

COMMENT FORM

For Office Use only:	
Date	29.10.2019
Ref	HCRS010

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		
Full Name		
Job Title (where relevant)		
Organisation (where relevant)	Local Plans Team, CBMDC	
Address		
Post Code		
Email Address		
Telephone Number		

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	Various	Policy	Various
Page Number		Appendix	Various		

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

Support		Object		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 table

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:

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Date:

29.10.2019

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

Haworth, Cross Roads & Stanbury Neighbourhood Development Plan
Regulation 16 Consultation – City of Bradford Metropolitan District Council Responses

Representation Reference	Document	Page Number/Section/Policy	Nature of Representation	Representation/Comment
HCRS010/1	Neighbourhood Plan	Policy GE4; Sites LGS2, LGS133, LGS137, LGS138 & LGS139; Appendix 5	Observation	<p>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:</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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. <ul style="list-style-type: none"> • 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.
HCRS010/2	Neighbourhood Plan	Section 5.2: Green Environment; Policies GE2 & GE3; Appendix 5	Observation	<p>Policies GE2 & 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>
HCRS010/3	Neighbourhood Plan	Local Green Spaces	Observation	<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 & 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</p>

				<p>benefits from significant protections and due to its location, it is not considered to be a good candidate for LGS designation.</p> <p>Site Specific Queries</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> <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.</p> <p>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)</p> <p>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.</p>
HCRS010/4	Neighbourhood Plan	Section 5.2: Green Environment; Policy GE2	Observation	<p>Bradford Wildlife Areas (BWAs) / Local Wildlife Sites (LWSs)</p> <p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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) <p>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.</p>

				<p>There is an impact to not doing this which can be seen with related to the following sites.</p> <ol style="list-style-type: none"> 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.
HCRS010/5	Neighbourhood Plan	Whole Document	Observation	<p>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</p> <p>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.</p>
HCRS010/6	Neighbourhood Plan	Landscape; Biodiversity/Geodiversity; Green Infrastructure	Observation	<p>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.</p>
HCRS010/7	Neighbourhood Plan	Polices GE2 & H4; Appendix 5	Observation	<p><u>Ebor Mills (Airedale Springs Mill Pond) – LGS 127 & Policy H4</u></p> <p>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.</p> <p>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.</p> <p>Policy H4 - Ebor Mills, Ebor Lane, Haworth also does not refer to the Local Wildlife Site designation.</p>
HCRS010/8	Neighbourhood Plan	Policy H8	Observation	<p><u>Policy H8 - Housing Mix</u></p> <p>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.</p> <p><u>Suggested Amendments:</u></p>

				<p>POLICY H8: HOUSING MIX</p> <p>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:-</p> <ul style="list-style-type: none"> • Smaller dwellings (1-2 bedrooms), including accessible housing and housing suitable for older people. • Medium-sized dwellings (3 bedrooms) suitable for families. <p><u>Proposals should also have</u> also have Having regard also to the most up-to-date local housing needs evidence.</p> <p>Developments consisting primarily of large (4 bedroom) detached dwellings will be resisted. <u>The housing mix</u> of affordable housing should be provided with the same emphases.</p> <p>A particular emphasis on dwellings for private rental is also encouraged.</p> <p>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.</p> <p><u>Points of Clarification</u></p> <p>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.</p> <p>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</p>
HCRS010/9	Neighbourhood Plan	Section 5.6: Highways & Travel; Policies HT5 to HT7	Observation	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.