

For Office Use only:	
Date	16.10.2019
Ref	SwES001-1

## COMMENT FORM

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

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

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

### PART A: PERSONAL DETAILS

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

	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
<b>Title</b>		
<b>Full Name</b>		
<b>Job Title</b> (where relevant)		
<b>Organisation</b> (where relevant)	Airedale NHS Foundation Trust	DAC Beachcroft LLP
<b>Address</b>		
<b>Post Code</b>		
<b>Email Address</b>		
<b>Telephone Number</b>		

### How to submit your Comment Form:

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

- **E-mail:** [planning.policy@bradford.gov.uk](mailto:planning.policy@bradford.gov.uk)
- **Post:** Local Plans Team, Bradford Council,  
4<sup>th</sup> Floor Britannia House, Broadway, Bradford, BD1 5RW

Any comments received after this date will not be accepted.

### Data Protection Statement

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

**Regulation 16 – Publicising a Plan Proposal**

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**PART B – YOUR COMMENTS**

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

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

Neighbourhood Development Plan	<input type="checkbox"/>	Basic Conditions Statement	<input type="checkbox"/>
Consultation Statement	<input checked="" type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

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

Whole document	<input checked="" type="checkbox"/>	Section	<input type="checkbox"/>	Policy	<input type="checkbox"/>
Page Number	<input type="checkbox"/>	Appendix	<input type="checkbox"/>		

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

Support	<input type="checkbox"/>	Object	<input type="checkbox"/>	Make an observation	<input checked="" type="checkbox"/>
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**4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.**

Airedale NHS Foundation Trust received the letter to statutory consultees shown in Appendix 8 of the Consultation Statement by email from the Clerk to Steeton-with-Eastburn Parish Council on 3 February 2017. The Trust prepared a response objecting to Policy SWES17 in relation to land owned by the Trust and this was emailed to the Clerk (as requested in the letter and the representation form) on 16 March 2017 as attached to this form.

We note that the Trust's consultation response is not referred to in the Consultation Statement and the points raised have not been addressed in the submission plan. The Trust has made further comments on the submission plan itself and trusts that these matters will be properly addressed at this stage. The Trust nevertheless feels that the examiner should be aware that the Consultation Statement is, at least in this respect, not complete.

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

**6. Signature:** [REDACTED] **Date:** 16/10/19

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



**David Moss**

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**From:** [REDACTED]  
**Sent:** 16 March 2017 16:10  
**To:** [REDACTED]  
**Subject:** RE: Steeton, Eastburn and Silsden Draft Neighbourhood Development Plan  
**Attachments:** SWES Neighbourhood Plan Regulation 14 Consultation Representation Form 26 01 17.docx


Hi [REDACTED]

Please find attached a completed form on behalf of Airedale NHS Foundation Trust.

Please confirm receipt

Regards,

[REDACTED]

#  my name is...

[REDACTED]

My **Wayfinder** location is... **Building 5**

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**From:** [REDACTED]  
**Sent:** 05 February 2017 11:12  
**To:** [REDACTED]

[REDACTED]

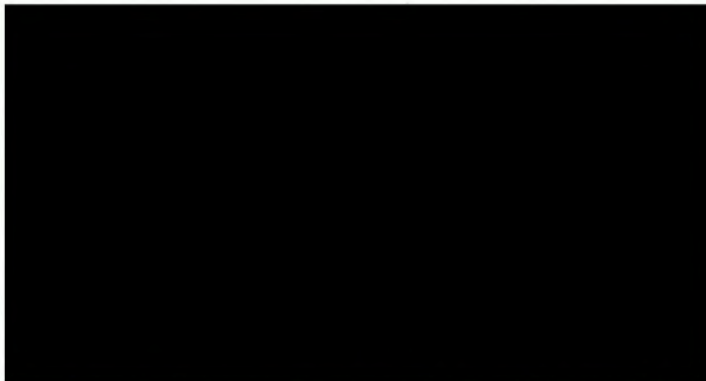
**Subject:** Steeton, Eastburn and Silsden Draft Neighbourhood Development Plan

Dear Consultee

Please find attached a the draft Neighbourhood Development Plan for Steeton, Eastburn and Silsden, together with supporting maps, an explanatory letter and a representation form.

I look forward to your response

Regards



Please note that the position of clerk is a part time role and there may be a delay in replying

This e-mail and any files transmitted with it are confidential and intended solely for the use of the individual or entity to which they are addressed. If you have received this message in error, you must not disclose, copy, circulate or in any other way use or rely on the information contained in this message. If you have received this message in error, please delete it immediately and advise us by return e-mail to the above address.

# 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	[REDACTED]
Organisation	Airedale NHS Foundation Trust
Address	[REDACTED]
Email	[REDACTED]
Tel. No.	[REDACTED]

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

Page Number	69
Policy Number	SWES 17

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

Support	
Object	X
Making a Comment	

Please Turn Over

Please use the box below for any comments.



SWES17/6 refers to the Airedale Hospital Sports ground and calls for it to be protected for sports and recreational use.

The Trust has to object to this proposal as there is potential of selling the land for development in the future. There is a funding crisis in the NHS and the Trust is under significant financial pressure, the Trust must look to maximise the value of its assets to re-invest money into patient care.

If housing is built behind the hospital and behind the current Miller Homes development the Trust would look to sell the land for housing development.

The Trust has made commitments to the Department of Health to dispose of land for housing, if building becomes possible. DoH have a target of building an addition 26,000 homes on NHS land, this area of land forms part of this target and constitutes part of a review by [REDACTED]

The space has not been used for the purpose of recreation since 1993. The access route is very poor and only achieved via the adjacent bridleway, at the time of building access was intended to be via foot through the hospital site.

The council has not demonstrated that it has enough available housing land to satisfy its overall housing needs for the next five years and this site could be used to improve that requirement.

**Thank you for your time and interest. Please return this form  
to [REDACTED]**

**Or by email to:**

[REDACTED]

## COMMENT FORM

For Office Use only:	
Date	16.10.2019
Ref	SwES001-2

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### PART A: PERSONAL DETAILS

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

	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title	[REDACTED]	[REDACTED]
Full Name	[REDACTED]	[REDACTED]
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	Airedale NHS Foundation Trust	DAC Beachcroft LLP
Address	[REDACTED]	[REDACTED]
Post Code	[REDACTED]	[REDACTED]
Email Address	[REDACTED]	[REDACTED]
Telephone Number	[REDACTED]	

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**Steeton with Eastburn & Silsden Neighbourhood**

**Development Plan**

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**PART B – YOUR COMMENTS**

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

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

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

Whole document		Section		Policy	SWES17/7
Page Number		Appendix			

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

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

Airedale NHS Foundation Trust is the owner of Airedale Hospital Sports Ground, which is identified in the submission version of the Neighbourhood Plan as a site to be protected under policy SWES17 for sport and recreation uses.

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

The Hospital Sports Ground was established by the Trust to provide facilities solely for hospital staff. Neither the field nor the clubhouse were ever made available for use by members of the public on any sort of basis. The Hospital Sports Ground was always operated with the financial support of the Trust until this support became unsustainable. At that point, around 15 years ago, the Hospital Sports Ground was closed.

Following closure, the Hospital Sports Ground has been kept secure but has not been laid out or maintained for any form of sport or recreational use. The clubhouse was demolished in 2018 and the site is currently unmanaged grassland. The land is now only used to provide a landing area for air ambulances as and when required and any return to sports or recreational use would be incompatible with air ambulance use. The Trust does not therefore foresee any likelihood of the land being reopened for sports or recreational use by hospital staff or for public use.

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

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

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

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

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

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

X

6. Signature:

Date:

16/10/19

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

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## COMMENT FORM

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<b>Title</b>	[REDACTED]	[REDACTED]
<b>Full Name</b>	[REDACTED]	[REDACTED]
<b>Job Title</b> (where relevant)	[REDACTED]	
<b>Organisation</b> (where relevant)	Airedale NHS Foundation Trust	DAC Beachcroft LLP
<b>Address</b>	[REDACTED]	[REDACTED]
<b>Post Code</b>	[REDACTED]	[REDACTED]
<b>Email Address</b>	[REDACTED]	[REDACTED]
<b>Telephone Number</b>	[REDACTED]	

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

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

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

Whole document		Section		Policy	SWES17/8
Page Number		Appendix			

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

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

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

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

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

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

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

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

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

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

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

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

X

6. Signature:

[Redacted Signature]

Date:

16/10/19

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