HAWORTH, CROSS ROADS & STANBURY NEIGHBOURHOOD PLAN

EXAMINATION

CITY OF BRADFORD MDC RESPONSE TO EXAMINER'S INITIAL QUERIES

20th MAY 2020



Question 1: Would the QB confirm that there are no other Neighbourhood Plans relating to the NP area

See Qualifying Body Response

Question 2: Would you provide me with copies of the correspondence from the environmental bodies to the consultation on the SEA and HRA screening report of July 2018 and the HRA update report of May 2019.

See Qualifying Body Response

Question 3: Would the QB provide me with a paragraph to state how the plan and the plan making process have taken account of Human Rights legislation.

See Qualifying Body Response

Question 4: The Policies Map shows the Non Designated Heritage Assets and Community Facilities with coloured circles. Is there a background evidence report showing the boundaries of these properties that can be used by decision makers in determining whether a development proposal would affect one of these properties?

See Qualifying Body Response

Question 5: What is the mauve shaded area on the west of the plan area shown on the Magnification Section? It does not appear to be included in the key. Is it the South Pennine SPA/SAC?

See Qualifying Body Response

Question 6: The introduction to the Plan does not include any information about the strategic context of the Neighbourhood Plan.

Would the QB and LPA agree a few sentences to be included in the NP to list the strategic plans and the timescales for the emerging Site Allocations Plan.

Would you explain the strategic planning context for the Neighbourhood Plan e.g. the status of the villages in the settlement hierarchy and the level of growth anticipated in them to provide the context for the housing and employment policies in the NP.

Would you explain how it is intended that the requirements set out in Policies H1 – H4 are to be taken forward.

National & Local Planning Policy Context for the Neighbourhood Plan - Current & Emerging

The neighbourhood plan has been prepared within the wider strategic planning policy context set out in national and local planning policy. National policy includes the National Planning Policy Framework (2019) and

Planning Practice Guidance (2014 onwards). Within Bradford district, the strategic planning policy is set out in the documents that make up the Local Plan (as far as they relate to Haworth, Cross Roads & Stanbury parish area) are the:

- <u>Core Strategy DPD (adopted July 2017)</u>, which sets out the broad scale and distribution of growth as well as
 policies to protect and enhance the natural and built environment, and guide/manage development across
 Bradford district for the period 2011 to 2030.; and
- Replacement Unitary Development Plan (RUDP) for Bradford District Saved Policies (adopted May 2005), which includes a number of policies that are relevant to the neighbourhood plan, including the defined Green Belt boundaries.

There is also a <u>Waste Management DPD</u> (adopted October 2017) and two Area Action Plans (AAPs) (adopted December 2017), covering <u>Bradford City Centre</u> and the <u>Shipley & Canal Road Corridor</u> respectively. The AAPs are not relevant to the parish area.

CBMDC are currently undertaking a <u>partial review of its Core Strategy</u>. This review is due to various changes to national planning policy and local circumstances, and covers several subjects including a proposed new plan period (2020 to 2037), revised housing and employment land requirements and spatial distribution as well as various environment and transport policies. Work reached the Preferred Options stage in July 2019. Further consultation (a revised Preferred Options) is due to take place in 2020, with a submission draft being published in 2021. Work is also on-going to prepare an <u>Allocations DPD</u> that will identify sites to meet the requirements of the Core Strategy Partial Review. It is anticipated that both documents will be adopted in 2022.

Strategic Planning Context for the Neighbourhood Plan - Level of Growth & Development

For spatial planning purposes, CBMDC has split its area into four sub-areas (City of Bradford; Airedale; South Pennine Towns & Villages; and Wharfedale). The neighbourhood plan area is situated within the South Pennine Towns & Villages sub-area, which also includes the settlements of Cullingworth, Denholme, Harden, Oakworth, Oxenhope, Queensbury, Thornton and Wilsden.

The settlement hierarchy is defined in Core Strategy policy SC4. Under this policy, Haworth is classed as a Local Service Centre, where the emphasis will be on will be on a smaller scale of development comprising both market and affordable housing, together with the protection and enhancement of those centres as attractive and vibrant places and communities, providing quality of place and excellent environmental, economic and social conditions. Cross Roads is not specifically referred to as a separate settlement with the hierarchy. Figure SS2 within the Core Strategy shows the extent of Haworth and Cross Roads.

Stanbury, along with a number of other villages and/or hamlets in Bradford district, is classed under saved RUPD policy K/GB3.5 as being washed over by the Green Belt. Again it is not specifically referred to in the Core Strategy settlement hierarchy (none of these settlements are listed in the hierarchy).

Under Core Strategy policies PN1 and HO3, Haworth will see the development of 400 homes over the adopted plan period (2011 to 2030). Within the Core Strategy Partial Review, it is proposed to reduce this requirement to 275 dwellings over the revised plan period (2020 to 2037). The sites to accommodate this growth will be identified in the emerging Allocations DPD. A specific level of employment development is not identified for the neighbourhood plan area.

In terms of the retail hierarchy (Core Strategy policy EC5), Main Street and Mill Hay in Haworth, and Cross Roads are identified as Local Centres. The policy states that these centres (46 in total across Bradford district) should be the focus for appropriately sized local supermarkets and a variety of small shops of a local nature to meet people's day to day needs and minimise their need to travel.

Development in Stanbury is restricted by saved RUDP policy GB3 to infill development, provided that it falls within the infill boundary of the settlement, as defined on the Proposal Map, fills a small gap in a small group of buildings and is related to the scale of the settlement and does not adversely affect the character of the settlement or its surroundings. Also it should not result in the loss of open space which is important to the

character, visual amenity and local identity of the settlement. Proposals for the extension of the settlement will not be permitted.

Implementation of Policies H1 to H4

The policies, as drafted, leave any formal designation/allocation of these sites to the Local Plan Allocations DPD. As mentioned, CBMDC is in the process of preparing this document. Work is underway the suitability of all sites within the Strategic Housing Land Availability Assessment (SHLAA), including those listed in policies H1 to H4 of the Haworth, Cross Roads & Stanbury Neighbourhood Plan, using an agreed site selection methodology (available on the CBMDC website). The results of this work, together with the evidence base, Sustainability Appraisal and Habitat Regulations Assessment will inform those sites identified in the Preferred Options version of the Allocations DPD, due for publication later this year.

Should all or any of these sites be allocated in the Allocations DPD, it would be expected that the policy considerations set out in the neighbourhood plan policies H1 to H4 will be used by officers/members in determining planning applications on them.

It should be noted the Ebor Mills site (Policy H4) is currently the subject of a pending planning application (Application Ref: 19/04426/MAF). It is for the conversion and refurbishment of Ebor Mills into 14 dwellings, construction of 24 new dwellings within the curtilage of the site, landscaping, biodiversity and environmental enhancements, highway and footway improvements to Ebor Lane and demolition of the weaving sheds and partial demolition and reconstruction of the boiler house. An application for Listed Building Consent (Application Ref: 19/04425/LBC) is also pending.

Question 7: What is the LPA's process for designating non-designated heritage assets? Is it intended that they should be designated through the NP or is does the LPA have a separate procedure?

CBMDC does not at present have a process in place for identifying/designated non-designated heritage assets. However, the council's <u>Conservation Area Assessments and Appraisals</u> do identify key unlisted buildings and structures within these Conservation Areas. As part of preparing neighbourhood plans, a number of groups have sought to identify further heritage assets of local importance to build on the lists set out in the Conservation Area Assessments and Appraisals, using Historic England to guidance as the basis for their methodology.