</p> <p>This policy includes requirements for all new dwellings within major schemes to meet building regulation standards M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings'. M4(2) standards are met, where reasonable provision is made for most people to access the dwelling. This can include ensuring there is step free access to the dwelling, car park space, communal space and WC.</p> <p>In addition, ensuring that the dwelling is capable of being adapted in the future. M4(3) standards occur where a new dwelling makes reasonable provision for a wheelchair user to live in the dwelling and use associated private and outdoor space, parking and communal facilities that may be provided for the use of the occupants. This policy seeks to provide a choice of suitable housing so as to enable people to live for longer within their own homes.</p> <p>Our client is supportive of the above. However, we question the need for all new dwellings to meet this standard. The approach and percentage adopted is normally informed by an up-to-date Strategic Housing Market Assessment; and/or a caveat in the supporting text that development proposals should be informed by needs identified in the SHMA. We therefore request that the wording of this policy is revisited.</p> <p><b>DRAFT POLICY 'HN20: STONE WALLS'</b></p>	

## HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS

<b>Consultation point:</b>	Policy HN20: Stone walls		
<p>The policy states that stone walls, including areas of historic dry-stone wall should be retained and restored using local stone and traditional techniques wherever possible in new developments or in refurbishments. The policy is welcomed. However, where partial loss is required to facilitate access and thus much needed development – this should not seek to prevent development.</p> <p>OTHER DRAFT POLICIES</p> <p>The ethos and wording of other policies are supported by our client.</p> <p>Summary</p> <p>1.14 If you wish to discuss the contents of this letter further, please do not hesitate to contact me via the details outlined below. We would welcome continued dialogue.</p>			

<b>Consultation point:</b>	Policy HN20: Dry Stone Walls		
<b>Representation ID:</b>	30376	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	2747	<b>Agent:</b>	-
<b>Summary:</b>			
<p>Land adjacent to Chelston Park is not showing as having a dry stone wall and and yet this plot of land is mostly surrounded by existing dry stone wall between Braes Castle boundary to the North and boundary with Ivy Cottage farmland to the west and along the public footpath so that should be included and protected.</p>			
<b>Full Submission:</b>			
<p>Land adjacent to Chelston Park is not showing as having a dry stone wall and and yet this plot of land is mostly surrounded by existing dry stone wall between Braes Castle boundary to the North and boundary with Ivy Cottage farmland to the west and along the public footpath so that should be included and protected.</p>			

<b>Consultation point:</b>	Policy HN20: Stone walls		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>Whilst the policy sets out a key aspiration for the community, consideration should be given to whether in can be delivered in practice. The construction, demolition or alteration of a stone wall of less than 2 metres in height (1 metre adjacent to a road) would not require planning permission.</p> <p>The policy perhaps needs to also refer to the traditional field pattern, not just walls.</p> <p>The use of the word “<i>refurbishment</i>” should be clarified. Does it refer to refurbishment of existing sites/buildings or alterations to existing stone walls, for example when someone needs to create a new access gate through a wall.</p>			

### 20. CHAPTER 6: HERITAGE - POLICY HN21: KEY VIEWS

<b>Consultation point:</b>	HN21: Key Views		
<b>Representation ID:</b>	30372	<b>Comment Type:</b>	Comment

<b>Consultation point:</b>	HNDP21: Key Views		
<b>Respondent:</b>	7371	<b>Agent:</b>	7370 – Astrum Planning
<b>Summary:</b>			
<p>Draft Policy HNDP21 ‘Key Views’ is noted. With views to the south of my client’s land identified as a view which should be retained. The policy states ‘The views and vistas within Harden village and into Harden village should be retained. Development affecting these views and vistas should be designed in such a way so as not to have a significant adverse impact on their visual quality and amenity. Applications should demonstrate any impact development proposals may have on the views identified below...5. View south from Long Lane towards Wilsden’</p> <p>1.12 The supporting text notes that the elevation and topography of the site in question, provides uninterrupted views southwards, over Goit Stock Woods and Harden Beck towards Wilsden, which incises the valley and then rises up again. The landscape is dominated by pasture which is divided by traditional stone walls and/or hedgerows and vegetation. Firstly, we note that the policy does not preclude development, a fact supported by the allocated of land to the east. Overall, we consider that a sensitive development could be delivered, which consider retain views extending southwards. We also note that views can still be obtained from Leech Lane which runs along the western boundary</p>			
<b>Full Submission:</b>			
<p>HARDEN NEIGHBOURHOOD PLAN CONSULTATION (REGULATION 16)</p> <p>Representation on behalf of</p> <p>1.1 We are writing to you to provide a representation to the current consultation on the Harden Neighbourhood Plan, on behalf of our client Louise Hobson.</p> <p>REPRESENTATION</p> <p>Compliance with Emerging Bradford Local Plan</p> <p>1.2 The Neighbourhood Plan Area (NPA) was formally approved by City of Bradford Metropolitan District Council (Bradford Council) on Wednesday 30 August 2017 in accordance with the Localism Act, 2011, and the Neighbourhood Planning (General) Regulations, 2012.</p> <p>1.3 The strategic planning policy background to the Neighbourhood Plan (as outlined in the consultation documents) is provided by the adopted Bradford Council Core Strategy (2017), Bradford City Centre Area Action Plan, Shipley and Canal Road Area Action Plan, the Waste Management DPD, and the Bradford Homes and Neighbourhoods Design Guide. The Neighbourhood Plan covers the same period as the Bradford Council Core Strategy to 2030.</p> <p>1.4 It is noted that Bradford Council in the process of preparing a New Local Plan, which is moving towards the more advance stages of preparation. As such, we consider that the NDP should seek to align with the New Local Plan. This will ensure it is up-to-date and reflective of strategic priorities coming forward. A failure to do so, could result in the need for a review of the Plan being considered in-effective. On this point, we do note that the NPA does refers to the fact that Bradford Council are reviewing land for allocation in the assessment of land for local green space in justifying certain parcels from being allocated for this purpose.</p> <p>1.5 Expanding on the above, we note that the NPA does not allocate land for development, but includes policies linked to future development in the Harden Area. Linking to para 1.4 above; we draw reference to ‘Preferred Option – Policy SP8 Housing Growth’ of the emerging Bradeord Local Plan, which outlines the ‘draft’ proposed housing requirement for the district.</p> <p>1.6 Harden has been identified within Draft Policy SP8 (at time of representation) to deliver 60 dwellings, with land allocated to deliver this ‘need’. However, importantly, the Policy states under criterion (F) – 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</p>			



<b>Consultation point:</b>	HNDP21: Key Views
<p>sustainable way and that proposed sites according with the policies within this plan’. Clearly, there is a requirement for Neighbourhood Plans to also look at delivering development. Ensuring that the NPA aligns with the emerging</p> <p>1.7 Bradford Local Plan, rather than the current adopted Plan which will be superseded - is therefore essential. Land at Long Lane/ Hill End Lane, Harden</p> <p>1.8 Our client owns land located to the south of Hill End Lane. The site is located within the Green Belt, and adjoins land south of Long Lane, east of Dale Bank, which is currently allocated for housing in Bradford’s emerging Local Plan.</p> <p>1.9 Representation has been made through the preparation of the emerging Local Plan, outlining the ‘suitability’ and ‘availability’ of the site to accommodate development. We still consider this to be the case. Indeed, the site forms a natural extension to the settlement, and given its size, has more flexibility to delivering other essential requirements, such as those linked to the environment and social requirements.</p> <p>1.10 We note that the Council’s Green Belt Assessment, did not recommend the parcel for release for development, as it was considered as a standalone location and as such would not result in a pattern of sustainable development. However, as noted above land adjoining has secured a draft allocation for housing and as such forms a natural extension. On this point, we draw attention to the Green Belt Assessment, which states that if the site was combined with HR/0006 then a new assessment would be required for the larger site. Given that the site has been actively promoted - consideration should be given to undertaking this assessment. We note that an initial assessment was conducted as part of a local plan representation made by Bowcliffe for the site and attached to this representation.</p> <p>1.11 Draft Policy HNDP21 ‘Key Views’ is noted. With views to the south of my client’s land identified as a view which should be retained. The policy states “The views and vistas within Harden village and into Harden village should be retained. Development affecting these views and vistas should be designed in such a way so as not to have a significant adverse impact on their visual quality and amenity. Applications should demonstrate any impact development proposals may have on the views identified below...5. View south from Long Lane towards Wilsden’</p> <p>1.12 The supporting text notes that the elevation and topography of the site in question, provides uninterrupted views southwards, over Goit Stock Woods and Harden Beck towards Wilsden, which incises the valley and then rises up again. The landscape is dominated by pasture which is divided by traditional stone walls and/or hedgerows and vegetation. Firstly, we note that the policy does not preclude development, a fact supported by the allocated of land to the east. Overall, we consider that a sensitive development could be delivered, which consider retain views extending southwards. We also note that views can still be obtained from Leech Lane which runs along the western boundary.</p> <p>Comments on Draft Planning Policies</p> <p>1.13 We set out our comments herewith on the relevant policies contained within the pre-submission version of the NPA and responds accordingly to ensure that the Neighbourhood Plan is positively prepared, justified, effective and consistent with local and national planning policy.</p> <p><b>DRAFT POLICY 'HNDP1: SUSTAINABLE DESIGN &amp; RENEWABLE ENERGY'</b></p> <p>The policy sets a list of requirements a development proposal must achieve. This includes:</p> <ul style="list-style-type: none"> <li>• New development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions. This includes the provision of on-site energy generation from renewable sources:</li> <li>• Proposals should be accompanied by a visual impact assessment that demonstrates renewable energy provisions would not cause visual harm and/ or do not detract from the visual amenity of its location.</li> </ul>	



<b>Consultation point:</b>	HNDP21: Key Views
<ul style="list-style-type: none"> <li>Where appropriate, developments should include sustainable drainage systems (SuDS) and rainwater harvesting to help mitigate flooding and alleviate surface water. Best practice and examples are provided in the Harden Design Code (further comments below on Design Code) and should be referred to in applications.</li> </ul> <p>Our client recognises the importance of delivering sustainable development, and meeting the Government’s aspirations to achieve carbon zero. Overall, we are supportive of the above policy and introduction of a design code, but question the need for a visual impact assessment for renewable energy provision on an allocated site. Especially, as this would have been considered as part of the evidence base to enable release. As such we consider that this policy should be revisited.</p> <p><b>DRAFT POLICY ‘HNDP2: HOUSING MIX’</b></p> <p>The policy states for new housing development of 10 or more dwellings will be required to provide a mix of house types and sizes to meet the needs of the local community, including i) a minimum of 35% dwellings of no more than 2 bedrooms; and ii) a minimum of 30% 3 bedrooms. The remainder of the mix can be determined by the applicant to ensure the proposal is viable and meets local needs.</p> <p>To maintain flexibility in a changing local market; we agree that it will be important that the housing mix prescriptions are revised in line with up- to-date evidence. It is therefore important that this is reflected within the policy wording.</p> <p><b>DRAFT POLICIES and HNDP ‘HIGH QUALITY DESIGN’ &amp; ‘HNDP4: HOMEWORKING’</b></p> <p>Our client is supportive of these policies, and introduction of a Design Code. However, we note that the design code states that ‘new dwellings’ should avoid creating north-facing habitable rooms, and that the overuse of north facing glazing that is likely to make homes cold in the winter. We question the impact of this requirement on any land allocated to the south of Harden - especially where the Design Code wants the principal elevation of a property to front onto the main street frontage.</p> <p>We also note that the design code also seeks to deliver areas of play. However, this will only be achievable/viable on large sites allocated. Currently, land allocated in the forthcoming Local Plan comprises small parcels. The allocation of additional large parcels could as part of the Local Plan and/or neighbourhood plan could address this requirement and we would recommend the consideration of land in the ownership of our client.</p> <p>The preference for stone is acknowledged. However, key is ensuring that materials utilised are sympathetic and complementary to the character of the area. This could also include reconstituted stone and render, which are also typical of the area. Restricting materials to the use of stone only, could impact on the viability of a project and thus deliverability. We request that this element of the policy is revisited and other materials local to the area also identified for inclusion.</p> <p><b>DRAFT POLICY ‘HNDP5: BUILDING FOR A HEALTHY LIFE &amp; ACCESSIBLE HOMES’</b></p> <p>The policy states that new housing developments of 10 or more dwellings should be accompanied by a Building for a Healthy Life assessment that demonstrates the proposals will result in high quality sustainable development. All new homes are encouraged to be developed to Accessible and Adaptable Dwellings Standards.</p> <p>This policy includes requirements for all new dwellings within major schemes to meet building regulation standards M4(2) ‘accessible and adaptable dwellings’ and M4(3) ‘wheelchair user dwellings’. M4(2) standards are met, where reasonable provision is made for most people to access the dwelling. This can include ensuring there is step free access to the dwelling, car park space, communal space and WC.</p> <p>In addition, ensuring that the dwelling is capable of being adapted in the future. M4(3) standards occur where a new dwelling makes reasonable provision for a wheelchair user to live in the dwelling and use associated private and outdoor space, parking and communal facilities that may be provided for the use of the occupants.</p>	

<b>Consultation point:</b>	HNDP21: Key Views		
<p>This policy seeks to provide a choice of suitable housing so as to enable people to live for longer within their own homes.</p> <p>Our client is supportive of the above. However, we question the need for all new dwellings to meet this standard. The approach and percentage adopted is normally informed by an up-to-date Strategic Housing Market Assessment; and/or a caveat in the supporting text that development proposals should be informed by needs identified in the SHMA. We therefore request that the wording of this policy is revisited.</p> <p>DRAFT POLICY 'HNDP20: STONE WALLS'</p> <p>The policy states that stone walls, including areas of historic dry-stone wall should be retained and restored using local stone and traditional techniques wherever possible in new developments or in refurbishments. The policy is welcomed. However, where partial loss is required to facilitate access and thus much needed development – this should not seek to prevent development.</p> <p>OTHER DRAFT POLICIES</p> <p>The ethos and wording of other policies are supported by our client.</p> <p>Summary</p> <p>1.14 If you wish to discuss the contents of this letter further, please do not hesitate to contact me via the details outlined below. We would welcome continued dialogue.</p>			

<b>Consultation point:</b>	Policy HNDP21: Key Views		
<b>Representation ID:</b>	30377	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	2747	<b>Agent:</b>	-
<b>Summary:</b>			
<p>The view from Wilsden Road to the West toward Ivy Cottage Farm should be preserved as it has far reaching views of the valley looking towards Halifax and the woodlands and hills between.</p>			
<b>Full Submission:</b>			
<p>The view from Wilsden Road to the West toward Ivy Cottage Farm should be preserved as it has far reaching views of the valley looking towards Halifax and the woodlands and hills between.</p>			

<b>Consultation point:</b>	HNDP21: Key Views		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>As draft the policy requires applicant to demonstrate how proposals may impact on the identified views/vistas, however it is not clear how this should be done. It should be noted that not all developments will require Design and Access Statements.</p> <p>Accordingly, it suggested that the wording of the policy is amended to states:</p> <p><i>"The views and vistas within Harden village and into Harden village, <b>listed below and shown on Figure XX</b>, should be retained. <b>These are:</b></i></p> <p><b><i>1. view south from Harden Road</i></b></p>			

<b>Consultation point:</b>	HNDP21: Key Views		
<p><b><u>2. view north from Harden Road</u></b></p> <p><b><u>3. panoramic view from Harden Moor</u></b></p> <p><b><u>4. views south from Ryecroft</u></b></p> <p><b><u>5. view south from Long Lane towards Wilsden</u></b></p> <p><i>Development affecting these views and vistas should be designed in such a way so as not to have a significant adverse impact on their visual quality and amenity."</i></p> <p>Reference should also be made within the policy and/or the supporting text to the guidance set out in the Harden Design Code HDC3.</p>			

**21. CHAPTER 7: BUSINESS & EMPLOYMENT - POLICY HNDP22: BUSINESS & EMPLOYMENT**

<b>Consultation point:</b>	HNDP22: Business and Employment		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>The aim of the policy is supported, however it should be clearer regarding the scale and nature of the commercial enterprises and businesses. Different types of uses bring with them different issues. For example, cafes and takeaways raise issues such as amenity and car parking. Also, the policy should be clear regarding where new commercial/business development would be permitted. This would assist in providing clearer guidance to applicants and decision makers.</p> <p>It may be appropriate to consider a similar approach to that set out in the Oxenhope Neighbourhood Development Plan (2022), which has a policy covering this topic.</p> <p>The phrasing "...providing all other material planning considerations are satisfied." is vague. It needs to be clear what is meant in the regard. It may be appropriate to amend the wording to read "providing that they are consistent with the locational, environmental and design policies set out in the Neighbourhood Plan, the Core Strategy and other relevant national planning policy and guidance".</p>			

<b>Consultation point:</b>	HNDP22: Business and Employment		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>Policy references</p> <p>This list of Core Strategy policies that this policy relates to should include Policy PN1(C), PN2(D) and EC4</p>			

**22. APPENDIX 9 - 9.1 LOCAL GREEN SPACE ASSESSMENTS**

<b>Consultation point:</b>	9.1 Local Green Space Assessments		
<b>Representation ID:</b>	30365	<b>Comment Type:</b>	Comment

**HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS**

<b>Consultation point:</b>	9.1 Local Green Space Assessments		
<b>Respondent:</b>	1339	<b>Agent:</b>	-
<b>Summary:</b>			
<p>As per appendix 9 (9.1 local green space) (section G)</p> <p>Please see attached wildlife pictures this is just a few of loads that we have taken in the field behind Chelston Park so I am not sure how it can not be classed as a wildlife area every year foxes come to nest/give birth in here along with deer in the field most days especially during the spring/summer along with lots of bats, birds, rabbits and badgers I also believe the bats live in the building that is built on the field.</p>			
<b>Full Submission:</b>			
<p>As per appendix 9 (9.1 local green space ) (section G)</p> <p>Please see attached wildlife pictures this is just a few of loads that we have taken in the field behind Chelston Park so I am not sure how it can not be classed as a wildlife area every year foxes come to nest/give birth in here along with deer in the field most days especially during the spring/summer along with lots of bats, birds, rabbits and badgers I also believe the bats live in the building that is built on the field.</p> <p>LOCAL GREEN SPACE ASSESSMENT: G</p> <p>Site name &amp; reference letter: West Wilsden Road (Ref. G)</p> <p>Location: Land west of Wilsden Road</p> <p>Size (hectares - ha): 0.6ha</p> <p>Proximity to community served (ref NPPF 100a): The site is located to the southwest of the village centre and is in close proximity to the community it serves.</p> <p>Landscape significance, Historic significance, Recreational value, Wildlife richness (ref NPPF 100b): The site provides no recreational value, historic significance or landscape significance. There is no evidence to suggest the site is rich in wildlife.</p> <p>Local in character / not an extensive tract of land (ref NPPF 100c): The site is local in character and is bounded by traditional stone walls. The site is not an extensive tract of land.</p> <p>Summary Assessment: The site fails to meet the assessment criteria. The site is within the green belt and there would be no additional benefit in designating this site as a Local Green Space.</p> <p>Recommendation: DO NOT DESIGNATE AS LOCAL GREEN SPACE</p>			

<b>Consultation point:</b>	9.1 Local Green Space Assessments		
<b>Representation ID:</b>	30378	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	2747	<b>Agent:</b>	-
<b>Summary:</b>			
<p>Plot G shows no consideration of the wildlife habitat that exists in this area of green belt land. The plot has extensive areas of stone walling and also very mature specimens of trees and established hedgerows. There is plenty of wildlife here including owls, bats, sparrow hawk, finches and woodpeckers but also foxes, rabbits, deers and the occasional badger. There are butterflies and moths in the areas of grass and brambles patches but also some wild flowers including wild orchids. The land itself contains a natural spring line so any</p>			

## HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS

<b>Consultation point:</b>	9.1 Local Green Space Assessments		
development would have a detrimental impact on this bio diverse area of land. This is definitely green belt and should remain so.			
<b>Full Submission:</b>			
Plot G shows no consideration of the wildlife habitat that exists in this area of green belt land. The plot has extensive areas of stone walling and also very mature specimens of trees and established hedgerows. There is plenty of wildlife here including owls, bats, sparrow hawk, finches and woodpeckers but also foxes, rabbits, deers and the occasional badger. There are butterflies and moths in the areas of grass and brambles patches but also some wild flowers including wild orchids. The land itself contains a natural spring line so any development would have a detrimental impact on this bio diverse area of land. This is definitely green belt and should remain so.			

### 23. APPENDIX 9 - 9.3 KEY VIEW ASSESSMENT

<b>Consultation point:</b>	9.3. Key View Assessment		
<b>Representation ID:</b>	30379	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	2747	<b>Agent:</b>	-
<b>Summary:</b>			
Another view to consider is West of Harden Hall above the access road to Ivy House Farm and towards the Cottages surrounded by woodland at Leech Lane and beyond to Cullingworth via the pepper pot and long distant views of rolling hills and woodlands with some farmland with Ovenden Moor wind farm on the horizon.			
<b>Full Submission:</b>			
Another view to consider is West of Harden Hall above the access road to Ivy House Farm and towards the Cottages surrounded by woodland at Leech Lane and beyond to Cullingworth via the pepper pot and long distant views of rolling hills and woodlands with some farmland with Ovenden Moor wind farm on the horizon.			

### 24. HARDEN DESIGN GUIDE

<b>Consultation point:</b>	Harden Design Code HDC1 – Materials		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
Core Strategy DS3 seeks to ensure that the development proposals should create a strong sense place and are appropriate to their context in terms of layout, scale, density, density, details and materials. It also allows for the use of innovative and contemporary approaches to design that respond to and complement the local context.			
As drafted this element of the Design Code could be viewed as too prescriptive and not in conformity the above policy as it appears not encourage or support innovative and contemporary approaches to design, which could help to meet the plan's other policies and aspirations in relation to sustainable design and renewable energy solutions.			

**HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN - SUMMARY OF REPRESENTATIONS**

<b>Consultation point:</b>	Harden Design Code HDC2 – Heights		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
<p>As drafted, the wording of HDC2 could be considered to be prescriptive. There is a mixture of housing heights in Harden, and that is often part of its character. Therefore, it is considered that HDC2 should refer to the heights of new development being responsive to landform and sympathetic to the height (and massing) of adjoining buildings. As drafted this element of the Design Code could be viewed as too prescriptive and not in conformity the above policy as it appears not encourage or support innovative and contemporary approaches to design, which could help to meet the plan’s other policies and aspirations in relation to sustainable design and renewable energy solutions.</p>			

<b>Consultation point:</b>	Harden Design Code HDC3 – Views & Vistas		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
Needs to be cross-reference to Policy HNPD21.			

<b>Consultation point:</b>	Harden Design Code HDC5 – Movement & Accessibility		
<b>Representation ID:</b>	-	<b>Comment Type:</b>	Comment
<b>Respondent:</b>	City of Bradford MDC	<b>Agent:</b>	-
<b>Full Submission:</b>			
Essentially this is only repeating CS Policy DS4. Some reference to materials for hard surfaced areas would have been useful.			