

<p>HAWORTH, CROSS ROADS & STANBURY NEIGHBOURHOOD PLAN</p> <p>EXAMINATION</p> <p>CITY OF BRADFORD MDC RESPONSE TO EXAMINER'S QUESTIONS & MATTERS FOR CLARIFICATION</p> <p>22nd JUNE 2020</p>	
--	--

- 1. Policy BHDD1 – The first paragraph on page 17 about the CAA is worded negatively which is considered to be inappropriate. I am proposing that the fourth sentence from the first paragraph on page 17 should be deleted.**

It is considered that this wording should be deleted.

- 2. Would it be helpful to refer to the Bradford Shop Front Design Guide and the Shopkeepers Guide to Securing Premises SPDs which provide much more detailed guidance on the design of shopfronts in historic areas than bullet points 9 and 10?**

It is considered that the policy and/or supporting text should refer to the documents listed above. This will clearly show applicants and decision makers where to access further guidance in preparing and determining proposals involving shopfronts. In addition it shows a greater link to the wider strategic planning context.

- 3. Bullet points 2, 3, 10, 11 and 12 of Policy BHDD1 are set out as requirements. Would the QB and LPA consider whether a degree of flexibility should be introduced into these considerations?**

It is noted that the Parish Council consider the policy to be sufficiently flexible. It is suggested that may be appropriate to some additional wording to the opening paragraph to read as follows: *“In order to preserve and enhance the character and appearance of Haworth Conservation Area, as shown on the Neighbourhood Plan Policies Map, development including new buildings, and extensions and alterations to existing buildings, within or affecting the setting of the conservation area, should reflect its distinctive local characteristics and have regard to the following design principles:.....”*. Alternatively *“design principles”* could remain as *“objectives”*.

A further alternative form of wording could be: *“In order to preserve and enhance the character and appearance of Haworth Conservation Area, as shown on the Neighbourhood Plan Policies Map, development including new buildings, and extensions and alterations to existing buildings, within or affecting the setting of the conservation area, should reflect its distinctive local characteristics and seek to achieve the following objectives:.....”*

In relation to the specific amendments to bullet points 2, 3, 10, 11 and 12, it is considered that

- Bullet 2 – replace “Development must” with “The need to maintain and respect.....”
- Bullet 3 – replace “Development must” with “Reflect, where possible,”
- Bullet 10 – replace “Retention of” with “Retain” and delete “being required to” and replace “reflect” with “reflecting”
- Bullet 11 – replace “Retention of” with “Retain”
- Bullet 12 – replace “Retention of” with “Retain”

Any amendments will need to be viewed in the context of Question 4 (below).

- 4. Would the QB explain what is meant by “reflect the interest of the area” and how it is to be interpreted by decision makers in bullet point 4 of Policy BHDD1?**

See Qualifying Body response

- 5. Policy BHDD2 is worded identically to Policy BHDD1. Is there any reason for the policy to be separate or could it be amalgamated with Policy BHDD1 to provide one policy to guide development in the conservation areas?**

It is considered appropriate for policies BHDD1 & BHDD2 to be amalgamated into a single policy, provided that the supporting text relating to each Conservation Area remains.

- 6. Should Policy BHDD3 include consideration be given to the “conservation” of these areas?**

Should the examiner be minded to include reference to the “conservation” of these areas, it needs to be borne in mind that these areas are not formal designations such as Conservation Areas, where there is a duty to conserve them. Accordingly, the weight to be applied in decision making is different. It may be more appropriate for wording to reflect the ambition of paragraph 200 of the National Planning Policy Framework focusing on the need to enhance or better reveal the significance of these areas.

- 7. Policies BHDD4 – 7 are identical except for an additional criterion in 6 and 7. Is there any reason for four separate policies or could they be amalgamated to provide one policy to guide development in the Local Heritage Areas?**

It is considered appropriate for policies BHDD4 to BHDD7 to be amalgamated into a single policy to guide development in these areas, although it would need to be made clear to which of the LHAs some of the criteria apply as a number are specific to the Murgatroyd LHA.

- 8. Policy BHDD8 - It is difficult to identify the non-designated heritage assets and their curtilages from the Policies Map and I am concerned that the policy could not be applied consistently by decision makers.**
- I am proposing to recommend that Appendix 3 be presented as a separate assessment report that should give more information on the process of identifying the properties, the selection criteria and that it should include maps and photographs of the properties. Would the QB confirm that this would be acceptable.
 - Would the QB confirm that the property owners/occupants have been consulted on the proposed designation and how they have dealt with any objections.
 - There are two properties included in Appendix 3 (Balcony Farm House and Pedley’s Old Telephone Exchange) that appear not to be proposed for designation. Some explanation should be given of the reasons or they should be removed from the report.

See Qualifying Body response

- 9. Local Wildlife Sites – I note BMDC’s comments on the Local Wildlife Sites that have been designated and the possible conflicts with other designations. Would the QB and LPA consider these and agree any revisions to the NP and supporting documents that should be made in the light of the designation of the four sites as LWS.**

It is proposed that references to Bradford Wildlife Areas within the neighbourhood plan document, including the Local Green Space assessment appendix and Strategic Environmental Assessment (SEA) screening are deleted and replaced with the most up to date terminology - Local Wildlife Sites (LWS). Within the SEA, the

increased importance of the LWS designation should be acknowledged. The relevant citation documentation can be provided should the examiner consider it necessary.

In addition, it is proposed that the final sentence of third paragraph under the sub-heading Landscape, Biodiversity/Geodiversity and Green Infrastructure is amended. The following wording is suggested: *“Further designated sites of regional or local interest include the four Local Wildlife Sites (LWS) of ~~Dimples End Quarry, Airedale Spring Mill Pond, Baden Street (Haworth), Brow Moor with Sugden End, and Penistone Hill.~~ The last of these is also a Country Park”*. It is considered that these sites should be identified on the Policies Map for clarity.

In relation to Policy GE5, it is suggested that a further criteria is added to the policy to reflect its status as a LWS, and the need to take this designation into account when determining proposals for development affecting it. The following wording/new bullet point is suggested: *“The need to maintain and enhance the designated Local Wildlife Site and its nature conservation value, and comply with the provisions of Core Strategy Policy EN2(C)”*

It is suggested that wording should be included within Policy H4 to reflect that the site is adjacent to the Airedale Springs Mill Pond LWS and that there is need to take the presence and importance of the LWS into account when preparing/determining proposals for development on the former Ebor Mill site.

10. Policy GE2: BMDC has noted that some of the sites are within the Green Belt or covered by other designations. Would the LPA confirm which sites are within the Green Belt. Is there any value in identifying the sites in the Green Belt as LGS to demonstrate that a comprehensive assessment of sites important to the local community has been undertaken?

The following proposed Local Green Space designations are located within the Green Belt, as defined in the Bradford District Replacement Unitary Development Plan (2005), and as such benefit from the protections that this designation confers:

- LGS 2: Haworth Cricket Pitch (also identified under saved RUDP policy OS3 as a playing field)
- LGS 3: Mytholmes Rec
- LGS 4: Longacres Park (Massey Fields Play Area)
- LGS 8: Stanbury Playground
- LGS 13: Stanbury Cemetery
- LGS 126: Baden Street Woodland (also designated as Local Wildlife Site. It was previously identified (partially) as a Bradford Wildlife Area, prior to re-assessment as an LWS)
- LGS 139: West Lane Methodist Chapel Burial Ground
- LGS 160: Brow Top Road

There is some value in designating such sites as LGS where it is clearly demonstrated that they have value to the community e.g. for recreational purposes, or landscape importance.

11. Policy GE2: would the LPA explain their comments in the representation on sites LGS 16 and LGS 137 which do not appear in the submission plan.

CBMDC’s comment relating to Local Green Space (LGS) site **LGS16** should refer to **LGS160: Brow Top Road**. This response was submitted to highlight that proposed LGS site (**LGS160**) had been added to the plan following the consultation the Regulation 14 version of the Neighbourhood Plan document and that it had been identified in the SHLAA 2015.

In relation to **LGS 137**, it is noted that this site, despite having been deleted, is still referred to the assessment table for **LGS 133** within the text for “Landscape significance”. Also, clarification was sought regarding the reasons for its removal.

12. Policy GE3: Would the QB/LPA comment on the proposed revision to the wording: “The

enhancement of a designated Local Green Space to improve the quality or usability of the open space will be encouraged. I am also proposing that it should be included at the end of Policy GE2.

It is considered that the revised wording is appropriate.

13. Policy CF1: It would be helpful to explain in the justification to the policy how marketing and viability assessment is to be carried out and the evidence required to support applications that involve the loss of community facilities. Does the Council have established procedures or guidance for undertaking marketing or viability testing of proposals that would result in the loss of a community facility? Would the QB and LPA agree additional wording to be included in the justification to explain the evidence required.

In order to assist prospective applicants, it is suggested that the following (or similar) wording is added to explanatory text for the policy: *“Where proposals involve the loss of a community facility, developers will be expected to demonstrate that the facility, and its continued use, is no longer economically viable, and that all reasonable efforts have been made to market the site/facility for its current use without success.”*

CBMDC does not currently have any procedures or guidance for undertaking marketing or viability testing or proposals that would result in the loss of a community facility.

14. Policy CF1 – safeguarding of public houses, inns and social clubs. Appendix 7 lists 17 such facilities. The policy may be difficult to apply to such facilities in this settlement in view of the number of them. Other neighbourhood plans for smaller communities usually seek to safeguard “the last pub”. Would the QB and LPA consider whether the policy is deliverable in this respect.

The neighbourhood plan area contains a number of the facilities that are considered to be of importance to the community, and that they are located across the three settlements that make up the area. Accordingly, it is considered that the policy is appropriate.

15. Policies H1 – H4: Other than the Sustainability Assessment has any masterplanning or other assessment of the potential housing sites been undertaken to consider whether the sites and the specified requirements are deliverable and how they would impact on the viability of the sites as required by NPPF para 34? Would the QB and LPA consider whether some flexibility should be introduced into the policy e.g. by referring to the criteria as “principles” or adding “where possible/feasible”. Is it intended that all the requirements should be met in which case the word “and” should be added at the end of the penultimate paragraph.

The sites named in policies H1 to H3 (Worstead Road, Lees Lane North & Baden Street) were previously allocated or identified in the Bradford Replacement Unitary Development (RUDP) (2005) as either Safeguarded Land (H1 & H3) or a Phase 1 Housing Allocation (H2). Together with the Ebor Mills site (Policy H4), they were highlighted in the Strategic Housing Land Availability Assessment (SHLAA) 2015. To date no work has been undertaken in relation to masterplanning or assessing their deliverability and/or viability, although the Ebor Mills site (H4) is currently the subject of a planning application for residential development as well as an application for Listed Building Consent.

As highlighted in previous correspondence, CBMDC is currently the process of preparing an Allocations DPD to deliver the development requirements of the emerging Core Strategy Partial Review. Work on the Allocations DPD is moving towards the Preferred Options stage, including undertaking an assessment of the suitability of all sites listed in the SHLAA. Viability and deliverability will be also assessed as part of developing the Allocations DPD. A decision has yet to be made on which sites within the neighbourhood plan area will or will not be allocated. It is considered appropriate to consider these policies against this backdrop.

It is noted that all four policies do include some flexibility by stating that *“In the event that the principle of residential development is accepted via a site allocation in the Land Allocations DPD and/or relative to the requirements of the Core Strategy Policy SC8, development at.....”*

Should it be determined to continue with the approach of the neighbourhood plan, it is considered that a greater degree of flexibility should be introduced into the policy wording.

16. Policy H3: from Google Maps aerial photos this site appears to have considerable tree cover. Would the LPA provide a map of the TPO on this site. Have the views of the Highway Authority been sought on access to this site? I note the concerns raised in Appendix 8 on parking in Baden Street. I am concerned that the evidence in Appendix 8 does not set out robust evidence to support the introduction of local parking standards as required by NPPF para 105. Moreover, criterion 6 is considered to be imprecise. It would be more helpful to set a minimum standard related to the size of the dwelling in terms of the number of bedrooms. It should be agreed with the highways authority. Would the QB discuss with the LPA.

Extent of Tree Preservation Orders (TPO woodland) – Baden Street, Haworth

The extract below shows the extent of the TPO designation on the sites. In addition to the TPO, it is considered that the site may have ecological/biodiversity value.



Access

Initial views from the council's highways team is that the site can be accessed from Baden Street. However, a more detailed assessment is not available at the time of writing. As mentioned elsewhere in this response, the council's highways team will assess the implications of any proposal that may be submitted on the site on its merits.

Parking Standards

In relation to parking provision, CBMDC consider that it should be consistent with the provisions of adopted Core Strategy (2017) policy TR2 and Appendix 4, rather than establishing local standards. Policy TR2G requires new developments to take a design led approach to parking which is well integrated within the overall layout so that it supports the street scene and local character, and creates a safe and pleasant environment even in parking areas. Further guidance/advice on incorporating parking into residential development is set out in section 2.15 of the recently adopted [Homes & Neighbourhood Design Guide](#)

17. Policy H5: Would the QB / LPA comment on the following:

- a) Three bullet points refer to *“avoiding adverse impacts”*. Should the word *“unacceptable”* be added as it may not be possible to avoid all adverse impacts.
- b) Should *“and their settings”* be added to criterion 2?
- c) Has the highways authority agreed to criterion 4? Is this appropriate and deliverable? Would the QB and LPA comment on the following proposed wording *“The programme of highway improvements shall be agreed with the highway authority before development commences on the*

site".

- d) How is it intended that the term "*quick and easy access*" is to be applied in criteria 5 and 8?
- e) Legislation enables the diversion of rights of way, if necessary, for development, so criterion 6 needs some flexibility. Would the QB and LPA comment on the proposed revised wording: "*Public rights of way and cyclepaths should be retained on their existing route. Where this is not feasible, the diverted route should not be substantially less convenient for the public to use than the existing route.*"
- f) Criterion 9 is considered to be vague and imprecise. Would the QB and LPA comment on the proposed revised wording: "*Adequate in-curtilage off street parking shall be provided in accordance with, or in excess of, the Council's parking standards.*"
- g) Criterion 10 on trees also requires a degree of flexibility as the safeguarding and retention of all trees on a site may not always be possible or desirable. Would the QB and LPA comment on the proposed revised wording: "*As far as possible, trees that are subject to a Tree Preservation Order shall be safeguarded and protected during development and other mature trees shall be retained.*"

- a. It is considered that addition of the word "*unacceptable*" to those bullet points. However, in relation to criterion 1 & 2 it may more appropriate to use the terms "*significant adverse impacts*". This is more consistent with national policy.
- b. It is considered appropriate that the wording "*and their settings*" is added to criteria 2. This would ensure that the policy reflects others within the neighbourhood plan as well as local and national planning policy.
- c. The Council's Highways team assesses each planning application on its merits to determine whether or not there any impacts on the highway network resulting from the proposed development. This will include the need for any highway improvements, where they are justified. Should this be the case, any programme of works would normally be sought as part of a planning condition. The proposed wording is considered to potentially conflict with the wording a planning condition. Therefore, it is suggested that the following wording be used "*The programme of highway improvements shall be clearly set out in a planning condition before development commences on the site*".
- d. See Qualifying Body response.
- e. It is acknowledged that legislation allows for the diversion of rights of way, in necessary, to allow development to take place. Based on this and to ensure consistency with Core Strategy policies TR3 and DS4, it may be appropriate for the first sentence of the criteria to read "*The protection of existing Public Rights of Way and cycle paths on the site, where possible, and their integration into the development*" with the proposed amendment as a second sentence.
- f. In relation to parking provision, CBMDC consider that it should be consistent with the provisions of adopted Core Strategy (2017) policy TR2 and Appendix 4, rather than establishing local standards. Policy TR2G requires new developments to take a design led approach to parking which is well integrated within the overall layout so that it supports the street scene and local character, and creates a safe and pleasant environment even in parking areas. Further guidance/advice on incorporating parking into residential development is set out in section 2.15 of the recently adopted [Homes & Neighbourhood Design Guide](#)

Accordingly it is suggested that the criteria within the policy is worded as follows: "*Adequate in-curtilage off street parking shall be provided in accordance with indicative standard of 1.5 spaces per dwelling for non-town/city centres (as set out in Core Strategy policy TR2 and Appendix 4)*"

- g. Policy EN5 of the adopted Core Strategy (2017) generally seeks to preserve and enhance the contribution that trees and woodland make to the character of Bradford district. In relation to Tree Preservation Orders, criteria D of the policy states that "*The Council will continue to make Tree Preservation Orders where necessary, especially within and adjacent to development and will rigorously enforce such orders. On development sites, the Council will require the retention of those trees which are healthy and which*

have or would have a clear public amenity benefit. The Council will require the protection during construction of trees to be retained and, where appropriate, replacement tree planting for trees lost or damaged during construction.”

Accordingly, any revised policy wording should be reflective on this wider context.

18. Policies H1 – H5: If Policy H5 is to be applied to all allocated housing sites is there a need for Policies H1 – H4?

See comments in relation to Question 15. This would allow for greater flexibility, particularly in the light of the on-going work to prepare the Local Plan Allocations DPD.

19. Policy H6: I am concerned that this policy does not put any constraints on the suitability of development locations other than precluding sites safeguarded by the plan’s environmental policies. In particular how would this policy be used to consider proposals in the countryside? There is no reference to sites being well related to existing development or only being acceptable in the countryside if it accords with national planning policy.

In this case, it may be appropriate to add some additional working to the policy to address the examiner’s concerns, for example encouraging new development to take place within the settlement boundary for Haworth & Cross Road, and that it is compatible with character of the settlement, in terms of scale, layout, design and massing as well as making the most appropriate use, where possible, of previously developed land. It may also be worth added something that reflects the need to be well related to existing services and facilities.

In relation to development in the countryside, there are various national and local policies that cover the circumstances under which this will be permitted, in particular NPPF paragraphs 78 & 79 and saved RUDP policies GB1 to GB4. Policy GB4 is particularly important for proposals in Stanbury, which is classed as being “washed over” by the Green Belt.

20. Policy H6: The second bullet point sets out a number of considerations relating to the capacity of infrastructure. Unless deficiencies have been identified e.g. in an up to date Local Infrastructure Plan it would be very difficult for decision makers to apply this policy as worded. Would the LPA confirm how they deal with small scale development proposals in areas where there are deficiencies in infrastructure. Do they have policies or guidance on contribution towards improvements to the infrastructure?

CBMDC’s approach to infrastructure delivery and provision is set out in Section 6 of the adopted [Bradford Local Plan Core Strategy DPD \(2017\) \(Policies ID3, ID4, ID5 and ID6\)](#). A Local Infrastructure Plan (LIP) was prepared to support the Core Strategy. The [most recent version](#) of published in March 2016 as part of the evidence base for the Community Infrastructure Levy (CIL). The LIP is being reviewed as part of the on-going work on the Core Strategy Partial Review and emerging Allocations DPD.

CBMDC has an adopted [Community Infrastructure Levy \(CIL\)](#), which took effect from 1st July 2017. This applies to all new dwellings (1 unit upwards) but excludes affordable units. The Haworth, Cross Roads & Stanbury parish area falls within CIL Charging Zones (Residential) 2 & 3. Under CIL, the Parish Council will received 15% of CIL monies to spend on local infrastructure priorities. This percentage rises to 25% should the neighbourhood plan be made.

As part of CIL, the [Regulation 123 list](#) sets out those projects or types of infrastructure that CBMDC intends to be wholly or partly funded through CIL, However, it does not identify priorities for spending or any apportionment of CIL funds across the district, nor does signify a commitment from the Council to fund the projects list through the CIL. The list restricts the use of Section 106 (S106) obligations to ensure that developments are not charged for the same infrastructure through the duplication of contributions. S106 are used to provide affordable housing contributions and site specific matters to make a development acceptable

in planning terms. These obligations need to meet the tests outlined CIL Regulations 122 and 123. It should be noted S106 rarely applies to development of under 10 dwellings.

In terms of assessing infrastructure requirements, CBMDC only refer proposals for 10 or more dwellings (major development) for infrastructure assessment to various departments within the authority, for example education, leisure and open space. The National Health Service tends to seek contributions for developments of 10 or more dwellings. The Council's Highways team assesses with each planning application on its merits. They will only seek any off-site highway works where it is justified.

21. Policy H6: Accessible housing – Core Strategy Policy HO8 sets a threshold of 10 dwellings. Has the QB prepared any robust evidence to justify the reduced threshold?

See Qualifying Body response

In relation to Core Strategy (CS) housing accessibility it appears there is some confusion between accessible housing standards (Policy HO9) and accessibility standards (CS Appendix). The policy refers to accessibility standards (CS Appendix 3: Accessibility Standards) not housing standards (accessible homes) - this should be made clear in the policy/plan - it may need rewording

22. Policy H8: The Housing Needs Assessment provides a fine grain assessment of the need for various types of housing in the parish. It concludes that there is a need for 49 social and affordable homes; however this is not reflected in the first bullet point on page 49 of the Plan. I have concerns that the policy is not clearly worded and would be difficult to apply consistently. Would the QB/LPA comment on the following proposed revisions to the policy

Amalgamate first four paragraphs to read: *“Subject to the findings of the latest housing needs assessment, development of larger housing sites (of 0.4ha or above or 10 or more dwellings) will be expected to provide a mix of market and affordable housing of: (include two bullet points from Policy H8).*

“The development of Build to Rent housing will also be encouraged.

“The development of sites consisting primarily of large dwellings (4 or more bedrooms) will not be supported.

Final paragraph not changed.

Revise the first bullet point on page 49 of the justification and include reference to need on Build for Rent.

It is considered the proposed revisions to the policy would provide a greater level of clarity and allow for more consistent application.

23. Policy E1: The policy makes no reference to design or consideration of impact on the conservation areas. I am proposing to recommend that the following criterion is added to the policy: *“Where applicable the development shall be laid out and designed taking into account the principles of Policy BHDD1.”* Would the QB confirm that this is acceptable.

See Qualifying Body response.

24. Policy E2: I have a number of concerns about the clarity of the wording of this policy.

- a) Planning policy cannot *“retain”* uses unless there is a justification for safeguarding them.
- b) It is not clear what *“locally based”* visitor accommodation refers to. In any case planning policy cannot control the ownership or management of such accommodation.
- c) The wording refers to a mixture of landscape and heritage features although not the conservation areas.
- d) The second paragraph of the policy includes the wording from CS Policy EC4F *“having regard to accessibility and sustainable transport, local character and design”* without adding any local

interpretation.

- e) Would the QB and LPA comment on the following suggested revised wording for this policy: *“The development of visitor accommodation will be supported where it respects the character of the local landscape of the South Pennines and conserves and enhances the heritage of Haworth and the conservation areas.*

New accommodation should be well designed to reflect the built character of the area and have regard to the principles set out in Policy BHDD1.”

It is considered that the revised form of policy wording is appropriate. It may also benefit from having a reference to “...to the principles set out in Policy BHDD1 as well as other relevant development plans including Core Strategy EC4F”. This will show greater links between the various policy levels.

- 25. Policy HT1: Would the QB clarify the intentions of the second paragraph of this policy. Presumably all developments will be expected to meet their own parking requirements. Is it intended to encourage development that provides additional public car parking as well?**

See Qualifying Body response

- 26. Policy HT2: I have checked the locations of all the car parks on Google Maps aerial photographs. Would the QB confirm that car park 7 Damside Mill is plotted accurately as there appears to be a building on the site. Would the QB confirm that all the owners of these sites have been consulted on this policy.**

See Qualifying Body response

- 27. Policy HT2: A number of these car parks are associated with other uses such as churches, community halls and clubs. In the circumstances where the main building and the car park were to be redeveloped together it would appear that criterion (ii) would require replacement parking in the area. Is that the intention of the policy?**

See Qualifying Body response

- 28. Policy HT4 please refer to my comments on Policy H3(6) above. I am concerned that the policy is vague and imprecise and is not supported by robust evidence.**

See response to Question 16 relating to parking standards.

- 29. Policy HT5 – This policy is in effect seeking planning obligations to improve bus services. It is not clear what types of development the policy will be applied to. It is not therefore possible to demonstrate that the requirements satisfy the tests for planning obligations set out in NPPF para 56. I am therefore proposing that the policy should be deleted. It is noted that the support for new routes to the hospital and Halifax is included as a Community Action.**

It is noted that the examiner is minded to delete this policy. However, should a policy regarding public transport improvement continue to be included it may be appropriate to have a more general focus on the need to improve public transport infrastructure within the neighbourhood area.

In relation to developer contributions, CBMDC’s response to question 20 provides an overview of the policy background. Also, it should be noted that CBMDC’s Development Management team consult the West Yorkshire Combined Authority (WYCA) on all major applications. WYCA would identify any justifiable improvements to public transport infrastructure, usually in the form of bus stops/shelters. These requests are considered in terms of the overall viability of a scheme but are usually secured.

30. Policy HT6: I have similar concerns about Policy HT6. It is noted that the Community Actions set out the priorities for improvement to the network. I am proposing to recommend that the policy be deleted and replaced with the following: *"Where feasible developments should include a link to the nearby public rights of way, bridleway or cycle network."*

Any policy redrafted should be reflective of Core Strategy policies TR3 and DS4. These policies encourage the integration of opportunities for walking and cycling within new development.

Therefore, it may be appropriate for the policy to centre on supporting the improvement of the Public Rights of Way network within the plan to improve connections for local people and visitors to access local facilities/services and the countryside, and encouraging development that includes opportunities for walking and cycling by incorporating existing paths and routes within it and/or connecting to existing routes in a safe and secure manner. Where necessary, this could include improving existing routes.

In relation to developer contributions, CBMDC's response to question 20 provides an overview of the policy background. Also, CBMDC's Development Management team consult the Public Rights of Way team on all major applications. Where appropriate and justified they will identify suitable improvements and seek to secure them.

31. Policy HT7: I am proposing that the wording of the policy should be clarified to refer to the route being "safeguarded" and the development of the route as a cycle way being supported. Would the QB/LPA comment on the proposed revision. *"...Neighbourhood Area shown on the Neighbourhood Plan Policies Map is safeguarded. The development of the safeguarded route as a cycle way will be encouraged. Development should not prevent or harm the development of a cycle route along the identified route."*

It is considered that the revised wording is appropriate. However, it would be useful clarify the status and progress of the cycleway project.