

For Office Use only:	
Date	22.10.2019
Ref	SwES002-1

**The Neighbourhood Planning (General) Regulations 2012
Regulation 16 – Publicising a Plan Proposal**

COMMENT FORM

**PUBLICATION OF THE STEETON WITH EASTBURN & SILSDEN NEIGHBOURHOOD DEVELOPMENT PLAN PROPOSAL - SUBMITTED TO BRADFORD METROPOLITAN DISTRICT COUNCIL FOR EXAMINATION
TUESDAY 17TH SEPTEMBER 2019 TO 5PM TUESDAY 29TH OCTOBER 2019**

The Steeton with Eastburn & Silsden Neighbourhood Development Plan, prepared by Steeton with Eastburn Parish Council and Silsden Town Council, has been submitted to Bradford Council for examination. The Council must now publicise the plan proposal and supporting documents and seek comments.

Please use this comment form to submit your views on the proposal. Details of how to view the proposed plan and supporting documents are available on the Council's website: <https://www.bradford.gov.uk/consultations>.

PART A: PERSONAL DETAILS

Response forms must include a name and address otherwise your comments will not be taken into account.

	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title	█	
Full Name	██████████	
Job Title (where relevant)	N/a	
Organisation (where relevant)	N/a	
Address	████████████████████	
Post Code	██████████	
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How to submit your Comment Form:

Please return completed comment forms by **5pm on Tuesday 29th October 2019** to:

- **E-mail:** planning.policy@bradford.gov.uk
- **Post:** Local Plans Team, Bradford Council,
4th Floor Britannia House, Broadway, Bradford, BD1 5RW

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Date: 22.10.2019

Ref

Ref: SwES002-1

The Neighbourhood Planning (General) Regulations 2012

Regulation 16 – Publicising a Plan Proposal

Steeton with Eastburn & Silsden Neighbourhood Development Plan

PART

B – YOUR COMMENTS

Please use a separate Part B sheet for each comment. Additional forms can be downloaded from the web page.

1. To which document does your comment relate? Please place an 'X' in one box only

Neighbourhood Development Plan

Basic Conditions Statement

Consultation Statement

X

Other (please specify)

2. To which part of the document does your comment relate?

Whole document

Section

Policy X

Page Number

Appendix

5 (item 1.4)

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

Support

Object

X

Make an observation

4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

It is stated "All minutes of the Working Group were available online" (followed by footnote 4)

I object to this on the basis that the residents of Silsden have never had access to the working groups minutes. In fact it is very clear that they have been denied that access, by NOT making the documents available throughout the consultation process, since 2014 in Silsden.

Furthermore the residents of Silsden have neither been notified that they should be looking at another parish councils website in order to access the minutes. Silsden is the largest town and populated community within this proposal yet it is strangely unusual that the community as a whole have never been kept updated and never had access to any minutes or indeed progress of the working group in Silsden itself.

Silsden Town Council has not got it's own website and though it does to a very limited extent use silsden.net (a private website..not run by the council) there have been no published working group minutes regarding this proposal or indeed any part of it available. Furthermore there has been NO advertisement as to the working groups actions including this present submission on its community Silsden Town Council noticeboard or indeed the Steeton and Eastburn noticeboard, located outside the Post Office.

In addition the Silsden, Steeton and Eastburn Neighbourhood Plan Facebook site was created in March 2015 and its last posting was in January 2017. There has been no updates for almost three years, so there has not been any availability to be kept informed on that site. In effect it has been defunct.

The whole Parish of Silsden have thus NOT been informed and included effectively in the consultation process and have not met their obligations under the criteria required to ensure that the community is kept updated as required to meet the government legislative requirements for a neighbourhood Plan, as found on Gov.net.

On the whole I would state the working group have never kept the residents of Silsden informed, in fact I would go so far to say that they have completely failed in their duties to keep the residents of Silsden informed at every stage since 2014.

5. Please place an 'X' in the box if you would like to be notified whether the plan proposal is made (adopted) by the Council or not:

X

Please contact Local Plans Team planning.policy@bradford.gov.uk or phone (01274) 433679.

For Office Use only:	
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Ref	SwES002-2

**The Neighbourhood Planning (General) Regulations 2012
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COMMENT FORM

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Regulation 16 – Publicising a Plan Proposal

Steeton with Eastburn & Silsden Neighbourhood Development Plan

PART

B – YOUR COMMENTS

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Neighbourhood Development Plan

Basic Conditions Statement

Consultation Statement

X

Other (please specify)

2. To which part of the document does your comment relate?

Whole document

Section

Policy X

Page Number

Appendix

6 (item 2.2)

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

Support

Object

X

Make an observation

4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

The positive aspects are subjective:

- **Small, friendly communities (Silsden is not particularly a small community; What defines the communities as being 'friendly?...Where is the evidence for these statements?)**
- **Easy access to the beautiful countryside on the doorstep and further afield – the coast, Lakes, Dales (These aspects have NO relevance to the requirement for a neighbourhood plan)**
- **Good rail links (What defines good; the rail network that travels between the communities is NOT a reason that defines a requirement towards the creation of a neighbourhood plan. In fact it can be argued that the railway line itself dissects the communities making them distinct from each other. A similar argument by the River Aire and the A629.**
- **Good, independent local shops (There are very few shops in Steeton with Eastburn)**
- **Low levels of crime (Uk Crime Statistics show that in comparison to sept 2014 violent crime has risen from 15 to 67 in sept 2018. Shoplifting has nearly doubled and vehicle crimes have risen. In all there were 146 crimes reported in sept 2014 and this has consistently increased, rising to 201 crimes in sept 2017 then 171 in sept 2018. This years crime statistics have yet to be published. Though these crime levels are low compared to other areas of Bradford the crimes are clearly steadily rising.**

If these are the only positive attributes between the communities I do Not think they offer any consensus.

Though it is said that these are positive aspects taken as answers from questionnaires that does not necessarily make them the right reasons or indeed good enough reasons for consensus towards a neighbourhood plan.

The statements set forward by this proposal does not explain why the proposal is an appropriate area as required under regulation 5 of the Neighbourhood Planning (General) Regulations 2012.

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X

6. Signature:

Date:

9th October 2019

Please contact Local Plans Team planning.policy@bradford.gov.uk or phone (01274) 433679.

For Office Use only:	
Date	22.10.2019
Ref	SwES002-3

The Neighbourhood Planning (General) Regulations 2012
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COMMENT FORM

PUBLICATION OF THE STEETON WITH EASTBURN & SILSDEN NEIGHBOURHOOD DEVELOPMENT PLAN PROPOSAL - SUBMITTED TO BRADFORD METROPOLITAN DISTRICT COUNCIL FOR EXAMINATION
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Steeton with Eastburn & Silsden Neighbourhood Development Plan

PART

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Basic Conditions Statement

Consultation Statement

Other (please specify)

2. To which part of the document does your comment relate?

Whole document

Section

Policy

Page Number

Appendix

8 (item 2.5)

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

Support

Object

Make an observation

4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

It is stated that opportunities to meet were offered and that unfortunately only two responses were received.

It does not state how the opportunities were offered, what follow ups did they did to engage more, especially knowing that only two responses were received.

Given that it is said that the working group were keen to engage local business the working group does not appear to have made any good effort to do so. It may be that the local businesses aren't interested in this neighbourhood plan proposal.

What have they done to engage?...they say they have sought to engage but it appears NO engagement has really been done.

Given that it's a Neighbourhood plan it does appear that the local business community have NOT been engaged and thus the proposed Neighbourhood plan has no viewpoint or input from the business community.

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6. Signature:

Date:



9th October 2019

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Ref	SwES002-4

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Steeton with Eastburn & Silsden Neighbourhood Development Plan

PART

B – YOUR COMMENTS

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1. To which document does your comment relate? Please place an 'X' in one box only

Neighbourhood Development Plan

Basic Conditions Statement

Consultation Statement **X**

Other (please specify)

2. To which part of the document does your comment relate?

Whole document

Section

Policy X

Page Number

Appendix

9 (item 2.9)

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

Support

Object **X**

Make an observation

4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

It is stated that the consultation draft document was made available online on Facebook.

Where is the evidence of these been made available on Facebook? There is also no reference to whether this was a closed Facebook group or an open Facebook site and it does not say what was the name of the Facebook site. What dates?

Why wasn't there a public Neighbourhood Plan website specifically created for this proposal where all the documents, minutes and working progress could be viewed anytime?

Having looked into the transparency of this Facebook site I conclude that it was made on the 19th March 2015 and its last posting was on the 29th January 2017. There has been NO updates for nearly three years.

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X

6. Signature:

Date:



9th October 2019

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Ref	SwES002-5

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Date: 22.10.2019
Ref: SwES002-5

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Regulation 16 – Publicising a Plan Proposal

Steeton with Eastburn & Silsden Neighbourhood Development Plan

PART

B – YOUR COMMENTS

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1. To which document does your comment relate? Please place an 'X' in one box only

Neighbourhood Development Plan Basic Conditions Statement
 Consultation Statement Other (please specify)

2. To which part of the document does your comment relate?

Whole document Section Policy

Page Number Appendix

Complete Document

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

Support Object Make an observation

4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

I refer you to the planning inspectorate report (2016) : Report to the City of Bradford Metropolitan District Council and Report on the Examination of the Local Plan for the Bradford District Core Strategy Development Plan Document (adopted) items 171 and 170.

171. Some participants sought higher apportionments for Steeton and Thornton, since these are sustainable and accessible settlements, which might have the capacity to accommodate more growth. However, the latest SHLAA confirms that, whilst there are sufficient potential housing sites to meet the proposed apportionments, higher levels of development would probably involve greater loss of Green Belt land and/or development in flood risk areas. Some compare Steeton with Silsden, but these settlements have different characteristics, with the latter having more facilities, more potential land available without using Green Belt, and easy access to the railway station at Steeton.

The planning inspectorate reports specifically identify the facts that Silsden and Steeton with Eastburn have very different settlement characteristics.

170. Silsden is a hub for the upper Airedale/Wharfedale communities.

There is therefore no basis for a Neighbourhood Plan between the two communities. The only commonality is that both are designated as growth centres. Silsden is a sufficiently self contained community that has connections more to the north than to the south.

As a resident of Silsden of over 16 years I would sincerely doubt that anyone living here would say that Silsden has similar characteristics with Steeton and Eastburn, because it is evidently clear that geographically Silsden is totally separated by a wide valley, and more so by the dissection A629 dual carriageway, the River Aire and the Railway.

Continued...

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It would not be unreasonable to state that the people of Silsden, when travelling by private transport such as a car, motorcycle or bicycle have very little reason to go anywhere near Steeton or Eastburn, because the road connections through, to and from Silsden have strong routes to either the A629 dual carriageway, to Addingham and the Wharfe Valley, Kildwick or to Riddlesden. In effect there is little reason to actually go to Steeton and Eastburn other than maybe for hospital usage. Congestion affects the roads around the A629 and Steeton with Eastburn, and this factor denies any reasonable usage of the roads, putting many people off should they feel the need to travel that way. The congestion in effect acts as 'mental and physical' barrier to many people, similar to the traffic holdups at the Kildwick level crossing. Silsden people, I would say mostly stay away from that side of the valley because of the traffic congestion.

Even direct public transport from Silsden to Steeton is limited as the bus turns away from much of Steeton to Keighley. There is NO direct public transport to Eastburn, without having to connect with a second bus.

Recent school statistics also reveal that very few people from Steeton actually take their children to school in Silsden (3) and I doubt that there are anyone utilising the two primary schools in Steeton with Eastburn from Silsden.

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X

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Regulation 16 – Publicising a Plan Proposal

Steeton with Eastburn & Silsden Neighbourhood Development Plan

PART

B – YOUR COMMENTS

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1. To which document does your comment relate? Please place an 'X' in one box only

Neighbourhood Development Plan X

Basic Conditions Statement

Consultation Statement

Other (please specify)

2. To which part of the document does your comment relate?

Whole document X

Section

Policy

Page Number

Appendix

All pages with plans and graphics

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

Support

Object

Make an observation X

4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

Having viewed the whole document submitted I am utterly concerned because the plans and images are of such poor quality that they cannot be effectively viewed or utilised for any purpose (including this submission)

Not only is there no consistent scale, for the drawings to enable comparison of what each is trying to demonstrate but many are of such poor resolution it is difficult to determine what each image is trying to achieve.

The overall quality is poor making them unreadable.

Not happy and totally unacceptable; the information presented should be clear, precise and certainly readable. Anyone trying to read them will instantly be put off.

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Date:



20th October 2019

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Date: 22.10.2019
Ref: SwES002-7

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Steeton with Eastburn & Silsden Neighbourhood Development Plan

PART

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Neighbourhood Development Plan Basic Conditions Statement
 Consultation Statement Other (please specify)

2. To which part of the document does your comment relate?

Whole document Section Policy

Page Number Appendix

Complete Document

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Support Object Make an observation

4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

The Neighbourhood Development Plan proposed fails to observe and concern that between the two con-joined proposed multi-parishes lies a significant wedge of landscape which belongs to the administrative boundaries of North Yorkshire. This landscape has not been considered or evaluated in the plan and in fact no mention of it can be found.

This North Yorkshire protrusion is a valuable rural contribution between the parishes and it is known that there was an historic byway extenuating from Sykes lane in Silsden across towards Eastburn, with a likely crossing of the River Aire. This historic factor has not been considered because the parish boundaries have been adhered to.

It would be significantly more appropriate to consider the North Yorkshire landscape within this proposal because of its bearing with the two Parishes. In essence a proposed Neighbourhood Plan for these two communities would be more appropriate and associative if the proposal was a cross boundary neighbourhood plan.

As it stands a significant part of the landscape between and surrounding Silsden along with Steeton and Eastburn has been omitted; which does not consider the wider impact of this proposal and that of the communities addressed here or nearby. It does not make sense to leave out the wider social and economic aspects that this proposal clearly does.

I thus object fully with the proposal as it stands. It does not address fully the wider landscape and the communities that people work in or utilise on a regular basis.

6. Signature:

Date:



22nd October 2019

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