

**Steeton with Eastburn and Silsden Neighbourhood Plan**

<b>Respondent ID</b>	SwES001	<b>Name &amp; Organisation</b>	Airedale NHS Foundation Trust		<b>Agent Name &amp; Organisation</b>	DAC Beechcroft LLP	
<b>Date Received</b>	16.10.2019	<b>Document</b>	Consultation Statement	<b>Policy/Paragraph</b>	Whole Document	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<p>Airedale NHS Foundation Trust received the letter to statutory consultees shown in Appendix 8 of the Consultation Statement by email from the Clerk to Steeton-with-Eastburn Parish Council on 3 February 2017. The Trust prepared a response objecting to SWES17 in relation to the land owned by the Trust and this was emailed to the Clerk (as requested in the letter and the representation form) on 16 March 2017 as attached to this form.</p> <p>We note that the Trust's consultation response is not referred to in the Consultation Statement and the points raised have not been addressed in the submission plan. The Trust has made further comments on the submission plan itself and trusts that these matters will be properly addressed at this stage. The Trust nevertheless feels that the examiner should be aware that the Consultation Statement is, at least in this respect, not complete.</p>							
<b>Representation Reference</b>				SwES001-1			

<b>Respondent ID</b>	SwES001	<b>Name &amp; Organisation</b>	Airedale NHS Foundation Trust		<b>Agent Name &amp; Organisation</b>	DAC Beechcroft LLP	
<b>Date Received</b>	16.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	SWES17/7	<b>Nature of Representation</b>	Object
<b>Comment Details</b>							
<p>Airedale NHS Foundation Trust is the owner of Airedale Hospital Sports Ground, which is identified in the submission version of the Neighbourhood Plan as a site to be protected under policy SWES17 for sport and recreation uses.</p> <p>Whilst welcoming the aims of Policy SWES17, the Trust notes that the Policy is intended to protect existing recreation sites that already provide sport and recreation facilities for the community in order to prevent the net loss of facilities resulting from future development.</p> <p>The Hospital Sports Ground was established by the Trust to provide facilities solely for hospital staff. Neither the field nor the clubhouse were never made available for use by members of the public on any sort of basis. The Hospital Sports Ground was always operated with the financial support of the Trust until this support became unsustainable. At that point, around 15 years ago, the Hospital Sports Ground was closed.</p> <p>Following closure, the Hospital Sports Ground has been kept secure but has not been laid out or maintained for any form of sport or recreational use. The clubhouse was demolished in 2018 and the site is currently unmanaged grassland. The land is now only used to provide a landing area for the air ambulances as and when required and</p>							

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any return to sports or recreational use would be incompatible with air ambulance use. The Trust does not therefore foresee any likelihood of the land being reopened for sports and recreational use by hospital staff or for public use.

Public access to the land has not been permitted at any time. If permitted, public access could only be achieved using the public bridleway and footpath which lie to the south of the land. There is no public vehicular route to the land and no means or prospect of providing such a route.

The Trust objects to the inclusion of the Hospital Sports Ground within Policy SWES17 because it does not provide any sports or recreational facilities, has never provided such facilities for community use, and there is no prospect of facilities suitable for community use being provided on this land in the future, not least because of the lack of suitable public access. It would be wrong for the Policy to be applied to this area of land in order to protect a use that has not, does not and will not exist in the future.

The Trust is aware that the Hospital Sports Ground was identified as a playing field for the purposes of saved Policy OS3 of the Replacement Unitary Development Plan. However, it is not clear why the Hospital Sports Ground was included in Policy OS3 in the first place. The supporting text to Policy OS3 refers to “demand for bookable playing field provision”. The Hospital Sports Ground has never been bookable in the way that Policy OS3 requires. The Hospital Sports Ground was in use by the hospital at the time of the Replacement Unitary Development Plan was prepared and is marked as a sports ground on Ordnance Survey maps; it is entirely possible, therefore, no consideration was given at that time to the way in which the ground was actually used and operated. The inclusion of the Hospital Sports Ground in Policy OS3 several years ago does not justify its inclusion on policy SWES17 now.

Policy SWES17 seeks, rightly, to complement policy EN1 of the adopted Core Strategy. Policy EN1 applies to “land identified as recreation open space which is currently or was formerly used for recreation open space”. Although the Core Strategy does not list the sites identified, it is clear from the text associated with Policy EN1 that this policy is intended to apply to the land identified in the Bradford Open Space, Sport and Recreation Study and the Bradford Playing Pitch Strategy Final Assessment, being the most recent assessments of identified provision. Neither of these assessments identify the Hospital Sports Ground as providing recreation open space. Accordingly, the Core Strategy Policy EN1 does not apply to the Hospital Sports Ground.

For the reasons set out above, the inclusion of the Hospital Sports Ground (or, more correctly, the former Hospital Sports Ground) within policy SWES17 would not be in conformity with the Development Plan and would not comply with the aims of the Policy itself or contribute to the achievement of sustainable development. The Trust therefore objects to inclusion of the Hospital Sports Ground and requests that it is removed from Policy SWES17.

<b>Representation Reference</b>	SwES001-2
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Respondent ID	SwES001	Name & Organisation	Airedale NHS Foundation Trust		Agent Name & Organisation	DAC Beechcroft LLP	
Date Received	16.10.2019	Document	NDP	Policy/Paragraph	SWES17/8	Nature of Representation	Object
<b>Comment Details</b>							

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Airedale NHS Foundation Trust is the owner of the area of land lying between Airedale General Hospital and the B6265, which is shaded brown on the submission policies map as a site to be protected under policy SWES17 for sport and recreation uses. The site is not labelled but the Trust understands that the reference in Policy SWES17/8 to “Airedale Mews Gardens” is a reference to this land.

Whilst welcoming the aims of Policy SWES17, the Trust notes that the Policy is intended to protect existing recreation sites that already provide sport and recreation facilities for the community in order to prevent the net loss of facilities resulting from future development.

Airedale Mews Gardens (as so described in Policy SWES17/8) is a landscaped area that has never provided such facilities for community use and there are no proposals to provide such facilities in the future. It would be wrong therefore for the policy to be applied to this area of land in order to protect the use that has not, does not and will not exist in future.

The land is currently subdivided into three sections by wooden fencing and comprises a section of mown grass at the western end, a central section of juvenile tree planting and unmanaged grass, and a further section of juvenile tree planting at the western end. A mature tree line runs along the northern boundary of the site.

The land was part of the development of hospital accommodation for which planning permission was granted in 2003 (application 03/00039/FUL), forming part of the landscaping scheme approved in accordance with condition 14 of that planning permission. A footpath/cyclepath linking the accommodation block to the main road was required by condition 4 of the planning permission and this runs across the western section of the site.

The land is not used for sports and recreation as envisioned by Policy SWES17, or even as a garden, as the name allocated to it in the submission version of the Neighbourhood Plan suggests. This area of land is a landscape buffer between the main road and the hospital buildings. It does not function as recreation land, either for residents of the nearby accommodation block (for whom recreational land is provided to the west of the accommodation block itself) or the public. Any access by members of the public to this area, whether via the footpath link or by crossing the boundary wall, would be unauthorised. A notice erected alongside the footpath link expressly prohibits dogs from using this area.

The land is identified as a “Village Green Space” for the purposes of saved Policy OS7 of the Replacement Unitary Development Plan, specifically because it “maintains the open aspect along Main Road and the setting of the listed Eastburn House”. The Trust feels that this is a fair and accurate description of the purpose of the land under the 2003 planning permission. A sports and recreation use would clearly not be consistent with this designation and therefore the Neighbourhood Plan would not be in conformity with the existing local plan in this respect.

The Trust notes that the submission version of the Neighbourhood Plan identifies, in Policy SWES16, Local Green Spaces in accordance with paragraphs 99 and 100 of the National Planning Policy Framework. It is clear that this area of land would not qualify as a Local Green Space for those purposes and it is therefore properly not included in Policy SWES16. The inability to include this land within Policy SWES16 does not, however, justify its inclusion within Policy SWES17.

For the reasons set out above, the inclusion of this land within Policy SWES17 would be in conformity with the Development Plan and would not comply with the aims of the policy itself or contribute to the achievement of sustainable development. The Trust therefore objects to the inclusion of this land and requests that it is removed from Policy SWES17.

**Representation Reference**

SwES001-3

Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Respondent ID</b>	SwES002	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	22.10.2019	<b>Document</b>	Consultation Statement	<b>Policy/Paragraph</b>	Paragraph 1.4 (page 5)	<b>Nature of Representation</b>	Object
<b>Comment Details</b>							
<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>							
<b>Representation Reference</b>				SwES002-1			

<b>Respondent ID</b>	SwES002	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	22.10.2019	<b>Document</b>	Consultation Statement	<b>Policy/Paragraph</b>	Paragraph 2.2 (page 6)	<b>Nature of Representation</b>	Object

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Comment Details	
<p>The positive aspects are subjective:</p> <ul style="list-style-type: none"> <li>• Small, friendly communities (Silsden is not particularly a small community; What defines the communities as being ‘friendly?...Where is the evidence for these statements?)</li> <li>• 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)</li> <li>• 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.</li> <li>• Good, independent local shops (There are very few shops in Steeton with Eastburn)</li> <li>• 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.</li> </ul> <p>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.</p> <p>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.</p>	
Representation Reference	SwES002-2

Respondent ID	SwES002	Name & Organisation	Resident		Agent Name & Organisation		
Date Received	22.10.2019	Document	Consultation Statement	Policy/Paragraph	Paragraph 2.5 (Page 8)	Nature of Representation	Object
Comment Details							
<p>It is stated that opportunities to meet were offered and that unfortunately only two responses were received.</p> <p>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.</p>							

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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.

<b>Representation Reference</b>	SwES002-3
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<b>Respondent ID</b>	SwES002	<b>Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>			
<b>Date Received</b>	22.10.2019	<b>Document</b>	Consultation Statement	<b>Policy/Paragraph</b>	Paragraph 2.9 (Page 9)	<b>Nature of Representation</b>	Object

**Comment Details**

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.

<b>Representation Reference</b>	SwES002-4
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<b>Respondent ID</b>	SwES002	<b>Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>			
<b>Date Received</b>	22.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Whole Document	<b>Nature of Representation</b>	Object

**Comment Details**

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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.

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.

<b>Representation Reference</b>	SwES002-5
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<b>Respondent ID</b>	SwES002	<b>Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>	
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**Steeton with Eastburn and Silsden Neighbourhood Plan**

<b>Date Received</b>	22.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Whole Document (All plans & graphics)	<b>Nature of Representation</b>	Object/Observation
<b>Comment Details</b>							
<p>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)</p> <p>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.</p> <p>The overall quality is poor making them unreadable.</p> <p>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.</p>							
<b>Representation Reference</b>				SwES002-6			

<b>Respondent ID</b>	SwES002	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	22.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Whole Document	<b>Nature of Representation</b>	Object
<b>Comment Details</b>							
<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>							

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<b>Representation Reference</b>	SwES002-7
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<b>Respondent ID</b>	SwES003	<b>Name &amp; Organisation</b>	Barratt Homes & David Wilson Homes Yorkshire West	<b>Agent Name &amp; Organisation</b>	ID Planning		
<b>Date Received</b>	24.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Core Strategy (Pages 30 & 31)	<b>Nature of Representation</b>	Support

**Comment Details**

Barratt Homes and David Wilson Homes Yorkshire West support the growth strategy referred to in the Neighbourhood Plan as set out in the adopted Core Strategy. This correctly identifies Steeton with Eastburn and Silsden as being Local Growth Centres with 1,200 dwellings to be distributed to Silsden and 700 dwellings to Steeton with Eastburn.

It is stated that Steeton with Eastburn will require some local Green Belt changes in sustainable locations with good walking and cycling links to Silsden and Steeton railway and bus interchange station. We support the Neighbourhood Plan's inclusion of Core Strategy Policy AD1, which is based on key sustainable development principles.

The Neighbourhood Plan also duly refers to the recent consultation on the Partial Review of the Core Strategy but correctly states that given the early stages of the review the implications for the Neighbourhood Plan are very limited at this stage. We support this statement.

<b>Representation Reference</b>	SwES003-1
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<b>Respondent ID</b>	SwES003	<b>Name &amp; Organisation</b>	Barratt Homes & David Wilson Homes Yorkshire West	<b>Agent Name &amp; Organisation</b>	ID Planning		
<b>Date Received</b>	24.10.2019	<b>Document</b>	NPD	<b>Policy/Paragraph</b>	Objectives (Page 28)	<b>Nature of Representation</b>	Support

**Comment Details**

Barratt Homes and David Wilson Homes Yorkshire West support the objectives identified in the neighbourhood plan.

In particular support is provided for objective 1 (promoting sustainable housing development), objective 5 (to ensure that all new development includes suitable infrastructure to address its needs and any new impact it may have on the wider community) and objective 8 (to support improvements to the transport network that meet the needs of all users).

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Barratt Homes and David Wilson Homes Yorkshire West are promoting land off Summerhill Lane for allocation for residential use through Bradford Council's Land Allocations document. The allocation of this site would support the objectives set out in the Steeton with Eastburn and Silsden Neighbourhood Plan.

<b>Representation Reference</b>	SwES003-2
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<b>Respondent ID</b>	SwES003	<b>Name &amp; Organisation</b>	Barratt Homes & David Wilson Homes Yorkshire West		<b>Agent Name &amp; Organisation</b>	ID Planning	
<b>Date Received</b>	24.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Objective 8	<b>Nature of Representation</b>	Support

**Comment Details**

Barratt Homes and David Wilson Homes Yorkshire West support the Plan's commitment to improving the transport network. There is no policy in relation to local transport issues as it is acknowledged that many of the concerns raised are outside the scope of the planning system. The issues have been highlighted in the Plan as supporting actions to be addressed through related non-planning activity.

The supporting actions list includes improvements to car parking at Silsden and Steeton station. The site being promoted for residential allocation by Barratt Homes and David Wilson Homes Yorkshire West off Summerhill Lane is located in close proximity to the train station and may offer some potential to provide improvements to car parking as part of the residential development of the site.

<b>Representation Reference</b>	SwES003-3
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<b>Respondent ID</b>	SwES003	<b>Name &amp; Organisation</b>	Barratt Homes & David Wilson Homes Yorkshire West		<b>Agent Name &amp; Organisation</b>	ID Planning	
<b>Date Received</b>	24.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Policy SWES1	<b>Nature of Representation</b>	Support

**Comment Details**

Barratt Homes and David Wilson Homes Yorkshire West support policy SWES1 which sets out criteria for new development within the settlements of Steeton with Eastburn and Silsden.

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The supporting text to this policy confirms the Neighbourhood Plan does not seek to allocate land for housing on the basis that Green Belt land will be required to meet the identified need and this is a strategic planning policy matter. The Neighbourhood Plan acknowledges that this will be dealt with through the review of the Core Strategy and the Land Allocations Plan. We support this approach.

<b>Representation Reference</b>	SwES003-4
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<b>Respondent ID</b>	SwES003	<b>Name &amp; Organisation</b>	Barratt Homes & David Wilson Homes Yorkshire West	<b>Agent Name &amp; Organisation</b>	ID Planning		
<b>Date Received</b>	24.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Policy SWES2	<b>Nature of Representation</b>	Support

**Comment Details**

Barratt Homes and David Wilson Homes Yorkshire West support policy SWES2 which sets out criteria to ensure that new housing development is of a good quality design. The proposed policy accords with national planning policy in seeking to ensure development is of a high quality and that places are well designed.

<b>Representation Reference</b>	SwES003-5
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<b>Respondent ID</b>	SwES003	<b>Name &amp; Organisation</b>	Barratt Homes & David Wilson Homes Yorkshire West	<b>Agent Name &amp; Organisation</b>	ID Planning		
<b>Date Received</b>	24.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Policy SWES3	<b>Nature of Representation</b>	Support

**Comment Details**

Barratt Homes and David Wilson Homes Yorkshire West support policy SWES3 which seeks to ensure that new housing development in the neighbourhood area makes best and most effective use of land. The policy states that development should seek to achieve a minimum density of 30 dph but higher densities will be considered in areas within reasonable walking distance of the rail station and bus routes served by daily, frequent bus services. We support this approach to housing density.

<b>Representation Reference</b>	SwES003-6
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<b>Respondent ID</b>	SwES003	<b>Name &amp; Organisation</b>	Barratt Homes & David Wilson Homes Yorkshire West	<b>Agent Name &amp; Organisation</b>	ID Planning		
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Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Date Received</b>	24.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Policy SWES9	<b>Nature of Representation</b>	Support
<b>Comment Details</b>							
Barratt Homes and David Wilson Homes Yorkshire West support policy SWES9 which seeks to ensure that any identified additional infrastructure needs arising as a result of proposed new development must be addressed before planning permission is granted.							
<b>Representation Reference</b>				SwES003-7			

<b>Respondent ID</b>	SwES004	<b>Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>			
<b>Date Received</b>	26.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	-	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<p>I have lived in Steeton for 23 years, and it is a lovely part of the country: pleasant in its own right, and convenient for rural and urban attractions nearby.</p> <p>I would agree that the most important need we have at the moment is a pedestrian bridge to cross the busy A629 to make access to Silsden safer and easier (and more convenient for both pedestrians and motorists). This has been suggested/promised before, and nothing has come of it - it needs to be the priority.</p> <p>Public transport needs to be a lot better, particularly bus services - having had eye surgery recently (preventing me from driving) I have had to rely on public transport. Ilkley, for example, is only 7 miles away, but getting there from Steeton without a car is a day's excursion.</p> <p>I would also comment on the point that Steeton Primary school is "split site". This is true, but misleading: nobody has to cross a busy road to get from one building to another - it isn't unsafe - and the buildings are much closer to each other than some in schools which seemingly have "single site" accommodation. (I did Supply teaching work in many Bradford schools, and can confirm that, say, Nessfield Primary in Keighley has buildings further apart (causing kids to get wet in rainy weather) than those of Steeton Primary School. This is not an urgent priority that needs attention, in my opinion.</p> <p>PS - I do think that you need to make it easier for residents to reply to "consultation" notices; the faff I've had sending this might lead a more cynical person to believe that such consultations were merely paying lip-service to a legal requirement, and that you were doing your damndest to make sure that you got as few replies as possible.</p>							
<b>Representation Reference</b>				SwES004-1			

Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Respondent ID</b>	SwES005	<b>Name &amp; Organisation</b>	Coal Authority		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	27.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	-	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<p>As you will be aware the Neighbourhood Plan area lies within the current defined coalfield. According to the Coal Authority records there are risks from past coal mining activity including; mine entries and other mining legacy risks arising from unrecorded probable shallow coal workings.</p> <p>Some of the mine entries are located in the A6034 corridor around Cringles, others lie in the northern half of the plan area, whilst the main concentration of mine entries are located in the Robin Hood Wood area. The unrecorded probable shallow coal workings are predominantly located in the same broad areas.</p> <p>It would appear that the Neighbourhood Plan does not allocate any sites for future development and on this basis we have no specific comments to make.</p>							
<b>Representation Reference</b>				SwES005-1			
<b>Respondent ID</b>	SwES006	<b>Name &amp; Organisation</b>	Historic England		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	28.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	-	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<p>We write in response to your consultation regarding the Submission Draft of the Steeton with Eastburn and Silsden Town Council Neighbourhood Development Plan 2019-2030. We have previously provided advice and comments to Addingham Parish Council in our letter of 17 March 2017.</p> <p>Having carefully considered the Submission Draft of the Steeton with Eastburn and Silsden Town Council Neighbourhood Development Plan 2019-2030, we do not consider it necessary to provide any further comments.</p>							
<b>Representation Reference</b>				SwES006-1			
<b>Respondent ID</b>	SwES007	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		

Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Date Received</b>	28.10.2019	<b>Document</b>	NDP & Consultation Statement	<b>Policy/Paragraph</b>	Objective 5 (Pages 52 & 53)	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<b>Utility Supplies</b>							
Utility supplies need to be robust. Prior to any further development, a comprehensive & open assessment should be made to ascertain projected future requirements for all utilities. The requirements should then be compared against existing capacity. Systems and available supplies need to have built in contingency to ensure supply can be protected and re-established quickly in the event of failure. Areas at most risk need to be identified and impacts on residents and businesses acknowledged.							
<b>Representation Reference</b>				SwES007-1			

<b>Respondent ID</b>	SwES007	<b>Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>			
<b>Date Received</b>	28.10.2019	<b>Document</b>	NDP & Consultation Statement	<b>Policy/Paragraph</b>	Objective 8 (Pages 61 & 63)	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<b>Transport</b>							
Full infrastructure for road (car and public transport), rail, cycle and pedestrian routes that were detailed in the original RUDP need to be reinforced and adopted into the NHP. Infrastructure requirements must be planned and implemented ideally before, but certainly no later than directly alongside future developments. To that point, developments must not be allowed to become operational in advance of infrastructure linked to the development from being in situ and fully commissioned. Re-establish direct bus links between Silsden and those urban areas west of Silsden including Cross Hills and Skipton. Further work needs to be done to fully align rail fares west of Steeton/Silsden to Skipton so that they reflect the fares East to Keighley, Bradford and Leeds.							
<b>Representation Reference</b>				SwES007-2			

<b>Respondent ID</b>	SwES007	<b>Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>			
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Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Date Received</b>	28.10.2019	<b>Document</b>	NDP & Consultation Statement	<b>Policy/Paragraph</b>	-	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<b>Cross Border Collaboration</b> Support much greater collaboration between the two principal Authorities of Bradford Metropolitan District Council and Craven District Council to ensure Silsden and Steeton areas are not disadvantaged due to the proximity of the border of the two areas. Many services and infrastructure requirements are cross border and authorities need an appreciation of that.							
<b>Representation Reference</b>				SwES007-3			

<b>Respondent ID</b>	SwES007	<b>Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>			
<b>Date Received</b>	28.10.2019	<b>Document</b>	NDP & Consultation Statement	<b>Policy/Paragraph</b>	Objective 1 (Pages 35 to 39)	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<b>Housing</b> Any land released for development should firstly be offered for Community Led Housing. Housing needs to be prioritised by the needs of the local area and community/population over the wider needs of the local authority.							
<b>Representation Reference</b>				SwES007-4			

<b>Respondent ID</b>	SwES007	<b>Name &amp; Organisation</b>	Resident	<b>Agent Name &amp; Organisation</b>			
<b>Date Received</b>	28.10.2019	<b>Document</b>	NDP & Consultation Statement	<b>Policy/Paragraph</b>	Chapter 5 (Pages 29 to 33)	<b>Nature of Representation</b>	Observation

Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Comment Details</b>							
<b>Relevance of the Plan</b>							
<p>The NHP was originally conceived several years ago. Whilst there have been a few minor amendments in the run up to the consultation period, the plan is fundamentally based on out of date information/data. BDMP are well on with the wider district Core Strategy, and the Core Strategy will no doubt supersede the NHP if there are any conflicts. Even though there is a substantial financial benefit for the local Town Council from increased funding if the plan is implemented with increased CIL funding, it is in my opinion more important that the NHP takes full consideration of the Core Strategy when it is eventually released for public consumption. Full adoption of the NHP needs to have an opportunity for further amendment once the Core Strategy plans have been adopted.</p>							
<b>Representation Reference</b>				SwES007-5			

<b>Respondent ID</b>	SwES007	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	28.10.2019	<b>Document</b>	NDP & Consultation Statement	<b>Policy/Paragraph</b>	Objective 7 (Pages 58 to 60)	<b>Nature of Representation</b>	Observation

<b>Comment Details</b>							
<b>Employment Opportunitites</b>							
<p>There is a significant lack of emphasis in the plan to develop employment opportunities. Every development must identify local employment opportunities that could be expected as a direct result of the development.</p>							
<b>Representation Reference</b>				SwES007-6			

<b>Respondent ID</b>	SwES008	<b>Name &amp; Organisation</b>	North Yorkshire County Council		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Chapter 5 (Pages 29 to 33)	<b>Nature of Representation</b>	Observation

<b>Comment Details</b>							
<p>Thank you for consulting North Yorkshire County Council (NYCC) on the proposed Steeton with Eastburn &amp; Silsden Neighbourhood Development Plan.</p>							

## Steeton with Eastburn and Silsden Neighbourhood Plan

As a neighbouring upper tier authority our primary interest is in relation to any potential strategic cross boundary issues, and in particular infrastructure. Officers from our relevant service areas have reviewed the consultation documents and have the following comments:

**Growth & Heritage Service:**

NYCC has a number of plans and strategies that are relevant to strategic growth including the Plan to deliver Economic Growth and Strategic Transport Prospectus. In order to enable a joined up approach to planning and infrastructure delivery to be achieved we would encourage the Steeton with Eastburn & Silsden Neighbourhood Development Plan to be aligned with these, where appropriate.

<b>Representation Reference</b>	SwES008-1
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<b>Respondent ID</b>	SwES008	<b>Name &amp; Organisation</b>	North Yorkshire County Council		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Policy SWES10	<b>Nature of Representation</b>	Observation

**Comment Details**

Thank you for consulting North Yorkshire County Council (NYCC) on the proposed Steeton with Eastburn & Silsden Neighbourhood Development Plan. As a neighbouring upper tier authority our primary interest is in relation to any potential strategic cross boundary issues, and in particular infrastructure. Officers from our relevant service areas have reviewed the consultation documents and have the following comments:

**Children and Young Peoples Service:**

Policy SWES10 does not appear to have been amended to reflect our previous comments. We therefore wish to resubmit them.

*"South Craven School at Cross Hills, near Keighley in North Yorkshire serves the area of the Bradford Metropolitan District Council for those pupils whose main home is in the electoral areas of Eastburn, Silsden and Steeton. New housing in Silsden and Steeton and Eastburn will generate additional secondary-aged pupils at South Craven school. The County Council therefore asks that policy SWES10 is amended to include the provision of additional places for secondary provision at South Craven School".*

<b>Representation Reference</b>	SwES008-2
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<b>Respondent ID</b>	SwES008	<b>Name &amp; Organisation</b>	North Yorkshire County Council		<b>Agent Name &amp; Organisation</b>		
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Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Objective 8 (Pages 61 & 63)	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<p>Thank you for consulting North Yorkshire County Council (NYCC) on the proposed Steeton with Eastburn &amp; Silsden Neighbourhood Development Plan.</p> <p>As a neighbouring upper tier authority our primary interest is in relation to any potential strategic cross boundary issues, and in particular infrastructure. Officers from our relevant service areas have reviewed the consultation documents and have the following comments:</p> <p><b>Public Rights of Way:</b></p> <p>Where Public Rights of Way are affected by housing or industrial development, planning consent should seek to maintain the open nature of the original path, for example, by the creation of a “linear village green”, and avoid paths either running between narrow fencing, or being converted into pavements or estate roads.</p> <p>Any new bypass should also include safe crossing points, preferably via underpasses, and should avoid at grade crossings.</p>							
<b>Representation Reference</b>				SwES008-3			

<b>Respondent ID</b>	SwES009	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	25.09.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Whole Document	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<p>I am pleased to note that of the 10 objectives in the NDP 2 of them state –</p> <p>“To conserve and enhance the areas’ natural environment”</p> <p>“To protect and promote a vibrant countryside”.</p> <p>With these 2 in mind I would like to suggest that no more houses or other buildings are built on the green areas of the Aire valley to the SE of Silsden. I note that one of the concerns of Silsden residents is that the scale of housing and proposed housing is too great.</p> <p>Also surely brownfield sites should be used if needed for building before green sites are even considered. There is such a large brownfield site to the SW of Silsden (the site of demolished mills) opposite Aldi on the other side of Keighley Road.</p>							
<b>Representation Reference</b>				SwES009-1			

Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Respondent ID</b>	SwES010	<b>Name &amp; Organisation</b>	Taylor Wimpey UK Limited		<b>Agent Name &amp; Organisation</b>	Johnson Mowat	
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Policy SWES13	<b>Nature of Representation</b>	-
<b>Comment Details</b>							
<p>These comments have been made on behalf of Taylor Wimpey UK Limited, who have a continued land interest in land off Skipton Road, Steeton with Eastburn (SHLAA Site ST/009 and part of ST/008). Submissions have been made in the past to Bradford Council in relation to the emerging Allocations DPD in relation Taylor Wimpey's land interests.</p> <p>We note that the Neighbourhood Plan does not seek to allocate land for housing and acknowledges that future housing allocations will be dealt with through the Core Strategy Partial Review and Site Allocations DPD.</p> <p><b>Policy SWES13 – Protecting Local Employment Sites</b></p> <p>Policy SWES13 seeks to protect existing local employment sites. Whilst Taylor Wimpey do not have any objections to the protection of existing employment sites, some flexibility could be included within the policy wording to account for other appropriate alternative uses in the future. This would conform with the Framework. It is not deemed necessary to formally include the existing employment sites for protection on the Policies Map. These designations do not align with the RUDP Proposals Map, and the emerging Site Allocations DPD are at this stage unknown. For instance part of SWES13/8 Eastburn Works, Skipton Road, Eastburn is a safeguarded site (K/UR5.41) in the RUDP. There is a concern that designating protected local employment sites in the Neighbourhood Plan will result in contradiction between the Neighbourhood Plan and the Site Allocations DPD.</p> <p>Taylor Wimpey welcome the opportunity to comment on the Submission Draft Neighbourhood Development Plan and would be happy to provide further information and engage in future discussions as deemed necessary.</p>							
<b>Representation Reference</b>				SwES010-1			

<b>Respondent ID</b>	SwES010	<b>Name &amp; Organisation</b>	Taylor Wimpey UK Limited		<b>Agent Name &amp; Organisation</b>	Johnson Mowat	
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Policy SWES17	<b>Nature of Representation</b>	-
<b>Comment Details</b>							

## Steeton with Eastburn and Silsden Neighbourhood Plan

These comments have been made on behalf of Taylor Wimpey UK Limited, who have a continued land interest in land off Skipton Road, Steeton with Eastburn (SHLAA Site ST/009 and part of ST/008). Submissions have been made in the past to Bradford Council in relation to the emerging Allocations DPD in relation Taylor Wimpey's land interests.

We note that the Neighbourhood Plan does not seek to allocate land for housing and acknowledges that future housing allocations will be dealt with through the Core Strategy Partial Review and Site Allocations DPD.

### **Policy SWES17 – Protecting and enhancing Sport and Recreation Provision**

This policy seeks to protect and enhance sports and recreation provision. Included within the list of facilities is Airedale Hospital Sports Ground (SWES17/7), which has been identified as part of the proposed Taylor Wimpey residential development off Skipton Road. The indicative proposals include the redevelopment of the sports ground and the relocation of the sports ground within close proximity. These are still early, indicative proposals however, we welcome the policy wording of SWES17, which supports the loss of sports and recreation resources subject to suitable alternative provision being made available elsewhere, to an equivalent or better standard, and within reasonable distance of the community it serves.

Taylor Wimpey welcome the opportunity to comment on the Submission Draft Neighbourhood Development Plan and would be happy to provide further information and engage in future discussions as deemed necessary.

<b>Representation Reference</b>	SwES010-2
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Respondent ID	SwES011	Name & Organisation	Resident		Agent Name & Organisation		
Date Received	29.10.2019	Document	NDP	Policy/Paragraph	Whole Document	Nature of Representation	Observation

### **Comment Details**

- Page 11/3.3 - [insert dates] Should the dates of this consultation be in these brackets?
- Page 18/4.18 - Silsden now has only 2 pharmacies
- Page 18/4.19 - Silsden now has 5 pubs (Kings Arms, Butchers Arms, Punch Bowl, Red Lion and The Robin Hood) 4 cafes (Christine's Kitchen, The Old Post Office, The Rolling Pin and Crumbs) plus the wine bar (The Counting House) and a coffee shop/bar (The Duck Pond)
- Page 18/4.21 - Daisy Chain is now know as The Hive and has become a Community Interest Company (other references to this throughout the document also need changing).
- Page 19/4.23 - The Town Hall – last sentence of this paragraph needs changing as the Friends of Silsden Town Hall has become a Community Interest Organisation charity and has now signed a 125 year Community Asset Transfer lease with CBMDC as of 1.4.19.

## Steeton with Eastburn and Silsden Neighbourhood Plan

- Page 20/4.26 - The green space around St James’s Church includes the graveyard (not cemetery). Silsden cemetery is on Howden Road and does not appear to be mentioned in this plan – should it be?
- Page 20/4.27 - The Friends of Silsden Park is now a community group.
- Page 20/4.30 - When Hothfield Junior School and Aireview Infant school merged they became known as Silsden Primary school (this is not mentioned). Plans have been approved to build new school premises off Hawber Cote Lane and construction is due to commence at the end of 2019. (The same information needs updating on page 24, third paragraph down).
- Page 21/4.31 - Could this confusing paragraph be re-written? It says flood or flooding 8 times in 3 sentences including 3 in one sentence. In the first sentence it should also probably say the fields to the South of the town rather than around the town.
- Page 54 /Photo - Numark pharmacy no longer exists, could we have a more up to date picture of Kirkgate?
- Page 61/6.48 - The list in the red box – the first item and the last item are saying the same thing.
- Page 63/6.50 - Silsden Post office (SWES 15/3) is now closed and the services have now been taken over by Twiggs newsagents. Map 12 on page 82 is therefore also wrong.
- Page 65/6.54 - Local Green Spaces – The reference numbers in this document do not match those given in the separate ‘Local Green Space Assessment’ document. There is no explanation as to why SWES16 and SWES 17 differ from this earlier document and why some areas are no longer included.
- Page 75/Map 5 - Some of the buildings identified on the map do not match the description on the list on page 40. SWES4/18 Former library building/board school is not shown on map 5 as it is in the area above the cut off point at the top of the map. On Map 5 SWES4/18 has mistakenly been incorporated into the Town Hall (as that is where the library is now run from). On Map 5 what is shown as SWES4/8 and SWES4/18 should just say SWES4/8 and the map should be enlarged to show the former library/board school building (which has recently been converted into 2 houses).
- Page 51, 59 & 65 - Policies Map 1 is referred to several times in this document but it has not been included. I did find it in the local Green Space assessment. Many people will not have seen it if they did not know this. It should either have been included in the main NDP document or at the very least there should have been instructions as to where to find it.
- Page 53/6.35 - The public toilets have now been turned into a commercial building so it will not be possible to re-open them.

**Representation Reference**

SwES011-1

Respondent ID	SwES011	Name & Organisation	Resident		Agent Name & Organisation		
Date Received	29.10.2019	Document	NDP	Policy/Paragraph	Chapter 5 (Pages 29 to 33)	Nature of Representation	Observation

Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Comment Details</b>	
1. Throughout this document reference is made to CBMDCs Core Strategy and the need to tie in with this. However, the Core Strategy is currently undergoing a partial review which means that many references to it need to be amended either now, or after the partial review has been completed - for example the reference to the housing target of 1200 homes for Silsden (see page 30). How will the Neighbourhood Plan be revised to be consistent with the soon to be amended Core Strategy?	
<b>Representation Reference</b>	SwES011-2

<b>Respondent ID</b>	SwES011	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Paragraph 4.34 (Page 22)	<b>Nature of Representation</b>	Observation

<b>Comment Details</b>							
2. Page 22 (4.34) Safe access for pedestrians and cyclists from Silsden to Steeton & Silsden railway station should not just include a bridge over the Aire Valley Trunk Road but also an off road route that meets up with any such bridge (to tie in with 6.28 b).							
<b>Representation Reference</b>				SwES011-3			

<b>Respondent ID</b>	SwES011	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Paragraph 4.36 (Page 22)	<b>Nature of Representation</b>	Observation

<b>Comment Details</b>							
3. Page 22 (4.36) The last sentence of this paragraph should be deleted. Building an eastern bypass for Silsden is not a sustainable option. It will only encourage more car use which goes against the sentiment of the CSPR. Instead more needs to be done to discourage car journeys (as in point 2 above) and more traffic calming measures introduced into the centre of the town.							
<b>Representation Reference</b>				SwES011-4			

Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Respondent ID</b>	SwES011	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Paragraph 6.2 (Page 62)	<b>Nature of Representation</b>	Object
<b>Comment Details</b>							
4. Page 35 (6.2) I do not support the NDP statement that Silsden be classified as a local growth area as this is leading to the overdevelopment of the town which is contrary to wishes of the residents and the Town Council.							
<b>Representation Reference</b>				SwES011-5			
<b>Respondent ID</b>	SwES011	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Paragraph 6.5 (Page 36)	<b>Nature of Representation</b>	Object
<b>Comment Details</b>							
5. Page 36 (6.5) - b) There are open spaces in the town which need to be added to the list before I can agree with this statement.							
<b>Representation Reference</b>				SwES011-6			
<b>Respondent ID</b>	SwES011	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Paragraph 6.7 (Page 36)	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
6. Page 36 (6.7) a. How is this to be realised when current developments are not meeting this criteria? d. Climate Change targets – where are these documented?							

Steeton with Eastburn and Silsden Neighbourhood Plan

i. No development on the edge of the settlement has or will improve access to the countryside as they are being built on that very countryside and are therefore permanently removing everybody's access to it. The current Barratt development to the south of Silsden has not enhanced the local landscape but has been very detrimental to it and to the views into and out of the town (see also 6.25 on page 45).

<b>Representation Reference</b>	SwES011-7
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<b>Respondent ID</b>	SwES011	<b>Name &amp; Organisation</b>	Resident		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	Local Green Space Assessment	<b>Policy/Paragraph</b>	Paragraph 3.0 (Pages 5 to 8)	<b>Nature of Representation</b>	Observation

**Comment Details**

3.0 From the list on pages 5-8 a very short list of Local Green Spaces has been identified on pages 8 and 9 but no clear explanation is given as to why the areas on the long list have been rejected and, as I mentioned earlier, the short list which appears in the NDP is different again. Can you provide further detail of this process and how it was felt they did not meet the assessment framework?

<b>Representation Reference</b>	SwES011-8
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<b>Respondent ID</b>	SwES012	<b>Name &amp; Organisation</b>	National Grid		<b>Agent Name &amp; Organisation</b>	Wood E&I Solutions UK Ltd	
<b>Date Received</b>	30.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	-	<b>Nature of Representation</b>	Observation

**Comment Details**

**SUBMISSION ON BEHALF OF NATIONAL GRID**  
 National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.  
**About National Grid**

## Steeton with Eastburn and Silsden Neighbourhood Plan

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

### Specific Comments

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.

### Electricity Distribution

The electricity distribution operator in the City of Bradford Metropolitan District Council is Electricity Northwest. Information regarding the transmission and distribution network can be found at: [www.energynetworks.org.uk](http://www.energynetworks.org.uk)

### Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

<b>Representation Reference</b>	SwES012-1
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Respondent ID	SwES013	Name & Organisation	Resident		Agent Name & Organisation		
Date Received	01.11.2019	Document	NDP	Policy/Paragraph	Whole Document	Nature of Representation	Observation
<b>Comment Details</b>							
I read through the plan and find it makes good proposals particularly in Chapter 6.							

Steeton with Eastburn and Silsden Neighbourhood Plan

My main observation is that, whilst intentions sound good with regard to developments in Silsden, I wonder how they will be implemented in practice. For example, on p.30 (5.6) mention is made of the plan for 1200 new homes in Silsden, and of providing “highway infrastructure and good walking and cycling links”. I hope these proposal will be pursued because at present walking and cycling links, for example from Silsden down to the station, are very poor.

On page 36 criteria are laid down for housing development, and on p.38 (6.8/6.9). The point I would make is that what is proposed is sound in my view, but will it be implemented in practice? The Barratt development off Belton Road does not lead to optimism that the criteria will be followed in the future, should the NDP be approved. On p.47 mention is made of the need to take care with any development on the Aire Valley flood plain, and yet this Barratt development has the flood water of the plain lapping at its doors. So, will such developments really be avoided in the future? Will the standards which are proposed for housing development be adhered to?

I am pleased that under Policy SWES16, p.65, mention is made of Bolton Road Allotments and that “Development of these areas will only be permitted when consistent with national planning policy for Green Belt”. Of course, I imagine that how watertight any of the proposals laid down in the NDP will provide will depend both on national government rulings and also whatever is laid down in the Local Plan Core Strategy for BMDC. I hope the fine intentions in the NDP will not just be paper ones but will be adhered to in reality.

<b>Representation Reference</b>	SwES013-1
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<b>Respondent ID</b>	SwES014	<b>Name &amp; Organisation</b>	Natural England		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	04.11.2019	<b>Document</b>	SEA	<b>Policy/Paragraph</b>	Table 1	<b>Nature of Representation</b>	Observation

**Comment Details**

**Table 1: Establishing the Need for SEA**

This table draws inconclusive results, and the overall conclusions with some question marks in place of yes or no conclusions of no SEA cannot be ruled out without clear answers to the questions posed. The screening continues to provide more details and reaches the conclusion that no SEA is required, it may be that some additional wording is required to explain more clearly how the uncertainties in Table 1 have been addressed.

<b>Representation Reference</b>	SwES014-1
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<b>Respondent ID</b>	SwES014	<b>Name &amp; Organisation</b>	Natural England		<b>Agent Name &amp; Organisation</b>	
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Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Date Received</b>	04.11.2019	<b>Document</b>	HRA	<b>Policy/Paragraph</b>	-	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
Natural England agrees with the conclusions of the HRA screening.							
<b>Representation Reference</b>				SwES014-2			

<b>Respondent ID</b>	SwES014	<b>Name &amp; Organisation</b>	Natural England		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	04.11.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Policies SWES1	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<p>Although there are no specific allocations in this Neighbourhood Plan, Policy SWES1 Housing development within the existing urban area of Steeton with Eastburn and Silsden supports development, and it is unclear what level of development could potentially be supported or where, if known more detail should be included in the plan.</p> <p>Natural England notes the proximity of the plan area to the South Pennine Moors (Phase 2) Special Protection Area (SPA), South Pennine Moors Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) and the findings of the Bradford Core Strategy Habitats Regulations Assessment with regards to development in proximity to these designations. We would like to see a specific reference to the constraints to development provided by the South Pennine Moors designations and a cross reference to the Bradford Core Strategy Core Policy SC8 which sets out policy with regards to this.</p>							
<b>Representation Reference</b>				SwES014-3			

<b>Respondent ID</b>	SwES015	<b>Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Neighbourhood Plan	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							

**Steeton with Eastburn and Silsden 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.

<b>Representation Reference</b>	SwES015-1
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<b>Respondent ID</b>	SwES015	<b>Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Neighbourhood Plan	<b>Nature of Representation</b>	Observation

**Comment Details**

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.

<b>Representation Reference</b>	SwES015-2
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<b>Respondent ID</b>	SwES015	<b>Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Chapters 1 & 7	<b>Nature of Representation</b>	Observation

**Comment Details**

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.

<b>Representation Reference</b>	SwES015-3
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<b>Respondent ID</b>	SwES015	<b>Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team		<b>Agent Name &amp; Organisation</b>		
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Steeton with Eastburn and Silsden Neighbourhood Plan

<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Chapter 2 - Paragraphs 2.1 & 2.2	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<p><b>Paragraph 2.1</b> - Editing – this paragraph should be reviewed to give clarity</p> <p><b>Paragraph 2.2</b> - 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), <del>can</del> produce development plans to promote, guide and control development of houses, businesses, open spaces and other uses of land for their areas, <del>so, too, now, by preparing a NDP, can</del> parish and town councils <u>can also do so by preparing a NDP.</u>”</i></p>							
<b>Representation Reference</b>				SwES015-4			

<b>Respondent ID</b>	SwES015	<b>Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team	<b>Agent Name &amp; Organisation</b>			
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Chapter 3 - Figure 2; Paragraphs 3.3 & 3.4	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<p><b>Figure 2</b> - Editing – this figure should be updated in the post-examination and subsequent versions of the plan to reflect the relevant stage.</p> <p><b>Paragraphs 3.3 &amp; 3.4</b> - Editing – the text should be updated in the post-examination version of the plan</p>							
<b>Representation Reference</b>				SwES015-5			

<b>Respondent ID</b>	SwES015	<b>Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team	<b>Agent Name &amp; Organisation</b>			
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Chapter 4 - Paragraphs 4.9, 4.11 & 4.30; Various	<b>Nature of Representation</b>	Observation
<b>Comment Details</b>							
<p><b>Paragraph 4.9</b> - May wish to consider how quickly parts of the profile information may change and date the plan.</p>							

**Steeton with Eastburn and Silsden Neighbourhood Plan**

**Paragraph 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?

**Various** - See earlier comments in relation to material quickly dating.

**Paragraph 4.30** - Factual update – planning permission for the new Silsden Primary School was granted in June 2018. It is suggested that the 5th, 6th and 7th sentences amended in the post-examination version of the plan to reflect this

<b>Representation Reference</b>	SwES015-6
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<b>Respondent ID</b>	SwES015	<b>Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Chapter 5	<b>Nature of Representation</b>	Observation

**Comment Details**

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 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. 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.

<b>Representation Reference</b>	SwES015-7
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<b>Respondent ID</b>	SwES015	<b>Name &amp; Organisation</b>	City of Bradford Metropolitan District Council - Local Plans Team		<b>Agent Name &amp; Organisation</b>		
<b>Date Received</b>	29.10.2019	<b>Document</b>	NDP	<b>Policy/Paragraph</b>	Chapter 6 - Policies SWES1 to SWES5, SWES7, SWES9, SWES11, SWES13 &	<b>Nature of Representation</b>	Observation

					SWES18, Policies Map 1 & Paragraph 6.20		
<b>Comment Details</b>							
<p><b>Editing</b> – delete reference to policy SWES15 and replace with reference to policy SWES13</p> <p>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. “design out crime” – does this need to be in speech marks within the main body of the policy?</p> <p><b>Edit</b> – There should be suitable provision of suitable space...</p> <p>Net or gross dwellings per hectare? Higher densities encouraged rather than just considered? Particularly in light of NPPF changes.</p> <p>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.</p> <p>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</p> <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 &amp; 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; Rivock 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><b>Special Protection Area/Special Area of Conservations/Site of Special Scientific Interest</b></p> <ul style="list-style-type: none"> <li>• South Pennine Moors</li> </ul> <p><b>Local Geological Sites (LGS)</b></p> <ul style="list-style-type: none"> <li>• Addingham Edge Millstone Quarry</li> <li>• Doubler Stones</li> </ul>							

- Throstle Nest, Silsden

**Local Wildlife Sites**

**Silsden Town Area**

- 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\*

**Steeton with Eastburn Parish Area**

- Curren Wood\*
- Hawkcliffe Wood\*
- Steeton Reservoir\*\*

\* Site previously identified in RUDP as a Bradford Wildlife Area

\*\* Site previously identified in RUDP as a Site of Ecological & Geological Importance

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.

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.

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 be 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.

## Steeton with Eastburn and Silsden Neighbourhood Plan

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 should be in the supporting text for the policy.

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).

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:

**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.

**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.

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.

<b>Representation Reference</b>	SwES015-8
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Respondent ID	SwES015	Name & Organisation	City of Bradford Metropolitan District Council - Local Plans Team	Agent Name & Organisation			
Date Received	29.10.2019	Document	SA/HRA	Policy/Paragraph	-	Nature of Representation	Observation
<b>Comment Details</b>							
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)							
<b>Representation Reference</b>				SwES015-9			