

COMMENT FORM

Respondent ID: HCRS007
Representation Refs: HCRS007/1
to HCRS007/12

For Office Use only:	
Date	29.10.2019
Ref	

PUBLICATION OF THE HAWORTH, CROSS ROADS AND STANBURY NEIGHBOURHOOD DEVELOPMENT PLAN

PROPOSAL - SUBMITTED TO BRADFORD METROPOLITAN DISTRICT COUNCIL FOR EXAMINATION

TUESDAY 17TH SEPTEMBER TO 5PM ON TUESDAY 29TH OCTOBER 2019

The Haworth, Cross Roads and Stanbury Neighbourhood Development Plan, prepared by Haworth, Cross Roads and Stanbury Parish Council, has been submitted to Bradford Council for examination. The Council must now publicise the plan proposal and supporting documents and seek comments.

Please use this comment form to submit your views on the proposal. Details of how to view the proposed plan and supporting documents are available on the Council's website: <https://www.bradford.gov.uk/consultations>.

PART A: PERSONAL DETAILS

Response forms must include a name and address otherwise your comments will not be taken into account.

	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title	[REDACTED]	
Full Name	[REDACTED]	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	Harworth Group Plc	
Address	[REDACTED]	
Post Code	[REDACTED]	
Email Address	[REDACTED]	
Telephone Number	[REDACTED]	

How to submit your Comment Form:

Please return completed comment forms by **5pm on Tuesday 29th October 2019** to:

- **E-mail:** planning.policy@bradford.gov.uk
- **Post:** Local Plans Team, Bradford Council,
4th Floor Britannia House, Broadway, Bradford, BD1 5RW

Any comments received after this date will not be accepted.

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/>

The Neighbourhood Planning (General) Regulations 2012
Regulation 16 – Publicising a Plan Proposal
Howarth, Cross Roads & Stanbury Neighbourhood
Development Plan

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PART B – YOUR COMMENTS

Please use a separate Part B sheet for each comment. Additional forms can be downloaded from the web page.

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

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

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

Whole document		Section	Housing	Policy	H1-H6 & H8
Page Number		Appendix			

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

Support		Object	X	Make an observation	X
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4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

Please see attached letter of representation for detail regarding objections/observations.

5. Please place an 'X' in the box if you would like to be notified whether the plan proposal is made (adopted) by the Council or not:

X

6. Signature:

[Redacted Signature]

Date:

29/10/2019

Thank you for taking the time to complete this Comment Form.

Please contact Local Plans Team planning.policy@bradford.gov.uk or phone (01274) 433679.

Harworth

Local Plan Team
City of Bradford Metropolitan District Council
4th Floor
Britannia House
Broadway
Bradford
BD1 1HX

29th October 2019

Dear Sir/ Madam

REPRESENTATIONS TO THE HAWORTH, CROSS ROADS & STANBURY NEIGHBOURHOOD DEVELOPMENT PLAN 2019 – 2030 PUBLICATION DRAFT (OCTOBER 2019) – LAND AT SUN STREET, HAWORTH (SHLAA REF: HA/013)

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.

HCRS007/1

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.

With consideration to this, our comments on the NDP are as follows:

- **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:

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Policy H1: Worsted Road, Cross Roads (SHLAA Ref: HA/001)

HCRS007/3

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.

Policy H2: Lees Lane North, Cross Roads (SHLAA Ref: HA/002)

HCRS007/4

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.

Policy H3: Baden Street, Haworth (SHLAA Ref: HA/016)

HCRS007/5

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.

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.

- **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.
- **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.

HCRS007/6

HCRS007/7

We do have some concerns regarding two requirements of policy H5, these are:

- *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.
- *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.

HCRS007/8

- **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.

HCRS007/9

- **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.

HCRS007/10

Overall, we are supportive of the provisions of the Neighbourhood Plan with exception to the comments set out above. 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.

HCRS007/11

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.

HCRS007/12

We trust our comments will be considered in the Examination and request to be notified of these stages at the specified address when:

- i. the NDP has been submitted for independent examination;
- ii. the report of the Examiner is published; and
- iii. the NDP has been adopted.

Should the Forum have any queries, we welcome the opportunity to engage with it and will continue our engagement with Bradford's review of the Local Plan and associated documents.

Yours faithfully,

[Redacted signature]

[Redacted name]

[Redacted address]

[Redacted address]

