

ASPECT OF PLAN COMMENTED UPON	REPRESENTOR	REPRESENTATION MADE	RESPONSE
Vision Statement	HCRS007/1 (Harworth Group PLC)	<p><i>(NB text below is extract from representation deemed to require comment – omitted text does not relate to any NDP content)</i></p> <p>Until this requirement (<i>i.e. CSPR draft requirement of 275 dwellings per annum</i>) is adopted, then we agree with the Vision Statement's acceptance of the parish receiving its allotted share of Bradford's growth.</p>	While agreement with the Vision Statement is welcomed, the PC would point out that the statement's acceptance of the parish's allotted share will hold good whatever the final requirement.
Policies BHDD1, 4 & 8; Built Heritage	HCRS006/1 (Cinema Theatre Association)	<p>I wish to support the proposed Haworth Cross Roads & 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.</p> <p>Although my support extends across the complete plan I wish to highlight the following three specific policies as these are the most relevant to my remit of conservation of cinema buildings:</p> <p>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)</p> <p>A number of community actions and approaches have been identified throughout the consultation stages, as detailed in Chapter 6. Monitoring, Review, Implementation: namely regarding</p>	<p>The PC welcomes the support.</p> <p>The PC welcomes the support.</p> <p>The support is welcomed. The PC would be happy to receive the</p>

		Conservation Areas to lobby CBMDC re review/assessment of proposed extensions/new areas in Haworth & Cross Roads. The Cinema Theatre Association is in full support of this and would be willing to assist in this regard with Parish Council and CBMDC.	association's support in its lobbying of CBMDC.
Non-Designated Heritage Assets	HCRS001/2	<p>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.</p> <p>Information on where building owners can go to get help for restoration of these assets would be helpful.</p>	<p>In line with NPPF policy on such assets, the implication of Policy BHDD8 is that the particular significance of any asset (i.e. what makes it important as an asset – ref Appendix 3 and the views of the determining planning officer) will be taken in order to consider the impact of a development proposal on the asset. The aim is to avoid or minimise any conflict between the asset's importance and any development. This in no way means that development will be prevented.</p> <p>CBMDC's landscape, design and conservation team within the Planning & Building Control Department is a recommended first port of call.</p>
BHDD1 & BHDD2	HCRS002/2 (Gladman Developments Ltd)	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.	It is considered that neither policy is "overly prescriptive" and that both already allow sufficient flexibility for development schemes. Both policies adopt a 'should' format which is neither

		<p>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:</p> <p>"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 in each place, and should allow a suitable degree of variety where this would be justified."</p>	<p>prescriptive, (i.e. as in 'must' or 'will'), or inflexible. The policy further states that "there is some scope for modern architectural innovation, provided it respects the distinctiveness of the approved conservation area as shown", thereby allowing flexibility on a site-by-site basis. The policies set out the very 'list of design principles' (here termed 'objectives'), by the representor's own admission, as requested by the representor. It is considered that the policies have full regard to the final sentence of Framework para 126. It is unclear whether the representation, in its reference to para 126, is also suggesting that the plan should use visual tools such as design guides and codes. It is considered that this would be excessive and unnecessary in relation to the policies' intentions and but be considered as a supplementary project post the plan being made. It is noted that both policies moreorless exactly follow the wording suggested by CBMDC in their Regulation 14 representations.</p>
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Policies BHDD1-7	HCRS002/3 (Gladman Developments Ltd)	<p>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 7 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.</p> <p>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.</p>	<p>The plan makes a clear distinction between the policies/evidence base in respect of the 2 conservation areas (BHDD1 & 2) and the 4 Local Heritage Areas (BHDD4-7). BHDD1 & 2 adopt a 'should' format in respect of significant views and vistas. The views are not, as the representor asserts, those considered important by the plan makers – the majority are views/vistas identified by CBMDC in its conservation area appraisals for Haworth and Stanbury, with the remainder being those specifically suggested for additional inclusion by Historic England in its Regulation 14 representations. The plan strengthens the existing CAAMP evidence base with the addition of photos and short descriptions. The policies' 'should' format reflects this strong evidence base. This approach has already found favour</p>

			<p>with other examiners/plans on which the QB's consultants have worked. NDPs for Aberford, Otley and Horsforth, all within the Leeds City Council area, have received favourable examiner reports in this regard and have gone on to be successful at referendum, being all now 'made' plans. In short, there are clear approved precedents for this approach. It is considered that this approach provides the proportionate and robust evidence required by the PPG.</p> <p>Policies BHDD4-7 adopt a 'softer' policy approach, including a principle on significant views/vistas which development is encouraged to follow. As there is no requirement, there is no detailed evidence base in support; rather the identification of key views is left to the discretion, expertise and good design sense of developers, their consultants and CBMDC planning officers.</p> <p>The PC considers that the policies do provide clarity and support for decision makers to apply the policies predictably and with confidence and are therefore in</p>
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			line with paragraph 16(d) of the Framework. It does not agree with the assertion that these policy elements should be deleted.
Policy GE4; Sites LGS2, LGS133, LGS137, LGS138 & LGS139; Appendix 5	HCRS010/1 (CBMDC)	<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> <p>1) 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.</p> <p>2) Appendix 5:</p> <p>a) Site LGS137 is still referred to but has been removed from the Appendix. (LGS133) also makes reference to proposed LGS137.</p> <p>b) It is suggested that the tables shown in the appendix are arranged in number order for ease of reading.</p> <p>3) 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.</p> <p>a) 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.</p> <p>b) 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.</p>	<p>1) PC agrees with this suggestion.</p> <p>2) a) PC would agree to removal of erroneous reference to LGS137 in assessment of LGS133 and anywhere else it may occur.</p> <p>2) b) PC would agree to rearrangement of table in site number order.</p> <p>3) a) PC agrees that the duplicate labelling of sites as LGS2 is an error that needs correcting – the Methodist burial ground should be listed in the policy and appendix as LGS139 as per the map (NB not as LGS138 as suggested).</p> <p>3) b) PC agrees that there is an error here in need of correction – the Baptist burial ground should be listed in the policy and appendix (NB Appendix 5 not 2 as suggested) as LGS 138.</p>

<p>Section 5.2: Green Environment; Policies GE2 & GE3; Appendix 5</p>	<p>HCRS010/2 (CBMDC)</p>	<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>	<p>The PC does not agree with this suggestion. The NPPF provides the power to identify areas of particular value to local communities for special protection as Local Green Space. This power does not extend to enhancement. It is therefore considered logical to keep the policy which identifies/ designates/protects LGS separate from the policy relating to LGS enhancement. This approach has already found favour with other examiners/plans on which the QB’s consultants have worked. NDPs for Aberford, Otley and Horsforth, all within the Leeds City Council area, have received favourable examiner reports in this regard and have gone on to be successful at referendum, being all now ‘made’ plans. In short, there are clear approved precedents for this approach.</p> <p>The PC agrees that the assessments have not been updated in this regard. As 18 of the 23 LGS are less than 1.0ha in size, this was considered unnecessary in these cases as they are as such, and self-evidently, not extensive tracts of land. As the PC understands it,</p>
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Local Green Spaces	HCRS010/3 (CBMDC)	<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>Assessments of all proposed LGS sites in Green Belt include text explaining the additional benefits LGS protection will bring. PPG (paras 10 & 11) does not refer to other designations such as open space and recreation grounds designated by local authorities. PPG does however make the very valid point that "different types of designations are intended to achieve different purposes". This is the case with LGS as opposed to open space etc. Nowhere in NPPF or PPG does it state that an LGS designation cannot exist in parallel with a Local Plan green space or similar designation. This approach</p>

		<p>An example of this includes LGS13: Stanbury Cemetery. This site is designated Green (<i>Belt?</i>) 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>Site Specific Queries:- 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>of parallel designations has already found favour with other examiners /plans on which the QB's consultants have worked. NDPs for Aberford, Otley and Horsforth, all within the Leeds City Council area, have received favourable examiner reports in this regard and have gone on to be successful at referendum, being all now 'made' plans. In short, there are clear approved precedents for this approach.</p> <p>The assessment deals with the Green Belt issue. The site's SLCI status does not preclude its LGS designation. It is considered that the assessment provides adequate evidence for its LGS eligibility.</p> <p>The assessment deals with the Green Belt issue. The fact that the site is not predominantly 'green' in colour does not preclude its LGS designation. There is ample evidence nationally of LGS comprising predominantly or exclusively hard surfaced spaces in made NDPs – the designation of such sites has already found favour</p>
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<p>Section 5.2: Green Environment; Policy GE2</p>	<p>HCRS010/4</p>	<p>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.</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: • 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> <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. 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</p>	<p>The PC accepts that NP references need updating from BWA to LWS and LWS names acknowledged where these occur in the text before the final version of the plan can be made.</p> <p>The PC considers that where such sites are relevant to NP policies, those policies provide for adequate protection of those sites, i.e. GE5 (Brow Moor with Sugden End), H3 (Baden Street), GE2 (Baden Street, Airedale Spring Mill Pond).</p> <p>The PC would agree to this updating and acknowledgement of enhanced LWS status.</p>
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		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.	
Whole Document	HCRS010/5 (CBMDC)	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.	As acknowledged by the representor's own comment, the PC/NP is not obliged to address nature conservation/wildlife/ ecological matters in any more detail than is required by the issues which the local community has indicated it wishes the NP to address. Where these matters are pertinent to NP policies, they have been fully and appropriately taken account of (NB subject to already acknowledged need for updates). The SEA/HRA screening reports accompanying the NP have addressed species implications to the satisfaction of both Natural England and CBMDC itself (again subject to acknowledged update needs). It is considered to be the role of the Local Plan to put in place fully evidenced district-wide policies to address site/habitat/ species protection to be applied alongside NP policies. The PC's refutation of CBMDC's Reg 14

			comments (P27 of Reg 14 Results Grid in evidence base) remain valid.
Landscape; Biodiversity/Geodiversity; Green Infrastructure	HCRS010/6 (CBMDC)	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.	The PC is not aware of any pronouncement to the effect that the 2009 work is now out of date and as such it is still considered to be valid evidence. Nor is it aware of the formal designation of a Bradford Ecological Habitat Network in planning terms or in which document this designation is formalised. Our understanding, in response to enquiries made of CBMDC re such work, was that mapping work was underway in connection with the Local Plan but was not available to share with the PC. No comments were made at Reg 14 stage by CBMDC re this work or this designation. The 2009 work as valid evidence, and green infrastructure policies based upon it, have already found favour with other examiners /plans on which the QB's consultants have worked. NDPs for Aberford, Otley and Horsforth, all within the Leeds City Council area, have received favourable examiner reports in this regard and have gone on to be successful at referendum, being all now 'made' plans – and made as

			recently as late 2019 and February 2020. In short, there are clear approved precedents for this approach.
Policies H1, H2 & H3	HCRS007/2 (Harworth Group PLC)	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 (NB outlined in subsequent comments HCRS007/3-6)	The PC accepts that there is no guarantee that the 4 potential housing sites addressed in Policies H1-H4 will follow through to the Site Allocations Plan. The PC does not accept that the NP ‘pre-supposes’ which sites will be allocated or ‘supports’ those sites for housing. Rather the NP identifies 4 potential housing sites, based both on their past status and their SHLAA ratings (i.e. 3 ‘green’ sites and 1 ‘amber’ site), and sets out policies to guide their development in the event of them being ultimately allocated – the use of the phrase ‘in the event that’ being key to Policies H1-H4 and the understanding of the PC/NP’s position on them. It is, finally, contended that all housing sites will have some deliverability issues.
Policy H1	HCRS007/3 (Harworth Group PLC)	Although this site is currently designated as safeguarded land within the Replacement Unitary Development Plan, this does not necessarily mean it is a more suitable site when compared to non-safeguarded land located elsewhere in the Plan area.	The PC in its NP makes no comparative judgements re the merits of safeguarded as opposed to non-safeguarded land in the area. In the case of Worsted Road,

			it does however take account of CBMDC's SHLAA ratings of sites alongside its safeguarded status. The site is rated 'green'. These factors together informed its identification as a potential housing site to be addressed via NP policy.
Policy H2	HCRS007/4 (Harworth Group PLC)	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.	The PC/NP does not 'automatically assume' that the site is suitable/deliverable. The site's SHLAA 'green' rating does however suggest this to be the case. It is based on this evidence, plus the site's previous identification as a housing site, that it was identified as a potential housing site to be addressed via NP policy.
Policy H3	HCRS007/5 (Harworth Group PLC)	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,	The site is rated 'green' in the CBMDC SHLAA. Its constraints in respect of the TPO and Local Wildlife Site designation are fully recognised in the SHLAA and reflected in Policy H3. It is understood that only the open area of the site in the south-east quadrant would be considered suitable for development – this is reflected in the low anticipated yield of 18 dwellings. The NP does not make any reference to the site's location within the existing

		that is not outweighed by the potential delivery of a small number of dwellings.	settlement boundary. The NP does not 'support' the site's development – ref response to representation HCRS007/2.
Policy H4	HCRS007/6 (Harworth Group PLC)	<i>(Policy)</i> 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.	The site is 'amber' rated in the SHLAA. The SHLAA's site assessment identifies its constraints and these, including highways/access are reflected in Policy H4. The fact that a planning application has recently been submitted (and of the representor's own comments elsewhere re recent actions taken by the owners/potential developers) clearly indicate that there is a developer very keen to obtain permission with a view to future development, despite any difficulties that may exist. The PC sees housing as a potentially beneficial use of a derelict/disused /eyesore site, subject to the requirements the NP sets out in Policy H4. The PC does not agree with the deletion of this policy.
Policy H5	HCRS007/7 (Harworth Group PLC)	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	The PC welcomes the tacit support for the policy approach. The PC does not accept the suggested deletion of Policies H1-H4. They set out detailed, evidence-based, site-

		<p>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> <p>The requirement for the delivery of essential highway 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 improvement will be tested as part of each planning application, considering cumulative impacts of any other allocated or committed</p>	<p>specific requirements whereas H5 sets out more general guiding principles applicable to any site. They have separate roles to play. As argued in response to the representor’s comments elsewhere, H1-H4 do not pre-determine allocations. Neither will their inclusion render the NP out-of-date/alignment with a finally adopted Site Allocations Plan. The policies are essentially stand-alone (with the exception of H3’s link to HT4/Appendix 8), i.e. if they prove to be ultimately redundant, then that will not impact upon the efficacy of other NP policies. Such inclusion/non-usage would be no different to the inclusion of such policies in respect of allocated housing sites not coming forward for implementation during the plan period as is often the case.</p> <p>Given that the requirement relates only to essential improvements, the PC considers this to be reasonable.</p>
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		<p>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.</p> <p>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.</p>	<p>The PC accepts that in ‘protecting’ an existing right of way, it is sometimes necessary to divert/ amend the route of that right of way – this is implicit in the policy requirement. As such, the PC sees no need to amend this requirement in any way.</p>
Policy H6	HCRS007/8 (Harworth Group PLC)	<p>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.</p>	<p>Policy H6 does not apply to housing sites, it applies to potential housing sites proposed on non-allocated land. As stated in the policy’s explanatory text, it adds local detail to NPPF and Core Strategy policies and so is not considered by the PC to be covered by those policies. This type of policy approach has already found favour with other examiners /plans on which the QB’s consultants have worked. NDPs for Aberford and Otley, both within the Leeds City Council area, have received favourable examiner reports in this regard and have gone on to be successful at referendum, being both now</p>

			'made' plans. In short, there are clear approved precedents for this approach.
Policy H8	HCRS007/9 (Harworth Group PLC)	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.	The policy, as clearly stated and evidenced, is based on a study carried out by Chris Broughton Associates in late 2016/early 2017. The PC considers that this provides the necessary and robust local underpinning, in addition to the more general (and more out of date) Core Strategy evidence base/policy. This approach has already found favour with other examiners/plans on which the QB's consultants have worked. The NDP for Otley, within the Leeds City Council area, has received a favourable examiner report in this regard and has gone on to be successful at referendum, being now a 'made' plan. In short, there is an approved precedent for this approach.
Polices GE2 & H4; Appendix 5	HCRS010/7 (CBMDC)	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	The PC acknowledges the potential conflict between LGS designation and NDHA status. In practice, however, it is considered that the wording of the respective policies (i.e. GE2 and GE3 re LGS enhancement) would resolve any

		<p>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.</p> <p>Policy H4 - Ebor Mills, Ebor Lane, Haworth also does not refer to the Local Wildlife Site designation.</p>	<p>such conflict. GE2 only permits development in very special circumstances; GE3 encourages improvement/enhancement of LGS only where compliant with other NP/Local Plan policies. In the latter regard, the provisions of Core Strategy Policy EN2 clause C would clearly preclude any works such as mill pond re-creation. Conversely, any proposed development to improve the LWS would not be prevented by the NP's 'softly worded' NDHA policy BHDD8. The PC is agreeable to updating the NP in relation to references to the LWS wherever currently incorrect or now appropriate.</p> <p>This is because, as the PC understands it, the LWS lies outside the identified H4 site (ref Proposals Map). If this understanding is incorrect, the PC would be agreeable to making appropriate reference to the LWS in supporting text and reflecting its importance in policy wording. Equally, if outside the site, but the site's development is deemed to have implications for the adjacent (i.e. across Ebor Lane) LWS, again, the PC would be</p>
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			agreeable to making appropriate amendments to reflect this.
5.4 Housing	HCRS001/3	<p>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 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>	<p>Policy H4 explicitly provides for local greenspace, flood risk and safe access in its requirements. The PC/NP have no responsibility for or connection with the actions of the developer. Equally, the housing requirement is not within the gift of the PC/NP – it is handed down by Government and CBMDC through higher level planning policies. The NP does not give ‘carte blanche’ to any housing development – rather it sets out development requirements, ‘in the event’ that the principle of such housing development I accepted at a higher planning level.</p>
Policy H8	HCRS010/8 (CBMDC)	<p>Policy H8 - Housing Mix 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>Suggested Amendments: POLICY H8: HOUSING MIX</p>	<p>The PC would be agreeable to the amendments and rewording suggested.</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>Proposals should also have regard to the most up-to-date local housing needs evidence.</p> <p>Developments consisting primarily of large (4 bedroom) detached dwellings will be resisted.</p> <p>The housing mix 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>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</p>	<p>In both/all cases the intention is that policy only applies to larger sites as defined.</p>
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Housing	HCRS007/1 (Harworth Group PLC)	<p><i>(NB text below is extract from representation deemed to require comment – omitted text does not relate to any NDP content)</i></p> <p>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.</p>	<p>Firstly, Policies H1-H3 do not outline ‘current draft allocations’ as suggested – the basis for the identified sites is explained in response to other representor comments elsewhere in this grid. Secondly, the policies in question are not designed to meet any housing requirement, adopted or draft. Rather, as explained elsewhere, they are setting out site-specific development requirements for potential housing sites which may, based on available evidence, be reasonably expected to come forward as allocations, ‘in the event’ that they do. Further, no assumptions are made in the NP text re delivery against requirements; the text simply reproduces SHLAA information without comment or nuance. For the sake of accuracy, the representor fails to take account of dwellings that would be provided by the Ebor Mills site (H4) in the calculations made.</p>
Housing	HCRS007/11 (Harworth Group PLC)	<p>(As set out in this representation) there are constraints and deliverability issues 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.</p>	<p>The PC has addressed issues of deliverability/constraints, the plan’s ‘non-support’ for sites and the basis for identification of sites in the plan elsewhere in the grid. As</p>

			a point of information, the Qualifying Body for the preparation of the plan is a parish council not a Neighbourhood Forum as this is a parished area.
Housing	HCRS007/12 (Harworth Group PLC)	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.	The Sun Street site is currently in Green Belt. The community has made it clear to the PC during the course of NP consultations that it would not support any housing development on Green Belt land. Furthermore, NPs are precluded from included development-related policies on Green Belt land. This can only be done by LPAs as part of a comprehensive or selective Green Belt review, in connection with Local Plan preparation. As a point of information, the Qualifying Body for the preparation of the plan is a parish council not a Neighbourhood Forum as this is a parished area.
Section 5.6: Highways & Travel; Policies HT5 to HT7	HCRS010/9 (CBMDC)	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.	The PC considers this to be a vague and unfocussed comment to which it is impossible to reasonably respond. No one policy within the NP has more or less priority over any other policy – all are to be applied equally. Policy sections and policies within sections are ordered in accordance with the perceived

			priority which the community assigns to the issues they address. The order makes no difference to policy application.
5.6 Transport	HCRS001/4	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.	The PC would have no objection to referencing this fact in the section of the NP relating to improved walking, horse-riding and cycling provision.
Appendix 4 – Green Infrastructure	HCRS001/5	This section completely contradicts the housing section by naming 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.	There is no contradiction here. The Ebor Mill Nature Reserve LGS as defined on the NP Map is clearly distinct from the Ebor Mills housing site as defined separately on the map. Nowhere is the LGS described as being suitable for housing – the two are clearly totally incompatible. It is considered that the developer’s aspirations are not relevant to the NP as they are currently endorsed by the planning system.
Appendix 7 – Community Facilities	HCRS001/6	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’.	The PC would agree that not all pubs are necessarily community facilities. However, following an assessment of each (ref the evidence base), the majority have been deemed to provide a community facility by virtue of their usage, activities and offer. It is

			<p>considered that all the community can access their facilities (dependent of course on means and perhaps in some cases physical accessibility). Whether or not community members wish to access them is neither here nor there as far as their community facility credentials are concerned. There is nothing to preclude profit-making business from offering a community facility.</p>
Appendix 8	HCRS001/7	<p>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.</p>	<p>Appendix 8 provides the evidential support to Policy HT4 (Car Parking Standards for New Housing Development at Baden Street). As such, there is a clear link to a policy addressing a specific identified parking problem. Further, Policies HT1-3 also deal with parking in the Neighbourhood Area. As such, it is inaccurate to state that the PC is only concerned with parking in respect of Baden Street. No comments or evidence have been brought to the PC's attention regarding other parking issues. Even if such issues had been made known, the NP could only address them in relation to potential future exacerbation through new development and with supporting</p>

			evidence. Government has stated that NPs cannot take a blanket approach to the setting of parking standards.
General	HCRS003/1 (Coal Authority)	As you will be aware the Neighbourhood Plan area lies within the current defined coalfield. According to the Coal Authority 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.	The PC has no comment to make.
General	HCRS004/1 (National Grid)	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.	The PC has no comment to make.
General	HCRS005/1	The plan area does not adjoin North Yorkshire, and it is considered that there are unlikely to be any strategic cross boundary issues.	The PC has no comment to make.
General	HCRS008/1 (Historic England)	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. 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.	The PC has no comment to make.
General	HCRS009/1 (Natural England)	We have reviewed the Haworth, Cross Roads and Stanbury Neighbourhood Development Plan and associated Strategic	The PC has no specific comment to make in relation to the

		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. Natural England has no specific comment to make on the plan.	representation, but would make the more general point that Natural England have made no comments along the lines of those made by CBMDC, suggesting that unlike CBMDC it has no concerns re the treatment of biodiversity within the NP.
General	HCRS001/1	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.	While it would have been useful if the representor had pinpointed exactly the reference in question, the PC has no problem with the principle raised and would be agreeable to 'town proofing' the text to ensure no such references are included in the final version of the NP.
General	HCRS007/10 (Harworth Group PLC)	Overall, we are supportive of the provisions of the Neighbourhood Plan with exception to the comments set out above (<i>NB in representor comments HCRS007/1-9</i>)	The PC welcomes this general support.
General	HCRS002/1 (Gladman Developments Ltd)	<i>This representation presents information on NDP legal requirements, the revised NPPF, the NPPF/PPG relationship, PPG and NDP/Local Plan relationships – it does not however seem to relate this information to any NDP content. As such the text of the representation is not included here.</i>	The PC has no comment to make.
General	HCRS002/4 (Gladman Developments Ltd)	Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community.	The PC is confident that the NP meets the basic conditions in

		<p>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 policies contained in the development plan, for the reasons set out above.</p>	<p>respect both of national policy and the strategic elements of the Local Plan and that it has demonstrated such in the Basic Conditions Statement accompanying the plan. As a matter of fact, the PC would contend that contrary to the representor's assertion, they have sought only to clarify the relation of 7 of the NP's built heritage policies with the requirements of national planning policy and the strategic policies of the wider area, rather than the relation of the whole plan. Finally, the PC is also confident that the NP meets the basic condition pertaining to the achievement of sustainable development and that this is demonstrated in the sustainability assessment which forms part of the Basic Conditions Statement – it is noted that the representor offers no evidence in support of the view that the NP does not meet this basic condition. As a matter of accuracy, the PC notes that the basic condition relating to strategic policies as quoted by the representor should in fact be labelled e) rather than d). Similarly, in the cases of a), d) and c) the words 'or neighbourhood</p>
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			plan' should be included in brackets.
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