



29^h July 2022

Dear Planning Department

HARDEN NEIGHBOURHOOD PLAN CONSULTATION (REGULATION 16)

Representation on behalf of

- 1.1 We are writing to you to provide a representation to the current consultation on the Harden Neighbourhood Plan Submission Documents, on behalf of our client Louise Hobson.

REPRESENTATION

Compliance with Emerging Bradford Local Plan

- 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.
- 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.
- 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.
- 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.
- 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

- 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

- 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.
- 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.
- 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.
- 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'*
- 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.

Comments on Draft Planning Policies

- 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.

DRAFT POLICY 'HNDP1: SUSTAINABLE DESIGN & RENEWABLE ENERGY'

The policy sets a list of requirements a development proposal must achieve. This includes:

- 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:
- 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.
- 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.

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.

DRAFT POLICY 'HNDP2: HOUSING MIX'

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.

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.

DRAFT POLICIES and HNDP 'HIGH QUALITY DESIGN' & 'HNDP4: HOMEWORKING'

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.

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.

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.

DRAFT POLICY 'HNDP5: BUILDING FOR A HEALTHY LIFE & ACCESSIBLE HOMES'

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.

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.

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.

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.

DRAFT POLICY 'HNDP20: STONE WALLS'

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.

OTHER DRAFT POLICIES

The ethos and wording of other policies are supported by our client.

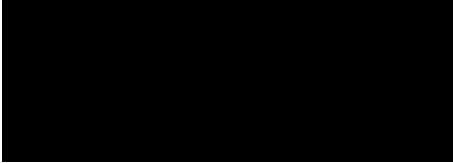
Summary

- 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.

Yours Sincerely,



Rachel Reaney, MRTPI



Company Registration Number: 12969998