

COMMENT FORM

For Office Use only:	
Date	29.10.2019
Ref	SwES015-1 to SwES015-9

**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)		
Organisation (where relevant)	Local Plans Team, City of Bradford Metropolitan District Council	
Address		
Post Code		
Email Address		
Telephone Number		

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

Any comments received after this date will not be accepted.

Data Protection Statement

Any information we receive will be processed in accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018. A Local Plan Privacy Statement sets out CBMDC Local Plan Team processes your personal data. This notice should also be read in conjunction with the Council's Corporate Privacy notice and other specific service notices, which are available at <https://www.bradford.gov.uk/privacy-notice/>

The Neighbourhood Planning (General) Regulations 2012
Regulation 16 – Publicising a Plan Proposal
Steeton with Eastburn & Silsden Neighbourhood
Development Plan

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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	See attachment	Basic Conditions Statement	
Consultation Statement		Other (please specify)	

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

Whole document	See attachment	Section	See attachment	Policy	See attachment
Page Number	See attachment	Appendix			

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

Support		Object		Make an observation	X
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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.

City of Bradford Metropolitan District Council has a number of comments/observations on the draft Steeton with Eastburn & Silsden Neighbourhood Development Plan. These centre on matters of presentation, typographical amendments and areas where further clarification is sought. These are detailed on the attached grid.

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:

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6. Signature:

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Date:

29.10.2019

Thank you for taking the time to complete this Comment Form.

**Steeton with Eastburn & Silsden Neighbourhood Development Plan
Regulation 16 Consultation (September/October 2019)
City of Bradford Metropolitan District Council Comments/Observations**

Representation Reference	Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
SwES015/1	Neighbourhood Plan	-	-	Officers from Bradford Council have during the preparation of the Steeton with Eastburn & Silsden Neighbourhood Development Plan sought to work with the qualifying body, providing input and guidance at each stage. This has been reflected within the plan and supporting document.
SwES015/2	Neighbourhood Plan	-	-	It is noted that an updated Planning Policy Assessment & Evidence Base Review is included a one of the key supporting documents for plan. However, it is suggested that clearer links to higher level policy and the evidence base should be included within the policies and supporting (where possible) as this will show how the plan builds upon them.
SwES015/3	Chapters 1 & 7	6, 7 & 68	-	Editing - both sections should be updated in the post-examination, and subsequent versions of the plan. It is suggested that Chapter 7 will not be required and should be deleted.
SwES015/4	Chapter 2	8	Para 2.1	Editing – this paragraph should be reviewed to give clarity of the
		8	Para 2.2	Editing – delete the word “can” from the second sentence and amend the final line to give greater clarity. <i>“Neighbourhood Development Plans (NDPs) are a relatively new part of the statutory development planning system. Just as local authorities, such as City of Bradford Metropolitan District Council (CBMDC), can produce development plans to promote, guide and control development of houses, businesses, open spaces and other uses of land for their areas, so, too, now, by preparing a NDP, can parish and town councils <u>can also do so by preparing a NDP.</u>”</i>
SwES015/5	Chapter 3	10	Figure 2	Editing – this figure should be updated in the post-examination and subsequent versions of the plan to reflect the relevant stage.
		11	Paras 3.3 & 3.4	Editing – the text should be updated in the post-examination version of the plan
SwES015/6	Chapter 4	15	Para 4.9	May wish to consider how quickly parts of the profile information may change and date the plan.
		15	Para 4.11	Always worth comparing percentage (working from home) against another source (England average for example). There is not necessarily a logical connection between working at home and need for expansion space – if this forms the basis for policy decisions / directions – where is the evidence?
		17 & 18	Various	See earlier comments in relation to material quickly dating.
		20	Para 4.30	Factual update – planning permission for the new Silsden Primary School was granted in June 2018. It is suggested that the 5 th , 6 th and 7 th sentences amended in the post-examination version of the plan to reflect this
SwES015/7	Chapter 5	29 to 33	-	As well as being in conformity with strategic planning policy produced by CBMDC, the neighbourhood plan should also be in conformity with national planning policy – the National Planning Policy Framework and Planning Practice Guidance, in particular. Accordingly, it is suggested that reference to national policy is included within the chapter. In relation to CBMDC planning policy, it is noted that the plan

				<p>highlights the on-going partially review of the Core Strategy DPD. In addition to the scoping consultation (mentioned in the plan), a Preferred Options version of the Core Strategy Partial Review was issued for public consultation between late July and mid-September 2019.</p> <p>CBMDC are also in the process of preparing an Allocations DPD, that will identify future site allocations for a range of development. A Preferred Options version will be published in 2020.</p>
SwES015/8	Chapter 6	35 & 36	Policy SWES1(a)	Editing – delete reference to policy SWES15 and replace with reference to policy SWES13
		36 & 37	Policy SWES2(e)	It is suggested that this criteria be amended to include a reference to ensuring that future housing can be adapted to meet the lifetime needs of existing/future occupants.
		36 & 37	Policy SWES2(f)	“design out crime” – does this need to be in speech marks within the main body of the policy?
		36 & 37	Policy SWES2(j)	Edit – There should be suitable provision of suitable space...
		38	Policy SWES3	Net or gross dwellings per hectare? Higher densities encouraged rather than just considered? Particularly in light of NPPF changes.
		40 to 42	Policy SWES4	Whilst the policy contains a list non-designated heritage assets and the supporting text refers to the use of Historic England guidance in determining it, it is considered useful if any assessment that was undertaken is published alongside the plan either within the evidence base or as an appendix. Alternatively further justification for the policy approach should be set out.
		43 & 44	Policy SWES5 & Supporting Text	Both the policy and the supporting text refer to non-designated biodiversity and geodiversity sites. Greater explanation should be provided within the plan outlining what these designations are and how they have been identified. It may be useful to give examples
		43 & 44	Para 6.20	<p>This paragraph of the plan should be updated to reflect changes in the terminology used to describe nature conservation designations within the neighbourhood plan area. This due to West Yorkshire currently going through a process of reassessing and merging old designated local sites (SEGI/SSI/LNA/WNA/SWS and BWA) into a single LWS designation.</p> <p>Accordingly sites identified as Site of Ecological & Geological Importance (SEGI) and Bradford Wildlife Areas (BWA) should be called Local Wildlife Sites (LWS), where they were assessed under the stricter criteria, whilst those identified as Regionally Important Geological Sites (RIGS) should be known as Local Geological Sites (LGS). Those sites which failed to meet the criteria still remain within the Bradford Ecological Habitat Network (Silsden Reservoir BWA; White Crag Plantation BWA; Rivoock Edge Plantation BWA; and Spring Crag/Alder Wood BWA)</p> <p>In addition, it should be noted that the listed of designated sites should be amended. West Yorkshire Ecology holds records for all designated sites within the sub-region. Should the examiner (and the councils) require this information, CBMDC can assist in obtaining it.</p> <p>The paragraph should include the following list of sites:</p>

			<p><u>Special Protection Area/Special Area of Conservations/Site of Special Scientific Interest</u></p> <ul style="list-style-type: none"> • South Pennine Moors <p><u>Local Geological Sites (LGS)</u></p> <ul style="list-style-type: none"> • Addingham Edge Millstone Quarry • Doubler Stones • Throstle Nest, Silsden <p><u>Local Wildlife Sites</u></p> <p>Silsden Town Area</p> <ul style="list-style-type: none"> • Brackenhill Ghyll* • Brown Bank Marsh** • Elam Wood* • Gillgrange Wood • Great Gill* • Jacobs Beck/Holden Wood* • Leeds & Liverpool Canal • Low Wood* • Silsden Reservoir Woodland* • Spring Crag & Alder Wood* • Swartha Wood* <p>Steeton with Eastburn Parish Area</p> <ul style="list-style-type: none"> • Curren Wood* • Hawkcliffe Wood* • Steeton Reservoir** <p>* Site previously identified in RUDP as a Bradford Wildlife Area ** Site previously identified in RUDP as a Site of Ecological & Geological Importance</p>
		47 & 48	<p>Policy SWES7</p> <p>The reference to protection and enhancement of the Green and Blue Infrastructure network is welcomed. However, it would be helpful to understand how the network described was identified and what evidence was used to support it. Also it is suggested a map showing this network is included within the plan and/or as part of the Policies Map.</p>
		52 & 53	<p>Policy SWES9(e)</p> <p>The wording of this policy in relation to the provision of education infrastructure is considered to be very prescriptive in terms of identifying specific schools where future expansion should take place.</p> <p>Where planning applications for residential development that potentially may generate a need for school places or infrastructure are received, CBMDC's education place planning team will consulted for their view/evaluation on whether or not there is capacity in local schools to accommodate demand and how this should be addressed. This may or may not result in a developer contribution being sought. Accordingly, it is suggested that references to expanding specific schools is removed as this will be dealt with at the planning application stage.</p> <p>Also the inclusion of school place data, which is a snapshot in time, will ensure that the policy is dated. Should the details about school capacity/possible expansion still needed it is considered that this</p>

				should be in the supporting text for the policy.
			Policy SWES11 & Policies Map 1	The policy states that boundary for the Silsden Local Centre is shown on Policies Map 1. However, this boundary is not shown. For the post examination version, Policies Map 1 should be amended to include this boundary. This should be consistent with show in the saved Bradford Replacement Unitary Development Plan (2005).
		58 to 60	Policy SWES13 & Policies Map	<p>It is considered that the boundaries of the two of the sites identified as being protected from employment purposes should be amended in the post-examination version of the plan:</p> <p>SWES13/4: Howden Road (Waterloo Mills), Silsden – the boundary of this location should be amended as the western section of this site has already been redeveloped for residential development. It is recommended that the site boundary be re-drawn to reflect this.</p> <p>SWES13/12: Old Goods Yard, Old Station Road, Steeton – the boundary of this site, as shown on the Policies Map include an area of land to the south that was identified in the Bradford Open Space Assessment (2006) as an area of amenity greenspace. It is considered that the boundary of the site be revised to exclude this area.</p>
			Policy SWES18	There potential for policy conflict between this policy and others should additional recreational activities are brought into the neighbourhood area. It is suggested that this can be address by included reference to Local Plan Core Strategy DPD Policy SC8 within the policy, to ensure that future tourism development is in accordance with its provisions.
SwES015/9	SA/HRA	-	-	CBMDC agree with the conclusions of the SEA/HRA screening assessment as the neighbourhood plan does seek to support or included development over and above that proposed in the existing Bradford Local Plan: Core Strategy DPD (2017)