

HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN (2021 TO 2030) COMMENTS FORM (June 2022)

The Harden Neighbourhood Development Plan has been submitted to City of Bradford Metropolitan District Council (CBMDC). The Council is now required to consult on the plan for a period of 6 weeks. The Plan and supporting documents are available to view electronically at: www.bradford.gov.uk/consultations as well on the Council's Opus Consult portal: <https://bradford.oc2.uk/document/43>. Hard copies are available to inspect during normal opening hours at:

- CBMDC Customer Service Centre, Britannia House, Hall Ings, Bradford, BD1 1HX
- City Library, Centenary Square, Bradford, BD1 1SD
- Bingley Library, 5 Rise Shopping Centre, Bingley, BD16 1AW

This consultation seeks your views on whether the Harden Neighbourhood Development Plan meets the Basic Conditions¹ which are that the plan:

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

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

The consultation period starts on **Monday 20th June** and closes at 5pm on **Monday 15th August 2022**.

How to comment

Comments can be submitted via the following:

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

Completing the Comments Form

There are two parts to this form:

- Part A: Personal/Agent Details
- Part B: For Comment

Contact Details:

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

- **Telephone:** 01247 433679
- **Email:** planning.policy@bradford.gov.uk
- **Address:** Local Plan Team, City of Bradford Metropolitan District Council, 4th Floor, Britannia House, Hall Ings, Bradford, BD1 1HX

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

NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012
REGULATION 16: PUBLICISING A PLAN PROPOSAL
HARDEN NEIGHBOURHOOD DEVELOPMENT PLAN (2021 TO 2030)
COMMENT FORM

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

PART A: PERSONAL DETAILS

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

You and/or your appointed agent (if relevant) can request to be notified once City of Bradford Metropolitan District Council has decided to “make” the Harden Neighbourhood Development Plan, following the Independent Examination and local referendum. This decision is the final statutory stage in adopting the Neighbourhood Development Plan. Please indicate below whether or not you wish to be notified.

1. PERSONAL / AGENT DETAILS		
	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title		
Full Name		
Job Title (where relevant)		
Organisation (where relevant)	Local Plans Team, City of Bradford Metropolitan District Council	
Address		
Post Code		
Email Address		
Telephone Number		

2. FUTURE NOTIFICATION

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

Yes

No

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

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PART B – YOUR COMMENTS

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

3. To which document does your comment relate? Please place an 'X' in one box only			
Neighbourhood Development Plan (NDP)	See Attachment	Basic Conditions Statement	
Consultation Statement		Other (please specify)	

4. To which part of the document does your comment relate?					
Whole document	See Attachment	Section	See Attachment	Policy	See Attachment
Page Number		Paragraph			

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

6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.
<p>City of Bradford Metropolitan District Council has a number of comments/observations on the draft Harden Neighbourhood Development Plan. These are detailed on the attached grid.</p>

7. Signature:		Date:	15.08.2022
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**Harden Neighbourhood Development Plan
Regulation 16 Consultation (June to August 2022)
City of Bradford Metropolitan District Council Comments & Observations**

Representation Reference	Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
	General comment	-	-	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.
	General comment	-	-	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.
	General comment	4	Contents Page	<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>
	General Comment	-	-	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.
	General comment	6	1.3	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.
	General comment	-	-	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.
	General Comment	7, 23, 33, 35, 37, 41, 43, 45, 47	Maps	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> .

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				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> .
	General Comment	-	Neighbourhood Plan & Design Code	<p>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.</p> <p>It is strongly suggested that the Summary in the design code needs to be expressed as a Policy in the Plan.</p> <p><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 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>
	02 Housing	17	HNDP1 Sustainable Design & Renewable Energy	<p>The policy as drafted would seem to cover three particular topic areas:</p> <ul style="list-style-type: none"> • Building Performance/Sustainable Construction & Design • Renewable Energy • Flood Risk/Sustainable Drainage <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 HNDP3 is more precise in its wording. Policy HNDP1 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</p>

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				<p>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 & 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><u>“Sustainable Construction & Design</u></p> <p><i>New housing 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, subject to be being consistent with relevant design and heritage policies of the plan.</i></p> <p><u>Renewable Energy</u></p> <p><i>Proposals incorporating small-scale renewable energy technologies and infrastructure will be supported. These 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.</i></p> <p><u>Sustainable Drainage</u></p> <p><i>Where appropriate, developments should include sustainable drainage systems (SuDS) and rainwater harvesting to help mitigate flooding and alleviate surface water.</i></p> <p><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></p>

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	02 Housing	17	HNDP2 Housing Mix	<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> <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:</p> <p><i><u>"Subject to the findings of the latest housing needs assessment, new housing developments of 10 or more dwellings will be required to provide a mix of house types, sizes and tenures (both market and affordable) to meet the needs of the local community..."</u></i></p>
	02 Housing		HNDP3 High Quality Design	<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> <p>It is suggested the policy title is changed to "ENCOURAGING HIGH QUALITY AND LOCALLY DISTINCTIVE DESIGN".</p> <p>It may be appropriate to include that the second is 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 & Neighbourhoods SPD, the National Design Guide and National Model Design Code</p>

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	02 Housing	18	Policy References	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.
	02 Housing		HNDP4 Homeworking	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: <i>"All new housing developments are encouraged to provide space to support and facilitate homeworking, with flexible space adaptable to a home office"</i> .
	02 Housing		HNDP5 Building for a Healthy Life & Accessible Homes	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 (or updated versions) that demonstrates the proposals will result in a high quality sustainable development"</i> . 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 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"</i> . Cross referencing either in the policy and/or supporting text to the relevant section of the Harden Design Code would also be useful.
	02 Housing	19	Paragraph 2.2.12 Third Sentence	This sentence should deleted as applicants should be able to engage appropriately qualified person/organisation to undertake a Building for a Healthy Life assessment.
	02 Housing	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: <i>"<u>....and the Homes and Neighbourhoods Design Guide Supplementary Planning Document</u>"</i> .
	02 Housing	19	Policy References	In addition to Core Strategy HO9, reference should also be include to Core Strategy Policies DS1, DS3, DS4, DS5 and SC9 as well as section 3.2 of the Homes and Neighbourhoods Design Guide SPD.

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	02 Housing	20	HNDP6 High Speed Broadband	<p>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.</p> <p>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.</p> <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>
	03 Transport	21	HNDP7 Harden to Bingley Active Travel	<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>
	03 Transport	21	HNDP8 Electric Vehicle Charging Points	<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</p>

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				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. Based on the above, it is questioned this policy is necessary and adds to existing policy.
	04 Community Facilities & Services	26	HNDP13 Community Facilities & Services	This policy as drafted does not reflect the reality of Planning Use Class E introduced by Government in September 2020. 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.
	04 Community Facilities & Services	26	Paragraph 4.2.7 Second Sentence	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.
	04 Community Facilities & Services		HNDP14 Enhancing the Village Centre	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: <i>"New developments in the village centre will be expected to incorporate and make provision for appropriate improvements to:</i> <ul style="list-style-type: none"> • <i>Public realm, street furniture and hard landscaping;</i> • <i>Green infrastructure;</i> • <i>Pedestrian and cycle safety; and/or</i> • <i>Parking management.</i> <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>
	05 Green Spaces	30	HNDP15 Green Infrastructure	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

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				<p>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"> • <i>Include provision of green infrastructure....”</i> <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>
	05 Green Spaces	34	HNPD17 Tree Planting	<p>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.</p> <p>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.</p> <p>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.</p> <p>It may also be appropriate to refer to the use of “street trees” in new developments, as set out in NPPF paragraph 131.</p>
	05 Green Spaces	36	HNPD18 Local Green Spaces	<p>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.</p>
	05 Green Spaces Appendix 9.1	36-37 53-81	HNPD 18 Local Green Spaces	<p>The Green Space Assessment fails to provide information relating to the existing land designations of the suggested sites in the RUDP 2005.</p>

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				<p>For information, the current land designations of the sites are as follows:</p> <ul style="list-style-type: none"> • Site A – No designation • Site B – Recreation Open Space • Site C – Playing Fields (Cricket) • Site D – Playing Fields (Football) • Site E – Village Greenspace <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>
	06 Heritage	42	HNDP19 Heritage	<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 preserve, protect and enhance designated and non-designated heritage assets in the Harden Neighbourhood Area and their settings in line with Core Strategy Policy EN3. 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 that require planning permission 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><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></i></p>
			HNDP20 Stone Walls	<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</p>

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				<p>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>
	06 Heritage	46 & 47	HNDP21 Key Views	<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, listed below and shown on Figure XX, should be retained. These are:</i></p> <p><u>1. view south from Harden Road</u></p> <p><u>2. view north from Harden Road</u></p> <p><u>3. panoramic view from Harden Moor</u></p> <p><u>4. views south from Ryecroft</u></p> <p><u>5. view south from Long Lane towards Wilsden</u></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>
	07 Business & Employment	49	HNDP22 Business & Employment	<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 “<i>...providing all other material planning considerations are satisfied.</i>” is vague. It needs to be clear what is meant in the regard. It may be appropriate to amend</p>

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				the wording to read <i>“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”</i> .
	07 Business & Employment	49	Policy References	This list of Core Strategy policies that this policy relates to should include Policy PN1(C), PN2(D) and EC4
	Harden Design Code		Design Code HDC1 Materials	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 Design Code		Design Code HDC2 Heights	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 to refer to the heights of new development being responsive to landform and sympathetic to the height (and massing) of adjoining buildings.
	Harden Design Code		Design Code HDC3 Views & Vistas	Needs to be cross-reference to Policy HN2P1.
	Harden Design Code		Design Code HDC5 Movement & Accessibility	Essentially this is only repeating CS Policy DS4. Some reference to materials for hard surfaced areas would have been useful.