



WILSDEN NEIGHBOURHOOD DEVELOPMENT PLAN (2020 TO 2038) COMMENTS FORM (FEBRUARY 2024)

Wilsden Parish Council has submitted their proposed Neighbourhood Development Plan to City of Bradford Metropolitan District Council (CBMDC). The Council is now required to consult on the plan for a period of 6 weeks in accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended).

This consultation seeks your views on whether the Wilsden Neighbourhood Development Plan meets the Basic Conditions¹ which are that the plan:

- Must be appropriate having regard to National Planning Policy.
- Must contribute to the achievement of sustainable development.
- Must be in general conformity with the strategic policies in the development plan for the local area.
- Must be compatible with human rights requirements.
- Must be compatible with EU obligations.

The consultation period starts on **Monday 5th February** and closes at 5pm on **Monday 18th March 2024**.

The Plan and supporting documents are available to view electronically at: www.bradford.gov.uk/consultations as well on the Council's Opus Consult portal: <https://bradford.oc2.uk/>. Hard copies are available to inspect during normal opening hours at:

- CBMDC Customer Service Centre, Britannia House, Hall Ings, Bradford, BD1 1HX.
- City Library, Centenary Square, Bradford, BD1 1SD.
- Bingley Library, 5 Rise Shopping Centre, Bingley, BD16 1AW.
- Wilsden Post Office, 112 Main Street, Wilsden, BD15 0AB.

How to submit your comments:

Please ensure you complete both parts of this comment form otherwise your comments may not be accepted.

Comments can be submitted:

- **Online at:** <https://bradford.oc2.uk/> (*Registration is required*)
- **Email to:** planning.policy@bradford.gov.uk
- **Post to:** Local Plan Team, City of Bradford Metropolitan District Council, 4th Floor, Britannia House, Broadway, Bradford, BD1 1HX (*Please ensure that there is sufficient time to guarantee delivery to our offices by the closing date for comments*)

All comments received will be sent to an independent examiner who will examine the plan. If the examiner determines that the plan meets the basic conditions, then a local referendum shall be held on whether to 'make' the Neighbourhood Plan.

Contact Details:

If you have any questions, comments or queries please contact the Local Plan Team using the details below:

- **Telephone:** 01247 433679
- **Email:** planning.policy@bradford.gov.uk

¹ <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012
REGULATION 16: PUBLICISING A PLAN PROPOSAL
WILSDEN NEIGHBOURHOOD DEVELOPMENT PLAN (2020 TO 2030)
COMMENT FORM

For Office Use only:	
Date Rec.	
Date Ack.	
Respondent ID	
Representation Ref:	

PART A: PERSONAL DETAILS

Please provide your personal contact details. If an agent is appointed to represent you, then they would need to provide their full contact details in addition to your title, full name and organisation (where relevant). This information is required to enable the independent examiner and/or the Council to contact you for further information if required during the examination of the Neighbourhood Plan.

1. PERSONAL / AGENT DETAILS		
	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title		Mrs
Full Name		Emma
Job Title (where relevant)		Sandham
Organisation (where relevant)	Wain Estates (Land) Limited	Avison Young
Address		11 York Street, Manchester
Post Code		M2 2AW
Email Address		
Telephone Number		

2. FUTURE NOTIFICATION

Please tell us if you would like to be notified when City of Bradford Metropolitan District Council decide to make the Plan under Regulation 19 (to bring it into legal force after examination and local referendum).

Yes

No

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

NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012
REGULATION 16: PUBLICISING A PLAN PROPOSAL
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PART B – YOUR COMMENTS

If responding using this form, please use a separate Part B sheet for each different part of the Plan or supporting document that you are commenting on, and clearly state to which part of the document it relates.

3. To which document does your comment relate? Please place an 'X' in one box only			
Neighbourhood Development Plan (NDP)	X	Basic Conditions Statement	
Consultation Statement		Other (please specify)	

4. To which part of the document does your comment relate?					
Whole document	X	Section		Policy	
Page Number		Paragraph			

5. Do you wish to? Please place an 'X' in one box only					
Support		Object	X	Make an observation	

Commented [SJ(YU1): Not sure which to tick here?]

6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.
<p>Please refer to our submission letter prepared by Avison Young on behalf of Wain Estates. The purpose of the letter is to promote land to the south of Birkhead Drive to be considered as a "possible option for change" for release from the Green Belt for residential development.</p>

7. Signature: [REDACTED]	Date: 18/03/2024
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Our Ref: 04C400155/ JS/ES

13 March 2024

Local Plan Team
City of Bradford Metropolitan District Council
4th Floor, Britannia House
Hall Ings
Bradford
BD1 1HX

By email only: [REDACTED]

Dear Sir or Madam,

**REPRESENTATIONS TO THE WILSDEN NEIGHBOURHOOD DEVELOPMENT PLAN REGULATION
16 CONSULTATION**

On behalf of my client, Wain Estates (Land) Limited ('Wain Estates'), I would like to thank you for the opportunity to submit representations to the Wilsden Neighbourhood Development Plan Regulation 16 Consultation.

These representations have been prepared by Avison Young ('AY') on behalf of Wain Estates and refer to land south of Birkshead Drive, Wilsden, Bradford ('the site') as shown on the red edge plan at **Appendix I**. The site does not currently benefit from an allocation for development within the Reg 16 Wilsden Neighbourhood Development Plan ('WNDP') and is therefore proposed to remain within the Green Belt. It is therefore our intention to demonstrate through these representations that the site is suitable for Green Belt release and to promote the site for residential development within the emerging Local Plan period.

It is important to acknowledge that the WNDP is being prepared simultaneously with the City of Bradford Metropolitan District Council (CBMDC)'s new Local Plan which the Council is currently preparing its Regulation 19 stage draft. Both the Local Plan and WNDP once adopted will form the Development Plan against which planning decisions will need to take account of. For this reason, it is highly important that the policies across both align, particularly in this instance on matters relating to the Green Belt and housing need. This is acknowledged by Wilsden Parish Council in the WNDP. We therefore request that the site is included as a 'possible option for change' within the WNDP. This will allow the site to be fully assessed for potential Green Belt release and allocated for residential purposes should it be deemed to be a suitable site.

Wain Estates

Wain Estates are a strategic land company, operating across the country from their headquarters in Warrington. They are part of the Wain Group, one of the UK's largest private land and residential developers. Established in 1972, they are made up of Wain Estates, the strategic land company and Wain Homes, the housebuilder. Through consistent action, they have developed a commitment to promoting, designing and placemaking in a way that defines them. Creating places

and spaces that enrich both the economy, and the way people live and work. What they do matters. And the way they do it, counts.

Site Context

The site is approximately 10.87 hectares in size and is located to the southeast of Wilsden Village settlement boundary as shown in Figure 1. It lies to the south of Birkshead Drive, to the east of residential properties along Low Wood and bisected by Shay Lane which runs north to south. There is also a public footpath which runs north to south through the western parcel of land connecting Birkshead Drive with Haworth Road (B6144). A public footpath also runs along the northern boundary of the site.

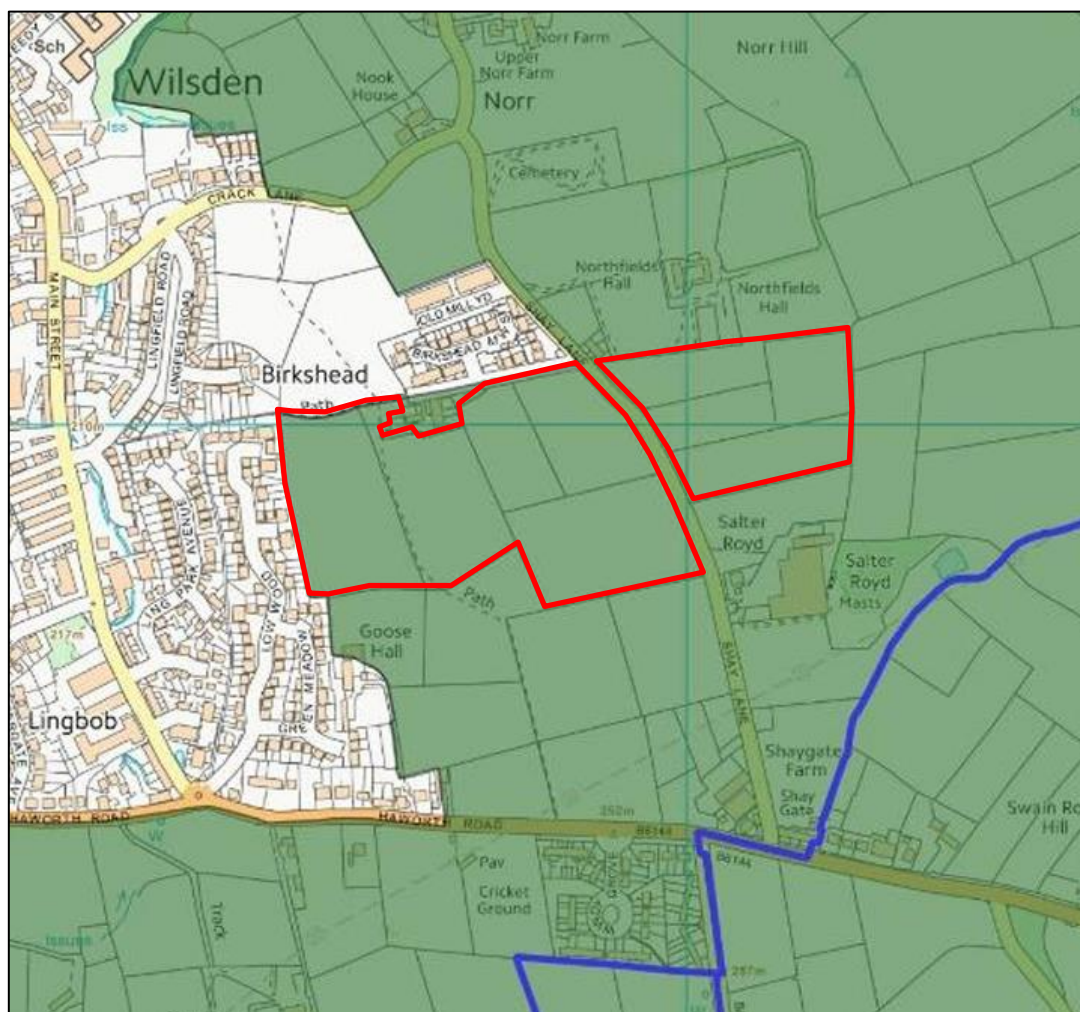


Figure 1: Wilsden Settlement Boundary, WNDP 2020-2038 (red line indicates the site promoted, blue line indicates the extent of the WNDP and the green indicates existing Green Belt)

To the north of the site is the Birkshead Special Character Area. This small group of terrace housing which is thought to pre-date the 1800s falls within the Green Belt but does not form part of the site promoted for release.

The site is mostly green fields divided by dry-stone walls with a limited tree coverage, dry-stone walls also form the site's boundaries to the adjoining main roads. It slopes slightly north to south and west to east. It is not located within an area at risk of flooding. Approximately 50 metres to the southeast of the site, across Shay Lane to the south of Salter Royd Equestrian Centre is a "late prehistoric enclosed settlement" which is a scheduled monument as listed under the Ancient Monuments and Archaeological Areas Act 1979.

Green Belt Release

Chapter 13 of the National Planning Policy Framework (NPPF, 2023) relates to Green Belt and states that 'authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process' (paragraph 145).

Paragraph 146 states that 'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph (145) and whether the strategy:

- a) Makes as much use as possible of suitable brownfield sites and underutilised land;
- b) Optimises the density of development in line with policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.'

As the WNDP is being prepared within a similar timeframe to the CBMDC emerging Local Plan, it has utilised much of the background evidence and research undertaken by the Council to inform the WNDP. Part of the Reg. 18 Draft published by CBMDC has included an assessment and proposed amendments to the Green Belt. This assessment has referenced the same requirements of the NPPF. Their findings state that in order to meet the proposed housing requirements for the District, as set out in draft Policy SP8 (Housing Growth), they cannot meet the provision for 'at least' 27,672 dwellings over the plan period 2020-38 on brownfield land alone. Paragraphs 3.5.4 – 3.5.7 of the CBMDC Reg. 18 draft sets out how the Council has addressed the three criteria above and from their assessment, this has resulted in a requirement for Green Belt release across the District. A summary of this is set out below:

- a) A brownfield land supply assessment has been completed and found that the sum total of maximum development on existing brownfield sites would still fall around 5,000 units short of the identified housing requirements.
- b) The CBMDC assessment of non-Green Belt land capacity takes consideration of density levels compliant with draft Policy HO2, with a significant uplift in urban locations well served by public transport, where this would not have unacceptable adverse consequences. The Local Plan features a very significant focus upon brownfield land redevelopment and regeneration with a strong emphasis on growth within Bradford City

Centre and Keighley. However, the possible supply number still falls significantly short of the required housing requirements.

- c) CBMDC have undertaken discussions with neighbouring authorities through the Duty to Co-operate. These discussions have concluded that no adjacent authorities are able to make a contribution towards meeting the District's remaining housing need.

CBMDC has therefore demonstrated that in order to meet its development needs, exceptional circumstances exist for Green Belt release. The Local Plan's proposed housing requirement will ensure that sufficient homes are provided to support the planned level of economic growth, but this can only be achieved with the release of Green Belt land. In view of the above and despite maximising the capacity of the existing urban area, if Bradford is to meet its housing requirement, it can only do so through the release of Green Belt land to provide for approximately 5,000 new homes. From the information which is available online, it does not appear as though Wilsden Parish Council have prepared their own Green Belt assessment as part of the WNDP preparations.

In terms of how this directly effects Wilsden and the WNDP, draft Policy SP8 of the emerging Local Plan provides details of the Council's preferred distribution of housing growth. For Wilsden, a Local Service Centre, its minimum requirement is 125 new homes over the plan period. Part F of the draft policy states *'the Council will support proposals within Neighbourhood Plans which seek to provide for additional housing development over and above the levels indicated within this policy providing this additional growth can be achieved in a sustainable way'*.

Further to the requirements of emerging Local Plan draft Policy SP8, Section 5.27 is specific to Wilsden and confirms its settlement boundary will need to be reviewed to release Green Belt land for residential development to meet this minimum targets.

Wain Estates strongly agree with CBMDC that exceptional circumstances to justify the release of Green Belt land for development exist in line with paragraph 146 of the NPPF. Wain Estates are also strongly supportive of the acknowledgement by Wilsden Parish Council that Green Belt release is necessary to meet housing requirements over the emerging Local Plan period, which is reflected in the draft WNDP.

Location of Green Belt Release

The WNDP shows a commitment to support new residential development as part of the Local Plan. The WNDP also acknowledges that land for future housing development within the existing Wilsden settlement boundary is extremely limited (paragraph 2.2.2).

The Local Plan identifies two sites in Wilsden for possible Green Belt release: WI2/H (Crack Lane) and WI3/H (Moorside Farm). Collectively these site's according to the CBMDC could deliver 120 dwellings. This is acknowledged in the WNDP in Figure 3, but it is not included within the proposed Policies Map. Paragraph 2.3.1 states *'this Neighbourhood Plan did consider allocating land to meet this housing requirement but ultimately determined not to do so'*. Wain Estates is supportive of the WNDP acknowledging the need to identify suitable land for Green Belt release.

The site which we are promoting was appraised for potential Green Belt release as part of the CBMDC Local Plan preparation and is included in their evidence base (Green Belt Assessment 3.27, site ref: WI/006). With regards to CBMDC's appraisal of the site (WI/006) it was concluded that it makes a "moderate" contribution to the five purposes of the Green Belt. This was the same overall finding for sites WI2/H and WI3/H, which were both assessed as making a "moderate" contribution.

In matter of fact, of the eight Green Belt sites which were appraised, only three were assessed as being “*moderate*” with the remainder concluded to make a “*major*” contribution. No sites were identified as making a “*weak*” contribution.

We have undertaken our own assessment of the site against the five purposes of the Green Belt as set out in the NPPF (paragraph 143).

- a) ‘To check the unrestricted sprawl of large built-up areas’ – we agree with the CBMDC assessment that there is no contribution to this purpose as the site does not adjoin the defined large built-up area.
- b) ‘To prevent neighbouring towns merging into one another’ – we agree with the CBMDC assessment that the site makes a “*low*” contribution towards this purpose as there is no second settlement in close proximity to the site.
- c) ‘To assist in safeguarding the countryside from encroachment’ – the CBMDC suggests the site makes a “*major*” contribution to this purpose. We would disagree with this assessment and consider it makes only a “*moderate*” contribution due to the existing surrounding built environment. Although the site is undeveloped, there is built development to the north and west, further south and to both the northeast and southeast corners, meaning the site is never viewed in isolation from built development.
- d) ‘To preserve the setting and special character of historic towns’ – the CBMDC consider the site makes a “*moderate*” contribution to this purpose. However, on reflection of the heritage assets identified within the WNDP, particularly the historic town of Wilsden, Conservation Area and key viewpoints, we note the site is not located in close proximity to the original historic town of Wilsden or any Conservation Area. Nor is it part of an important open view/vista as identified in draft Policy W/NE5 of the WNDP. It is acknowledged that to the north of the site is the Birkshead Special Character Area, in the form of three small rows of terrace housing. However, this does not form part of the site, furthermore the masterplan design for the site would be sensitively designed to enhance the setting of this area, similar to the new residential development across from Birkshead Drive in terms of materiality and unit orientation. We therefore consider that the site makes a weak to moderate contribution towards this purpose.
- e) ‘To assist in urban regeneration, by encouraging the recycling of derelict and other urban land’ – the CBMDC assesses all Green Belt sites as scoring “*moderately*” against this purpose. We do not challenge this basis, which is a fair assessment.

In addition to the above it is important to factor in the benefits of removing the site from the Green Belt for Wilsden as a whole. The site is larger than the other two ‘possible options for change’ sites in Wilsden, meaning its release would provide a greater benefit in being able to provide more housing in line with the Council’s ‘*minimum*’ targets for Wilsden set out in the emerging Local Plan. As a larger site, there is also potential for greater contributions towards local services and facilities. There is also extensive research and data published which confirms the economic, social and environmental benefits from the delivery of new residential development including: jobs, service provision, tax income and requirement to deliver on biodiversity net gain to name just a few. These should weigh in favour of positioning Wilsden as a successful and thriving Local Service Centre which supports its community through positive growth rather than only seeking to meet a target

in the Local Plan, which the Council explicitly says is a minimum target and would support unit provisions beyond the 125 number given.

In summary, it is considered that the CBMDC have provided sufficient evidence for the requirement to review the Green Belt across the District. This is acknowledged by Wilsden Parish Council. The site scores 'moderate' in the Councils Green Belt assessment and should therefore be considered as a third 'possible option for change' in order to allow it to be thoroughly explored as a possible future development option through the emerging Local Plan process. We have demonstrated that the site is suitable, available and achievable to accommodate residential development further in this letter below.

Other Policies

Whilst the level of Green Belt release in the WNDP is our main area of focus, we would also like to take the opportunity to comment on other policies contained within the draft WNDP.

Policy W/HO1: Development within Wilsden Village

If the Council opted to remove our site from the Green Belt for residential development, it should be noted that Wain Estates would design and deliver a scheme that complies with the requirements of this policy.

Policy W/HO2: Development outside Wilsden Settlement Boundary – The Green Belt

This policy supports the designation of the open countryside outside the settlement boundary as Green Belt. It is our suggestion that the settlement boundary be amended to include land to be allocated for residential development, as is required through the CBMDC. Wain Estates request that the site, be considered as a 'possible option for change' in the WNDP.

Policy W/HO4: Wilsden Design Code

We are fully supportive of this policy which requires high quality design to enhance and conserve local distinctiveness in line with the Design Code. We fully acknowledge the importance of good design and have a proven track record of delivering a number of high quality residential developments, each specifically designed to reflect their location.

Policy W/HO6: Housing Mix

We fully support the requirement for a mix of housing to support those most in demand. If allocated, Wain Estates would deliver a scheme to comply with the requirements of this policy including provision of smaller dwellings (less than 3 bedrooms) and no more than 35% of properties being 4 bedrooms or more.

Policy W/HO7: Affordable Housing

If allocated for residential development, Wain Estates would ensure an affordable housing provision in line with this policy either through onsite provision or a contribution for off-site, depending on the viability findings.

Policy W/BH3: Hallas Bridge and Birkshead Special Character Areas

This policy states: "an important part of the setting of Birkshead is that the open aspect of the fields to the south are retained". We consider this policy to be unnecessarily restrictive and unjustified. It is possible to preserve and enhance the setting of special character areas through

surrounding development. We acknowledge the distinctive nature of this small site and that any development would need to be sensitively designed so as not to impact on this. An example of this can be seen by the recent residential development across from Birkshead Drive which uses similar materiality, buff brick and slate roofing, to reflect the older dwellings. There are many examples across the District and country whereby new developments and listed heritage assets can sit harmoniously side by side without a negative impact. It would be wrong and unjustified for the policy to require no development to the south. Rather we would suggest the policy is reworded in a manner that requires any surrounding development to promote the Special Character Area and not detract from key views.

Policy W/DC1: Developer Contributions

This policy seeks financial contributions from developers towards the provision of neighbourhood infrastructure. In our experience this is not an uncommon request as such we would be more than willing to engage with the Parish Council to discuss areas most in need of financial support, should the site be brought forward for residential development.

We do not wish to make any comments on the remaining policies within the WNDP which are not referenced above, to which we are fully supportive. As mentioned Wain Estates are experienced developers not only across the North of England but also nationally. On every scheme they work with a skilled professional team to design, assess and deliver policy compliant, high quality developments each unique to their setting. We would ensure the same is delivered in Wilsden, subject to this site at Birkshead Drive being removed from the Green Belt for residential development.

Vision for the Site

We request that the site is included as a third 'possible option for change' to the settlement boundary, within the WNDP, in addition to the already proposed sites at Crack Lane and Moorside Farm. The inclusion of the site would significantly strengthen the District's ability to achieve its full housing target through the emerging Local Plan. Wain Estates would seek to secure the delivery of high quality housing suitable to support and further the local community and its economy, whilst assisting the wider region with its housing delivery. The site would make a logical extension to the village that complements and enhances the surrounding area. Below are the 3 main factors when considering whether the site is appropriate for Green Belt release;

1) Suitable

The site is well related to Wilsden's existing built form and is situated in a good location for potential future residents to access the settlements existing services. As previously mentioned, the site was reviewed by CBMDC within their appraisal of the site (WI/006) and it was concluded that the site provided a 'moderate' contribution to the requirements of the Green Belt. The proposed possible options for change were also assessed and have the same 'moderate' contribution, therefore not necessarily making them preferable to the Wain Estates site.

In regards to the sites physical suitability, Wilsden is defined as a service village, capable of accommodating housing development over the Plan period. The village has good road links, access to Bingley train station (4km) and a half hourly bus service to both Bingley and Bradford. Each bus stop within the village is accessible on foot with the walking times from the site ranging from 4 to

13 minutes dependent on the stop and the route chosen. The site should therefore be classed as suitable to be put forward as an option for change within the WNDP.

2) Available

The site is currently available for development. Wain Estates have entered into a Promotion Agreement with the landowner to promote the site for residential development through the WNDP and emerging Local Plan process. The site is currently all under one ownership, removing complications associated with land assembly and meaning that a single cohesive planning application could be made bringing forth the site under one scheme rather than on a piecemeal basis.

3) Achievable

If the site were to be included as a 'possible option for change' within the WNDP, this would provide an opportunity for CBMDC to consider the site in their emerging Local Plan as an allocation for housing, assisting the region with its housing delivery and helping to exceed its minimum targets for the Plan Period. Wain Estates have a clear track record and extensive experience in delivering large sites, such as the Carrington Estate; one of the largest regeneration sites in the UK, being promoted for a mix of uses and therefore they are a trustworthy source of delivery. With the available status of the site, as outlined above, it is possible that the site could come forward, in full within the first 5 years of the Plan Period.

Next Steps

Following the submission of these representations it is our intention to proactively enter into discussions with both the Council and Parish Council and to promote the site for Green Belt release and future residential development. We will also look to submit representations on the CBMDC's Local Plan on behalf of Wain Estates, which the Council is currently preparing their Regulation 19 (draft publication stage). In order to support future representations our client has instructed a masterplanner to review the site's opportunities and constraints and develop a masterplan to help illustrate the site's capacity and capability for residential development.

We would also like to take this opportunity to engage with Planning Policy Officers and would welcome a meeting to discuss these representations and our vision for the site further. As such, on receipt of these representations alongside confirmation of acknowledgement could you also please provide details for arranging this meeting.

Summary

These representations have been submitted by Avison Young, on behalf of Wain Estates, to the Wilsden Neighbourhood Plan Regulation 16 Consultation and relate to Wain Estate's interest in land to the south of Birkshead Drive, Wilsden, Bradford.

Wain Estates strongly believe that the site should be released from the Green Belt and included within the Neighbourhood Plan as a 'possible option for change' allowing for its release from the Green Belt in the emerging Local Plan. The site is a logical and sustainable site which would be able to meet the relevant key objectives of both the WNDP and CBMDC's Local Plan and provide high quality development on land adjacent to the existing settlement of Wilsden.

We would be most grateful if you could confirm safe receipt of these representations and provide potential dates for a meeting to discuss this site in due course.

**AVISON
YOUNG**

Yours faithfully,

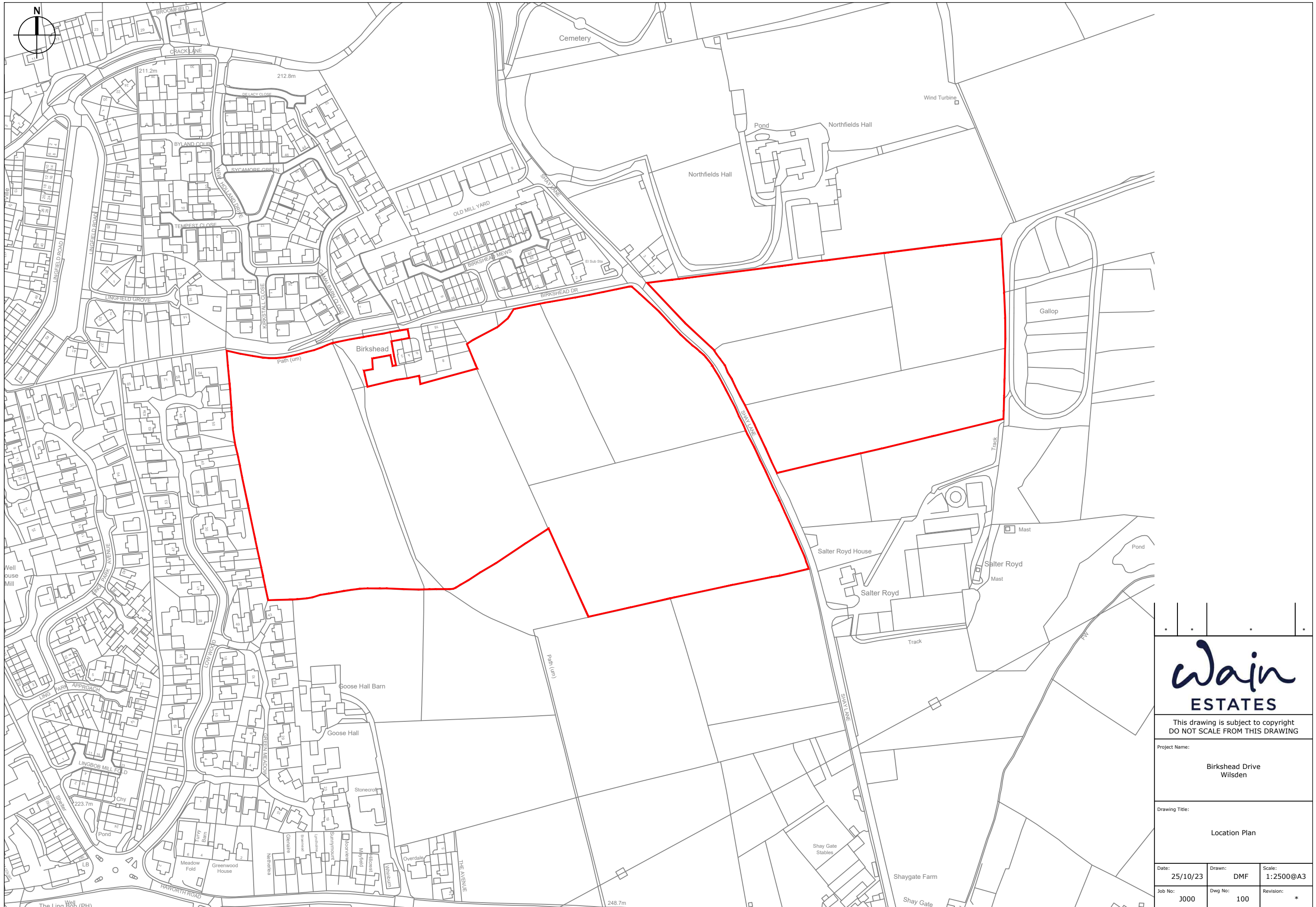


**Emma Sandham
Associate Director**



For and on behalf of Avison Young (UK) Limited

Appendix 1: Site Location Plan



Wain
ESTATES

This drawing is subject to copyright
DO NOT SCALE FROM THIS DRAWING

Project Name:
**Birkshead Drive
Wilmsden**

Drawing Title:
Location Plan

Date: 25/10/23	Drawn: DMF	Scale: 1:2500@A3
Job No: J000	Dwg No: 100	Revision: *