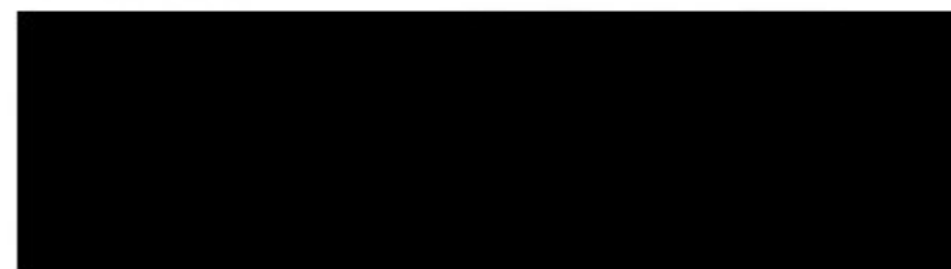




YORKSHIRE

Local Plan Team,  
Britannia House (4th floor),  
Hall Ings,  
Bradford,  
BD1 1HX

Our ref: PL00752983  
Your ref:



13<sup>th</sup> September 2021

Dear Sir or Madam ,

**Ilkley Neighbourhood Development Plan for Ilkley Town Council  
Regulation 16, Neighbourhood Planning (General) Regulations 2012  
Neighbourhood Plan Submission Consultation**

Thank you for consulting Historic England on the Submission Draft of the Ilkley Neighbourhood Plan.

We note that none of the Statutory Consultees (Natural England, the Environment Agency and Historic England) were consulted at Regulation 14, Pre-submission stage, as per the Neighbourhood Planning (General) Regulations 2012.

We therefore do not wish to comment on proposed Neighbourhood Plan until such time as we have had the opportunity to comment on, and contribute to the Regulation 12, Pre-submission draft of the Neighbourhood Plan.

Yours sincerely



Craig Broadwith  
Historic Places Adviser





YORKSHIRE

Mr. Iain Cunningham,  
Local Plan Team,  
Britannia House (4th floor),  
Hall Ings,  
Bradford,  
BD1 1HX

Our ref: PL00752983  
Your ref:

Telephone  
Mobile



16<sup>th</sup> September 2021

Dear Mr. Cunningham,

**Ilkley Neighbourhood Development Plan for Ilkley Town Council  
Regulation 16, Neighbourhood Planning (General) Regulations 2012  
Neighbourhood Plan Submission Consultation**

Thank you for consulting Historic England on the Submission Draft of the Ilkley Neighbourhood Plan. We are responding to the request in your e-mail of 14<sup>th</sup> September 2021.

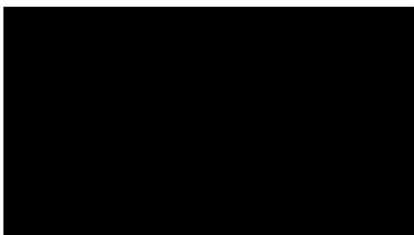
We have highlighted the fact that none of the Statutory Consultees (Natural England, the Environment Agency and Historic England) were consulted at Regulation 14, Pre-submission stage, as per the Neighbourhood Planning (General) Regulations 2012. We are therefore providing comments on the understanding that the Submission Draft may need to be amended, and if this is the case, a further consultation may be required.

Section/ Para./ Policy	Comment	Recommendation (amendments in <i>italic</i> )
INDP1	Policy item d) does not refer to “heritage assets” whether designated or non-designated. See Glossary item regarding Heritage Assets below.	Re-word policy as follows: “Would not have a significant adverse impact on a listed building and/or Conservation Area or other heritage asset or the setting of such an asset.”
INDP1	Policy item d) refers to Listed Buildings, but the document does not define a Listed Building, or identify them in a schedule or on a map, or via a hyper link.	<ul style="list-style-type: none"> <li>• Include a definition of a Listed Building within the Glossary.</li> <li>• Incorporate a map and schedule of Listed Buildings within the Neighbourhood Plan area, and/or include a hyper link to Historic England’s Listing web page, highlighting Listed Buildings in <a href="#">Ilkley</a>.</li> </ul>

5.27	This paragraph states that “all CBMDC Conservation Area Appraisals should be updated every 5 years”. However, Ben Rhydding and Ilkley’s were last appraised in 2006, whilst Middleton’s was appraised in 2009. The Conservation Area Assessments date from 2003, 2002 and 2003 respectively.	An opportunity exists for the community to review the Conservation Areas, in conjunction with Council, to assess their current condition, whether the boundary remains appropriate, and whether change since the last appraisal has been positive, neutral or negative. Policies and recommendations could be developed and incorporated within the Neighbourhood Plan to enhance the protection of the Conservation Areas.
Glossary	Heritage Assets are defined within the Glossary, but the document does not specifically identify them. Where policies relate to non-designated heritage assets, the absence of a schedule or map identifying them could lead to unnecessary disputes, or misunderstandings.	Incorporate a map and schedule of non-designated heritage assets (based upon the guidance set out in Historic England’s “ <a href="#">Local Heritage Listing</a> ”) into the document and include policies specifically relating to them, whether within or outside the conservation areas.
Glossary	Scheduled Monuments (SM’s) are mentioned in the glossary entry for “Designated Heritage Assets”, but not referred to anywhere else in the document, although there are 70 SM’s within the Neighbourhood Plan boundary.	<ul style="list-style-type: none"> <li>• Include a definition of a Scheduled Monument within the Glossary.</li> <li>• Incorporate appropriate policies, a map and schedule of Scheduled Monuments within the Neighbourhood Plan area, and/or include a hyper link to Historic England’s Listing web page, highlighting Scheduled Monuments in <a href="#">Ilkley</a>.</li> </ul>

We trust the above comments are helpful.

Yours sincerely



E-mail: 

