

# **Steeton with Eastburn and Silsden Neighbourhood Development Plan**

## **Submission Draft**

## **Consultation Statement**

**June 2019**



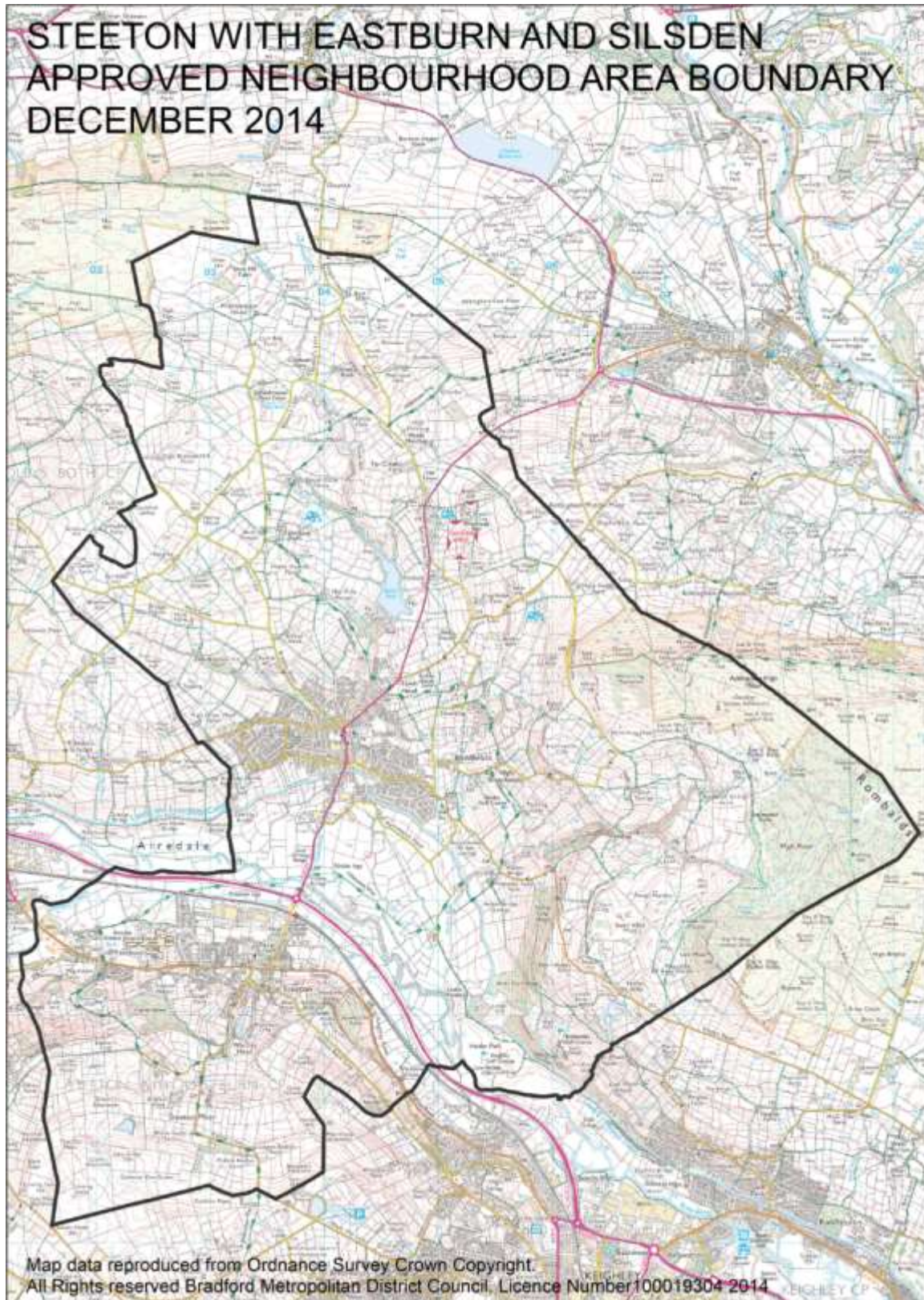
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## Map 1. Steeton with Eastburn and Silsden Designated Neighbourhood Area

(Source: CBMDC)





## 1.0 Introduction and Background

- 1.1 This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)<sup>1</sup> which defines a “consultation statement” as *a document which –*
- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;*
  - (b) explains how they were consulted;*
  - (c) summarises the main issues and concerns raised by the persons consulted; and*
  - (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.*
- 1.2 The Steeton with Eastburn and Silsden Neighbourhood Development Plan has been prepared in response to the Localism Act 2011, which gives parish councils and other relevant bodies, new powers to prepare statutory Neighbourhood Plans to help guide development in their local areas. These powers give local people the opportunity to shape new development, as planning applications are determined in accordance with national planning policy and the local development plan (and any other material considerations) and neighbourhood plans form part of this planning policy framework.
- 1.3 Steeton with Eastburn and Silsden Parish Councils, as qualifying bodies, made the decision to prepare a joint Neighbourhood Development Plan in summer 2014. An application for designation of the whole parish as a neighbourhood area was submitted to City of Bradford Metropolitan District Council (CBMDC) on 11<sup>th</sup> June 2014<sup>2</sup>. The Council undertook public consultation on the submitted application for a period of 8 weeks from 14 July until 8 September 2014. As a post consultation body, Keighley Area Committee were invited to consider the Neighbourhood Area Application at its meeting on 23 October 2014 and again on 27 November 2014. This application was approved by the Council's Executive Committee on 2 December 2014<sup>3</sup>.
- 1.4 A Joint Neighbourhood Development Plan Working Group was created. All minutes of the Working Group were available online<sup>4</sup>. Grant funding was subsequently secured from the Community Development Foundation for the initial stages of the Plan's preparation, including community consultation activity. From an early stage in the preparation of the Plan, the Parish Councils, through the Working Group, supported an approach to engage as many local people as possible in the plan process.

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<sup>1</sup> <http://www.legislation.gov.uk/ukxi/2012/637/contents/made>

<sup>2</sup> <https://www.bradford.gov.uk/Documents/DesignatedNeighbourhoodAreas/Steeton-with-Eastburn%20and%20Silsden//Steeton-with-Eastburn%20and%20Silsden%20Neighbourhood%20Area%20Application.pdf>

<sup>3</sup> <https://bradford.moderngov.co.uk/Data/143/20141202/Agenda/Report%20-%20NEIGHBOURHOOD%20PLANNING%20NEIGHBOURHOOD%20AREA%20APPLICATIONS.pdf>

<sup>4</sup> [http://www.steeton-with-eastburnparishcouncil.gov.uk/Neighbourhood\\_Plan\\_3858.aspx](http://www.steeton-with-eastburnparishcouncil.gov.uk/Neighbourhood_Plan_3858.aspx)

## 2.0 Draft Neighbourhood Plan Development and Informal Public Consultation

2.1 In February 2014 the councils organised a flyer to all households informing them of the decision to prepare a joint neighbourhood development plan.

2.2 Work was then progressed, through the Working Group, on identifying issues and objectives for the plan. To help with this work two drop-in events were held in September 2014. One in Silsden, advertised via a flyer (Appendix 1), that had 74 attendees; and one in Steeton (Appendix 2), advertised through the established newsletter, that had 12 attendees. The local press was also contacted through a press release. A questionnaire was made available at these meetings and online in order to gauge local opinion about the positive aspects of the area as well as issues and potential improvements that could benefit the local communities. These could be handed in at one of the consultation events or sent by post or email to the Steeton with Eastburn Parish Council clerk. 44 questionnaires were returned. The following comments were made:

### Positive Aspects of the Steeton with Eastburn and Silsden

There was general consensus that Silsden and Steeton with Eastburn have a number of good attributes:

- Small, friendly communities
- Easy access to the beautiful countryside on the doorstep and further afield – the coast, Lakes, Dales
- Good rail links
- Good, independent local shops
- Low levels of crime

But there are some significant issues:

### Environment

- Drainage and flooding issues e.g. St John's Street
- Development threat to the Green Belt and the surrounding countryside – brownfield sites should be used first
- The canal is an under-used and neglected asset
- The Park is neglected – it needs investment and a development plan
- Litter around takeaways
- There is little support for fracking on the grounds that more research into its potential impact is needed

### Housing

- The scale of proposed housing is too great – there is insufficient infrastructure to cope (roads, drainage, schools, medical facilities)
- BUT there is a need for affordable and sheltered housing

### Employment

- Need for new employment opportunities in the area
- New start-up businesses should be encouraged

### Community Facilities and Services

- No banks
- Vacant shops
- Dentist/GP surgeries are over-stretched
- Need to make better use of Silsden Town Hall

### Traffic and Transport

- Speeding traffic – need for traffic calming and introduction of 20mph limits in built-up areas
- Access to Steeton station from Silsden is poor and dangerous, particularly for pedestrians. Crossing the bypass is a significant problem
- Poor quality of footpaths
- Parking issues, especially at Steeton station
- Volume of traffic, particularly HGVs, on the main road through Silsden. Need for a bypass
- More cycle paths are needed
- Silsden centre is not wheelchair friendly
- Canal towpath improvements are required
- Bus and rail timetables do not marry up

- 2.3 In October 2014, the Silsden Community Showcase was held. The Town Council took the opportunity to attend this event and to raise awareness of the neighbourhood plan. Residents were engaged, handed questionnaires and information sheets.

2.4 Also in October 2014, the councils wrote to all local interest groups and agencies offering to come out and meet with those contacted. The purpose of the meetings was to discuss the future of the area; possible issues to be addressed in the plan; and to explore opportunities for collaborative working. Only the local schools and Airedale Hospital took up this offer. At the meeting with the Hospital representatives of the Working Group met with the Hospital's Director of Strategy and Estates Manager. The major issues for the Hospital are traffic delays due to difficulties of getting out the site and poor public transport. The Hospital were in talks with a local bus company to try and secure a better bus service. The Hospital would also support an improved bus link to the station and provision of a footpath/cycleway to the station. There were no plans for expansion of the Hospital site, however, reorganisation within the site is being carried out. The Hospital requested to be informed of the planned "call for sites".

2.5 The Working Group were keen to engage local business and in January 2015, using data supplied by CBMDC a letter was sent to all 305 businesses in the neighbourhood area (Appendix 3). This sought to engage them in the early stages of the plan's preparation around the initial eight themes:

- Heritage and Natural Environment
- Housing
- Retail
- Employment and business
- Education
- Transport
- Health
- Recreational, sporting and community facilities

Opportunities to meet were offered – unfortunately only two responses were received.



- 2.6 On 20<sup>th</sup> January 2015 a representative of the Working Group attended Silsden Churches Together – once again awareness of the neighbourhood plan was raised, and views invited. The churches offered to help raise awareness of the neighbourhood plan by publishing information in their newsletters.
- 2.7 In June 2015 the Working Group embarked upon a “call for sites” exercise. This was publicised on Facebook and through three local newspapers and on the two council web sites. 6 sites were submitted – these were either existing development plan allocations or in the Green Belt. Given that the former was already allocated, and the latter is a matter that can only be considered as part of a local plan review the Working Group agreed not to proceed with site allocations.
- 2.8 The Working Group also met with the local MP, Kris Hopkins, and the Airedale Partnership. These meetings discussed the future of the area, including the Silsden bypass and a possible bridge over the A429.



## Neighbourhood Plan Consultation Survey

Posted on May 5, 2016 by  silnews — No Comments ↓

[The draft plan](#)

[The questionnaire \(pdf\)](#)

[The questionnaire \(docx\)](#)

**If you are interested in how the plan is taken forward, please help the local Working Group by printing, completing and posting your questionnaire to: Rosie Sanderson, Clerk to Steeton-with-Eastburn Parish Council, 35 Kings Mill Lane, Settle, N. Yorks, BD24 9FD.** You can also save the document to your own computer, fill in your responses and then email the completed version to [clerk@steeton-with-eastburnparishcouncil.gov.uk](mailto:clerk@steeton-with-eastburnparishcouncil.gov.uk).

**Please return by end May 2016.**

If you prefer, you can pick up a hard copy of the questionnaire from Post Offices in Steeton, Eastburn and Silsden, where you can also obtain a hardcopy of the draft plan. If you are unable to travel and do not have access to a printer you can request a hard copy of the questionnaire and/or plan by emailing: [clerk@steeton-with-eastburnparishcouncil.gov.uk](mailto:clerk@steeton-with-eastburnparishcouncil.gov.uk)

Later in 2016 there will be a further, formal consultation period.

*i. Screenshot: informal consultation silsden.net, May 2016*

- 2.9 From February to May 2016 the two councils ran an Informal consultation on a draft plan. This preceded the formal Regulation consultation. Copies of the plan were placed on the two council web sites, where copies could be downloaded, and a questionnaire could also be

downloaded and returned. The consultation draft document was also made available online on Facebook and a flyer was produced (Appendix 4). This consultation generated the following list of issues from 80 individuals:

The Neighbourhood Development Plan has been developed by a Working Group, in consultation with the local community (full details of consultation and engagement are provided in the Consultation Statement that accompanies this document). The key issues raised during initial consultations included the following, these are listed in no particular order and reflect local people's concerns:

- Design criteria should be set, including a maximum height (2 storey) and density (25-30 per hectare?)
- Condition of some of the housing stock
- Need to conserve local heritage including the future management of the Conservation Areas
- Impact of future retail developments on current shops
- Need to control the number of hot food takeaways, charity shops and betting shops
- No land is allocated for additional employment use in Steeton or Eastburn
- The three primary schools in the area are in very old (Victorian) accommodation. Steeton school is multi-site.
- There is a lack of capacity in primary schools
- Silsden primary school is the only one in the Bradford area to operate a 3-tier system, i.e. separate sites for infant and junior children. From 2017 the schools will join together, Hothfield School to be incorporated within the Aire View School, for admission purposes only.
- Replacement primary schools are needed.
- Secondary schools: all are out of the local area, some are in North Yorkshire and thus in a different education authority. There is a lack of capacity and transport issues.
- Transport links to some areas poor.
- Issues related to drainage, sewerage and water supply
- Connectivity (broadband especially) is in need of improvement.
- Railway station: lack of parking space.
- Poor links between bus and rail services – most buses do not go to the station even though there is space to turn there.

- Negative impact of possible extension of the M65
- Level Crossing at Kildwick (out of area) causes traffic hold ups.
- GP surgeries and access to services: There is a new, purpose built health centre in Silsden which opened in 2014. Reports state there are still delays in trying to get an appointment. Space could be allocated for a new/expanded surgery and finance should be included in planning gain agreements.
- Increases in the elderly population will bring increasing demands for healthcare.
- Airedale Hospital is a major employer in the area.
- Lack of community hall space in Silsden.
- Poor quality of some, or lack of, play spaces and playing fields (drainage issues).
- Severe flooding is a major issue for this area - recent flooding in the area indicate that the third of sites proposed are likely to flood and the existing drainage system is inadequate. Any further development will add to the problems currently experienced by residents in the recent Boxing Day floods of 2015.
- The electricity substation has now exceeded its capacity of only a further additional 100 dwellings. Any upgrade will require a hugely costly expense.
- A second children's play area should be included in Silsden. There are presently only children's play areas within the actual park. Silsden is a sizeable area and another play area should be considered in the South/West of the town should more housing be granted.
- Management of change in the Conservation Areas.

### **3.0 Strategic Environmental Assessment/Habitat Regulations Assessment**

- 3.1 Kirkwells carried out a screening for the purposes of Strategic Environmental Assessment/Habitat Regulations Assessment. This is submitted separately as the “Environment Report” and it was determined that a full SEA/HRA was not required following consultation with the relevant statutory bodies.

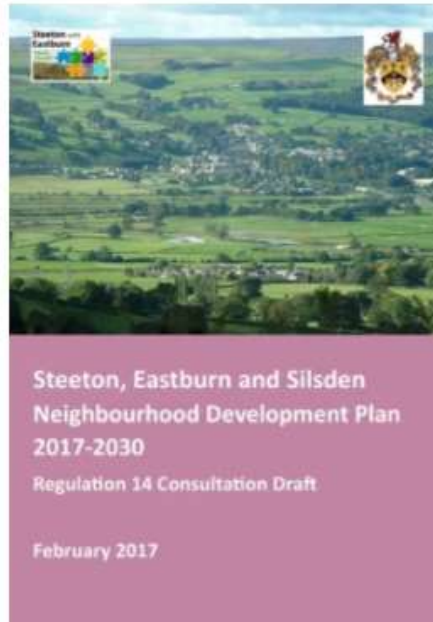
#### **4.0 Regulation 14 Consultation – Steeton with Eastburn and Silsden Draft Neighbourhood Development Plan 3<sup>rd</sup> February 2017 to 17<sup>th</sup> March 2017**

4.1 The public consultation on the Steeton with Eastburn and Silsden Draft Neighbourhood Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

*Before submitting a plan proposal to the local planning authority, a qualifying body must—*

- (a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area*
  - (i) details of the proposals for a neighbourhood development plan;*
  - (ii) details of where and when the proposals for a neighbourhood development plan may be inspected;*
  - (iii) details of how to make representations; and*
  - (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;*
- (b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and*
- (c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.*

## Steeton, Eastburn and Silsden Neighbourhood Development Plan 2017 – 2030, with associated maps



ii Screenshot Regulation 14 consultation silsden.net

- 4.2 The Steeton with Eastburn and Silsden Draft Neighbourhood Development Plan was published for the minimum 6 weeks' consultation from **3<sup>rd</sup> February 2017 to 17<sup>th</sup> March 2017**. Copies of the plan were available online at silsden.net and on the Steeton-with-Eastburn Parish Council web site<sup>5</sup>. Copies of the plan were available to download along with a response form. Hard copies of the plan were available on request from the clerk. Also published alongside the Regulation 14 Draft Plan was the *Planning Policy Assessment and Evidence Base Review* and the Strategic Environmental Assessment Screening.

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<sup>5</sup> [http://www.steeton-with-eastburnparishcouncil.gov.uk/Neighbourhood\\_Plan\\_3858.aspx](http://www.steeton-with-eastburnparishcouncil.gov.uk/Neighbourhood_Plan_3858.aspx)



iii Screenshot, Regulation 14 Consultation, Steeton-with-Eastburn Parish Council web site

4.3 The consultation was widely publicised in the neighbourhood area using.

- Flyers (Appendix 5)
- Letter sent to 301 businesses, 4 schools and GP surgery regarding formal consultation and the consultees listed in Appendix 11
- Banners and posters displayed to advertise drop-in events (Appendix 6)
- Article in Steeton-with-Eastburn Parish Council newsletter regarding formal consultation and drop-in events (Appendix 7)
- Letter sent to statutory consultees regarding formal consultation (Appendix 8)
- Press release issued regarding formal consultation and drop-in events at Silsden Methodist Church and THE HUB, Steeton
- Article in Steeton-with-Eastburn Churches newsletter regarding formal consultation and drop-in events
- Article in Aire Valley magazine regarding formal consultation and drop-in events (Appendix 9)

4.4 A representation form (see Appendix 10) was provided, and was made available for download and respondents were invited to submit comments either by downloading and completing the form or sending comments in writing **to the clerk by the deadline of 17<sup>th</sup> of March 2017.**

4.5 Two drop-in events were held, and residents were given an opportunity to make formal comments using the representation form or informal comments, most of these were recorded on post-it notes (Box 1). The suggested council response is recorded in bold in Box 1.

**Box1 - NEIGHBOURHOOD PLAN POST-ITS FROM EVENTS**

1. Protect little shops - help local small businesses stay open in face of large businesses starting up (e.g. Aldi). Preferential business rates. **Not an NDP matter.**
2. Once new school is built there will be an increase of traffic in and out of Howden Road, Dale View and Banklands - this needs to be addressed. **This will be addressed at time of any planning application.**
3. Silsden inhabitants are mainly commuters - shops haven't made any provision in their opening hours, to accommodate commuters. **Not an NDP matter.**
4. There are a large number of retired residents, families with children+ people employed at Airedale Hospital- not just a 'commuter' town! **Comment noted.**
5. Control over number of hot food, takeaways+ charity shops required. **Policy SWES11 seeks to do this.**
6. More car parks- yes but where? **Noted.**
7. Objectives 3,4,5,6,7,8,9 are all influenced and at risk. From objective 1, i.e., If Steeton has to accept 25% more houses it must not be without regard to supporting these objectives. **NDP seeks to help address such issues.**
8. There is not a lot of protected community facilities in Steeton? The MUGA has to be protected. **Add to SWES16**
9. This area already built on should have been site of new school. School continues its original site, no room for expansion bad planning! **Comment noted.**
10. Maps are not updated to show buildings already built. **Maps use latest available OS base.**
11. Before there is any significant housing development there must be a second crossing of the Canal at Elliot St, is a nightmare now the best of times. **Comment noted.**
12. No easy access to footpath at the top of Hawber Cote Lane, needs looking at. **Noted no change.**
13. West end of Waterloo Mills has converted into apartments. **Amend map.**
14. Old houses in St. Johns Close to be protected. **Add as heritage asset?**
15. Whole of No.27 North St. to be protected (it's all one house). **Add as heritage asset.**



16. Selected, relevant shop fronts should be listed. **Not possible. SWES11 seeks to manage replacement and installation of new shopfronts.**
17. Bridge over dual carriageway so easy/safe access for pedestrians to train station and Steeton. **Not an NDP matter. Covered in Supporting Action on page 62.**
18. Consideration should be given to provision of a pedestrian foot bridge over the Aire Valley Trunk Road to connect Silsden to the railway station with safety. **Not an NDP matter. Covered in Supporting Action on page 62.**
19. Please, please build the bridge to allow access from Steeton to Silsden. I used to walk into Silsden (along with others) from Steeton before the road (by pass) was built. **Not an NDP matter. Covered in Supporting Action on page 62.**
20. CCTV at the top of Howden Rd please. **Not an NDP matter.**
21. Volunteer work. **Not an NDP matter.**
22. What tourism? No public toilets, no bank, possibility of no library town hall. **Not NDP matters.**
23. Definitely need better bus links to Airedale Hospital and Skipton **Add to Supporting Actions on page 62.**
24. Tourism- A farmer's market. **Not an NDP matter. Add as a Supporting Action.**
25. Improve stiles on the good network of foot paths, grants for farmers? **Covered by SWES18.**
26. The playing fields/park (Silsden park) needs to be protected and maintained. **Covered by SWES16.**
27. Direct bus to Skipton would be well used. Buses to co-ordinate with train times! **Skipton link covered in Supporting Actions on page 62. Add timing co-ordination to Supporting Actions.**
28. Need a bridge over the dual carriage way to the station and Streeton. **Not an NDP matter. Covered in Supporting Action on page 62.**
29. Look after the park- it is getting neglected. The Council are proposing that they don't look after the bowling green anymore even. **Noted. No change.**
30. A method of providing priority to local residents for parking at the station should be considered. Even with increased spaces they will be filled by commuters from elsewhere. **Noted. Not an NDP matter.**

31. Provision of a footbridge over the trunk road to the railway station, from Silsden should be absolute priority. Contribution to funding this should be an essential requirement. **Not an NDP matter. Covered in Supporting Action on page 62.**
32. No buses to Skipton. **Already a Supporting Action.**
33. An improved cycleway from Silsden to station will be an asset. **Support noted.**
34. Provision of public toilets should be an important service provided by the local authority. **Not an NDP matter.**
35. A bypass or at least a weight restriction on traffic. **Noted.**
36. Free public toilets in Silsden would be a basic thank you very much. **Not an NDP matter.**
37. Kildwick level crossing is a major implement to objectives 5,7,8,10,1,6. **Noted.**
38. Aire Valley Trunk capacity inadequate for future building development. **Noted.**
39. Bus- Silsden- Skipton links would be really useful. **Covered in Supporting Actions.**
40. Foot/ road bridge for dual carriage way is desperately needed to make it a true Steeton+ Silsden railway station. **Not an NDP matter. Covered in Supporting Action on page 62.**
41. Carmel House in Wesley Place (next door to Catholic Church) should be designated as a protected community facility, as the ground floor is used as a church hall, including use for wider community activities. This would be considerable importance if the town hall ceases to be available. **No change.**
42. Why continue to permit building along the town path of silsden conal where people walk to enjoy views + visits, it also stops tourists mooring up for overnight stops in Silsden. **Comment noted. No change.**
43. A bypass (i.e. concrete solid road on green fields) will further increase flooding on the surrounding areas. **Not an NDP matter. Covered in Supporting Action on page 62.**
44. One automatic toilet will cover ladies, gents+ disabled and stop any vandalism+ little maintenance. **Noted not an NDP matter.**
45. A safe crossing point over the bypass to the station. **Not an NDP matter. Covered in Supporting Action on page 62.**

46. As a regular commuter by train travelling from Silsden to Steeton, my husband has to drive me there and drop me off- I completely agree better access to station is required+ footbridge over main road. **Not an NDP matter. Covered in Supporting Action on page 62.**
47. Co-ordinate with North Yorks to improve Crosshills level crossing, Cononley Lane end needs roundabout, bus direct to Skipton. **Noted. Dealt with in Supporting Actions.**
48. If no separate public toilets then need to ensure town hall stays open to provide facilities. **Not an NDP matter.**
49. Scheme for reduced business rates for new start ups. **Not an NDP matter.**
50. Make sure enough parking (free) for shops, public toilets for visitors to Silsden. **Not an NDP matter.**
51. There needs to be better coordination of road works to maintain easy access to Airedale hospital- the roads get dead locked there. **Not an NDP matter.**
52. Today has shown the need for more parking. **Noted.**
53. Objective 5 make sure the new school has money to expand with a greater population. **Noted.**
54. Access to Steeton station from Silsden created without steps. Bus service to Skipton. **Not an NDP matter. Covered in Supporting Action on page 62.**
55. Traffic lights needed at the bottom of Howden Road. **Noted. Not an NDP matter.**
56. Road access through Silsden needs to be addressed- it often is blocked by roadworks or even just pub deliveries. Flow needs to be maintained. **Noted.**
57. Transport links increasingly important- bus Silsden to Skipton, safe access to railway station, continued service to Keighley. **Not an NDP matter. Covered in Supporting Actions on page 62.**
58. Concern for health services already at breaking point. **Not an NDP matter.**
59. Before any more houses are built in Silsden the new school needs to be built and open. The existing schools are full to capacity already. **Noted addressed in SWES9.**

- 60.No more new houses until new school is up and running. Toilets needed to be up and running once more in town centre. Traffic controls end of Howden Rd, Kirkgate, Elliot St. Noted. **Addressed in SWES9.**
- 61.King Street, Queen Street- could flower beds be put I these roads? **Not an NDP matter.**
- 62.Objective 2- save the town hall. **Covered by SWES15.**
- 63.The idea of building more+ more houses in the area before there is adequate infrastructure is absurd. There are insufficient school places, insufficient health centres/doctors. Inadequate roads+ transport links. **Addressed in SWES9.**
- 64.Oak tree in Hainworth Rd in field to north- can it have a TPO? **Not an NDP matter. Pass to CBMDC.**
- 65.Map 7 Silsden protected community facilities the Library should be highlighted in yellow. **Amend map.**
- 66.Check south area view map wrong- map 9. **Check and amend if necessary.**
- 67.By pass really needed. **Not an NDP matter. Covered in Supporting Actions on page 62?**
- 68.Dream but sensible wish: safe crossing+ footpath the way concluding lightly+ push chair accessible - from Steeton+ Silsden. **Covered in Supporting Actions.**
- 69.The park needs to be upgraded. The gates need painting. Noted. **Not an NDP matter.**
- 70.Is there any proposal to re-introduce the previous proposals for a road by-pass to the east side of Silsden? **Not an NDP matter. Covered in Supporting Actions on page 62.**
- 71.Hainsworth Road preserve flora+ fauna, keep hedgerows + verges. **Noted.**
- 72.Now we have money from the library, pensioners' toilets. Can we please have the roads - Spencer Avenue, bottom of Hillcrest Avenue made up please. Bradford have the Council Tax from the pensioners' houses. Council houses, Hunters Glenn are using the roads that were paid for by the pensioners. **Noted.**
- 73.To develop a visitor offering for the locality by encouraging day and long stay attractions, amenities visitor destinations will benefit by working with Craven District Council and South Craven parish councils. **Covered by SWES18.**

74. Great concern for the congestion on the Crosshills to Keighthly Road through Eastburn/Steeton due to substantial house building intentions and emergency service delays due to inadequate road capacity for the expansion of housing. **Noted.**

4.5 All responses submitted in writing or by email were given careful consideration and have been used to inform the revised, Submission Draft Plan.

## **5.0 Consultation Responses to the Regulation 14 Draft Neighbourhood Plan**

- 5.1 62 responses were received during the Regulation 14 consultation.
- 5.2 Table 1 summarises the responses and sets out the Town and Parish Councils' response and action in relation to each response.

**Table 1 Regulation 14 Responses**

Response Number	Respondent	Response	Suggested PC response/modification to plan
		<p><b>NOTE: MANY OF THE CBMDC COMMENTS SEEM TO BE REPEAT COMMENTS OF THE COMMENTS MADE INFORMALLY BEFORE PUBLICATION OF THE REGAULTION 14 DRAFT. IN MANY INSTANCES THE PLAN HAS ALREADY BEEN CHANGED TO ADDRESS THESE CHANGES, OR IT HAS BEEN EXPALINED WHY CHANGES HAVE NOT BEEN MADE TO THE PLAN. THE FOLLOWING CBMDC COMMENTS AND RESPOSNES SHOULD BE READ WITH THIS IN MIND.</b></p>	
1	CBMDC	<p><b>Specific and general comments relating to the Steeton With Eastburn and Silsden Neighbourhood Development Plan.</b></p> <p>1. Page 27 / 36-40 – <b>Objective 1</b> states that the aim of the plan is to promote a suitable range and type of housing, however the three policies provided do not address the issues of ‘range’ or ‘type’ of housing to be provided, therefore how will this objective been met by the plan?</p> <p>2. Page 76 – Appendix 1 – The quality of the Brunthwaite Conservation Area map is not acceptable and should be improved for clarity. The title of the map could usefully state <b>‘Brunthwaite Conservation Area’</b>.</p> <p>3. Page 77 – The map would benefit from a more descriptive title, i.e <b>‘Steeton Conservation Area’</b>. The map should also include the relevant copyright statement, North point sign and scale.</p> <p>4. Page 78 - The quality of the Silsden Conservation Area map is not acceptable and should be improved for clarity. The title of the map could usefully state <b>‘Silsden Conservation Area’</b></p>	<p>1. Amend Objective 1 to “To promote sustainable housing development”.</p> <p>2. Map is included in NDP for information not policy but given comment. Map is from CBMDC document. Request CBMDC provide a better quality copy. Amend map title as suggested.</p> <p>3. Amend title as suggested, add north point and licence information.</p> <p>4. See 2. Above.</p> <p>5. Comment noted. These issues will be addressed in the Basic Condition Statement.</p> <p>6. Use consistent</p>

		<p>and should also include the relevant copyright statement, North point sign and scale.</p> <p><u>General comments:</u></p> <p>5. The policies in the plan would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to the evidence base which supports each policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it will assist future users of the document.</p> <p>6. There should be a consistent approach throughout the plan and its policies with regards to the <b>terminology</b> or references used to refer to areas in the neighbourhood area; for example, could the reference to existing urban areas (the built up area of the settlements) refer to land within the existing settlement boundary? There are other instances in the plan whereby other descriptions are used and not defined.</p> <p>7. The Council has not had sight of any <b>evidence base and draft consultation statement</b> documents which would support the policies within the Steeton, Eastburn and Silsden NDP; as a result the comments provided by CBMDC do not provide a full policy assessment. It would be useful for the Council to see this evidence as soon as possible in order to be able to provide further advice and comments to assist in the plan making process. It is appreciated that this is not requirement, but it would help the Council to understand and appreciate the plan in its full context.</p> <p>8. The plan would benefit from a <b>composite policies map</b> to show all the spatial implications of all policies on one map to highlight any inconsistencies and to help future users of the document.</p> <p>9. The Parish Councils should be aware that the Council will require <b>an Equality Impact Assessment</b> to be submitted at the next stage of the process – Regulation 15. Whilst this is</p>	<p>terminology as suggested.</p> <p><b>7. Has CBMDC seen Planning Policy and Evidence Base document? I think it has.</b></p> <p>8. Comment noted. Not practical given wide area and detailed nature of proposals.</p> <p><b>9. Noted that this is not a legal requirement. Suggest if it is a CBMDC requirement CBMDC be requested to undertake this work.</b></p> <p>10. Comment noted. Future Regulation 16 consultation will be a CBMDC task – CBMDC to action.</p> <p>Note on emerging policy and holding direction noted. This note has been attached to each set of policy comments. In all cases, therefore, noted.</p>
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		<p>not a requirement of the Neighbourhood Planning regulations, CBMDC is committed to the equality duty in that every policy, plan or programme is accompanied by an equality assessment to determine any potential disproportionate impact on equality groups. The Council can advise the PC on this matter further outside of this consultation.</p> <p>10. The Parish Council are reminded to bear in mind the implications of the Data Protection Act when producing the Consultation Statement to ensure that no personal data is inadvertently published. Furthermore it would be useful if your future comment forms display a data protection notice to clearly outline to the respondent how their personal data will be used.</p> <p><i>Please note: The Council would usually provide comments which refer to the emerging Local Plan Core Strategy, however due to the Government’s Holding Direction on the plan we are unable to give any weight or effect to its content. Please be aware that the Council may have further comments to make in due course.</i></p>	
2	CBMDC	<p>The CBMDC agree with the conclusion that the Plan does meet the requirements of the Habitats Regulations.</p> <p>In order to maintain consistency with the Habitats Regulations Assessment (HRA) carried out for the Core Strategy, the list of qualifying bird species included in para 6.6 (page 23) should be amended so that it reflects those noted in paragraph 3.2.3 page 10 in the HRA of the Proposed Modifications to the Core Strategy of November 2015, i.e. just include Merlin and Golden Plover (rather than Merlin, Golden Plover, Peregrine Falcon, Short Eared Owl and Dunlin).</p> <p>Similarly, the list of regularly occurring migratory species listed in para 6.7, should be amended to also include short-eared owl and dunlin – again, so it is consistent with our own HRA and the original SPA citation notice.</p>	<p>Support for HRA conclusions noted. Amend plan to take account of named bird species as suggested.</p>
3	CBMDC	<p><b>SWES Policy 1 – Housing development within the exiting urban area of Steeton, Silsden and Eastburn</b></p>	<p>1. Amend policy as suggested. 2. No change. This will be a matter to be</p>

	<p>Policy Comments:</p> <ol style="list-style-type: none"> <li>1. Suggested policy wording amendments for the purpose of clarity: ‘Development proposals for new housing will be supported, in principal, within the... of Steeton, Silsden and Eastburn when, where possible, it:...’</li> <li>2. It has not been made clear when a previously developed site might be of high environmental value.</li> <li>3. For the purposes of clarity, the policy wording should ideally make it clear which criteria would apply to a development proposal, i.e. is it all of them or not (and/or).</li> <li>4. In the case of the re-use of existing employment premises (B1, B2 and B8 uses), the applicant must be able to show that any building is no longer suitable or viable for an employment generating use. Is this realistic? The policy ignores recent changes to Part 3 permitted development rights which allow B1 and B8 buildings to change to housing without the need for planning permission.</li> <li>5. Part D - “It is in accordance with national and strategic planning policy for the area” - this is a given part of the consideration of a planning proposal and therefore is not necessary for this to be included in the policy wording.</li> <li>6. There is no policy regarding how to deal with planning applications for the remaining allocated housing sites or the numerous safeguarded land allocations outside of the urban areas in Silsden/Steeton which will be brought forward.</li> <li>7. The reference to existing ‘built up urban areas of the settlement’ should use consistent terminology with the rest of the plan (see point 9) and should be identified on a policies map.</li> <li>8. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic</li> </ol>	<p>determined at planning application stage.</p> <ol style="list-style-type: none"> <li>3. Policy is clear it is all criteria.</li> <li>4. On B1, B2 B8 uses this criterion is considered realistic. Policy does not ignore permitted development rights. The policy can only control matters that require planning consent.</li> <li>5. At this stage I would suggest keeping (d) because as we know “strategic planning policy for the area” is about to change.</li> <li>6. This was agreed based on previous CBMDC comments/discussions. No change. Policy for these sites is covered in the RUDP and will be covered by emerging planning policy when adopted.</li> <li>7. Use consistent terminology. Need to consider issue of map?</li> <li>8. See previous</li> </ol>
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		<p>Conditions; plus it would assist future users of the document.</p> <p>9. There should be a consistent approach throughout the plan and its policies with regards to the terminology or references used to refer to areas in the neighbourhood area; for example, could the reference to existing urban areas (the built-up area of the settlements) refer to land within the existing settlement boundary? There are other instances in the plan whereby other descriptions are used.</p> <p>10. It is not clear how this policy links to SWES 2.</p> <p>11. There is no policy content in here about affordable housing – where is it needed and how does the local community think it should it be provided?</p> <p>Please note: The Council would usually provide comments which refer to the emerging Local Plan Core Strategy, however due to the Government’s Holding Direction on the plan we are unable to give any weight or effect to its content. Please be aware that the Council may have further comments to make in due course.</p>	<p>comment on Basic Condition Statement.</p> <p>9. Amend to use consistent terminology.</p> <p>10. Comment noted. No change. The plan must be read as a whole.</p> <p>11. Noted. No change. This is left to strategic planning policy.</p>
4	CBMDC	<p><b>SWES Policy 2 – Design of new housing development within the Steeton, Eastburn and Silsden Neighbourhood Plan Area</b></p> <p>Policy Comments:</p> <p>1. The aim of this policy is to ensure all future development proposals are of good quality design and fit into its surroundings, however this policy does little to guide how development proposals should be assessed and how the policy would influence the determination of a development proposal. SWES2 adds little to existing design policies such as RUDP Policy D1. The current drafting of this policy emulates the start of a design guide rather than a planning policy.</p> <p>A more detailed explanation of what the local community perceive as being the locally distinctive built form is needed, and how the community expects the Planning Authority to take account of scale, density and appropriate materials for particular neighbourhoods. A more detailed analysis of local distinctiveness would be more helpful than a generic list. What does good design mean</p>	<p>1. Comment noted. RUDP Policy D1 will be replaced, in part, by SWES2. Add in further detail on local distinctiveness.</p> <p>2. Add in further detail on local distinctiveness.</p> <p>3. This has been dealt with before with CBMDC it is a policy to assess applications. Obviously, applicants will be able to use the</p>

	<p>for the NDP area?</p> <p>2. The policy is in accordance with RUDP Chapter 9, but lacks the evidence and area specific details to justify a more prescriptive approach.</p> <p>3. The policy would benefit from reconsideration on its intent; is it a criteria based policy listing the matters a planning application should include; a policy used to determine planning applications; or the basis of a 'design guide' for the NDP area?</p> <p>4. Part B – This part seems to be a list of design elements of a proposal, not site characteristics which may aid the determination of a development proposal application.</p> <p>5. Part C - K - most of these already long established criteria for assessment of all planning applications so this Policy adds little to the relevant RUDP Policies and NPPF.</p> <p>6. Part G – There is doubt cast over the use of the word 'central'. Does this mean that recreation open space has a spatial reference and is required to be in the centre of the development OR a key component of the development proposal? This could be considered as being too prescriptive if the intent of the criteria is the former point.</p> <p>7. Parts I - It would be helpful if specific opportunities or desires for enhanced access to countryside could be identified. If identified, these should be identified on a policies map.</p> <p>8. Part K - lighting in rural areas is surely also a consideration?</p> <p>9. The policy contains a number of terms that need elaboration and clarification if they are to be used effectively.</p> <p>Further Comments:</p> <p>10. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and</p>	<p>policy identify the matters they should include in planning applications.</p> <p>4. Comment noted – preamble actually says, "site characteristics and surroundings".</p> <p>5. C to K comment noted. RUDP policy will be replaced by the NDP, in part, NPPF is not part of the development plan. CBMDC has also commented on these previously, suggesting (j) be added!</p> <p>6. G amend to "should preferably in a central location within the overall development".</p> <p>7. Noted. No change.</p> <p>8. It is but this policy only deals with the urban area.</p> <p>9. Ask CBMDC to clarify which terms.</p>
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		<p>links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</p> <p>11. Para 6.8 states ‘Policy SWES 2 also provides further detail over and above the emerging planning policy....’ Does it?</p> <p>12. Para 6.10 – It would be helpful if the plan defined what the particular importance of the distinctive local heritage and local landscape is in order to assist any development proposal.</p> <p>13. The policy contains numerous terms that need elaboration and clarification if they are to be used effectively.</p> <p>Please note: The Council would usually provide comments which refer to the emerging Local Plan Core Strategy, however due to the Government’s Holding Direction on the plan we are unable to give any weight or effect to its content. Please be aware that the Council may have further comments to make in due course.</p>	<p>10. See previous comment on Basic Condition Statement.</p> <p>11. Noted. No change.</p> <p>12. See above.</p> <p>13. See above.</p>
<p>5</p>	<p><b>CBMDC</b></p>	<p><b>SWES Policy 3 – Housing Density</b></p> <p>Policy Comments:</p> <p>1. The policy lacks the evidence and area specific details to justify a more prescriptive approach by requiring higher densities in identified locations. What local evidence has been used to justify a more prescriptive approach? There may be site specific circumstances where such requirements are not possible. The policy wording could be amended to state: ‘Higher densities should be considered in the following locations’.</p> <p>2. Part A – the following statements ‘reasonable walking distance’ and ‘main bus routes’ need to be qualified and justified in the supporting text to the policy.</p> <p>3. Part B – The terminology used to describe the ‘older, inner parts of the towns’ is at odds with the terms used in the rest of the plan. These areas need to be defined and justified to ensure that any applications know which area the plan is referring too.</p>	<p>1. Insert additional evidence in para. 6.12. Change last line of policy preamble to ‘Higher densities should be considered in the following locations’.</p> <p>2. Insert details on main bus routes and add in walking distances.</p> <p>3. Clarify terminology in Part B.</p> <p>4. Part C change not</p>

		<p>4. Part C – The plan should define what it meant by ‘good access’, ‘main road network’ and ‘significant and demonstrable adverse road traffic impacts’ in the supporting text.</p> <p>5. This part of the policy only refers to traffic impacts and not about other modes such as public transport and cycling.</p> <p>6. The spatial elements in the policy need to be identified on a Policies Map.</p> <p>Further Comments:</p> <p>7. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</p> <p>8. Para 6.12 – It would be useful to set out what is considered as ‘reasonable’ walking distance of rail station?</p> <p>9. It is not clear when housing density may need to be less than 30 (e.g. sites with trees and drainage issues).</p>	<p>accepted – no change.</p> <p>5. No change. Public transport and cycling do have the same impacts as traffic.</p> <p>6. Comment noted. No change. Further comments noted. See previous comment on Basic Condition Statement and walking distance.</p>
6	CBMDC	<p><b>SWES Policy 4 – Protecting Local Non-Designated Heritage Assets</b></p> <p>CBMDC welcomes the clarification of the policy title to include ‘non-designated’ heritage assets and also that the heritage assets have been included on a policies map which were omitted from the Informal Draft (2016).</p> <p>Policy Comments:</p> <p>1. In general terms, this policy is too long and it is unclear whether the aim of this policy is to designate; be used in the determination of a planning application; or the basis of a design guide or conservation area assessment for S/S.</p>	<p>1. Comment noted. The policy designates the assets and then sets development management criteria – no change arising from this comment.</p> <p>2. Comment noted, no change. Additional word unnecessary.</p>

	<p>2. Suggested wording amendment - ‘New development....’</p> <p>3. There are concerns about how the properties on this list have been identified and selected. Without any additional information regarding the selection criteria it is very difficult to understand why these properties have been identified as having a degree of significance meriting consideration in planning decisions. This evidence to support the policy should have been made available for public consultation, either alongside or separate to this NDP consultation. With no evidence to back up this list of sites/buildings are more open to challenge at a planning appeal for example.</p> <p>Historic England has published an advice document about Local Lists (Good Practice Guide for Local Heritage Lists) see link: <a href="https://historicengland.org.uk/imagesbooks/publications/local-heritage-listing-advice-note-7/">https://historicengland.org.uk/imagesbooks/publications/local-heritage-listing-advice-note-7/</a>. This document sets out that it is essential to have selection criteria which define the scope of the list and also suggests that the list will be more effective if the selection criteria have been tested through public consultation.</p> <p>4. There should be clarification which of the assets listed are also referred to as key unlisted buildings within the Conservation Area Assessment / Appraisals.</p> <p>5. The third part/paragraph of this policy is quite vague and the intended meaning of the use of the word ‘renovation’ is unclear.</p> <p>6. The intention of the penultimate paragraph to protect in the policy duplicates paragraphs 133, 134 and 135 of the NPPF but unlike the NPPF, it does not set out what the definable public benefits are. The last sentence is quite ambiguous and it is unclear what the intended meaning is.</p> <p>7. The last two parts of this policy are vague and contradictory statements. How is the ‘public benefit’ going to be assessed? What kinds of public benefit would justify the loss of a non-designated heritage asset?</p> <p>8. The last paragraph of the policy is a statement not a policy of the NDP and it is recommended that this is removed.</p>	<p><b>3. Publish additional evidence and consult?</b></p> <p><b>4. Identify key unlisted buildings in Appendix.</b></p> <p>4. Comment noted – renovation is clear and is qualified by the need for planning permission.</p> <p>6 and 7. No change. Public benefit is not defined in the NPPF. The benefit of individual proposals will be identified and assessed at the planning application stage.</p> <p>8. Final paragraph added following SEA comments from Historic England – no change.</p> <p>Policy Map Comments</p> <p>Sykes Lane – no change. NPPF definition of heritage assets is not limited to buildings it includes “sites, places, areas and landscapes”.</p>
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7	CBMDC	<p><b>SWES Policy 5 – Protecting local non-designated biodiversity and geodiversity assets</b></p> <p><b>Policy Comments:</b></p> <p>1. This policy appears to duplicate the intentions of the Landscape Character SPD (Volume 1: Airedale) which provides detailed guidance on key character areas, their designated and non-designated assets, their characteristics, and guidance for managing development and change within them. The SPD supports the saved policies NE3 and NE3A in the adopted Replacement UDP (2005).</p> <p>2. What does the policy add to the Landscape Character SPD (Volume 1: Airedale)?</p>	<p>1. Comment noted. SPD is not part of the development plan – neighbourhood plan policy will be – no change.</p> <p>2. See above. No change.</p> <p>3. By their very nature</p>



		<p><b>3. The policy is too vague and the supporting text does little to expand on what is meant by non-designated biodiversity and geodiversity assets. How would a developer know if this policy applied to his site?</b></p> <p><b>4. There is a lack of certainty as to what the policy will apply too. Is it everything in the list, if so this would be considered as being too prescriptive. An assessment of where the policy would apply would be beneficial.</b></p> <p><b>5. If these non-designated biodiversity and geodiversity assets can be identified they should be included in a Policies Map.</b></p> <p><b>6. The policy wording in the second part which refers to ‘planning permission will be refused’ is too strongly worded and should be avoided. This policy would be one element of the planning decision making process and any proposal could not be refused purely on this policy.</b></p> <p><b>7. What assessments, evidence or justification is there to promote the policy? If it is a protection policy, what assets is it protecting? The ‘assets’ in the policy are very vague.</b></p> <p><b>8. The policy would benefit from rewording to clarify how the local data could be used in determining any planning application for development of the site of an asset.</b></p> <p><b>Further Comments:</b></p> <p><b>9. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</b></p>	<p>non-designated biodiversity and geodiversity sites may not have been identified. Such sites will come to light through surveys in support of planning applications and comments on applications; and information from local organisations e.g. the Wildlife Trust. Comment noted, no change.</p> <p>4. See above.</p> <p>5. See above.</p> <p>6. This is a cut and paste from CBMDC previous informal comments – policy has been changed to say, “not be supported”. No change.</p> <p>7 and 8. See 1 above.</p> <p>9. See previous comment on Basic Condition Statement.</p>
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<p>8</p>	<p>CBMDC</p>	<p><b>SWES Policy 6 – Landscape</b></p> <p><b>Policy Comments:</b></p> <p>1. This policy is very long and detailed in its demands. The Plan is not clear about the types of proposals this policy would be applied to – is it all proposals?</p> <p>2. Much of the countryside would continue to be protected by Green Belt therefore such a lengthy policy would rarely be needed except for specific proposals such as, for example, wind turbines or specific outdoor recreation uses such as a golf course.</p> <p>3. Furthermore, the adopted Landscape Character SPD (Volume 1: Airedale) provides detailed policy guidance on key character areas, their designated and non-designated assets, their characteristics, and guidance for managing development and change within them. The SPD supports the saved policies NE3 and NE3A in the adopted Replacement UDP (2005). Therefore this policy could be considered as duplicating existing policy. It is not clear what additional protection/guidance this policy adds to EN4 or the Landscape Character SPD (Volume 1: Airedale)?</p> <p>4. What local assessment, evidence or justification is there for a more prescriptive approach to specific assets, e.g. views?</p> <p>5. The spatial elements of the policy, such as views, should be identified on a Policies Map.</p> <p><b>Further Comments:</b></p> <p>6. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</p> <p>7. Para 6.23 – The plan would benefit from further explanation as to why is Airedale the most complex landscape character area?</p>	<p>1. Comment noted. No change. Policy includes “where appropriate”.</p> <p>2. Green Belt is a strategic policy NOT a landscape policy. No change.</p> <p>3. Comment noted. SPD is not part of the development plan – neighbourhood plan policy will be – no change.</p> <p>4. CBMDC’s own evidence base/National Character Areas. No change. <b>Local identification of views?</b></p> <p>6. Add links.</p> <p>7. Previous CBMDC comment. Regulation 14 draft already changed to say, “one of the most”.</p>
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<p>9</p>	<p>CBMDC</p>	<p><b>SWES Policy 7 – Green and Blue Infrastructure</b></p> <p><b>Policy Comments:</b></p> <p>1. CBMDC welcomes the inclusion of the following policy wording in part C “...,unless this would lead to additional pressures on the South Pennine Moors SPA/SAC”.</p> <p>2. What local assessment, evidence or justification is there for a prescriptive approach?</p> <p>3. The spatial elements of the policy should be identified on a policies map for clarity.</p> <p><b>Further Comments:</b></p> <p>4. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</p>	<p>1. Noted.</p> <p>2. Policy is not prescriptive – includes the words “should”. No change.</p> <p>3. Noted. No change.</p> <p>4. See previous comment on Basic Condition Statement.</p>
<p>10</p>	<p>CBMDC</p>	<p><b>SWES Policy 8 – Access to the Countryside, Countryside Sport and Countryside Recreation</b></p> <p><b>Policy Comments:</b></p> <p>1. This policy, as drafted, lacks clarity and purpose. It is unclear as to what the policy is directed to control as there are a number of things which is confusing and could weaken the policy.</p> <p>2. For example, local desires regarding Sykes Lane and Pot Lane etc. would be better with their own specific policy designed to protected identified local ‘greenways’ rather than jumbled into a generic policy where the objective of this element will be lost.</p> <p>3. Furthermore, it is unclear whether the policy is concerned with the determination of planning applications for the development of access to the countryside and/or the development of facilities for sport recreation and tourism?</p> <p>4. Objectives for dealing with any outdoor recreation proposals that may occur in the Green Belt are jumbled up necessarily with policy objectives for extensions and reuse of green belt buildings.</p>	<p>1. Noted. No change.</p> <p>2. Noted. No change.</p> <p>3. Policy sets out types of uses supported and appropriate measures. No change.</p> <p>4. Delete criteria b, c and d – covered by Green Belt policy.</p> <p>5. Comment noted. <b>Local work of Working Group.</b></p> <p>6. Policy is clear “new”.</p>

		<p><b>5. What assessments, evidence and justification exists for a more prescriptive approach, particularly under Parts F and G?</b></p> <p><b>6. Part A - Do the assessments, evidence and justification relate solely to new access points and routes in this policy, and not improvements and enhancements to existing routes and access points.</b></p> <p><b>7. Part B – does this relate to new and/or existing sport and recreation facilities?</b></p> <p><b>8. It is unclear whether Parts F and G seek to protect the ‘highway’; the current ‘environment and character’ of the highway and its surroundings; or both. The status of the highways noted in F and G may prohibit the protection proposed if this relates to the environment and character.</b></p> <p><b>9. Any spatial elements should be included in the Policies Map.</b></p> <p><b>Further Comments:</b></p> <p><b>10. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</b></p>	<p>No change.</p> <p>7. see 4 above.</p> <p>8. Comment noted – details are included in f and g as to what should be protected - no change.</p> <p>9. Map f and g.</p> <p>10. See previous comments on this matter.</p>
11	CBMDC	<p><b>SWES Policy 9 – Infrastructure for new development</b></p> <p><b>Policy Comments:</b></p> <p><b>1. The policy seems to be both a list of some matters that Development Management might consider when dealing with some planning applications and a Development Management policy to assist the determination of a planning application. The intent of the policy should be clear. The policy wording needs reconsideration as it is very prescriptive and does not recognise that it may be appropriate for some infrastructure to be provided after the development has</b></p>	<p>1. Noted. No change. These appear to be CBMDC’s comments on previous version of the plan.</p> <p>2. Noted. No change. Policy included local detail.</p>

		<p><b>been completed.</b></p> <p><b>2. This policy does not establish any specific local context or add further value to the existing CS policies in relation to infrastructure delivery and potential mechanism for viable implementation of schemes.</b></p> <p><b>3. Part E – this part of the policy could be clarified by rewording in terms of the determination of a planning application as the majority of this part is not applicable to planning policy, i.e. the number of school places.</b></p> <p><b>4. What does this policy add to the development management process or the provisions of CSPD M/M ID3?</b></p> <p><b>5. The policy omits any reference to ensuring provision of green infrastructure/open space within new development. Bradford’s Core Strategy and Habitats Regulations Assessment identifies the provision of new alternative natural greenspace as a key element of mitigating the impacts of new development.</b></p> <p><b>Further Comments:</b></p> <p><b>6. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</b></p>	<p>3. Noted. No change.</p> <p>4. See 2 above. No change.</p> <p>5. Noted. This is a matter dealt with through RUDP/emerging Core Strategy.</p> <p>6. See previous comments on this matter.</p>
12	CBMDC	<p><b>SWES Policy 10 – Community Infrastructure Levy</b></p> <p><b>Policy Comments:</b></p> <p><b>1. The intent of the policy is a parish council/s wish list of what they / the community would like to see come forward as a result of CIL contributions, however this is not a land use policy which could assist in the determination of planning applications. Therefore, as drafted, this is not a planning policy that could be adopted as part of the development plan.</b></p>	<p>1, 2 and 3 – comment noted. The NDP is one of the few opportunities for local people to identify CIL projects. The policy is not prescriptive, nor does it prioritise. It</p>

		<p><b>2. The CIL Regulation does not allow the Council to formally prioritise infrastructure for spending the CIL money, or any apportionment of it, across the District. The Council will work with local communities and parish/town councils to agree local priorities for spend. The ‘meaningful proportion’ held by local communities can be spent on a variety of eligible infrastructure projects and ultimately it may not be appropriate to restrict to specific a category.</b></p> <p><b>A list of appropriate schemes which CIL could be applied to is set out with the Regulation 123 list (see link below). Proposals included on the list such as bus service improvements, maintenance of ‘on-site’ green spaces, public toilets and support for local employment enterprises are covered by these regulations and therefore monies cannot be used for these proposals.</b>  <b>(<a href="https://www.bradford.gov.uk/documents/communityinfrastructurelevy/2%20draft%20charging%20schedule/regulation%20123%20list.pdf">https://www.bradford.gov.uk/documents/communityinfrastructurelevy/2%20draft%20charging%20schedule/regulation%20123%20list.pdf</a>)</b></p> <p><b>3. The Parish Council may wish to include the projects in this list as the Parish Council’s supporting actions, as has been done in the transport section of the plan under Objective</b></p> <p><b>Further Comments:</b></p> <p><b>4. If the policy is retained despite the LPAs concerns, the policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</b></p>	<p>identifies local projects that CIL could be used to support and which will be considered during the development management process. No change.</p> <p>4. See previous comments on this matter.</p>
13	CBMDC	<p><b>SWES Policy 11 – Silsden Local Centre</b></p> <p><b>Policy Comments:</b></p> <p><b>1. The Council objects to this policy on the grounds that it repeats existing national and</b></p>	<p><b>1. Comment noted. No change. NPPF is national policy – the NDP sets local development plan policy. NPPF does not</b></p>

	<p><b>local planning policies.</b></p> <p><b>There is no evidence or justification provided as to why this is needed for the Local Centre. Both the NPPF and Core Strategy seek to protect, maintain and enhance the viability and vitality of retail centres through a number of policies (e.g. NPPF paragraph 28 and CS policies EC5d). This policy does not add any further value to this principle on top of the RUDP (policy CR1A), what has already been promoted through the CS policies (EC5D) and also other relevant local planning guidance e.g. Hot Food takeaway SPD and Shop Front Design Guide SPD.</b></p> <p><b>Further Comments:</b></p> <p><b>Should the parish council wish to proceed with this policy, as is or amended, the following comments apply.</b></p> <p><b>2. As drafted, the policy is in conflict with EC(d) of the Core Strategy as part a Retail (A1) is unqualified and unrestricted in terms of size, i.e as drafted the policy would permit retail use of any size. The policy could usefully qualify this use by stating “excluding 150sqm or above”.</b></p> <p><b>3. The policy does not indicate how new residential or office uses in the local centre should be dealt with. For example, in circumstances when conversions of an empty shop to a residence or an office for a small business might be encouraged.</b></p> <p><b>4. What local assessment, evidence or justification is there for a more prescriptive approach to takeaways and shop fronts.</b></p> <p><b>5. Betting shops were identified as an issue but the Neighbourhood Plan is silent on how to deal with these.</b></p> <p><b>6. The locations identified within the policy text would sit better as Parish Council proposals / actions as these do not relate to planning policies. Consider splitting the document into a plan that could be adopted as part of the development plan, and companion documents that relate to the role and actions of the PC’s.</b></p> <p><b>7. The policy is long and covers a number of different elements and would benefit from</b></p>	<p><b>replace the development plan. Core Strategy policies are only emerging. RUDP policy is being replaced and the SPDs are not development plan documents.</b></p> <p>2. Add in size threshold.</p> <p>3. Add in new criterion to address 3.</p> <p><b>4. Local evidence?</b></p> <p>5. Betting shops are A2 uses there is no additional planning control that can be applied.</p> <p><b>6. Include as Supporting Actions?</b></p> <p>7. See above.</p> <p>8. Centre is mapped. No change.</p> <p>9. Ask CBMDC for better map – from their plan!</p>
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<p><b>14</b></p>	<p><b>CBMDC</b></p>	<p><b>SWES Policy 12 – Local Shops outside Silsden Town Centre</b></p> <p><b>Policy Comments:</b></p> <p><b>1. The policy would benefit from more clarity in terms of what it means by ‘urban areas of the villages’, ‘village centres’ etc and how these terms are consistent with other terms used throughout the NDP.</b></p> <p><b>2. The areas (in point 1) should be defined on a proposals map.</b></p> <p><b>3. Despite the current position of the Core Strategy, Steeton With Eastburn was highlighted in para. 6.24 of the Council’s Retail and Leisure Study (2013) to be designated a new Local Centre – has the Parish Council considered this? (<a href="https://www.bradford.gov.uk/Documents/EvidenceBase/Bradford%20District%20Retail%20and%20Leisure%20Study//Bradford%20District%20Retail%20and%20Leisure%20Study%20Update%20Final%20May%202013.pdf">https://www.bradford.gov.uk/Documents/EvidenceBase/Bradford%20District%20Retail%20and%20Leisure%20Study//Bradford%20District%20Retail%20and%20Leisure%20Study%20Update%20Final%20May%202013.pdf</a>)</b></p> <p><b>4. The policy could be clarified by rewording in terms of the determination of a planning application for certain uses or would lead to the loss of certain uses.</b></p>	<p>1. Clarify be adding “not in the Green Belt”.</p> <p>2. Noted. No change. See above.</p> <p>3. Yes. Given limited local centre uses and broken nature of the same it was decided not to do this. Add to supporting text.</p> <p>4. Noted. No change.</p> <p>5. By assessment against criteria a to d. No change.</p>



		<p><b>5. How do you envisage the ‘detrimental’ and ‘adverse’ impacts to be assessed?</b></p> <p><b>6. The wording “ serving a purely local need’ is too prescriptive.</b></p> <p><b>Further Comments:</b></p> <p><b>7. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</b></p>	<p>6. Noted. No change.</p> <p>7. See previous comments on this matter.</p>
15	CBMDC	<p><b>Policy SWES 13 – Protecting Local Employment Sites</b></p> <p><b>Policy Comments:</b></p> <p><b>1. The Council, through planning policy, seeks to protect existing employment land and buildings in the urban areas from development for other uses using criteria based approach in Policy EC3 of the RUDP (and EC4 of the Core Strategy). I note that third part of the policy, the criteria, is near duplication of proposed text in the Core Strategy. This is not considered acceptable.</b></p> <p><b>2. The policy states that sites SWES13/1 to SWES13/13 will be protected for employment use. However, what additional or alternative protection will be offered, as Policy EC4 already does this? This seems like repetition of existing policy, which should be avoided.</b></p> <p><b>3. Has an assessment of the existing stock been undertaken to justify the sites put forward?</b></p> <p><b>Policies Map Comments:</b></p> <p><b>4. The sites/boundaries identified in Map 5 (Silsden) and Map 6 (Steeton) should be checked for correctness.</b></p>	<p>1. Comment noted. Cores Strategy is subject to holding direction. NDP will be made before Core Strategy. No change. Outcome will be same.</p> <p>2. See above.</p> <p><b>3. ?</b></p> <p>4-7 – check and amend boundaries.</p> <p>8. Noted. This matter is left to CBMDC. No change.</p> <p>9. See previous comments on this matter.</p>

		<p>5. Site SWES 13/7 (Silsden) – land to the north of the site has previous planning permission for housing (06/05923/FUL)</p> <p>6. Site SWES 13/10 (Steeton) – part of this site has outline planning permission for housing (14/04208/MAO)</p> <p>7. There is a policy conflict regarding site SWES 13/8 (Steeton) as part of the south-west of the site is proposed as an employment site, however part of the site is also listed as sport and recreation under Policy SWES 17, site SWES 17/8.</p> <p><b>Further Comments:</b></p> <p>8. The NDP provides no discussion on the employment land requirement for the area and consequently no allocation of new employment sites to accommodate future economic growth other than retaining existing premises. There is also no indication that the existing premises will be suitable for future industrial, commercial or market needs.</p> <p>9. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</p>	
16	CBMDC	<p><b>Policy SWES 14 – Micro Businesses</b></p> <p><b>Policy Comments:</b></p> <p>1. This policy which provides support for the development of smaller micro businesses is unclear as it lacks the context, reasoning, justification and a statement of its intent. Certain operations are permitted within a ‘homeworking’ context without the need for planning permission. On the other hand, where businesses require their own premises, new development to accommodate such enterprises will, in most cases, require planning permission. A broad statement that the development ‘would not lead to any significant</p>	Amend as suggested?

		<p><b>adverse impacts on residential occupiers and on the road network’ is not acceptable as a reason for permission to develop. There are many other factors to be considered.</b></p> <p><b>2. Alternative policy wording to add clarity:</b></p> <p><b>Proposals requiring planning permission to convert or split up existing employment space to create office or light industrial units of 50-150 (?) square meters suitable for micro or small businesses (with less than 10 employees) within the existing urban area will be supported, subject to considerations of local amenity, parking and traffic.</b></p> <p><b>3. I note that the policy is specific in that it would limit the number of employees to under 10. How will this be implemented?</b></p>	
17	CBMDC	<p><b>Policy SWES 15 – Protection of Local Community Sites and Buildings</b></p> <p><b>Policy Comments:</b></p> <p>1. The policy which aims to provide protection for certain sites and buildings which are in use for the benefit of the community within the NDP area is unclear as it lacks the context, reasoning, justification and a statement of its intent.</p> <p>2. It is unclear whether it is the intention of the policy to retain the identified buildings or the function that is taking place within the building. Most of the functions operated within the buildings listed, i.e. pubs, will cease trading/operating because the business is unviable and therefore change of use would be supported.</p> <p>Further Comments:</p> <p>3. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</p>	<p>1. Policy is clear – seeks to protect community sites and buildings.</p> <p>2. Policy is clear – seeks to protect community sites and buildings not functions.</p> <p>3. See previous comments on this matter.</p>
18	CBMDC	<p><b>Policy SWES 16 – Local Green Spaces</b></p> <p>The Council agrees with the principle of this policy, however as drafted and evidenced there are fundamental issues which need to be addressed as you progress your plan.</p>	<p>Amend para 6.49 to say “consistent”.</p>

	<p>NPPF, paragraph 78, requires that the local policy for managing development within a Local Green Space should be consistent with policy for Green Belts, as (incorrectly) acknowledged in paragraph 6.49.</p> <p>Policy Comments:</p> <p>1. The policy, as drafted, is unclear and inconsistent with NPPF in that this policy states that its intent is to ‘protect’ local green spaces as opposed to ‘designating’ the areas of land. It is therefore suggested policy wording is amendment to provide consistency of approach with national planning policy:</p> <p>“The areas of land listed below and identified in Maps 10 and 11 will be protected designated as Local Green Spaces. New development will not be permitted other than in very special circumstances.”</p> <p>Evidence Comments:</p> <p>2. There is inconsistency between the name of the open spaces in the assessment and the names of sites in the policy which makes it very difficult to ascertain which assessment is applicable to a site listed. It also appears that there some sites in the policy which have not been assessed. This needs thoroughly checking and amending to ensure that sites are referred to correctly and consistently.</p> <p>3. The background evidence, as included within the plan, is not considered to be a robust assessment of the Local Green Spaces identified.</p> <p>a. In the column ‘close proximity to the community it serves’. A description of its each sites location within the community / settlements would add further value to the assessment in the column relating to</p> <p>b. There is not sufficient detail or evidence in the assessment of how sites are ‘demonstrably special’ to justify designation. Evidence must be provided of the land’s value to and use by the local community to show the land holds a particular local significance. The land must fulfil one or more of the following criteria: beauty; historic significance; recreation value; tranquillity and richness to wildlife.</p>	<p>1. Policy is consistent with national Green Belt policy. Suggested wording would only refer to “inappropriate development” not the exceptions listed in NPPF. However, change wording to “not be approved in except in very special circumstances”.</p> <p>2. Use consistent names in assessment and policy.</p> <p><b>3 and 4. Produce more detailed evidence report.</b></p> <p>5. Check and correct maps.</p> <p>6. See previous comments on this matter.</p>
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		<p>c. There is no minimum size limit for Local Green Spaces; however it would be useful if the size of the site was included.</p> <p>4. There are 18 sites in the assessment, but only 15 sites listed in the policy; have some sites been omitted from the policy for any specific reason?</p> <p>Polices Map Comments:</p> <p>5. The site referencing should be thoroughly checked for errors; examples noticed:</p> <p>a. Site SWES 16/12 in Steeton is listed as Chapel Road Recreation Area in the policy, but looks like a cemetery on the map?</p> <p>b. Site SWES 16/16 is outlined in Map 11, but is not listed in the policy wording.</p> <p>Further Comments:</p> <p>6. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</p> <p>Please note: The Council would usually provide comments which refer to the emerging Local Plan Core Strategy, however due to the Government’s Holding Direction on the plan we are unable to give any weight or effect to its content. Please be aware that the Council may have further comments to make in due course.</p>	
19	CBMDC	<p><b>Policy SWES 17 – Protecting and enhancing sport and recreation facilities</b></p> <p><b>Policy Comments:</b></p> <p>1. Some of the proposed sport and recreation sites listed in the policy are also proposed to be designated as Local Green Spaces within the plan; LGS would provide greater protection of the land. It would not be appropriate in policy terms to have two conflicting policy allocations on a site. These sites are SWES 17/11; 17/10; and 17/9.</p>	<p><b>1. Separate out which are LGS which recreation</b></p> <p><b>2. Add in further evidence.</b></p>

		<p>2. There is a lack of evidence to support the policy as drafted. Another concern is that it is not immediately clear why, for example, SWES 17/5 Jackson’s Field and SWES 17/12 The Paddock has been included or what its use is.</p> <p>Polices Map Comments:</p> <p>3. There is a policy conflict regarding site SWES 17/8 (Steeton) as part of the south-west of the site is also proposed as an employment site under Policy SWES 13, site SWES 13/8.</p> <p>Further Comments:</p> <p>4. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</p>	<p>3. Check and correct maps.</p> <p>4. See previous comments on this matter.</p>
<b>20</b>	<b>CBMDC</b>	<p><b>Policy SWES 18 – Tourism Development</b></p> <p>Policy Comments:</p> <p>1. It would be useful if a policy assessment was provided which demonstrates to the user what the policy linkages are between Policy SWES 18 and others in the plan.</p> <p>2. Does the policy add to that in E8 and E10 in the RUDP? Are there any assessments, evidence or justification for a more detailed local approach?</p> <p>3. It is noted that the proposal related to improvements to footpaths and rights of way does not promote horse riding.</p> <p>Further Comments:</p> <p>4. The policy would benefit from further information in the supporting text which provides clear policy linkages (to RUDP, emerging plan, NPPF compliance), justification for the policy and links to your evidence which supports the policy. This information will be expected at Examination to assist the examiner in their assessment of whether the plan meets the Basic Conditions; plus it would assist future users of the document.</p>	<p>1. Plan read as a whole. No change. Add note to this effect at 6.1.</p> <p>2. Noted. No change.</p> <p>3. Noted. No change.</p> <p>4. See previous comments on this matter.</p>
<b>21</b>	<b>Lichfields</b>	See attached letter.	<b>Remove land shown</b>

			<p><b>green in Annex 1 from Map 13.</b></p> <p><b>Delete SWES13/7 Yorkshire Railway Sleepers site – planning permission for residential.</b></p> <p>Comment on SWES3 noted. No change – policy seeks to achieve higher densities in appropriate NDP locations.</p> <p>Comment SWES9 noted. Comment confuses addressing needs identified at the planning approval stage and delivery of that infrastructure. No change.</p>
<p><b>22</b></p>	<p><b>Roger Lambert</b></p>	<p>SUGGESTED ADDITION TO “NON-DESIGNATED HERITAGE ASSETS” i.e. Objective 2, Policy SWES4, para 6.14</p> <p>The Neighbourhood Plan recognises the existence of various existing listed buildings (listed at Appendix 2). At para 6.14 the Plan also identifies additional heritage assets which are not specifically currently listed, but which the Plan proposes should be recognised and thereby provided with some degree of protection. I suggest that there are landscape features associated with Steeton Hall which should be added to the list at para 6.14.</p>	<p>Comment noted. No change. Listing includes the building and its setting. NDP cannot provide a greater degree of protection than the statutory protection of listing.</p>

		<p>I attach below a copy of the statutory listing of Steeton Hall, and the earliest material noted is “re-used C17 window surround”. However a building on this site has probably fulfilled the role of “the manor house” for the Manor of Steeton (and subsequently the Manor of Steeton with Eastburn) since the C14 and/or C15, in the possession of the Percys, de Plumptions, etc. (see “The Courts and People of South Craven Manors”, David Gulliver, 2015). The inspection of the building by the “listing officer” did not take account of various immensely thick walls inside the Hall which, under this thesis, might represent remains of a building substantially earlier than C17. Further, if the building’s origins are much earlier, then the extensive curved retaining walls still to be found at the west and north of the Hall could represent the remains of a moat. A moated setting would be entirely appropriate for a building of this status at this time.</p> <p>My request is that these curved retaining walls should be protected by an appropriate entry in the Neighbourhood Plan.</p>	
23	<b>Craven District Council</b>	<p>Thank you for the opportunity to review and comment on the draft neighbourhood plan for Steeton, Eastburn and Silsden. Craven District Council is a neighbouring planning authority, and from our own duty to cooperate work, there are cross boundary effects arising from the plan documents that should be taken into account going forward.</p> <p>In this regard, we note that the neighbourhood plan references matters that are of relevance to Craven, Bradford and Eastburn/Steeton – Silsden. These are:</p> <ul style="list-style-type: none"> <li>• The role and function of South Craven School; (para 4.29) and</li> <li>• Operation of the Crosshills railway crossing and resultant traffic delays (page 23)</li> </ul> <p>Craven District Council supports the recognition of potential cross-boundary effects of neighbouring plan proposals. These are matters that are also relevant to South Craven, and will be accounted for as the Craven Local Plan moves forward.</p> <p>I note that the Neighbourhood plan does not allocate sites for development and defers to the Bradford site allocations plan to identify sites and locations for that purpose. We will engage with Bradford Council and comment separately on those matters as and when consultation on those sites takes place.</p>	Comments noted. No change.
24	<b>Bingley Town Council</b>	<p>Bingley Town Council comments that this is a comprehensive document. It would be helpful to have photographs referenced throughout the document.</p>	Comment noted. Improve phot references.
25	<b>Coal Authority</b>	<p>Thank you for the notification of the 3 February 2017 consulting The Coal Authority on the above NDP.</p>	Noted. No change.



		<p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.</p> <p>As you will be aware the Neighbourhood Plan area lies within the current defined coalfield.</p> <p>According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity in the form of 195 recorded mine entries and other mining legacy risks arising from unrecorded probable shallow coal workings and thick coal outcrops.</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 and thick coal outcrops are predominantly located in the same broad areas.</p> <p>If the Neighbourhood Plan were to propose to allocate sites for future development in these areas then consideration would need to be given as to how the development will need to respond to the risks to surface stability in accordance with the National Planning Policy Framework and the City of Bradford Development Plan. However I note that the Neighbourhood Plan makes no allocations for new built development, in addition none of the designations relating to protecting assets and areas are affected by mining legacy.</p> <p>In addition any allocations on the surface coal resource would need to consider the impacts of mineral sterilisation in accordance with the National Planning Policy Framework and the City of Bradford Development Plan. However again I note that the Neighbourhood Plan makes no allocations for new built development.</p> <p>Consequently The Coal Authority has no objection to any proposals within the Neighbourhood Plan and we have no changes that we would be seeking.</p>	
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		<p>In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended) please continue to consult The Coal Authority on planning matters using the specific email address of <a href="mailto:planningconsultation@coal.gov.uk">planningconsultation@coal.gov.uk</a>.</p> <p>The Coal Authority wishes the Neighbourhood Plan team every success with the preparation of the Neighbourhood Plan.</p>	
<b>26</b>	<b>Val Carroll</b>	<p>I came to the consultation event last week, and have a few thoughts about properties to be protected. As I live in Silsden, they all refer to Silsden:</p> <ul style="list-style-type: none"> <li>- no.27 and no.27a North Street, Silsden, are one property - both should be protected</li> <li>- the older cottages in Pear Tree Close (at the bottom of North St)</li> <li>- Pear Tree Cottage, on Skipton Road, next to Hillcrest Avenue</li> <li>- 1, 3, 5 and 18a, 18b, 18c North Street (the latter 3 are next to Highfield House)</li> <li>- 7 &amp; 9 Chapel Street</li> <li>- Stirling Street, at the bottom of Cat Steps</li> <li>- Townhead Farm and the other old farm buildings above Townhead</li> <li>- the old Library building (which was once a school)</li> </ul>	<b>Add in as non-designated heritage assets?</b>
<b>27</b>	<b>Historic England</b>	<p>Thank you for consulting Historic England in connection with the Pre-submission draft of the Steeton, Eastburn and Silsden Neighbourhood Development Plan. We are responding to the document sent with your e-mail of 3 February 2017, which we understand to be the latest version the draft Neighbourhood Development Plan.</p> <p>We note and welcome the draft Neighbourhood Development Plan and only have one comment to make in respect of Policy SWES 6.26 Landscape. The text identifies in clause f) “Protecting and enhancing important views” and goes on to identify these views in subclauses i.-vi.</p>	<b>Add in map of viewpoints.</b>

		<p>We would suggest that additional map is added to the Neighbourhood Development Plan, which indicates the view points, direction of views and breadth of the views, any panoramas or wider views which have identified as being important, which will strengthen the policy.</p> <p>We hope the above advice is helpful, and look forward to being consulted by Bradford Council on the Examination version of the Neighbourhood Development Plan in due course.</p>	
28	<b>Martin Foster</b>	<p>Having read the neighbourhood plan, here are some thoughts I hope can be taken into consideration. Overall, the plan seems very aspirational and aimed at protecting the integrity of the area and there is much to be commended, such as improvements to the canal and park facilities. My overriding concern is that developments are already taking place which seem to go counter to the plan and that this may only increase. Examples of this are:</p> <p>The library - faced with imminent closure, a volunteer group has offered to keep this valuable service open but has been met with delays and the presence of some other, seemingly cloak and dagger, group that the council is not prepared to talk about.</p> <p>The town hall - listed in the plan as an invaluable asset, yet also faced with closure.</p> <p>The need for affordable housing - yet we have a development called The Banks advertising “luxury 3, 4 &amp; 5 bedroom homes”</p> <p>Silsden is earmarked for 1000 to 1200 extra homes. This would surely represent a 25% increase to the current population, along with a near-comparable increase in local traffic, which our already-crowded roads could ill support.</p> <p>Schools - Aire View and Hothfield are already oversubscribed. An extra classroom had to be provided at Aire View, vastly reducing the available playground space. Whilst plans seem to be in place for a new school, what primary age children need is an intimate setting, not a 4 or 5 form intake super-school.</p> <p>Railway station - the proposed footbridge, according to recent news, currently has funding of £200k out of a required £1.5m. I don’t believe the bridge is either necessary or the right solution. A footbridge would not readily suit the needs of wheelchair / mobility scooter users, or cyclists. As</p>	<p>NDP cannot influence development taking place or that has existing planning approval.</p> <p>NDP seeks to protect the Library and Town Hall buildings – but cannot protect services.</p> <p>Affordable housing policy is set through CBMDC’s policies.</p> <p>Silsden growth target will be set through Core Strategy. NDP must be in general conformity with this.</p> <p>NDP seeks to address school capacity issue where it can through SWES9e.</p> <p>Comments on station</p>

	<p>a daily user of that route, I believe the following could be done at a fraction of the cost:</p> <ul style="list-style-type: none"> <li>• Recognisable pedestrian crossings - traffic regularly queues across the crossings, ignoring the presence of pedestrians and cyclists. The introduction of light-controlled crossings would provide clarity for pedestrians / cyclists and drivers alike.</li> <li>• Better lighting - the crossings are not well-lit and the roundabout generally has several lights out.</li> <li>• Traffic calming measures - an enforced reduction in speed on the roundabout, on the approaches and on the exits would help protect those crossing. Drivers rarely signal their intentions, making it hard for pedestrians to determine when to cross. Traffic approaching the roundabout does not slow down enough and traffic exiting the roundabout often leaves as if starting a Grand Prix race.</li> </ul> <p>The plan and Northern Rail both mention cycling as an integrated part of the transport plan, yet the problems listed above do not encourage cycling to the station. Until October, I cycled to and from the station each day. I, along with several others, then became the victim of cycle theft. Despite feedback to the Police and to Northern Rail, no action has been taken to improve cycle security at the station. Again, the solution is simple, yet seemingly not a priority:</p> <ul style="list-style-type: none"> <li>• Improve lighting by the cycle sheds.</li> <li>• Introduce effective CCTV - there are cameras on the Leeds side, but not the Skipton side, where the sheds are.</li> <li>• Replace the vandalised cycle storage - most lockers are now completely unusable.</li> <li>• Rotate the position of the lockers so that they are not hidden from view, allowing criminals to operate undetected.</li> <li>• Provide proper lockers on the Leeds side. There is a cycle shelter, but this does not afford proper protection and cycles are open to vandalism / theft of parts.</li> </ul> <p>Pedestrian / cycle access between Silsden and the station needs to be vastly improved before any further increase in traffic takes place. The pavement is, in places, dangerously narrow and, in others, poorly lit. A sensible approach also need to be taken to the section from the river bridge to the roundabout where the pavement runs out on one side.</p> <p>As for the proposed Silsden by-pass, I have several concerns:</p> <ul style="list-style-type: none"> <li>• The route would seem to destroy some of the stone-wall-enclosed narrow lanes that the plan aims to protect.</li> <li>• The route would be very (unacceptably?) close, I believe, to the proposed site for the new</li> </ul>	<p>noted. No change.</p> <p>Comments on bypass noted. No change.</p>
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		<p>school.</p> <ul style="list-style-type: none"> <li>• Building such a major road would then encourage in-fill of housing between the bypass and Bolton Road, leading to the destruction and loss of beautiful, historic meadowland. Two solutions would seem to present themselves:</li> <li>• Prohibit HGVs using the A6034. Suitable routes exist along the A629 and A65.</li> <li>• Remove parking on the high street. This would improve traffic flow and encourage reduced car use.</li> </ul> <p>Finally, there seems to be so much unused brownfield land in Silsden that this should be used as a priority before consideration is given to other developments. Coming back the need for affordable housing, I believe that, with some imagination, an acceptable standard of higher density, lower-cost housing could be provided on this land, thereby helping to meet Silsden's quota of new housing, whilst having a minimal impact on the natural environment surrounding the town. This land's proximity to the main road and to the station should help encourage greater use of public transport, reducing the impact of extra housing on traffic levels in the area.</p> <p>Thank you for your consideration. I appreciate that it is a tall order to collate large amounts of feedback and, no doubt, opposition. I hope we can all find a constructive way forward to meet demands but protect the area and all that is good about it.</p>	
29	Roger Lambert	The Old Star Inn has already been converted to residential (– presumably if the NDP proposed policy had already been in place then this planning application would have been refused).	<b>Comment noted. Remove from policy.</b>
30	Roger Lambert	The list of identified local employment sites is strangely selective – and it excludes lots of existing valuable employers, e.g. farms, nursing homes, shops, kennels, etc. Why?	Noted. Policy includes largest B1, B2 and B8 sites. No change.
31	Roger Lambert	Can the newly created public green spaces in the new housing be identified and included e.g. Redrow?	<b>Add as recreation sites?</b>
32	Roger Lambert	<p>Comment 1: The numbers used on the map do not tally with the numbers in the text. And some references in the text do not exist on the map e.g. SWES17/7 Airedale Mews? And SWES17/12 The Paddock?</p> <p>Comment 2: I note that the bowling green is defined under this policy (SWES17/11). Would such a designation restrict potential alternative uses of this central site e.g. multi-use games area?</p>	<p>Comment 1 – check and amend maps.</p> <p><b>Comment 2 – see Local Green Space comment by CBMDC.</b></p>
33	Roger Lambert	I am disappointed to not find any reference to the over-arching character of the hearts of the villages – what is it about Steeton that our friends from the south enjoy and remember? And if	<b>Include?</b>

		such was identified, then it should be SWOTted so that with time the best features of the villages can be enhanced.	
<b>34</b>	<b>Roger Lambert</b>	Can the NDP propose that Steeton Primary School might be given the opportunity to expand by developing the adjacent field (or part thereof) already in the ownership of the PC? I appreciate that a covenant exists, but can this be sidestepped in the interests of the whole community?	Noted. No change.
<b>35</b>	<b>Roger Lambert</b>	<p>This section discusses UDP policy K/OS7 – Village Green Space – and it appears to propose to re-apply the existing allocations (but in the absence of an associated map this is difficult to establish). K/OS7.5 specifically identifies a substantial area of “village green space”, much of it touching Station Road and nearby Memorial Wood, etc.</p> <p>This designated parcel includes much of the gardens of High Hall. This particular part of the proposed village green space does not comply with national planning guidelines as set out on the Planning Portal. I refer specifically to para 77 of the Planning Portal guidance which requires “close proximity to the community”, and it must be “demonstrably special to the local community”. The gardens at High Hall are “off the beaten track” and enclosed generally by multiple walls varying between 8 and 10 feet high – no-one can see in to most of the garden.</p> <p>The whole of this proposed OS7 village green space falls within the Steeton Conservation Area, and thus the extensive tree cover is itself well protected, and the walls in question are all well protected as they are “deemed” to be listed along with the house.</p> <p>I am not arguing against the OS7 designation as it might affect the publicly accessible edges, e.g. Station Road, memorial Wood and the Cemetery. But I am arguing that the designation of High Hall garden is technically incorrect and unnecessary.</p>	NDP seeks to replace OS7 with policies SWES16 and SWES17. Comment noted.
<b>36</b>	<b>Roger Lambert</b>	Airedale Hospital constructed three blocks of residential accommodation about 3 years ago. These were intended to be restricted by health workers on the site. However things did not go to plan – and much of the accommodation (funded through a PFI contract) was standing empty. I understand that planning approval was subsequently revised to allow the dwellings to be occupied by regular members of the public. If I am correct then can these dwellings be included in the assessment of Steeton’s progress towards its designated 750 new houses?	Refer comment to CBMDC.
<b>37</b>	<b>Neil Whitaker</b>	<p>I am Chair of Governors at Hothfield Junior School, Silsden.</p> <p>I have some comments on two parts of section 4 of the draft neighbourhood development plan.</p>	<b>Amend as suggested?</b>

		<p>Using the same numbering I think the two sections should read as follows:</p> <p>4.30: Silsden currently retains separate Infant and Junior schools, with pupils usually moving from the Infant school to the Junior school at age 7. As such each school has its own admissions process. This caused significant problems for some Silsden families in 2015, when, for the first time, families were not offered a school place at Aire View Infant School, due to there being insufficient places, even though the child had a sibling at Hothfield Junior School. An added benefit of the two schools coming together in September 2017 to form a single primary school will be that this problem is overcome. There are proposals to build a brand new school in Silsden to accommodate the combined schools (the combined school being called Silsden Primary School). A plot of land on the north east of the town has been identified for the new school building. The discussions regarding this proposal are currently on going.</p> <p>4.38 Silsden is the only place in the Bradford area to have separate Infant and Junior schools. From September 2017 the schools will join together and become Silsden Primary School (although still on the existing separate sites). One of the benefits will be that there will no longer be separate schools with separate admissions systems.</p>	
<p><b>38</b></p>	<p>Paul Redshaw</p>	<p>I write to express my significant concerns regarding the production of the Draft versions of 2017 Silsden &amp; Steeton Neighbourhood Development Plan.</p> <p>First of all I wish to point out that I do not seek to discredit hard work done for those currently involved; that is not my point here; I know how hard putting together these documents can be. However, what I see is a document that is neither visionary nor fresh or has a quality for its intended purpose.</p> <p><b>HISTORY</b></p> <p>As a resident of Silsden and a former professional environmental consultant who has excellent experience in writing similar documents, I had obviously an interest in the Neighbourhood Plan. Since its inception I have asked, several times, by email, to be part of the working group and not once did the clerk involved in the communication for the 'plan' respond to this request. It would appear that the current working party members, comprising of mostly Councillors, didn't want any other people involved in it's production, despite asking folk to come forward to help them. However, it came to my notice that the first draft version was produced November 2015 and I looked thoroughly through the document. Generally as first drafts go you should never expect too</p>	<p><b>What do you want to do about this one?</b></p>

	<p>much. However what was clear that whoever was putting this document together had little understanding of how an important document should be produced. There were many and I mean many failings; In fact so many that I relayed my concerns back to the working party by email. As it stood the document would require going through many major draft revisions before it would be fit for purpose.</p> <p><b>ADOPTION</b></p> <p>Surprisingly, it was noticed that this document was trying to redo the very professional work already undertaken by Bradford over the past few years. To explain, it would be far easier, more professional and more advantageous to engage the working party/Town Councillors to adopt many of the plans and documents already produced, such as the Silsden Town Design Statement 2001 or the Silsden Conservation Area Appraisal 2006 and Steeton Conservation Area Assessment Oct 2005 and no doubt there are others also. I have spoken, in person with other Councillors in other local townships around Keighley and it would appear that they are taking this adoption approach as they have recognised that the existing documents are entirely relevant and accurate. By doing this the Neighbourhood Plans can concentrate on what really matters for the future without trying to get messy by attempting to redo existing documents. Giving reference to these documents is the sensible approach and will undoubtedly save working groups involved in these productions a great deal of time and money. All one has to do is include it within the submission pack and give reference where necessary. A no brainer really!</p> <p><b>2017 DRAFT</b></p> <p>The newly realised 2017 draft Neighbourhood Development Plan, like its previous two incarnations Rev Nov 2015 and Feb 2017 (yes, a year later!) has significantly not addressed any of the issues I forwarded. There are failings abound, such as the regular use of the word 'we' (in reference to the working group) which should not appear at all. The document should be frank and precise and should have no reference to the body that created it within the document, other than maybe a credit mention at the end.</p> <p>Similarly the document opens with a quote "Our aim for the neighbourhood development plan ..." The word "our" should not be used and should be substituted for the word "The". The document is supposed to be by the people for the people.:</p> <p>The working body is just a representative of the people.</p> <p>The document is produced in a serif font, which is not acceptable to easy reading. It should be</p>	
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		<p>put into sans seraph like this writing is. You will find that all government or official documents are produced in a sans seraph font due to its easy reading ability.</p> <p>Plans and drawings are some of the poorest you could ever see; in fact many figs aren't even readable..fig 5, fig, 6, fig7 . The scales of the plans also consistently shift creating no conformity and even shift from metric to miles then back again at the turn of a page. You would constantly require the use of a scale ruler to appreciate scale of purpose, something most people would not have. There is no</p> <p>2 consistency of size either. Some have borders, some don't. Some have two lots of headings, etcetera, and etcetera.</p> <p>Photographs that are used throughout are some of the gloomiest images you could take and do not show buildings or landscape to its advantage.</p> <p>From cover to cover the design and quality of this document is of the poorest word document you would not wish to see as a statement of an intention.</p> <p>Though it wouldn't be acceptable for the document to address National, strategic or Bradford adopted planning policies etcetera it would be advantageous to give reference to the policies that would apply or necessary and which bodies to go to for support.</p> <p><b>CONCLUSION</b></p> <p>The document needs to be produced in an Accessible Communication Format as described on the GOV.UK WEBSITE.  <a href="https://www.gov.uk/government/publications/inclusive-communication/accessiblecommunication-formats#providing-accessible-formats">https://www.gov.uk/government/publications/inclusive-communication/accessiblecommunication-formats#providing-accessible-formats</a></p> <p>Without doubt there requires some very serious thinking to be done by the Town Councils and the working party involved in this document. In its present state I feel that it is not an acceptable document that Silsden, Steeton and Eastburn folk can be proud of. Where is the quality and where is the real Vision?</p> <p>Given that this is still at the FORMAL CONSULTATION STAGE of the development planning process I request that an urgent shadow meeting is undertaken with all parties to discuss this issues to ensure that what is achieved is the right initiative, done in the best way. It is imperative that Silsden, Steeton and Eastburn get the right plan and not one forced through just because it's taken a long time to produce so far. After all you can do a lot of work but still not make grounds! We need proper scrutiny and evaluation and a document that we can all be proud of.</p>	
39	Roger Smith	There is no mention of the three places of worship in Steeton-with-Eastburn, whilst places of worship in Silsden are mentioned.	Add in references as suggested.

		Please can we have similar information inserted within the Steeton-with-Eastburn section? i.e. Steeton-with-Eastburn benefits from having three churches, St Stephens Church of England, Steeton Methodist Church and Eastburn Methodist Church, all situated in the centre of the villages. The churches together still play an important part in the community. The churches are still well used by community organisations and offer social activities, coffee mornings as well as religious worship.	
40	Roger Smith	<p>1. Under Traffic and Transport please can we have a 20 mph limit on Grange Road, Eastburn.</p> <p>2. Steeton – Silsden Railway Station needs vehicular drop off pick up point on North side of station platform, especially for disabled travellers.</p> <p>3. Also proper tarmac paths on the North side leading to platform, currently they are not adequate for disabled users.</p> <p>4. Volume of traffic passing through Eastburn and Steeton accessing the hospital would be significantly reduced if access to the hospital could be provided from the A629 into the rear of the hospital. It would also improve the air quality.</p>	<p>1. Not an NDP matter – <b>add to supporting actions?</b></p> <p>2. <b>Add to supporting actions?</b></p> <p>3. Noted. Not an NDP matter.</p> <p>4. Noted. Not an NDP matter.?</p>
41	Roger Smith	There is a sub post office in Eastburn. Steeton Hall provides a restaurant and accommodation.	Add in references to these facilities.
42	Roger Smith	5.14 Mentions associated community facilities 5.15 Mentions associated community facilities and high quality employment areas. Can you be more specific what these might be and how achieved?	<b>Add in what these are?</b>
43	Roger Smith		
44	Roger Smith	Spelling error Eastburn Works not Eastbourne Works. Both photograph	<b>Check spelling</b>
45	Roger Smith	Where does the green space appear next to the hospital. Between the main road and the hospital opposite the older peoples bungalows? There are two green spaces one on either side of the Main road.	<b>Map?</b>
46	S Calvert Smith	Comments on bypass and seeks a weight restriction as more appropriate.	Comment noted. No change.
47	S Rycroft	Existing restaurants/pubs (Nightingale and Goatshead) in Steeton/Eastburn don't necessarily fit demographics of all the people moving here. So, they either need to refresh their offerings or will	Comment noted. NDP cannot influence offer

		go out of business. Otherwise – the money people could spend in their local area will just go outside	of individual commercial premises.
48	S Rycroft	Business isn't all about space or roads. Some need 21st century comms links to flourish, so when will we be able to have fibre throughout the community rather than on just a couple of selected roads. Local council needs to put pressure on Telco's	<b>Add comment on better telecommunications infrastructure?</b>
49	S Rycroft	Need better restaurants/pubs to encourage tourism – even if people chose to stay here, they'll take their money elsewhere to eat/drink	Comment noted. Plan seeks to support tourism related development.
50	H Barton	Comments on possible closure of Town Hall.  Comment on state of parks e.g. Silsden	NDP seeks to protect the Town Hall building – but cannot protect services.  Comment on state of parks noted. NDP seeks to protect these and councils will support improved management and enhancements.
51	North Yorkshire County Council	Support Objectives 5 and 8.  Within the consultation draft there are transport issues discussed which are within North Yorkshire boundaries, namely:  <ul style="list-style-type: none"> <li>- A629 Keighley to Kildwick Bypass</li> <li>- Cross Hills level crossing</li> <li>- Skipton to Silsden direct bus route</li> </ul> A629 Keighley to Kildwick Bypass – Paragraph 4.35 states “The Aire Valley dual carriageway (A629), Keighley to Kildwick by-pass, was completed in 1988 and built to alleviate the traffic	Support noted.  Can comment on A629 in para 4.35 be evidenced?  Amend reference to Cross Hills level crossing to Kildwick level crossing

	<p>congestion in the Aire Valley at that time. However, decades later, the traffic problems remain the same due to the large volume of vehicles which travel through the area.”          NYCC as LHA would be interested to see your supporting evidence for this statement.</p> <p>Cross Hills level crossing – Paragraph 4.39 identifies as a key issue “Level Crossing at Cross Hills (out of area) causes traffic hold ups.” For clarification the level crossing is referred to as Kildwick level crossing, see below link:</p> <p><a href="http://archive.nr.co.uk/Transparency/LevelCrossingItemDetail.aspx?lcid=5719&amp;name=Kildwick&amp;View=onList&amp;postcode=BD20&amp;radius">http://archive.nr.co.uk/Transparency/LevelCrossingItemDetail.aspx?lcid=5719&amp;name=Kildwick&amp;View=onList&amp;postcode=BD20&amp;radius</a></p> <p>NYCC is currently investigating opportunities for improvements to the local highway network and the possibility of an additional station around this area in conjunction with partners. In reference to the Steeton, Silsden and Easton Neighbourhood Plan there is no reference to any additional rail services contained within the draft plan. NYCC would seek to be consulted at the earliest opportunity should any change to services be considered to understand the impacts it would have on Kildwick level crossing down time.</p> <p>Skipton to Silsden direct bus route – Throughout the draft consultation document the reinstatement of a direct bus route between Silsden and Skipton is discussed. NYCC, in principle, is supportive of sustainable transport methods that can meet gaps or are complimentary to existing services. It would need to be demonstrated that a direct bus route between Silsden and Skipton can be found to be viable</p> <p>Children and Young People’s Service          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.</p> <p>Heritage Services Archaeology</p>	<p>Comment noted on rail services but not a NDP matter.</p> <p>Comments on bus service to Skipton noted.</p> <p>Amend SWES10 to include South Craven school.</p> <p>Supporting comments on archaeology noted.</p>
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		We are pleased to see the reference to heritage assets of archaeological interest (para 6.17). As the plan falls outside of North Yorkshire we presume that West Yorkshire Archaeological Service will be making more detailed comments.	
<b>52</b>	<b>Highways England</b>	<p>Thank you for the opportunity to comment on the Steeton, Eastburn and Silsden draft neighbourhood plan.</p> <p>We have reviewed the documents with the primary area of interest of maintaining the Strategic Road Network (SRN).</p> <p>The role of the Agency in the Local Plan process is set out in the Circular, which states that development proposals are likely to be acceptable "if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at overcapacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. "</p> <p>With this in mind we agree that the Neighbourhood Plan supports the policies that look to retain and enhance cycle ways, footpaths, bridleways and public transport as these measures can significantly contribute towards reducing the impact on the SRN.</p> <p>In addition we continue to welcome the opportunity to work with neighbourhood planners and developers, prior to submission of any planning application, to understand the impact of any development. Where development sites will have a significant impact on the SRN and Highways England do not have a committed investment they may need to deliver or contribute towards the required mitigation.</p>	Comments noted. No change.
<b>53</b>	<b>S Rycroft</b>	What happened to the proposed path from the Thornhill Road area through the Redrow development to the station? If we can't even get a footpath built what hope is there of anything more ambitious?	<b>Any local knowledge on this?</b>
<b>54</b>	<b>Anne Knight</b>	<p>Seeks following:</p> <ol style="list-style-type: none"> <li>1. Provision of access for ambulances only from the Aire Valley Road.</li> <li>2. Landing area for air ambulances as near to hospital as possible.</li> </ol>	<p>Comments are noted and will be passed on to highways and the Hospital. Matter 1 is a highway issue that is not a matter for the NDP.</p> <p>Matter 2 is an</p>

			operational issue for the hospital.
55	David Shailer	Raises issue of improved access to Silsden and Steeton Station from Steeton.	<b>Add in supporting action: “To improve walking, cycling and road access to the station from the local communities of Steeton, Eastburn and Silsden.”</b>
56	John Dixon	6 and 8 Green Lane should be added to the local heritage list. Wishes to know what the impact of this could be.	<b>Consider adding to list. Contact to explain implications for owners if this action is agreed.</b>
57	John Dixon	Need for better integration of bus and rail times.	<b>Add better integration of bus and rail times as a new Supporting Acton. Contact service providers about this issue.</b>
58	R.A and J.M. Fotherby	Raise the following issues: <ol style="list-style-type: none"> <li>1. Lack of publicly owned open space in the area – particularly suitable for use by teenagers.</li> <li>2. Site for a new primary school should be identified in Steeton.</li> <li>3. Support need for a new footbridge over A629.</li> <li>4. More investment in Silsden Park.</li> </ol>	Comment 1 noted. Open and local green spaces are protected in the plan. <b>Comment 2 – Supporting Action?</b> Comment 3 noted. <b>Comment 4 – add in improvements to Silsden Park as a proposal?</b>
59	V. Hepworth	Comments on Ings Road/Currer Walk development open space and grass verges.	<b>Not NDP matters. Pass to CBMDC for</b>

			<b>response.</b>
<b>60</b>	<b>Judith Neal</b>	Comment on access to Station.	Comment noted. No change.
<b>61</b>	<b>S. M. Stocks</b>	Objects to development at Bolton Road.	Comment noted. No change.
<b>62</b>	<b>E. Rhodes</b>	Support for new housing development but this should be fully accessible to disabled.	Comment noted. No change. This is dealt with through Building Regulations

## **6.0 Submission 2017 and 2019**

- 6.1 Following submission in November 2017 CBMDC wrote to the Town and Parish Council with a number of concerns (Appendix 12). These included concerns about mapping, Local Green Space designation and a number of other technical and factual matters. It was decided not to carry out the Regulation 16 submission consultation and to address CBMDC's concerns. To address these the councils commissioned a Local Green Space study; a number of minor amendments to the NDP; corrected factual errors in the SEA/HRA screening; and re-mapped the NDP site allocations where necessary. Some matters, e.g. insertion of consultation dates and the chapter on how to respond to the Regulation 16 consultation remain in the NDP.
- 6.2 The consultation on Local Green Spaces yielded two responses and based on one of thee it was decided not to designate the Keighley Road Allotments as Local Green Space (Appendix 12).
- 6.3 In between submission in November 2017 and re-submission in January 2019 CBMDC committed to a partial review of the Core Strategy. This is at a very early stage and has little, or no impact on the submitted NDP.
- 6.4 Post-submission in January 2019 CBMDC after checking the submitted documents issued a further letter setting out further corrections and clarifications (Appendix . It was agreed to make these minor, technical amendments, prior to commencing the Regulation 16 consultation. Given the delay involved it was also agreed that the NDP now be examined against the February 2019 NPPF.



# Appendices

## **Appendix 1 - Silsden Drop-in Flyer, September 2014**



# Planning for the Future of Silsden

Silsden Town Council  
and Steeton-with-  
Eastburn Parish  
Council

Phone: 01729 825944  
E-mail:  
clerk@steeton-with-  
eastburnparishcouncil.gov.uk



**Calling all residents — We need you!**

**Neighbourhood plan drop in consultation**

**1pm-9pm Friday 26 September**

**at Silsden Methodist Church Hall**

**What is neighbourhood planning?** Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops, and offices or industrial units to be built, have their say on what those buildings should look like and what infrastructure should be provided. Silsden Town Council has started the process to develop a neighbourhood plan, and has decided to do this jointly with Steeton-with-Eastburn Parish. Both Councils believe that there are many common issues joining the two communities and that it make sense to develop a joint plan.

**How can I join in?** Drop-in consultation events, where anyone can come along and give their views about the area will be held from 1pm to 9 pm on Friday 26th September at the Methodist Church Hall in Kirkgate, Silsden and on Saturday 27th September at the HUB in Stone Grove, Steeton. You can attend either event.

**More detail:** A Neighbourhood Plan is a community-led framework for guiding the future development and growth of an area. It may contain a vision, aims, planning policies, proposals for improving the area or providing new facilities, and allocation of key sites for specific kinds of development. Neighbourhood plans relate to the use and development of land and associated social, economic and environmental issues. It may deal with a wide range of issues (like housing, employment, heritage and transport) or it may focus on one or two issues that are of particular importance in a local area. A Neighbourhood Plan for Steeton-with-Eastburn and Silsden will be subject to examination and referendum and then form part of the Bradford Local Development Plan.

## **Appendix 2 - Steeton with Eastburn Newsletter, Drop-in, September 2014**

# STEETON-WITH-EASTBURN PARISH COUNCIL

**Working for the Community**



**September 2014**



# Planning for the Future

*View of Eastburn from Eastburn moor*

## Calling all residents— We need you!

### Neighbourhood plan drop in consultation

### 1pm-9pm Saturday 27 September at the HUB

**What is neighbourhood planning?** Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops, and offices or industrial units to be built, have their say on what those buildings should look like and what infrastructure should be provided. Steeton-with-Eastburn Parish Council has started the process to develop a neighbourhood plan, and has decided to do this jointly with Silsden Town Council. Both Councils believe that there are many common issues joining the two communities and that it make sense to develop a joint plan.

**How can I join in?** Drop-in consultation events, where anyone can come along and give their views about the area will be held from 1pm to 9 pm on Saturday 27th September at the HUB in Steeton, and on Friday 26th September at the Methodist Church Hall in Silsden. You can attend either event.

**More detail:** A Neighbourhood Plan is a community-led framework for guiding the future development and growth of an area. It may contain a vision, aims, planning policies, proposals for improving the area or providing new facilities, and allocation of key sites for specific kinds of development. Neighbourhood plans relate to the use and development of land and associated social, economic and environmental issues. It may deal with a wide range of issues (like housing, employment, heritage and transport) or it may focus on one or two issues that are of particular importance in a local area. A Neighbourhood Plan for Steeton-with-Eastburn and Silsden will be subject to examination and referendum and then form part of the Bradford Local Development Plan.

**Robin Hood  
Family  
Pantomime**

21st December at the HUB  
12 noon—1 pm  
£5 per person, £15 family of 4  
Pre-booking advisable  
For tickets phone 01729 825944

[www.steeton-with-eastburnparishcouncil.gov.uk](http://www.steeton-with-eastburnparishcouncil.gov.uk)

### **Appendix 3 – Letter to Businesses, January 2015**



## Steeton-with-Eastburn Parish Council

## Silsden Town Council



Bozle Sanderson, Clerk to Steeton-with-Eastburn Parish Council,  
35 Kings Hill Lane, Settle, North Yorkshire, BD24 9FD. Tel: 01729 825944  
[clerk@steeton-with-eastburnparishcouncil.gov.uk](mailto:clerk@steeton-with-eastburnparishcouncil.gov.uk)

To all businesses in ~~Steeton, Eastburn and Silsden~~

5<sup>th</sup> January 2015

Dear Sir or Madam

### Development of a Neighbourhood Plan for ~~Steeton, Eastburn and Silsden~~

~~Steeton-with-Eastburn~~ Parish Council and ~~Silsden~~ Town Council are preparing a ~~Neighbourhood~~ Plan for the area. When complete this plan will guide and control development – this could decide things such as where new homes, shops, offices and business units should be built. It could look at design, protection of greenspace, conservation of heritage and traffic and transport.

The Councils have decided to prepare this plan jointly – because both Councils believe that there are many common issues joining the two communities and that it makes sense to develop a joint plan.

We are only at the start of the process – but we want your views on the future of the area, not just employment and business but any of our eight initial themes:

- Heritage and Natural Environment
- Housing
- Retail
- Employment and business
- Education
- Transport
- Health
- Recreational, sporting and community facilities

So let us know what you think the issues are, and the things we should plan for. You can do this in writing, or, alternatively, we will be happy to meet with you.

I look forward to hearing from you

Yours sincerely

|

Bozle Sanderson



## **Appendix 4 – Informal Consultation Flyer**



# Planning for the Future Steeton, Eastburn and Silsden



Silsden  
Town  
Council  
and  
Steeton-  
with-  
Eastburn  
Parish  
Council



Phone: 01729 825944  
E-mail:  
clerk@steeton-with-  
eastburnparishcouncil.gov.uk



**Neighbourhood plan drop in consultation**

**10am-1pm Sat. 14 May, The HUB,  
Skipton Road, Steeton**

**10am-1pm Sat. 21 May, Silsden  
Methodist Church Hall**

## **Appendix 5 – Regulation 14 Flyer**

# Planning for the Future Silsden, Steeton and Eastburn



Silsden  
Town  
Council  
and  
Steeton-  
with-  
Eastburn  
Parish  
Council



Phone: 01729 825944  
E-mail:  
clerk@steeton-with-  
eastburnparishcouncil.gov.uk



**Neighbourhood plan drop in consultation**

**10am-1pm Sat. 4 February**

**Methodist Church Hall, Kirkgate, Silsden**

**10am-1pm Sat. 18 February**

**The HUB, Skipton Road, Steeton**

## **Appendix 6 – Regulation 14 Banners and Posters**

**Planning for the Future  
Silsden, Steeton and  
Eastburn**

**Neighbourhood plan  
drop in consultation**

**10am-1pm Sat. 4th February**

**Methodist Church Hall**

**Kirkgate, Silsden**

# **A Neighbourhood Plan For Silsden, Steeton and Eastburn**

Consultation drop in events

10am-1pm Sat. 4 February

Methodist Church Hall, Kirkgate, Silsden



10am-1pm Sat. 18 February

The HUB, Skipton Road, Steeton







## **Appendix 7 – Steeton with Eastburn Newsletter, extract publicising Regulation 14 consultation**

## Council Contacts and Meetings



All meetings of Steeton-with-Eastburn Parish Council are open to the public, local residents are always welcome. Details of times and meetings are advertised on notice boards around the villages and on the Parish Council website. Meetings are generally held on the first Wednesday of the month, with a Community Hub Management Committee at 6.30pm and Full Council at 7.30pm. All meetings are held in the Hub at Steeton. At the start of each meeting there is a slot for public participation when members of the public may ask questions or raise issues with councillors. You can contact the clerk to the Council, Rosie Sanderson by email at [clerk@steeton-with-eastburnparishcouncil.gov.uk](mailto:clerk@steeton-with-eastburnparishcouncil.gov.uk), by telephone at 01729 825944, or write to 35 Kings Mill Lane, Settle, North Yorks, BD24 9FD. The Council has a Facebook page, search for Steeton with Eastburn and click like to receive regular updates on activities.



### Councillors are:

#### Eastburn:

Gladys Emmott	653112
Tessa Mounsey	633128
Diane Danby	658285

#### Steeton:

Pam Blagden	652974
David Mullen (Chairman)	654634
Roger Lambert	657060
Brian Southgate	07976307508
Su Thompson (Vice Chairman)	653070
Hilda Townend	654407
John Weller	0798 4633587

#### Bradford Ward Councillors

Andrew Mallinson	07971 274785
Adrian Naylor	07803 503643
Jack Rickard	07857 696057

#### MP:

Kris Hopkins	211152
--------------	--------

## Budget 2017-18

The Parish Council has set a budget for 2017-18 which includes the following projects:

- An grant of £1,500 to the Christmas Lights group for maintenance
- £1,000 for development of a garden area and Christmas tree site on the grass area at the junction of Skip-ton Road and Chapel Road
- £7,500 for improvements to the boardwalk area at Eastburn Playing fields and replacement of safety surfacing under play equipment
- £4,000 towards development of a sports pitch at Keighley Road Recreation ground
- Enhancement of Corn Mill Green following public consultation. It is expected that this work will be financed by an external grant.

The Hub is self financing, income from hires covers expenditure on maintenance and the costs of running the building. During 2017-18 the gable ends will be painted on the outside and new chairs will be purchased.

Council tax will increase to £30 annually from £28.75, an increase of 4.3%. This is the first increase for since 2013.

### Grants for the Community

The Parish Council has made available some money for small grants to local organisations. Grants will be awarded to organisations which can demonstrate a clear need for financial support to achieve an objective which will benefit the Parish by:

- Providing a service
- Enhancing the quality of life
- Improving the environment
- Promoting the Parish in a positive way

Please contact the clerk on 01729 825944 or [clerk@steeton-with-eastburnparishcouncil.gov.uk](mailto:clerk@steeton-with-eastburnparishcouncil.gov.uk) to request an application form.

## Consultation on draft Neighbourhood Plan

Steeton-with-Eastburn Parish council and Silsden Town Council have drafted a neighbourhood plan for the two parishes. It covers issues such as housing, economic development, heritage and the environment. Your views on any aspect of the plan are welcome. A formal public consultation on the draft neighbourhood plan begins on 3rd February 2017 for 6 weeks. There will be 2 drop in events, at the Methodist Church in Silsden on Saturday 4th Feb, and at the HUB in Steeton on 18th Feb, both between 10 and 1 pm. The plan will be available online at [Steeton-with-Eastburn Parish Council.gov.uk](http://Steeton-with-Eastburn Parish Council.gov.uk) and at [Silsden.net](http://Silsden.net). Once comments from the public and businesses have been considered and changes made the plan will be sent to Bradford Council who will arrange for a planning inspector to review the draft plan, and then will put it to a public vote as to whether it should be accepted or not. If accepted the neighbourhood plan will become part of the planning guidance for the area and must be taken account of for all developments. Neighbourhood planning work in the 2 communities is supported by grants totalling £15,000 from the Community Development Foundation.

## **Appendix 8 – Regulation 14 Consultation Letter to Consultees**



## Steeton-with-Eastburn Parish Council

## Silsden Town Council



Rosie Sanderson, Clerk to Steeton-with-Eastburn Parish Council.  
35 Kings Mill Lane, Settle, North Yorkshire, BD24 9FD. Tel: 01729 825944  
[clerk@steeton-with-eastburnparishcouncil.gov.uk](mailto:clerk@steeton-with-eastburnparishcouncil.gov.uk)

Consultees to Steeton-with-Eastburn Parish Council and Silsden Town Council  
Neighbourhood Plan

3<sup>rd</sup> February 2017

Dear Consultee

**Notification of Formal Public Consultation on the Steeton, Eastburn and Silsden Draft Neighbourhood Development Plan (Regulation 14 Town and Country Planning, England, Neighbourhood Planning (General) Regulations 2012)**

I am writing to advise you that the Steeton, Eastburn and Silsden draft Neighbourhood Development Plan (NDP) has been published for consultation by Steeton-with-Eastburn Parish Council and Silsden Town Council. A copy of the plan and supporting maps are being sent to you by email together with this letter.

The draft Neighbourhood Development Plan has been prepared by a steering group of town and parish councillors and interested residents on behalf of the two councils, building on public consultation and engagement since September 2014. When complete this plan will guide and control development. It considers design, protection of green space, conservation of heritage and transport. The Councils decided to prepare this plan jointly because they believe that there are many common issues joining the two communities.

**The consultation period runs for 6 weeks from 3<sup>rd</sup> February to 17<sup>th</sup> March 2017.**

The draft plan and other supporting documents can also be viewed and downloaded from the Neighbourhood Plan page on the Steeton-with-Eastburn Parish Council website [http://www.steeton-with-eastburnparishcouncil.gov.uk/Neighbourhood\\_Plan\\_3858.aspx](http://www.steeton-with-eastburnparishcouncil.gov.uk/Neighbourhood_Plan_3858.aspx) and the Silsden.net website [http://www.silsden.net/forum/philboard\\_read.asp?id=8964#.WJBpIQLTIU](http://www.silsden.net/forum/philboard_read.asp?id=8964#.WJBpIQLTIU). Hard copies of the draft plan also will be provided on request from the parish clerk (see contact details above). A representation form is provided for comments, which can be returned by email or post to the address at the head of this letter.

Following consultation the plan will be amended and submitted to Bradford Metropolitan District Council. The plan will then be reviewed by an independent examiner. Once any further amendments have been made the plan will be subjected to a local referendum to be organised by Bradford Metropolitan District Council. If the referendum result is positive the plan will become part of planning guidance and will influence planning applications in the Steeton, Eastburn and Silsden.

If you require any further information, please contact the parish clerk at the address provided above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Sanderson', written over a horizontal line.

Rosie Sanderson

## **Appendix 9 – Aire Valley Magazine extract**

# **Steeton, Eastburn and Silsden**

## **Consultation on draft Neighbourhood Plan**

Steeton-with-Eastburn Parish council and Silsden Town Council have drafted a neighbourhood plan for the two parishes. It covers issues such as housing, economic development, heritage and the environment. Your views on any aspect of the plan are welcome.

A formal public consultation on the draft neighbourhood plan begins on 3rd February 2017 for 6 weeks. There will be 2 drop in events, at the Methodist Church in Silsden on Saturday 4th Feb, , and at the HUB in Steeton on 18th Feb, both between 10 and 2 pm. The plan will be available online at [Steeton-with-Eastburn Parish Council.gov.uk](http://Steeton-with-Eastburn Parish Council.gov.uk) and at [Silsden.net](http://Silsden.net). Once comments from the public and businesses have been considered and changes made the plan will be sent to Bradford Council who will arrange for a planning inspector to review the draft plan, and then will put it to a public vote as to whether it should be accepted or not. If accepted the neighbourhood plan will become part of the planning guidance for the area and must be taken account of for all developments. Neighbourhood planning work in the 2 communities is supported by grants totalling £15,000 from the Community Development Foundation.

Neighbourhood planning work in the 2 communities is supported by grants totalling £15,000 from the Community Development Foundation.

## **Appendix 10 – Regulation 14 Response Form**



<b>Office Use Only</b> <b>Consultee No.</b> <b>Representation No.</b>
---

# Steeton, Eastburn and Silsden Neighbourhood Plan

## Regulation 14 Consultation Response Form

**3<sup>rd</sup> February 2017 and 17 March 2017**

PLEASE COMPLETE AND RETURN ONE FORM FOR EVERY COMMENT MADE

**ALL RESPONSES MUST BE RECEIVED BY 5pm 17<sup>th</sup> MARCH 2017**

Name	
Organisation	
Address	
Email	
Tel. No.	

Please state to which part of the Draft Neighbourhood Plan your representation refers. (Please indicate with X)

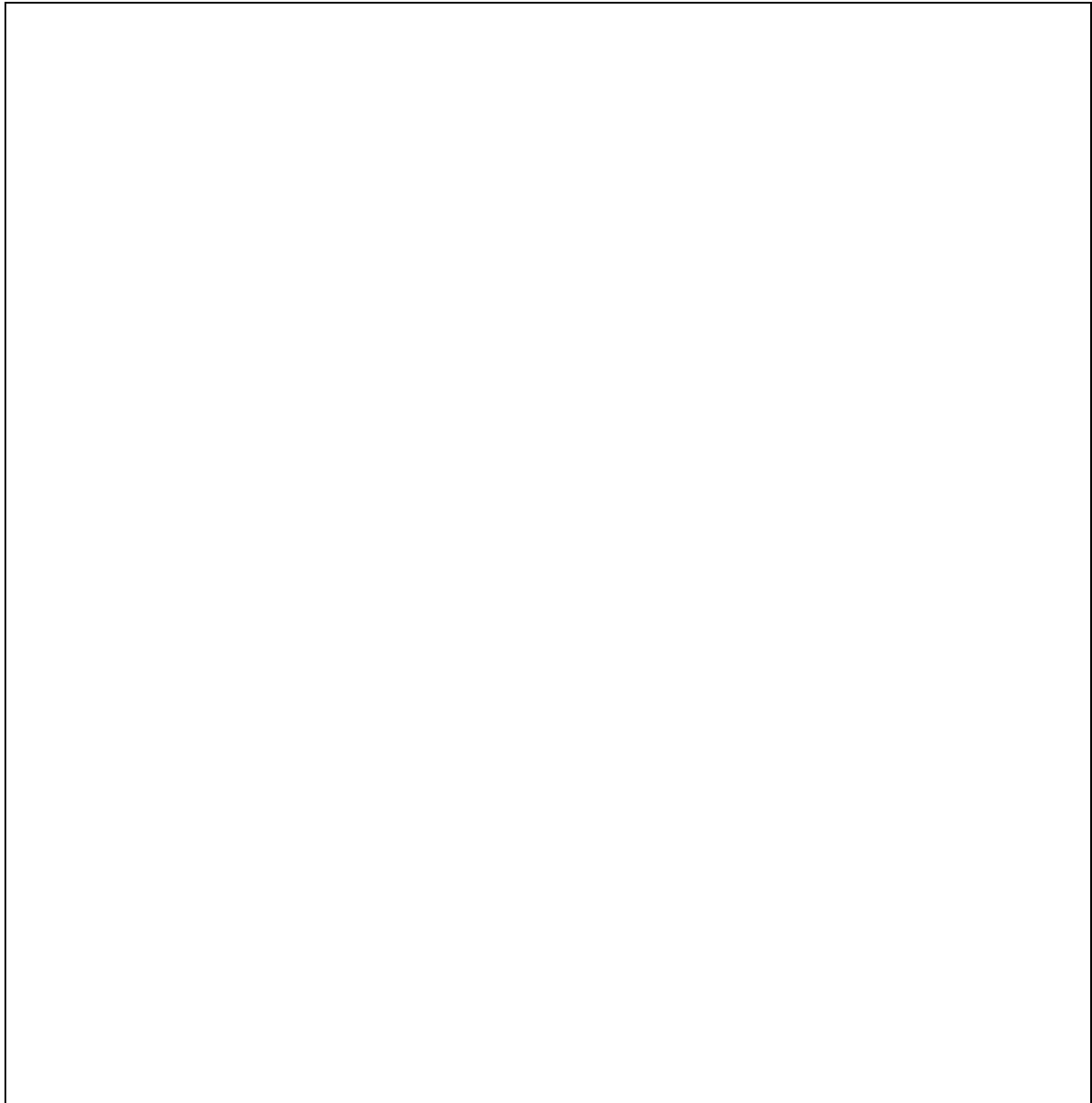
Page Number	
Policy Number	

Are you supporting, objecting, or making a comment? (Please indicate with X)

Support	
Object	
Making a Comment	

Please Turn Over

Please use the box below for any comments.



**Thank you for your time and interest. Please return this form to Rosie Sanderson, Clerk, Steeton-with-Eastburn Parish Council, 35 Kings Mill Lane, Settle, BD24 9FD**

**Or by email to:**

**[Clerk@steeton-with-eastburnparishcouncil.gov.uk](mailto:Clerk@steeton-with-eastburnparishcouncil.gov.uk)**

## **Appendix 11 – Regulation 14 Formal Consultees**

Borough of Pendle Council

Calderdale Metropolitan Borough Council

City of Wakefield M D C

Craven District Council

Harrogate District Council

Kirklees Metropolitan Council

Lancashire County Council

Leeds City Council

North Yorkshire County Council

Addingham Parish Council

Baildon Town Council

Bingley Town Council

Bradford Trident Community Council

Burley Parish Council

Clayton Parish Council

Cullingworth Parish Council

Denholme Town Council

Harden Parish Council

Haworth, Cross Roads & Stanbury Parish Council

Ilkley Parish Council

Keighley Town Council

Menston Parish Council

Oxenhope Parish Council

Sandy Lane Parish Council

Wilsden Parish Council

Wrose Parish Council

Bradleys Both Parish Council

Cononley Parish Council

Cowling Parish Council

Denton Parish Council

Draughton Parish Council

Drighlington Parish Council

Farnhill Parish Council

Gildersome Parish Council

Glusburn and Cross Hills Parish Council

Laneshaw Bridge Parish Council

Middleton Parish Council

Nesfield with Langbar Parish Council

Otley Town Council

Sutton-in-Craven Parish Council

Trawden Forest Parish Council

Wadsworth Parish Council

Weston Parish Council

Environment Agency

Natural England

Historic England

The Coal Authority

Environment Agency

Bradford Community Health Trust

Bradford & Airedale Teaching Primary Care Trust

Airedale NHS Foundation Trust

NHS Bradford City and Bradford Districts Clinical Commissioning Group

NHS Property Services Ltd

NHS Airedale, Wharfedale and Craven Clinical Commissioning Group

Bradford Hospitals NHS Trust

West Yorkshire Police Crime Prevention

West Yorkshire Police

Vodafone & O2

3

EE

British Telecom

Telewest Communications

Highways England

Network Rail

Highways England

Network Rail

Network Rail Infrastructure Ltd

Yorkshire Water

National Grid

City of Bradford Metropolitan District Council

## Appendix 12 – CBMDC Submission Letter

Sent via e-mail to:

[clerk@steeton-with-eastburnparishcouncil.gov.uk](mailto:clerk@steeton-with-eastburnparishcouncil.gov.uk)

### Department of Place

Local Plan Team  
4<sup>th</sup> Floor, Britannia House  
Broadway  
Bradford  
BD1 1HX

Tel: (01274) 433679

Email: [planning.policy@bradford.gov.uk](mailto:planning.policy@bradford.gov.uk)

Date: Monday 11th December 2017

Dear Rebecca,

**RE: REGULATION 15 - STEETON, EASTBURN AND SILSDEN SUBMISSION  
DRAFT NEIGHBOURHOOD DEVELOPMENT PLAN AND SUPPORTING  
DOCUMENTS**

The Council received your Regulation 15 Submission Draft Neighbourhood Development Plan on 22<sup>nd</sup> November 2017. Since then I have been reviewing your documents in light of the comments that were made at the Regulation 14 consultation and your response to those matters.

I appreciate that the Parish and Town Councils have undertaken a large amount of valuable work in getting to the Submission Draft Plan and that you are eager to move forward, however having considered the submitted document there are a number of significant issues which need addressing before the Council can progress to publishing the Plan for Regulation 16 public consultation.

In addition there are a series of changes to the Plan which the Council considers should ideally be made before publication as this would reduce the likelihood of the Council having to make a significant number of formal objections to the Plan. Such changes would enable the Plan to either meet the basic conditions or improve the clarity and purpose of the policies and thus ensure that they can be properly used and implemented in future planning decisions.

The three issues which the Council insist are resolved relate to the Policies Map, the SEA / HRA screening and clarity on the evidence that you have collected in support of the Plan and assurance that it will be published / made available prior to commencement of consultation:

### **Policies Map**

Whilst I appreciate the group's effort to produce an additional composite policies map, as requested in the Council's previous comments, this should not have resulted

in the deletion of supporting policy maps within the NDP document which were included in the Regulation 14 Draft. These should be reinstated.

The composite policies map, if it is the only map which identifies designations and policy boundaries, is unfortunately unacceptable in its current form as it does not clearly show all sites and their boundaries on the plan. It is essential that the Plan user, whether it be development management case officers, planning applicants or the public, can identify with certainty the boundary of sites and designations and thus ascertain what policies apply to schemes. Furthermore the lack of a reference key to indicate what you are showing is an omission which must be corrected. One option you might wish to consider is providing separate Policies Maps for each settlement as this would allow for a larger scale to be used.

### **SEA / HRA Screening**

The Council is of the strong opinion that the SEA/HRA Screening Assessment, as submitted, must be reviewed and amended in light of the adoption of the Core Strategy in July 2017. Whilst we appreciate that there have been minor amendments to the proposed NDP, none fundamental to change the outcome of the assessment, in legal terms, this document must refer to the current adopted development plan policies in line with the amendments to the Submission NDP. This document is a requirement of the basic conditions and the failure to update this document will lead to the plan failing these requirements and could expose the plan to legal challenges at a later date.

To assist you, I have set out in Table 1 below some detailed corrections and amendments which should be made to the document.

### **Issues Relating to the Content of the Plan and the (Lack Of) Supporting Evidence**

#### **Submission NDP**

The Council provided a number of comments at Regulation 14 that were intended to assist you in improving the clarity and effectiveness of the document and its policies and their compliance with national and local planning policies. I note that while some helpful changes have been made, many of these comments have, unfortunately, not been taken on board in the Submission Draft document.

Furthermore it is disappointing that there has been little communication from the Parish Councils since then and therefore no opportunity to discuss the comments that were made by the Council. It is good practice that qualifying bodies engage with the Council and discuss different viewpoints on matters of policy and content with the aim of resolving as many issues as possible before Regulation 15 is reached.

I have highlighted some of the main policy issues in Table 2 below, however please note that these are not exhaustive.

There are also a number of formatting errors within the Submission Draft NDP and it is recommended that these be addressed at the same time as the suggested

amendments outlined above for accuracy and correctness. I have highlighted some of these errors in Table 3 below.

### Evidence Base

The Council remains concerned about the lack of a submitted evidence base to support some of the policies within the Submission Draft NDP. The previous Regulation 14 consultation included the publication of a document entitled 'Planning Policy Assessment and Evidence Base Review'. However that document only included an outline of the evidence and studies which Bradford Council have gathered in support of its Core Strategy. While a good starting point it is unlikely that such evidence alone would be sufficient to support a suite of locally distinct policies and proposals within a Neighbourhood Plan.

This issue was raised at Regulation 14 consultation by the Council and some responses in the Consultation Statement suggest edits have been made to an Evidence Base document which the Council has not yet had sight of. If relevant evidence is not submitted in support of the policies within the plan then the Council will make objections on those grounds at Regulation 16.

You have indicated by e-mail that your consultants are updating this document. At the time of writing no such update appears to be available on your website or has been forwarded to us and there is thus no indication that you have collected, analysed and used any of your own evidence in drafting and justifying your policies.

Whilst we acknowledge that it is not a requirement as part of the submission, to provide the Council with your evidence it certainly is good practice to do so or at least ensure that it is published and available on your website. The NPPF and associated planning guidance makes it clear that policies should be supported by proportionate evidence and the Council must therefore have a clear understanding of the evidence you have collected and be confident that it will be available to all who wish to consider the content of your Neighbourhood Plan when the Council publishes it .

For that reason before we can commence Regulation 16 consultation the Council need to be provided with an updated version of the Planning Policy Assessment and Evidence Base Review document, and for clarity a separate bulleted list of the evidence base documents and studies you have prepared and an assurance that they will be available and published on your website by the time Regulation 16 consultation commences.

A key concern for the Council is the absence thus far of a proper Local Green Space Assessment. The table which is contained within the submission plan you have provided does not in itself constitute a proper, and thorough assessment to support a policy which would have significant implications for the use of those land parcels and for the land owners. We would also like confirmation that you have identified the owners of those land parcels, and engaged and consulted those owners before finalising their inclusion in the plan. This includes for example the farmers for areas of farm land (The NFU have written to Local Authorities across the north of England



including Bradford to raise concerns about the lack of engagement of their members in such matters) and the Council's Asset Management Service if applicable.

### General Comments

A minor point to raise with the group relates to the naming of the Neighbourhood Plan which has become inconsistent during your latest publications. Do you wish for the area to be referred to as 'Steeton-with-Eastburn and Silsden NDP' or 'Steeton, Eastburn and Silsden NDP'. This referencing should be consistent throughout your publications.

I trust that you will take on board all of my points in this letter and contact the Council should you wish to discuss anything further.

Yours faithfully,

Emma Higgins  
Planning Officer

**Steeton-with-Easburn & Silsden Neighbourhood Development Plan  
Submission Draft – November 2017  
CBMDC Break down of content issues**

*To note: The group should take extra care to check the Submission Draft documents to ensure that all errors are corrected as the Council may not have identified them all in the tables below.*

**Table 1: SEA / HRA Screening Assessment**

<b>Page</b>	<b>Para</b>	<b>Comment</b>
Various	3.4 5.4 (table 2) 5.6 (bullet 1) 6.10 6.13 - 6.16 6.17 6.20 6.21	References to the emerging Core Strategy should be replaced by references to the adopted Core Strategy:  Reference to proposed modifications
8	3.2	Objective 1 – re-worded in Submission NDP
17	5.4	Table 2 - References 15 Local Green Spaces, whilst there are 13 in the Submission NDP
26-27	6.17	The last part of the CS Policy SC8 is incorrect and should be amended in line with the adopted policy.
23	6.6	At Regulation 14 the Council requested that the report be amended to maintain consistency with the Habitats Regulations Assessment (HRA) carried out for the Core Strategy, in that the list of qualifying bird species included in para 6.6 (page 23) should be amended so that it reflects those noted in paragraph 3.2.3 page 10 in the HRA of the Proposed Modifications to the Core Strategy of November 2015, i.e. to reference only Merlin and Golden Plover (rather than Merlin, Golden Plover, Peregrine Falcon, Short-Eared Owl and Dunlin).
24	6.7	Similarly, the list of regularly occurring migratory species listed in para 6.7, should be amended to also include short-eared owl and dunlin – again, so it is consistent with the Councils HRA and the original SPA citation notice.
30+	Appendix 1	CBMDC's consultation response / comments have not been included.

**Table 2: Submission Draft NDP: Policy issues**

POLICY	Link to Reg 14 comment	Policy Comment
Policy SWES 4: Protecting local non-designated heritage assets	Bullet 3	<p>There remain concerns regarding how the list of non-designated heritage assets has been identified. It is not clear if these buildings have been mapped, these should be clearly identified on policy map alongside the policy.</p> <p>There is a numbering error in the current drafting of the listed sites which should be resolved and the policies map checked for accuracy.</p>
Policy SWES 8: Access to the Countryside, Countryside sport and countryside recreation	Bullet 5	<p>It is unclear if site references within parts C and D of the policy (formally F and G) are mapped on the policies map?</p>
Policy SWES 10: CIL		<p>The current drafting of this policy wording should be amended for the purpose clarity. By generically referring to 'CIL' it could be interpreted to mean to include the Council's element of the monies raised which would be incorrect. The policy should make it clear that only part of the levy raised can be used for local priorities. Suggested policy wording amendment for the purpose of clarity:</p> <p><i>'The local priorities for spending the Neighbourhood CIL fund in accordance with the CIL Regulations are as follows ...'</i></p> <p>or</p> <p><i>'Where consistent with the provisions of the CIL regulations the local priorities for spending the Neighbourhood CIL fund are'</i></p>
Policy SWES 11: Silsden Local Centre		<p>There is no explanation in the supporting text as to what the qualifying body constitutes as an 'appropriately sized supermarkets'. It is recommended that the following text is added to the policy wording</p> <p><i>"and is in accordance with the provisions of Core Strategy Policy EC5".</i></p>
Policy SWES 13: Protecting Local employment sites	Bullet 6	<p>SWES 13/9 – Eastburn Mills (formally SWES 13/10) has outline planning for permission for housing on part of this site which will contribute towards the housing apportionment for Steeton and reduce the need for green belt land release. The boundary of this designation must therefore be amended to</p>

		remove the part of the site which may be developed for housing.
Policy SWES 16 - Local Green Spaces		<p>As part of the submission documents, there is a lack of supporting evidence for the Council to re-assess if these proposed LGS designations satisfactorily meet the NPPF criteria. The central question is whether the land is demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife. Table 1, as drafted, does not provide a strong enough justification for these proposals.</p> <p>The purpose of a Local Green Space policy is to designate land/sites which meet NPPF criteria, not 'protect' it as this implies you are using the designation to prevent development. CBMDC suggests an amendment to the wording of this policy which that identified sites will be '<b>designated</b>'.</p> <p>CBMDC is unable to check previous mapping errors due to the lack of an evidence base document. Maps of these sites should be included within the NDP document alongside the policy, or as an appendix. The Composite Policies Map is difficult to interpret and lacks a reference key.</p> <p>It is very difficult to ascertain which sites have been included in the policy and which have been discounted as there is an inconsistent use of titles between the policy text and tables 1 and 2. This could be much improved to provide the necessary evidence for the policy.</p> <p>It is also unclear as to whether landowners of identified sites have been consulted during this process. Can this be confirmed?</p>
Policy SWES 17:	Bullets 1, 2, 3	As it is unclear if these sites have been mapped I am unable to check any possible duplication with any proposed Local Green Spaces.

**Table 3: Submission NDP: Document formatting issues to be addressed**

Chapter	Page	Paragraph	Comment
6	Various	6.9 6.25	To avoid any potential confusion your referencing to the CSLP (Core Strategy Local Plan) would benefit from being LPCS (Local Plan Core Strategy), or ideally CS (Core Strategy) to align with the Councils referencing.

1	5	1.2 1.3	Remove all parts of text which refer to the Regulation 16 consultation as the Council will not be amending this document prior to public consultation.
3	10	3.3	Delete text that states 'insert dates'
10	26	4.45	Delete text that states 'insert dates'
5	29	5.3	Missing word "NDP <b>has</b> been..."
5	31	Figure 4	The reference to the Airedale Spatial vision diagram should refer to the adopted Core Strategy (July 2017).
5	38	Policy SWES 4	Spelling error on 2 <sup>nd</sup> line 'sown', should be 'shown'.
5	39	Policy SWES 4	Incorrect numbering of assets. From what I can ascertain, the Steeton and Eastburn assets need to be re-numbered starting at SWES4/19.
5	40	6.15	The end of the sentence is incomplete.
5	40	6.17	The RUDP policies cited here have been superseded by Core Strategy Policies, i.e. BH19 – CS-EN3 NE2 – CS-EN1 NE3 – CS-EN4 NE3A – CS-EN4
5	42	6.21	Spelling error 'These sites <u>s</u> ...'
5	43	6.24	Reference should be to Landscape Character Supplementary Planning <b>Document</b> , not 'guidance'.
7	68	-	This chapter is not required – to be deleted.  As a result, amendments will be required to the Contents page (page 3)

## Appendix 13 – Local Green Space Consultation

-----Original Message-----

From: "Richard Dixon" <richard.dixon007@btinternet.com>

Sent: Friday, January 18, 2019 11:32am

To: clerk@steeton-with-eastburnparishcouncil.gov.uk

Subject: Fwd: Carter Royd

### Subject: Carter Royd

Dear Mr Mullen,

Thankyou for your email re the Steeton with Eastburn and Silsden Neighbourhood development plan - designation of local green spaces including the Carter Royd Allotments, Keighley Road, Steeton. We have part owned these allotments since 1986 and fully owned them since 1999 and throughout that time we have shown no interest in allowing any development of the allotments and it is our intention for that to be the situation going forward. Hence we are not sure of the necessity to grant them local green space designation.

As we see it, the allotments are an asset of community value rather than one which should receive local green space designation as they are privately owned and access to them is restricted to the allotment holders. They will remain as allotments in agreement with the Carter Royd Allotment Association who run them.

As our comments have to be in by 21/1/19 we have been unable to take further (legal?) advice over Local Green Space Designation and its implications. However we would be extremely happy to discuss this with you should you so wish

Yours Richard and Jo Dixon

Bolton Road Allotments

c/o Townhead Farm

North Street

Silsden

West Yorkshire

BD20 9PP



20th December 2018

Dear Cllr Mullen,

### **Steeton with Eastburn and Silsden Neighbourhood Development Plan – Designation of Local Green Spaces**

Thank you for your letter and invitation to comment on the Local Green Space designation for Bolton Road Allotments.

Your letter has arrived at a crucial time as we fear the allotments are under grave threat. The land is privately owned and each year for the last 9 years we have received a very large rent increase from the landowner. This year, the rent has increased by 18.75%. The total increase since 2010 has been 276%.

As you will know, the fields around the allotments are designated for housing development. We feel sure the landowner is trying to make our allotments unaffordable, so the land will fall into disuse and can be sold for housing development.

In fact, the allotments are needed and used more than ever. There are 16 full plots at Bolton Road Allotments, many of which are divided into two. A total of 21 families have a plot or half plot, and each is used to benefit an average three to five people. An estimated 80 people or so benefit from using the plots for fruit and vegetable growing, gaining physical and mental health/wellbeing benefits of outdoor activity and for making and sustaining social relationships/friendships.

So high is the demand for allotments, that we currently have a waiting list of a further 16 people/families.

**We therefore wholeheartedly support the proposal to designate Bolton Road Allotments as a Local Green Space. Indeed, making the land permanently unavailable for development may be the only way to preserve them for use, even in the short term – as the landowner may be dissuaded from continually increasing our rent.**

Most plot holders are not wealthy people, living in houses without much outdoor space. The allotments are a crucial way of providing Silsden's residents with access to sustainable and affordable gardening – and to building a sense of community. With the recent trend in building houses with very small gardens, allotments such as ours are an increasingly vital, and scarce, community asset.

To give you some illustration of the benefits, some plots are used by older people to enjoy a happy and healthy retirement. Our oldest plot holder is well into his 90s. He has won awards for potatoes grown on the plot at Harrogate Flower Show. His allotment keeps him fit, active and close to his family, who help and support him with his hobby. Without it, he would have little to do.

Allotments brings young families together. My own children learned to grow their first vegetables at my allotment, winning the pumpkin competition and getting their picture in the Craven Herald. Now somewhat uncommunicative teenagers, my daughter still comes to the allotment on occasion – just last year, she baked a cake for our summer barbeque.

And it helps people maintain their health in difficult circumstances. One plot holder, for example, recently suffered a very difficult bereavement and we know the allotment provides them with space to escape and try to recover.

We very much hope the council will wish to protect and preserve the allotments at Bolton Road, Silsden so that they can be enjoyed for families for generations to come. Without their permanent protection from development, it seems likely that the rent strategy currently being pursued by the landlord will result in the allotments quickly becoming unaffordable to the many local people who rely on them. If they become unused, we feel sure the landlord will then apply for permission to build housing on the land.

With best wishes.

Yours sincerely,

Simon Robinson

**Secretary**

Hello Dave

I apologise for leaving this response until the deadline. The Silsden Allotment Association trustees welcome the designation of our Elliott Street site as a Local Green Space on the basis that as such it will be subject to national Green Belt policy and retained as an allotment field in perpetuity.

The trustees ask if the designation in the Neighbourhood Development Plan will be or can be worded as "Local Green Space (allotments)". We are anxious to indicate that while allotments are a community asset, our site is open to "members only" as opposed to being, say, a park that is open to the general public. I would add that to be a member, allotment holders must live in Silsden.

Hope all this makes sense.

I will be grateful if you can keep us informed of the neighbourhood plan's progress and of any further public consultations.

With kind regards

John

Secretary and trustee

Silsden Allotment Association

Graham Anne REAY <grahamanne.reay@btinternet.com>

To: davidmmullen@yahoo.com

13 Jan at 10:50

Hi Dave,

We have considered this and certainly see no reason to object to this.  
Please keep us in touch with developments as this issue goes forward

Regards Graham

Graham Reay

Secretary Woodside Road Allotments Association,

Field No. 3 Silsden



## Appendix 14 – CBMDC Letter 2<sup>nd</sup> April 2019

### STEETON WITH EASTBURN & SILSDEN NEIGHBOURHOOD DEVELOPMENT PLAN (2019 – 2030) SUBMISSION DRAFT (JANUARY 2019)

#### Introduction

CBMDC are now in receipt (23<sup>rd</sup> January 2019) of a submission draft version of Steeton with Eastburn & Silsden Parish Councils Neighbourhood Plan (under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012), dated January 2019. A previous version was submitted in November 2017, to which CBMDC raised a number of issues regarding the plan and its contents. These comments were provided in December 2017. These were in addition to comments provided as part the Regulation 14 consultation.

Overall, it looks as though most of the comments have been addressed by the parish councils in the latest version. This paper sets out an assessment of how these have been dealt and provides further comment.

#### Previous Comments

The previous comments issued by CBMDC centred on the following:

- The Policies Map
- SEA/HRA Screening Assessment
- Plan & Policy Content
- Evidence Base
- Formatting of the Document

#### How Issues Have Been Addressed

Table 1 (below) set out how the changes to Plan have sought to address the comments and issues raised by CBMDC in the response from December 2017.

In general it appears that the majority of comments/issues raised by CBMDC on the previous draft NDP have been addressed. However there are a number of outstanding queries relating to the evidence base and the policies map.

- **Evidence Base:** CBMDC previously raised concerns about the links between the draft policies and the evidence base that has shaped them. The Basic Conditions Statement states that the NDP is underpinned by a sound evidence base, and makes reference to this being summarised in the accompanying Planning Policy Assessment & Evidence Base Review document. This document has not been provided as part of the document package sent to CBMDC. It is also not clear if this has been updated following comments made at the Regulation 14 stage. The version on the website dates from February 2016.

For that reason before we can commence Regulation 16 consultation we need to be provided with an updated version of this document, and for clarity a separate bulleted list of the evidence base documents and studies have been prepared or used to prepare the NDP. Assurance needs to be sought that it will be available and published on the Town/Parish Council website by the time Regulation 16 consultation commences. This document will also assist those making comments on the draft NDP and the examiner as part of their deliberations.

It is noted that Basic Conditions Statements sets out how the draft NDP is considered to meet the core planning principles set out in the NPPF (2012 version) and in general conformity with CBMDC's planning policy framework. Although it may be helpful if were greater links in the NDP itself to the strategic context. Is there a need to refer to the revised NPPF within the documentation?

As requested a Local Green Space assessment has been undertaken and provided as part of the package of documents sent to CBMDC.

- **Historic Environment policies** – there are some queries regarding the locally highlighted non-designated heritage assets (see table). There needs to be a clear link to evidence.
- **Typo** – the title for Figure 5 should refer to CBMDC Landscape Character Supplementary Planning Document, 2007 not Guidance.

- **Policies Map:** there are a number of queries that should be addressed in respect of the mapping:
  - **Scale** – may still be difficult to read. The key should also be on the map.
  - **Area** – it does not extend to cover the whole NDP area – it may be more helpful to have an A3 map showing the whole neighbourhood area with all designations and separate insets for each settlement.
  - **Local Centre Boundary** – Silsden Local Centre boundary does not appear on any of the maps provided despite being specifically referred to in policy SWES11.
  - **Local Green Space/Sport & Recreation Facilities Mapping** – there are some inconsistencies between the LGS assessment and the proposed designations (See Table)
  - **Omissions** – policy SWES8 refers to two routes that the NDP seeks to protect, however these are not shown on the policies mapping. Other things to consider – should the NDP mapping show all spatial elements highlighted in the NDP and other things like statutory nature conservation designations, conservation area, flood areas etc.

### **Other Documentation**

All other required documentation has been provided in line with the regulations.

### **SEA/HRA Screening & People v. Wind Judgement**

It is noted that the submitted screening document refers to the above judgement. In the light of the judgement and subsequent amendment to the Basic Conditions that the screening is reviewed and reference to whether or not the NDP is affected.

Also the Basic Conditions statement and other documentation will need to be updated to take into account the 28<sup>th</sup> December 2018 amendment.

SEA/HRA Screening – it is noted that screening refers to the 2017 version of the NDP and does not screen the current one. The screening should be updated (if needed).

### **Actions**

Both councils were contacted to suggest a new resolution for the submission to CBMDC and potentially allow for alignment with the new NPPF. New resolutions are likely to be important for reasons of transparency and because the content of the plan and supporting documents have changed. These resolutions have now been obtained and provided to CBMDC for information.

Also if it is likely to be examined under the new NPPF all references and the Basic Conditions Statement would need to be amended.

Section/Policy Paragraph	Comment	How Addressed
<b>Policies Map</b>		
Policies Map	<p>Whilst I appreciate the group's effort to produce an additional composite policies map, as requested in the Council's previous comments, this should not have resulted in the deletion of supporting policy maps within the NDP document which were included in the Regulation 14 Draft. These should be reinstated.</p> <p>The composite policies map, if it is the only map which identifies designations and policy boundaries, is unfortunately unacceptable in its current form as it does not clearly show all sites and their boundaries on the plan. It is essential that the Plan user, whether it be development management case officers, planning applicants or the public, can identify with certainty the boundary of sites and designations and thus ascertain what policies apply to schemes. Furthermore the lack of a reference key to indicate what you are showing is an omission which must be corrected. One option you might wish to consider is providing separate Policies Maps for each settlement as this would allow for a larger scale to be used.</p>	<p>Detailed policy mapping has been re-introduced for the non-designated heritage assets (Appendix 2 – Maps 2 to 11) and the Protected Community Facilities (Appendix 3 – Maps 12 to 14).</p> <p>The main Policies Map (Map 1) shows all other designations. The boundaries are defined, however the scale may make of difficulty reading it. A reference key has been provided. Only issue – it does not show the whole neighbourhood area.</p> <p>It is noted that policy SWES11 states that the Silsden Local Centre boundary is shown on the Policies Map – however does not appear to be the case.</p>
<b>SA/HRA Screening</b>		
<p>Various</p> <ul style="list-style-type: none"> <li>• 3.4</li> <li>• 5.4 (table 2)</li> <li>• 5.6 (bullet 1)</li> <li>• 6.10</li> <li>• 6.13</li> <li>• 6.16</li> <li>• 6.17</li> <li>• 6.20</li> <li>• 6.21</li> </ul>	<p>References to the emerging Core Strategy should be replaced by references to the adopted Core Strategy:</p> <p>Reference to proposed modifications (para 6.13)</p>	<p>3.4 – Yes 5.4 – Yes 5.6 - Yes 6.10 – Yes 6.13 - No 6.16 – Yes – refers to CS Modifications 6.20 – Yes 6.21 – Yes</p>
Page 8 – para 3.2	Objective 1 – re-worded in Submission NDP	Changed
Page 17 – para 5.4	Table 2 – References 15 Local Green Spaces, whilst there are 13 in the Submission NDP	No longer referenced
Page 23 – para 6.6	At Regulation 14 the Council requested that the report be amended to maintain consistency with the Habitats Regulations Assessment (HRA) carried out for the Core Strategy, in that the list of qualifying bird species included in para 6.6 (page 23) should be amended so that it reflects those noted in paragraph 3.2.3 page 10 in the HRA of the Proposed Modifications to the Core Strategy of November 2015, i.e. to reference only Merlin and Golden Plover (rather than Merlin, Golden Plover, Peregrine Falcon, Short-Eared Owl and Dunlin).	Amendment made
Page 24 – para 6.7	Similarly, the list of regularly occurring migratory species listed in para 6.7, should be amended to also include short-eared owl and dunlin – again, so it is consistent with the Councils HRA and the original SPA citation notice.	Amendment made
Pages 26/27 –	The last part of the CS Policy SC8 is incorrect and should be amended in line with the	Amendment made

para 6.17	adopted policy.	
Page 30 – Appendix 1	CBMDC’s consultation response / comments have not been included.	Not included within the appendix. The reader is referred to the consultation statement.
<b>Policies</b>		
SWES4	<p>There remain concerns regarding how the list of non-designated heritage assets has been identified. It is not clear if these buildings have been mapped, these should be clearly identified on policy map alongside the policy.</p> <p>There is a numbering error in the current drafting of the listed sites which should be resolved and the policies map checked for accuracy.</p>	<p>The draft plan states that Historic England guidance together with details of un-listed buildings highlighted in CBMDC’s Conservation Area Appraisals have been used to help identify these non-designated heritage assets.</p> <p>Policies Maps 2 to 11 identify these assets.</p> <p>Numbering error has been corrected.</p>
SWES8	It is unclear if site references within parts C and D of the policy (formally F and G) are mapped on the policies map?	Neither designation appears to be shown on the policies maps
SWES10	<p>The current drafting of this policy wording should be amended for the purpose clarity. By generically referring to ‘CIL’ it could be interpreted to mean to include the Council’s element of the monies raised which would be incorrect. The policy should make it clear that only part of the levy raised can be used for local priorities. Suggested policy wording amendment for the purpose of clarity:</p> <p>‘The local priorities for spending the Neighbourhood CIL fund in accordance with the CIL Regulations are as follows ...’</p> <p>or</p> <p>‘Where consistent with the provisions of the CIL regulations the local priorities for spending the Neighbourhood CIL fund are’</p>	An amendment has been made to the policy along the lines suggested.
SWES11	<p>There is no explanation in the supporting text as to what the qualifying body constitutes as an ‘appropriately sized supermarkets’. It is recommended that the following text is added to the policy wording</p> <p>“and is in accordance with the provisions of Core Strategy Policy EC5”.</p>	<p>There is still no explanation regarding what constitutes an “appropriately sized supermarket”. (Note: the adopted CS doesn’t give a definition either).</p> <p>Additional working has incorporated into policy. However, it is unclear if has been added in the correct place?</p> <p>It is noted that policy SWES11 states that the Silsden Local Centre boundary is shown on the Policies Map – however does not appear to be the case</p>
SWES13	SWES 13/9 – Eastburn Mills (formally SWES 13/10) has outline planning for permission for housing on part of this site which will contribute towards the housing apportionment for Steeton and reduce the need for green belt land release. The boundary of this designation must therefore be amended to remove the part of the site which may be developed for housing.	The site boundary on the Policies Map has been amended to reflect the planning permission granted on part of this site.

<p>SWES16</p>	<p>As part of the submission documents, there is a lack of supporting evidence for the Council to re-assess if these proposed LGS designations satisfactorily meet the NPPF criteria. The central question is whether the land is demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife. Table 1, as drafted, does not provide a strong enough justification for these proposals.</p> <p>The purpose of a Local Green Space policy is to designate land/sites which meet NPPF criteria, not 'protect' it as this implies you are using the designation to prevent development. CBMDC suggests an amendment to the wording of this policy which that identified sites will be 'designated'.</p> <p>CBMDC is unable to check previous mapping errors due to the lack of an evidence base document. Maps of these sites should be included within the NDP document alongside the policy, or as an appendix. The Composite Policies Map is difficult to interpret and lacks a reference key.</p> <p>It is very difficult to ascertain which sites have been included in the policy and which have been discounted as there is an inconsistent use of titles between the policy text and tables 1 and 2. This could be much improved to provide the necessary evidence for the policy.</p> <p>It is also unclear as to whether landowners of identified sites have been consulted during this process. Can this be confirmed?</p>	<p>A Local Green Space Assessment (dated January 2019) has been provided as part of the package of documents accompanying the draft NDP. This provides an assessment of how each site meeting site meets the NPPF criteria.</p> <p>All LGSs are shown on the composite policies and referenced in the key. The boundaries are shown in the accompanying LGS Assessment document. It should be noted that the boundary of site SWES16/4 (prev. SWES16/9) boundary is different in the LGS Assessment from the policies map.</p> <p>The LGS assessment highlights that the majority of the sites assessed are in the ownership of the Parish Councils. The owners of other sites have been contacted – one objected to the inclusion of their land as LGS and as such it has been discounted.</p>																																								
<p>SWES17</p>	<p>As it is unclear if these sites have been mapped I am unable to check any possible duplication with any proposed Local Green Spaces.</p>	<p>These sites are now shown on Policies Map 1. The LGS assessment notes that some of the sites are protected under policy SWES17, whilst the cemetery is protected under policy SWES15.</p>																																								
<table border="1"> <thead> <tr> <th colspan="4" data-bbox="383 991 2056 1018"><b>SWES16/17 Checklist</b></th> </tr> <tr> <th data-bbox="383 1018 607 1082"><b>LGS Assessment Site Ref</b></th> <th data-bbox="607 1018 1039 1082"><b>Name</b></th> <th data-bbox="1039 1018 1339 1082"><b>Proposed Designation</b></th> <th data-bbox="1339 1018 2056 1082"><b>Proposed Policy Reference (Actual Designation)</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="383 1082 607 1114">SWES16/1</td> <td data-bbox="607 1082 1039 1114">Memorial Gardens, Silsden</td> <td data-bbox="1039 1082 1339 1114">Local Green Space</td> <td data-bbox="1339 1082 2056 1114">SWES16/1 (LGS)</td> </tr> <tr> <td data-bbox="383 1114 607 1145">SWES16/2</td> <td data-bbox="607 1114 1039 1145">Bradley Green</td> <td data-bbox="1039 1114 1339 1145">Local Green Space</td> <td data-bbox="1339 1114 2056 1145">Not Included (Policies Map 1 shows a reference given to this site)</td> </tr> <tr> <td data-bbox="383 1145 607 1177">SWES16/3</td> <td data-bbox="607 1145 1039 1177">Silsden Park</td> <td data-bbox="1039 1145 1339 1177">Local Green Space</td> <td data-bbox="1339 1145 2056 1177">SWES16/3 (LGS)</td> </tr> <tr> <td data-bbox="383 1177 607 1209">SWES16/4</td> <td data-bbox="607 1177 1039 1209">Woodside Road Allotments</td> <td data-bbox="1039 1177 1339 1209">Local Green Space</td> <td data-bbox="1339 1177 2056 1209">SWES17/6 (Sport &amp; Rec)</td> </tr> <tr> <td data-bbox="383 1209 607 1297">SWES16/5</td> <td data-bbox="607 1209 1039 1297">Bolton Road Allotments</td> <td data-bbox="1039 1209 1339 1297">Local Green Space</td> <td data-bbox="1339 1209 2056 1297">SWES16/2 (LGS). Policies Map 1 shows this site as being proposed for Sport &amp; Rec. Should this be covered under policy SWES17 or is it a drafting error?</td> </tr> <tr> <td data-bbox="383 1297 607 1329">SWES16/6</td> <td data-bbox="607 1297 1039 1329">Keighley Road Recreation Ground</td> <td data-bbox="1039 1297 1339 1329">Local Green Space</td> <td data-bbox="1339 1297 2056 1329">SWES17/13 (Sport &amp; Rec)</td> </tr> <tr> <td data-bbox="383 1329 607 1361">SWES16/7</td> <td data-bbox="607 1329 1039 1361">Eastburn Playing Fields</td> <td data-bbox="1039 1329 1339 1361">Local Green Space</td> <td data-bbox="1339 1329 2056 1361">SWES16/6 (LGS)</td> </tr> <tr> <td data-bbox="383 1361 607 1382">SWES16/8</td> <td data-bbox="607 1361 1039 1382">Eastburn Rose Garden</td> <td data-bbox="1039 1361 1339 1382">Local Green Space</td> <td data-bbox="1339 1361 2056 1382">SWES17/4 (Sport &amp; Rec)</td> </tr> </tbody> </table>			<b>SWES16/17 Checklist</b>				<b>LGS Assessment Site Ref</b>	<b>Name</b>	<b>Proposed Designation</b>	<b>Proposed Policy Reference (Actual Designation)</b>	SWES16/1	Memorial Gardens, Silsden	Local Green Space	SWES16/1 (LGS)	SWES16/2	Bradley Green	Local Green Space	Not Included (Policies Map 1 shows a reference given to this site)	SWES16/3	Silsden Park	Local Green Space	SWES16/3 (LGS)	SWES16/4	Woodside Road Allotments	Local Green Space	SWES17/6 (Sport & Rec)	SWES16/5	Bolton Road Allotments	Local Green Space	SWES16/2 (LGS). Policies Map 1 shows this site as being proposed for Sport & Rec. Should this be covered under policy SWES17 or is it a drafting error?	SWES16/6	Keighley Road Recreation Ground	Local Green Space	SWES17/13 (Sport & Rec)	SWES16/7	Eastburn Playing Fields	Local Green Space	SWES16/6 (LGS)	SWES16/8	Eastburn Rose Garden	Local Green Space	SWES17/4 (Sport & Rec)
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SWES16/8	Eastburn Rose Garden	Local Green Space	SWES17/4 (Sport & Rec)																																							

	SWES16/9	Memorial Gardens & Wood	Local Green Space	SWES16/4 (LGS). Policies Map 1 shows an amended boundary compared with that shown in the LGS assessment. However, boundary does not reflect the proposed boundary set out in the recommendations of the LGS assessment. Needs to be amended.
	SWES16/10	Cemetery	Local Green Space	SWES15/25 (Comm Sites & Buildings)
	SWES16/11	Chapel Road Recreation Area	Local Green Space	SWES17/15 (Sport & Rec)
	SWES16/12	Corn Mill Green	Local Green Space	SWES16/5 (LGS)
	SWES16/13	Allotments off Keighley Road	Local Green Space	Not included.
<b>Evidence Base</b>				
Evidence Base	<p>The Council remains concerned about the lack of a submitted evidence base to support some of the policies within the Submission Draft NDP. The previous Regulation 14 consultation included the publication of a document entitled 'Planning Policy Assessment and Evidence Base Review'. However that document only included an outline of the evidence and studies which Bradford Council have gathered in support of its Core Strategy. While a good starting point it is unlikely that such evidence alone would be sufficient to support a suite of locally distinct policies and proposals within a Neighbourhood Plan.</p> <p>This issue was raised at Regulation 14 consultation by the Council and some responses in the Consultation Statement suggest edits have been made to an Evidence Base document which the Council has not yet had sight of. If relevant evidence is not submitted in support of the policies within the plan then the Council will make objections on those grounds at Regulation 16.</p> <p>You have indicated by e-mail that your consultants are updating this document. At the time of writing no such update appears to be available on your website or has been forwarded to us and there is thus no indication that you have collected, analysed and used any of your own evidence in drafting and justifying your policies.</p> <p>Whilst we acknowledge that it is not a requirement as part of <u>the submission</u>, to provide the Council with your evidence it certainly is good practice to do so or at least ensure that it is published and available on your website. The NPPF and associated planning guidance makes it clear that policies should be supported by proportionate evidence and the Council must therefore have a clear understanding of the evidence you have collected and be confident that it will be available to all who wish to consider the content of your Neighbourhood Plan when the Council publishes it .</p> <p>For that reason before we can commence Regulation 16 consultation the Council need to be provided with an updated version of the Planning Policy Assessment and Evidence Base Review document, and for clarity a separate bulleted list of the evidence base documents and studies you have prepared and an assurance that they will be available and published on</p>			<p>CBMDC previously raised concerns about the links between the draft policies and the evidence base that has shaped them.</p> <p>The Basic Conditions Statement states that the NDP is underpinned by a sound evidence base, and makes reference to this being summarised in the accompanying Planning Policy Assessment &amp; Evidence Base Review document. This document has not been provided as part of the document package sent to CBMDC. It is also not clear if this has been updated following comments made at the Regulation 14 stage. The version on the website dates from February 2016.</p> <p>For that reason before we can commence Regulation 16 consultation we need to be provided with an updated version of this document, and for clarity a separate bulleted list of the evidence base documents and studies have been prepared or used to prepare the NDP. Assurance needs to be sought that it will be available and published on the Town/Parish Council website by the time Regulation 16 consultation commences. This document will also assist those making comments on the draft NDP and the examiner as part of their deliberations.</p> <p>It is noted that Basic Conditions Statements sets out how the draft NDP is considered to meet the core planning principles set out in the NPPF (2012 version) and in general conformity with CBMDC's planning policy framework. Potential need to refer to latest versions of NPPF?</p> <p>As requested a Local Green Space assessment has been undertaken and provided as part of the package of documents sent to CBMDC.</p>

	<p>your website by the time Regulation 16 consultation commences.</p> <p>A key concern for the Council is the absence thus far of a proper Local Green Space Assessment. The table which is contained within the submission plan you have provided does not in itself constitute a proper and thorough assessment to support a policy which would have significant implications for the use of those land parcels and for the land owners. We would also like confirmation that you have identified the owners of those land parcels, and engaged and consulted those owners before finalising their inclusion in the plan. This includes for example the farmers for areas of farm land (The NFU have written to Local Authorities across the north of England including Bradford to raise concerns about the lack of engagement of their members in such matters) and the Council's Asset Management Service if applicable.</p>	
<b>Formatting</b>		
Chapter 1 - Page 5 – paras 1.2 & 1.3	Remove all parts of text which refer to the Regulation 16 consultation as the Council will not be amending this document prior to public consultation.	CBMDC will need to obtain an MS Word or editable PDF version of the NDP for this bit to be completed.
Chapter 3 – Page 10 – Para 3.3	Delete text that states 'insert dates'	See above
Chapter 4 – Page 26 – paras 4.45	Delete text that states 'insert dates'	See above
Chapter 5 – Page 29 – para 5.3	Missing word "NDP has been..."	Corrected.
Chapter 5 – Page 31 – Figure 4	The reference to the Airedale Spatial vision diagram should refer to the adopted Core Strategy (July 2017).	Corrected.
Chapter 5 – Pages 38/39 – Policy SWES4	<p>Spelling error on 2<sup>nd</sup> line 'sown', should be 'shown'.</p> <p>Incorrect numbering of assets. From what I can ascertain, the Steeton and Eastburn assets need to be re-numbered starting at SWES4/19.</p>	Typographical error has been corrected

Chapter 5 – Page 40 - para 6.15	The end of the sentence is incomplete.	
Chapter 5 – Page 40 – para 6.17	The RUDP policies cited here have been superseded by Core Strategy Policies, i.e. BH19 – CS-EN3 NE2 – CS-EN1 NE3 – CS-EN4 NE3A – CS-EN4	Document no longer refers to the former RUDP policies. There is general reference to proposals being assessed against the Core Strategy.
Chapter 5 – Page 42 – para 6.21	Spelling error ‘These sites...’	Corrected
Chapter 5 – Page 43 – para 6.24	Reference should be to Landscape Character Supplementary Planning <b>Document</b> , not ‘guidance’.	Corrected
Chapter 6 – paras 6.9 & 6.25	To avoid any potential confusion your referencing to the CSLP (Core Strategy Local Plan) would benefit from being LPCS (Local Plan Core Strategy), or ideally CS (Core Strategy) to align with the Councils referencing.	Document tends to refer to either Bradford Local Plan Core Strategy (LPCS) throughout.
Chapter 7 – Page 68	This chapter is not required – to be deleted.  As a result, amendments will be required to the Contents page (page 3)	CBMDC will need to obtain an MS Word or editable PDF version of the NDP for this bit to be completed.



# Kirkwells

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