

Haworth, Cross Roads & Stanbury Neighbourhood Plan

<b>Respondent ID</b>	HCRS001	<b>Respondent Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	23.09.2019	<b>Policy/Paragraph</b>	Section 5 - town centre reference	<b>Nature of Representation</b>	Objection

**Details of Representation**

Section 5 – under the list of key characteristics, in no way and under no circumstances (even like in this case through the use of inverted commas) should the village of Haworth be referred to as a town. Casual references to a 'town centre' put the village at risk of unsympathetic and inappropriate development. It may also have an adverse impact when licensed premises apply for new licenses. Giving the designation of a town will give leverage to longer opening times and more night time disruption. Remove this reference as it adds absolutely nothing to the document and simply muddies the planning water.

**Representation Reference**

HCRS001-01

<b>Respondent ID</b>	HCRS001	<b>Respondent Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	23.09.2019	<b>Policy/Paragraph</b>	Non designated heritage asset	<b>Nature of Representation</b>	Objection

**Details of Representation**

As part of my property is listed as a non-designated heritage asset, I would like more information about the implications of this. I have plans to develop this building and do not wish to be prevented by a decision made by someone who knocked on my door randomly and spent 5 minutes looking at the building. Information on where building owners can go to get help for restoration of these assets would be helpful.

**Representation Reference**

HCRS001-02

<b>Respondent ID</b>	HCRS001	<b>Respondent Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	23.09.2019	<b>Policy/Paragraph</b>	5.4 Housing - Ebor Mills	<b>Nature of Representation</b>	Observation

Haworth, Cross Roads & Stanbury Neighbourhood Plan

Details of Representation	
<p>5.4 Housing – although the site of Ebor Mill has been shown in this plan to be suitable for housing, this does not recognise a number of key issues this site has. Firstly a loss of local greenspace, which contradicts other elements of the plan, secondly the risk of causing further flooding. This site will fill valuable run off space and may lead to flooding elsewhere. There is also a lot of disquiet in the village about the manner in which the developer has decided to make tenants of the properties on Ebor Lane homeless, before their planning has even been sought. Currently they have bought cottage from the previous owner and have given tenants 2 months to get out. This development has many issues including access and is hardly an ideal place for housing. I also dispute further housing is required as a large number of properties are empty. These should be filled before new housing is agreed. The plan needs to reflect the environmental concerns about building on this site rather than simply giving carte blanche to another inappropriate housing development for executives built on the flood plain. Far more needs to be said in this section about the elevated risk of flooding and how the development of fields leads to greater risk for those of us who live in the valley bottom.</p>	
Representation Reference	HCRS001-03

Respondent ID	HCRS001	Respondent Name & Organisation	Joanne Addie,	Agent Name & Organisation	-
Date Received	23.09.2019	Policy/Paragraph	5.6 Transport	Nature of Representation	Objection

Details of Representation	
<p>5.6 Transport – as Yorkshire is now a recognised UCI Cycling region, the first of its kind, this should be referred to in the documentation and used as a lever to improve cycle infrastructure.</p>	
Representation Reference	HCRS001-04

Respondent ID	HCRS001	Respondent Name & Organisation	Resident	Agent Name & Organisation	-
Date Received	23.09.2019	Policy/Paragraph	Appendix 4 - Green Infrastructure - Ebor Mills	Nature of Representation	Observation

Details of Representation	
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Haworth, Cross Roads & Stanbury Neighbourhood Plan

Appendix 4 – green infrastructure – this section completely contradicts the housing section by naming the Ebor Mill Nature reserve as a green space. This site is named elsewhere in the document as being suitable for housing. The developer has already shut off access to the public and is carrying out spraying of plants in the area. This is at odds with the designation as a nature reserve. The PC need to take a side on this one. You cannot in one breath say you wish to protect green spaces, name this one and then in the next breath say that Ebor Mill is a housing development site. The developer clearly wants to develop more than the former Mill site itself.

<b>Representation Reference</b>	HCRS001-05
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<b>Respondent ID</b>	HCRS001	<b>Respondent Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	23.09.2019	<b>Policy/Paragraph</b>	Appendix 7	<b>Nature of Representation</b>	Objection

**Details of Representation**

Appendix 7 Community Facilities – are pubs really community facilities? One on the list is certainly more a nuisance than an asset. I would be very careful about listing public houses in this way. They are not facilities that all the community can, or wish to access. They are profit making businesses rather than in any way at all adding anything as a ‘community facility’.

<b>Representation Reference</b>	HCRS001-06
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<b>Respondent ID</b>	HCRS001	<b>Respondent Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	23.09.2019	<b>Policy/Paragraph</b>	Appendix 8	<b>Nature of Representation</b>	Objection

**Details of Representation**

Appendix 8 – why is there such a large section on Baden Street and parking when other areas suffer as well? It seems wholly unbalanced in the document. There is no link to any discussion elsewhere so gives the impression that this is the only parking the PC are concerned about.

<b>Representation Reference</b>	HCRS001-07
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Haworth, Cross Roads & Stanbury Neighbourhood Plan

<b>Respondent ID</b>	HCRS002	<b>Respondent Name &amp; Organisation</b>	Gladman Developments	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	22.10.2019	<b>Policy/Paragraph</b>	Whole document	<b>Nature of Representation</b>	Objection

**Details of Representation**

It is important to note that the City of Bradford Metropolitan District Council (BMDC) consulted on its Land Allocations DPD 'Further Issues and Options' in late 2017 and into early 2018 to accompany the Core Strategy.

However, its preparation is on hold whilst BMDC progress the Core Strategy - Partial Review which will guide development until 2037. The review was considered necessary following recent updates to national planning policy and a revised Local Housing Needs assessment using the Standard Method. The preferred options underwent consultation in Autumn 2019 to which Gladman has submitted detailed representations. The Land allocations DPD will allocate sites for development to ensure that the overall development requirements set out in the adopted Partial Review are delivered in full.

It is therefore important that policies contained in the HCRSNP allow for flexibility so that they are able to respond positively to the forthcoming changes that will inevitably arise following adoption of the Partial Review. This degree of flexibility is required to ensure that the HCRSNP is capable of being effective over the duration of both the adopted and forthcoming plan period, so it is not ultimately superseded by the emerging Partial Review, as s38(5) of the Planning and Compulsory Purchase Act 2004 states that: "if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be)."

<b>Representation Reference</b>	HCRS002-01
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<b>Respondent ID</b>	HCRS002	<b>Respondent Name &amp; Organisation</b>	Gladman Developments	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	22.10.2019	<b>Policy/Paragraph</b>	Policies BHDD1/BHDD2	<b>Nature of Representation</b>	Objection

**Details of Representation**

This section highlights the key issue that Gladman would like to raise with regards to the content of the HCRSNP as currently proposed. It is considered the requirements of national policy and guidance are not always reflected in the plan. Gladman have sought to recommend some modifications to ensure compliance with basic conditions.

**Policies BHDD1/2 – Haworth/Stanbury Conservation Area – Development and Design**

Policies BHDD1 and BHDD2 set out a list of design principles that all proposals for development are expected to adhere to. Whilst Gladman recognise the importance of high-quality design planning policies and the documents sitting behind them, they should not be overly prescriptive and do need flexibility in order for schemes to respond to site specifics and the character of the local area. There will not be a ‘one size fits all’ solution in relation to design and sites should be considered on a site-by-site basis with consideration given to various design principles.

Gladman therefore suggest that more flexibility is provided in the wording of these policies to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 126 of the Framework which states that:

"To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high quality standard of design. However, their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified."

<b>Representation Reference</b>	HCRS002-02
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<b>Respondent ID</b>	HCRS002	<b>Respondent Name &amp; Organisation</b>	Gladman Developments	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	22.10.2019	<b>Policy/Paragraph</b>	Policies BHDD1/2 Policies BHDD3/4/5/6/7	<b>Nature of Representation</b>	Objection

**Details of Representation**

Policies BHDD1 and BHDD2 also identify 54 and 26 short and long range views respectively which, the plan makers consider are important for the setting and character of Haworth and Stanbury Conservation Areas. Policies BHDD3 to 7 do not identify specific views, however, all seven of the above policies seek to maintain and respect the significant views and vistas into, out of and through the areas. Identified views must be supported by evidence and ensure that they demonstrate a physical attribute elevating a view’s importance beyond simply being a nice view of open countryside or urban form. Beyond providing a description, the evidence base to support the policies does little to indicate why these views are important and why they should be protected, other than providing a view of the streetscapes, surrounding fields and woodland. It therefore lacks the proportionate and robust evidence required by the PPG. Gladman consider that to be an important view that should be protected, it must have some form of additional quality that would ‘take it out of the ordinary’ rather than selecting views which may not have any landscape significance and are based solely on community support. Gladman therefore suggests this element of the policies is deleted as it does not provide clarity and support for a decision maker to apply the policy predictably and with confidence. It is therefore contrary to paragraph 16(d) of the Framework.

Haworth, Cross Roads & Stanbury Neighbourhood Plan

<b>Representation Reference</b>	HCRS002-03
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<b>Respondent ID</b>	HCRS002	<b>Respondent Name &amp; Organisation</b>	Gladman Developments	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	22.10.2019	<b>Policy/Paragraph</b>	Basic condition a) and d)	<b>Nature of Representation</b>	Objection

**Details of Representation**

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the HCRSNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic condition (a) in its conformity with national policy and guidance and is contrary to (d) the making of the order contributes to the achievement of sustainable development and the strategic policies contained in the development plan, for the reasons set out above.

<b>Representation Reference</b>	HCRS002-04
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<b>Respondent ID</b>	HCRS003	<b>Respondent Name &amp; Organisation</b>	Coal Authority	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	28.10.2019	<b>Policy/Paragraph</b>	-	<b>Nature of Representation</b>	No specific comments.

**Details of Representation**

The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.

As you will be aware the Neighbourhood Plan area lies within the current defined coalfield.

## Haworth, Cross Roads & Stanbury Neighbourhood Plan

According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity including; mine entries and likely unrecorded coal workings at shallow depth. It appears that the Neighbourhood Plan does not allocate any specific sites for future development, in its own right, but rather refers sites back to the Local Plan. On this basis we have no specific comments to make on this Neighbourhood Plan.

<b>Representation Reference</b>	HCRS003-01
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<b>Respondent ID</b>	HCRS004	<b>Respondent Name &amp; Organisation</b>	National Grid	<b>Agent Name &amp; Organisation</b>	Wood E&I Solutions UK Ltd
<b>Date Received</b>	28.10.2019	<b>Policy/Paragraph</b>	-	<b>Nature of Representation</b>	Observation

### Details of Representation

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) 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.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

#### Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

#### Electricity Distribution

The electricity distribution operator in the City of Bradford Metropolitan District Council is Electricity North West. Information regarding the transmission and distribution network can be found at: [www.energynetworks.org.uk](http://www.energynetworks.org.uk)

#### Appendices - National Grid Assets

Haworth, Cross Roads & Stanbury Neighbourhood Plan

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure.

<b>Representation Reference</b>	HCRS004-01
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<b>Respondent ID</b>	HCRS005	<b>Respondent Name &amp; Organisation</b>	North Yorkshire County Council	<b>Agent Name &amp; Organisation</b>	
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	-	<b>Nature of Representation</b>	No strategic cross boundary issues

**Details of Representation**

Thank you for consulting with North Yorkshire County Council (NYCC) as a neighbouring authority to Bradford MDC. Officers from our Growth & Heritage Team have reviewed the documentation. The plan area does not adjoin North Yorkshire, and it is considered that there are unlikely to be any strategic cross boundary issues.

<b>Representation Reference</b>	HCRS005-01
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<b>Respondent ID</b>	HCRS006	<b>Respondent Name &amp; Organisation</b>	Cinema Theatre Association	<b>Agent Name &amp; Organisation</b>	
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Policy BHDD1, BHDD4, BHDD8	<b>Nature of Representation</b>	Support

**Details of Representation**

I wish to support the proposed Haworth Crossroads & Stanbury Neighbourhood Development Plan on behalf of The Cinema Theatre Association, a national body for the study and protection of cinema buildings, our specialist expertise is sought by the many organisations as well as local authorities on planning applications regarding alterations to or demolition of cinemas.

Although my support extends across the complete plan I wish to highlight the following three specific policies as these are most relevant to my remit of conservation of cinema buildings;

## Haworth, Cross Roads & Stanbury Neighbourhood Plan

- Policy: BHDD1: HAWORTH CONSERVATION AREA – DEVELOPMENT AND DESIGN
- Policy: BHDD4: HAWORTH BROW LOCAL HERITAGE AREA
- Policy: BHDD8: PROTECTION AND ENHANCEMENT OF NON-DESIGNATED HERITAGE ASSETS (Former Bronte Cinema, Haworth – item 77 & Former Hippodrome Cinema, Haworth – item 72)

A number of community actions and approaches have been identified throughout the consultation stages, as detailed in Chapter 6. Monitoring, Review, Implementation; namely regarding Conservation Areas to lobby CBMDC re review/assessment of proposed extensions/new areas in Haworth & Crossroads. The Cinema Theatre Association is in full support of this and would be willing to assist in this regard with Parish Council and CBMDC.

<b>Representation Reference</b>	HCRS006-01
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<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Housing - Sun Street Haworth	<b>Nature of Representation</b>	Objection

### Details of Representation

Thank you for consulting Harworth Group Plc on the Publication Draft of the Haworth, Cross Roads & Stanbury Neighbourhood Development Plan (NDP). This consultation response builds upon representations previously made to consultations on the NDP and the Council's Core Strategy Partial Review (CSPR).

The adopted Core Strategy sets out an overall housing requirement for the period 2013-2030 of 2,476 dwellings per annum or circa 42,100 homes, however the CSPR recently consulted on a reduced annual housing need figure of 1,703 based upon the Standard Methodology calculation. The Methodology provides a range of housing need, with a lower threshold of 1,703 dwellings and an upper threshold of 2,251 dwellings per annum. We have made representations as part of Bradford's recent consultation to these revisions and suggest that the higher figure should be maintained considering expected future changes to the Standard Methodology and historic under delivery of housing in Bradford.

With regards to the settlement of Haworth, we have an interest in land at Sun Street, which is identified in the Strategic Housing Land Availability Assessment (SHLAA) as reference HA/013, see attached plan. The adopted housing requirement for Haworth is 400 dwellings over the plan period and whilst we are aware that the draft requirement in the CSPR is 275 per annum, until this requirement is adopted then we agree with the Vision Statement's acceptance of the parish receiving its allotted share of Bradford's growth.

As of April 2019, 129 dwellings across two sites (HA/009 & HA/033) are being constructed or have detailed planning permission within Haworth. The current draft allocations outlined in policies H1-H3 of the draft NDP indicate a potential provision of 128 dwellings. Therefore, there is a shortage of 143 dwellings against the adopted plan requirement and 18 dwellings against the draft requirement. In both instances, an assumption is made that the three draft housing allocations will deliver their full capacity as assessed in the SHLAA, if the sites fail to deliver this capacity, the shortage will increase.

Haworth, Cross Roads & Stanbury Neighbourhood Plan

<b>Representation Reference</b>	HCRS007-01
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<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Policies H1, H2 & H3	<b>Nature of Representation</b>	Objection

**Details of Representation**

**Policies H1, H2 & H3** – The NDP does not in itself allocate housing sites but it does identify four sites, which are marked up on the proposals map and in the supporting text of the housing section of the plan. The draft Plan states “a number of previously identified sites in Haworth are expected to be confirmed for housing development through the Land Allocations Plan”. The NDP is in effect pre-supposing which sites will be allocated, there is no guarantee that they follow through to the Site Allocations Plan simply because they have been previously identified. Additionally, it is considered that the sites that are supported in the NDP have deliverability issues, we outline the issues below:

<b>Representation Reference</b>	HCRS007-02
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<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Joel Gandhi, Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Policy H1	<b>Nature of Representation</b>	Objection

**Details of Representation**

**Policy H1: Worsted Road, Cross Roads (SHLAA Ref: HA/001)** - Although this site is currently designated as safeguarded land within the Replacement Unitary Development Plan, this does not necessarily mean that it is a more suitable and deliverable site when compared to non-safeguarded land located elsewhere in the Plan area.

<b>Representation Reference</b>	HCRS007-03
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Haworth, Cross Roads & Stanbury Neighbourhood Plan

<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Policy H2	<b>Nature of Representation</b>	Objection
<b>Details of Representation</b>					
<p><b>Policy H2: Lees Lane North, Cross Roads (SHLAA Ref: HA/002)</b> - This site has been allocated for residential development since 2005 and despite obtaining planning permission for the development of 33 units, the site remains undeveloped 13 years later. It should not automatically be assumed that the site is suitable or deliverable, particularly as no development has been forthcoming, just because it has previously been allocated.</p>					
<b>Representation Reference</b>			HCRS007-04		

<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Policy H3: Baden Street	<b>Nature of Representation</b>	Objection
<b>Details of Representation</b>					
<p><b>Policy H3: Baden Street, Haworth (SHLAA Ref: HA/016)</b> - This site is unsuitable for residential development, being almost entirely covered in mature trees. The sites location within the existing settlement boundary is not a satisfactory reason to offer support to its development. It is understood that the entirety of the woodland is covered by a tree preservation order meaning the trees cannot be removed, which significantly reduces the deliverable area and would lead to a convoluted development, enclosed within a woodland, which in turn would impact upon the amenity of future occupants through restricted natural light.</p> <p>Moreover, the root protection areas associated with the trees cannot be compromised and this will further reduce the developable area, development of this site will have an unacceptable impact on the biodiversity of the woodland area, that is not outweighed by the potential delivery of a small number of dwellings.</p>					
<b>Representation Reference</b>			HCRS007-05		

<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	-
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Haworth, Cross Roads & Stanbury Neighbourhood Plan

<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Policy H4	<b>Nature of Representation</b>	Objection
<b>Details of Representation</b>					
Policy H4 (Ebor Mills, Ebor Lane, Haworth) – Identifies the site at Ebor Mills as an ‘opportunity for development of new housing’. This site is neither a historic allocation or identified in the CSPR and does not have planning permission. This is a difficult site with significant access and highways constraints, the policy should therefore be deleted as the site has not undergone a detailed assessment of its constraints and benefits, like other potential housing sites.					
<b>Representation Reference</b>			HCRS007-06		

<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Policies H5 & H1 - H4	<b>Nature of Representation</b>	Objection
<b>Details of Representation</b>					
<p>Policy H5 (New Housing Development – Key Guiding Principles) – This policy pertains to draft housing allocation sites in the Preferred Options Growth Document. We agree that the Neighbourhood Plan should contain an overarching policy that sets out the guiding principles of development for all housing sites. This will ensure the consistency of well-designed new developments across the settlement. In the absence of Bradford’s Site Allocations DPD, we suggest that this policy dictates the spatial approach to development in the settlement instead of inflexible site-specific policies within the Neighbourhood Plan. On this basis, policies H1-H4 should be deleted as they pre-determine allocations ahead of the Site Allocations DPD and may mean the Neighbourhood Plan is out of date and out of alignment with Bradford’s Site Allocations Plan.</p> <p>We do have some concerns regarding two requirements of policy H5, these are:</p> <ul style="list-style-type: none"> <li>• The requirement for the delivery of all essential highways improvements upfront before any construction works commence on site. We do not believe that this requirement will pass the tests of soundness. The requirement for highways improvements will be tested as part of each planning application, considering cumulative impacts of any other allocated or committed development. The Highway Authority will agree suitable trigger points associated with such mitigation, which may require these interventions at the start of the development. However, in the absence of detailed analysis, we consider that the policy should be amended to reflect this.</li> <li>• The requirement for the protection of existing Public Rights of Way and cycle paths. It is sometimes necessary for developments to amend the routes of existing rights of way and this policy should reflect this. A separate legal process is in place for this.</li> </ul>					

Haworth, Cross Roads & Stanbury Neighbourhood Plan

<b>Representation Reference</b>	HCRS007-07
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<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Policy H6	<b>Nature of Representation</b>	Objection

<b>Details of Representation</b>					
Policy H6 (New Housing Development on Non-allocated sites) – Given our previous comments above in relation to policies H1 to H4, in the absence of Bradford’s Site Allocations DPD, the provisions of policy H5 will apply to all housing sites and therefore the requirements of policy H6 are covered by the NPPF and Bradford’s Core Strategy.					
<b>Representation Reference</b>	HCRS007-08				

<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Policy H8	<b>Nature of Representation</b>	Objection

<b>Details of Representation</b>					
Policy H8 (Housing Mix) – We do not object to the need for a housing mix, however, we do not consider that this policy has been underpinned with a thorough housing market analysis and therefore has no robust reasoning as to why the NDP seeks to prescribe the housing mix. We object to this policy and consider that it should be removed from the NDP. Bradford’s adopted Core Strategy provides detail on housing mix across the District.					
<b>Representation Reference</b>	HCRS007-09				

<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	-
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Haworth, Cross Roads & Stanbury Neighbourhood Plan

<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Provisions of NDP	<b>Nature of Representation</b>	Support
<b>Details of Representation</b>					
Overall, we are supportive of the provisions of the Neighbourhood Plan with exception to the comments set out above.					
<b>Representation Reference</b>			HCRS007-10		

<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	H1 to H4	<b>Nature of Representation</b>	Objection
<b>Details of Representation</b>					
As set out in this representation, there are constraints and deliverability issues associated with the four sites identified in policies H1 – H4 and the Neighbourhood Forum should not simply support these sites because they are currently safeguarded, allocated or located within the settlement boundary.					
<b>Representation Reference</b>			HCRS007-11		

<b>Respondent ID</b>	HCRS007	<b>Respondent Name &amp; Organisation</b>	Harworth Group PLC	<b>Agent Name &amp; Organisation</b>	
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Sun Street	<b>Nature of Representation</b>	Observation
<b>Details of Representation</b>					
If the Neighbourhood Forum continue to pursue development briefs for potential housing sites, we would be happy to work with the Neighbourhood Forum to prepare a brief for land at Sun Street, Haworth (SHLAA Ref: HA/013), which is an excellent site with no physical constraints capable of meeting the requirements of policy H5.					
<b>Representation Reference</b>			HCRS007-12		

## Haworth, Cross Roads & Stanbury Neighbourhood Plan

<b>Respondent ID</b>	HCRS008	<b>Respondent Name &amp; Organisation</b>	Historic England	<b>Agent Name &amp; Organisation</b>	
<b>Date Received</b>	30.10.2019	<b>Policy/Paragraph</b>	No comments	<b>Nature of Representation</b>	Support
<b>Details of Representation</b>					
<p>We write in response to your consultation regarding the Submission Draft of the Haworth, Cross Roads and Stanbury Neighbourhood Development Plan Consultation 2019-2030. We have previously provided detailed advice and comments to Haworth, Cross Roads and Stanbury Parish Council in our letter of 6 December 2018, and are pleased to note that the majority of our advice has been accepted.</p> <p>Having carefully considered the Submission Draft of the Haworth, Cross Roads and Stanbury Neighbourhood Development Plan Consultation 2019-2030, we do not consider it necessary to provide any further comments.</p>					
<b>Representation Reference</b>			HCRS008-01		

<b>Respondent ID</b>	HCRS009	<b>Respondent Name &amp; Organisation</b>	Natural England	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	06.11.2019	<b>Policy/Paragraph</b>	NDP and SEA/HRA	<b>Nature of Representation</b>	Support
<b>Details of Representation</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>We have reviewed the Haworth, Cross Roads and Stanbury Neighbourhood Development Plan and associated Strategic Environmental Assessment and Habitats Regulations Assessment screening reports and are in agreement with the conclusions. It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.</p> <p>Natural England has no specific comment to make on the plan. The following information may be useful to refer to as the plan progresses.</p> <p>Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans and development proposals. This contains useful information</p>					

to refer to when implementing the plan and policies. This is available at: <https://neighbourhoodplanning.org/wp-content/uploads/Environment-toolkit-080219-1521.pdf>

<b>Representation Reference</b>	HCRS009-01
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<b>Respondent ID</b>	HCRS010	<b>Respondent Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Policy GE4; Sites LGS2, LGS133, LGS137, LGS138 & LGS139; Appendix 5	<b>Nature of Representation</b>	Observation

**Details of Representation**

**DRAFTING ISSUES** – there are a number of points in relation to the drafting of the document that should be addressed in the post examination version of the plan. These are as follows:

- Policy GE4 – it is noted that the policy has been renamed and some other minor policy wording has taken place. However, the overall title of the section still refers to New Green Space. It is suggest the section and policy titles should be consistent.
- Appendix 5:
- Site LGS137 is still referred to but has been removed from the Appendix. (LGS133) also makes reference to proposed LGS137.
- It is suggested that the tables shown in the appendix are arranged in number order for ease of reading.
- Local Green Spaces - there are some drafting points relating to the numbering of several of the proposed Local Green Spaces (LGS2, LGS138 & LGS139) within policy GE2 & Appendix 5 as well as on the Policies Map.
- Site LGS2 is listed in Policy GE2 & Appendix 5 as both the Haworth Cricket Pitch and the West Lane Methodist Chapel Burial Grounds, whilst on the Policies Map the burial ground is shown as LGS site 139. It is suggested that this burial ground should be listed as LGS site 138 within the policy and appendix as well as on the Policies Map.
- The Policies Map currently shows LGS site 138 as being West Lane Baptist Church Burial Grounds. However it is listed in Policy GE2 and Appendix 2 as LGS site 139.

<b>Representation Reference</b>	HSCRS010-01
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Haworth, Cross Roads & Stanbury Neighbourhood Plan

<b>Respondent ID</b>	HCRS010	<b>Respondent Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Section 5.2: Green Environment; Policies GE2 & GE3; Appendix 5	<b>Nature of Representation</b>	Observation
<b>Details of Representation</b>					
<p>Policies GE2 &amp; GE3 – it is noted that they have been retained as two separate policies. It is suggested that it may be appropriate to combined them a single policy addressing Local Green Space.</p> <p>Appendix 5 – whilst Appendix 5 has been amended to reflect the National Planning Policy Framework criteria for designating Local Green Spaces, however it is noted that the extensive tract of land section the site assessments have not been updated to provide comment on this criterion.</p>					
<b>Representation Reference</b>			HCRS010-02		

<b>Respondent ID</b>	HCRS010	<b>Respondent Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Local Green Spaces	<b>Nature of Representation</b>	Observation
<b>Details of Representation</b>					
<p>There are a number of sites which have been identified for designation as Local Green Spaces within the neighbourhood plan that already have existing designations e.g. Green Belt, Open Space &amp; Recreation Grounds. In some instances it is unclear what additional benefits the LGS protection will give to these sites. The policy background for this is set out in the Government’s on-line Planning Practice Guidance (Paragraph: 010 Reference ID: 37-010-20140306).</p> <p>An example of this includes LGS13: Stanbury Cemetery. This site is designated Green and a Site of Local Conservation Importance (RUDP ref: K/NE9.71), It is located outwith the settlement boundary and not considered to be in close proximity to the community it serves. As it already benefits from significant protections and due to its location, it is not considered to be a good candidate for LGS designation.</p> <p><b>Site Specific Queries</b></p> <p>LGS4: Massey Fields – it is noted that this site boundary has been amended, however the proposed LGS designation is questioned as it is mainly a tarmac play area rather than green space and whether it would offer any extra benefit as it already benefits from Green Belt designation. It may be more appropriately designated as open space.</p>					

LGS8: Stanbury Playground – this site benefits from Green Belt designation and is the only play area/formal green space within the hamlet. It may be more appropriately designated as open space under the provision of children typology.

LGS16: Brow Top Hill – it is noted that this site has been added as a Local Green Space, however, it should also be noted it has been identified as a site in CBMDC’s Strategic Housing Land Availability Assessment (2015) (SHLAA site ref: HA/015)

LGS137: South View – it was noted that this site had no number in the Regulation 14 version of the plan. Clarification is sought as to why this site has been removed from the submission draft version.

<b>Representation Reference</b>	HSCRS010-03
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<b>Respondent ID</b>	HCRS010	<b>Respondent Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Section 5.2: Green Environment; Policy GE2	<b>Nature of Representation</b>	Observation

**Details of Representation**

**Bradford Wildlife Areas (BWAs) / Local Wildlife Sites (LWSs)**

There are some references to Bradford Wildlife Areas (BWAs) in the submission draft plan where sites have now been designated as Local Wildlife Sites. This is particularly significant with regards to the impact to Local Wildlife Sites.

The Council has previously set out which sites had successfully passed through the process of survey and qualification to become Local Wildlife sites comments submitted as part of the Regulation 14 consultation they have not been acknowledged as such in the Regulation 16 consultation information.

Due to the criteria that these sites are expected to fulfil to qualify – Local Wildlife Sites are considered to have a higher level of protection to the Sites of Ecological & Geological Importance (SEGI’s) and Bradford Wildlife Areas (BWAs) that they replaced. In addition it is the duty under the National Planning Policy Framework and the NERC Act 2006 (as opposed to other statutory bodies) to protect these sites. The following list of sites have been upgraded to Local Wildlife Sites:

- Brow Moor with Sugden End
- Penistone Hill
- Airedale Spring Mill Pond (listed in the draft plan as Local Green Space site 127)
- Baden Street, Haworth (listed in the draft plan as Local Green Space site 126, Policy H3 and supporting text to policy GE5)

It is considered that this information should be updated throughout the plan and including the SEA, which does not acknowledge the increased importance of Local Wildlife Sites over Sites of Ecological & Geological Importance and Bradford Wildlife Areas, and the citation documents appended.

Haworth, Cross Roads & Stanbury Neighbourhood Plan

There is an impact to not doing this which can be seen with related to the following sites.

1. Ebor Mills (LGS127 & Policy H4) – refer to observation specifically for Ebor Mills
2. Sugden End reservoir has been put forward as a potential community access green space. Although likely to be welcomed if sensitive development occurs here (and impacts to biodiversity have been mentioned) its status as a LWS has not been acknowledged and potentially conflicts may occur. It is important to balance the policy of additional public access with the enhanced status of LWS.

<b>Representation Reference</b>	HSCRS010-04
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<b>Respondent ID</b>	HCRS010	<b>Respondent Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Whole document	<b>Nature of Representation</b>	Observation

**Details of Representation**

The lack of species data in the evidence based means that the drafts plan aims may be in conflict with protected species policies and legislation. The Neighbourhood Plan, as drafted, does not provide much guidance with regard to ensuring it robustly protects wildlife and ensures developments are undertaken to high ecological standards

It is recognised that Neighbourhood Plans are not obliged to do this and therefore accept the general focus of the plan which is very much historic and community focussed. However, it is considered that the Council's comments submitted as part of Regulation 14 consultation remain valid – the policies are not well evidenced with regard to biodiversity and that records have not been obtained from West Yorkshire Ecological Service to ensure there are no conflicts of interest with district and national level policies.

<b>Representation Reference</b>	HSCRS010-05
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<b>Respondent ID</b>	HCRS010	<b>Respondent Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Landscape; Biodiversity/Geodiversity; Green Infrastructure	<b>Nature of Representation</b>	Observation

**Details of Representation**

Haworth, Cross Roads & Stanbury Neighbourhood Plan

It should be noted that references to Natural England’s 2009 “Yorkshire and Humber Green Infrastructure Mapping Project are out of date and that the current focus on the designated Bradford Ecological Habitat Network has not been incorporated within the draft plan.

<b>Representation Reference</b>	HSCRS010-06
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<b>Respondent ID</b>	HCRS010	<b>Respondent Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Polices GE2 & H4; Appendix 5	<b>Nature of Representation</b>	Observation

**Details of Representation**

**Ebor Mills (Airedale Springs Mill Pond) – LGS 127 & Policy H4**

The former Airedale Springs Mill Pond, adjacent to the Ebor Mills site, is currently designated as a Local Wildlife Site (LWS). It is noted that it is proposed for designation as a Local Green Space (LGS) in the draft Neighbourhood Plan, and has also been identified as a non-designated heritage asset. It is considered that there is potential conflict between these designations, should the mill pond ever be re-created. This would have a significantly detrimental to the LWS designation.

The Council have a duty as a Local Planning Authority to protect LWSs. The defence of the site (for wildlife) is likely to be much more effective if the correct up to date designation of LWS was applied. It is part of the Ecological Habitat Network required by the NPPF to support species extinction and climatic change resilience.

Policy H4 - Ebor Mills, Ebor Lane, Haworth also does not refer to the Local Wildlife Site designation.

<b>Representation Reference</b>	HSCRS010-07
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<b>Respondent ID</b>	HCRS010	<b>Respondent Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team	<b>Agent Name &amp; Organisation</b>	-
<b>Date Received</b>	29.10.2019	<b>Policy/Paragraph</b>	Policy H8	<b>Nature of Representation</b>	Observation

**Details of Representation**

**Policy H8 - Housing Mix**

## Haworth, Cross Roads & Stanbury Neighbourhood Plan

It is considered that wording of policy H8 could be improved appear clearer to the reader and decision making. The suggested amendments are underlined with the suggested deletions being struck through. Clarity is also sought regarding the application of some of the criteria within the policy.

### Suggested Amendments:

#### POLICY H8: HOUSING MIX

On larger sites, of 0.4ha and above or 10 dwellings or more, development will be expected to provide a housing mix with a particular emphasis on:-

- Smaller dwellings (1-2 bedrooms), including accessible housing and housing suitable for older people.
- Medium-sized dwellings (3 bedrooms) suitable for families.

Proposals should also have Having regard also to the most up-to-date local housing needs evidence.

Developments consisting primarily of large (4 bedroom) detached dwellings will be resisted. The housing mix of affordable housing should be provided with the same emphases.

A particular emphasis on dwellings for private rental is also encouraged.

Developments should provide a range of housing types, particularly semi-detached, small detached and bungalow units, but respecting and taking into account the location and nature of the site and its surroundings.

### Points of Clarification

It is not clear whether reference to development consisting of primarily large (4 bedroom) detached dwellings being resisted applies only to larger site or to all proposals.

Similarly, in relation to the last paragraph of the policy, it is not clear if this criteria applies to only larger sites or to all proposals

<b>Representation Reference</b>	HSCRS010-08
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Respondent ID	HCRS010	Respondent Name & Organisation	City of Bradford Metropolitan District Council - Local Plans Team	Agent Name & Organisation	-
Date Received	29.10.2019	Policy/Paragraph	Section 5.6: Highways & Travel; Policies HT5 to HT7	Nature of Representation	Observation

### Details of Representation

It is suggested that the policies relating to and promoting sustainable transport (Policies HT5 to HT7) should be given a higher priority within the neighbourhood plan.

Representation Reference	HSCRS010-09
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