

Local Development Framework for Bradford

Landscape Character

Supplementary Planning Document

Supporting Documents

Statement of Consultation

Statement of Sustainability Appraisal

October 2008



City of Bradford MDC

www.bradford.gov.uk

This document is one of a number that make up the Local Development Framework for the Bradford District. If you need the contents of this document to be interpreted or translated into one of the community languages or you require it in Braille, Large Print or on tape, please contact the Local Development Framework Group on (01274) 434050, (01274) 434544 or (01274) 434606.

આ દસ્તાવેજ ઘણાંમાં નો એક છે કે જે બ્રેડફોર્ડ ડિસ્ટ્રિક્ટ નાં સ્થાનિક વિકાસ ની રૂપરેખા બનાવે છે. જો તમને આ દસ્તાવેજનાં લખાણનું પ્રાદેશિક ભાષાઓમાં ભાષંતર કરાવવાની અથવા તેનો અર્થ સમજવાની જરૂર જણાય, અથવા તમને તેની જરૂર બ્રેઇલ, લાર્જ પ્રિન્ટ કે પછી ટેપ ઉપર હોય, તો મહેરબાની કરી લોકલ ડિવેલપમેન્ટ ફ્રેમવર્ક ગ્રુપનો (01274) 434050, (01274) 434544 અથવા (01274) 434606 પર સંપર્ક કરો.

यह दस्तावेज़ उन बहुत से दस्तावेज़ों में से एक है जिनसे मिलकर ब्रैडफोर्ड डिस्ट्रिक्ट का लोकल डिवेलपमेंट फ्रेमवर्क बनता है। यदि आप इस दस्तावेज़ की जानकारी का हिन्दी अनुवाद या इसे ब्रेल, बड़े अक्षरों या टेप पर प्राप्त करना चाहते हैं , तो कृपया लोकल डिवेलपमेंट फ्रेमवर्क ग्रुप से (01274) 434050, (01274) 434544 या (01274) 434606 पर सम्पर्क करें।

બ્રાડફોર્ડ ડિસ્ટ્રિક્ટ (Bradford District) એર લોકાલ ડેવેલોપમેન્ટ ફ્રેમવર્ક (Local Development Framework – સ્થાનીય ઉন্নયન કાર્થામો) એર અનેકગુલો કાગજપત્ર વાં દલિલપત્રેર એકટિ હલો એઈ તથ્યપત્રટિ । એઈ તથ્યપત્રેર વિષયવસ્તુ કમિયુનિટિર લોકદેર કોનો ભાષાય રુવાતે ચાઈલે અથવા લિખિત અનુવાદ ચાઈલે નતુવા તા બ્રેઈલે (અક્ષલિપિતે), મોટા હરફે કિંવા ક્યાસેટે રેકર્ડ કરે ચાઈલે, અનુગ્રહ કરે લોકાલ ડેવેલોપમેન્ટ ફ્રેમવર્ક ગ્રુપ (Local Development Framework Group)-કે (01274) 434050, (01274) 434544 વાં (01274) 434606 નાંધારે ફોન કરાન ।

یہ دستاویز بریڈفورڈ ڈسٹرکٹ کے مقامی ترقیاتی لائحہ عمل سے متعلقہ دستاویزات میں سے ایک ہے۔ اگر آپ کو اس دستاویز کا زبانی یا تحریری ترجمہ کسی بھی کمیونٹی زبان میں درکار ہو یا آپ اسے بریل، لارج پرنٹ یا ٹیپ میں چاہتے ہیں تو براہ مہربانی لوکل ڈیولپمنٹ فریم ورک گروپ سے ٹیلی فون نمبر: 01274 434050، 01274 434544 یا 01274 434606 پر رابطہ کریں۔

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1.0 STATEMENT OF CONSULTATION

1.1 The Landscape Character SPD sets out the Council's approach to the implementation of Policies NE3 and NE3A of the Replacement UDP (2005).

1.2 This Statement of Consultation has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004, and the summary of representations and the Council's response can be found in Appendix 3.

1.3 The draft SPD has been the subject of consultation, as resolved by Executive Committee on 22nd April 2008. This consultation period ran from 12 May to 23 June 2008.

1.4 In line with the Regulations, and the Statement of Community Involvement (as submitted), the draft SPD and accompanying documents:

- were made available at the Area Planning Offices in Bradford Shipley and Ilkley, and at the Keighley Information Centre;
- were made available at Central Bradford, Shipley, Bingley, Keighley and Ilkley libraries;
- were available to download on the Council's website;
- were posted (via CD) to forty-one statutory consultees, and a further 17 statutory consultees and 139 individuals/bodies were notified of the consultation period.

The consultation period was advertised in Bradford's local newspaper – Telegraph and Argus on 12 May 2008. The Legal Notice as advertised in the local press can be seen in Appendix 1.

1.4 The statutory consultees who received the draft SPD on a CD are listed below:

Addingham Parish Council	English Heritage
Borough of Pendle Council	Environment Agency
British Telecom	Government Office for Yorkshire & The Humber
Burley in Wharfedale Parish Council	Harrogate District Council
Calderdale Metropolitan Borough Council	Haworth, Cross Roads & Stanbury Parish
City of Wakefield M D C	Highways Agency
Clayton Parish Council	Ilkley Parish Council
Craven District Council	Keighley Town Council
Cullingworth Parish Council	Kirklees Metropolitan Council
Denholme Town Council	

Lancashire County Council	Silsden Town Council
Leeds City Council	Steeton with Eastburn Parish Council
Menston Parish Council	Telewest Communications
Mobile Operators Association	Transco (North of England)
Natural England	Wilsden Parish Council
Natural England (West Yorkshire Team)	Wrose Parish Council
Network Rail	Yorkshire and Humber Assembly
North Yorkshire County Council	Yorkshire Electricity
Northwest Regional Assembly	Yorkshire Forward Regional Development
Northwest Regional Development Agency	Agency
Oxenhope Parish Council	Yorkshire Water Services Ltd
Sandy Lane Parish Council	

- 1.6 The statutory consultees notified of the consultation are listed below:

Bradleys Both Parish Council	Laneshaw Bridge Parish Council
Cononley Parish Council	Middleton Parish Council
Cowling Parish Council	Nesfield with Langbar Parish Council
Denton Parish Council	Otley Town Council
Draughton Parish Council	Sutton-in-Craven Parish Council
Drighlington Parish Council	Trawden Forest Parish Council
Farnhill Parish Council	Wadsworth Parish Council
Gildersome Parish Council	Weston Parish Council
Glusburn Parish Council	

- 1.7 A full list of all the other consultees can be found in Appendix 5.
- 1.8 A total of fourteen representations were submitted to the Council; these are set out in Appendix 2 along with the Council's response and proposed changes, if appropriate. A number of other changes have also been made for clarity and correction.
- 1.9 There was a mixed response from the representations made, reflecting the diversity of interests of those responding. The majority of respondents were in support of the document and its aims, but it was criticised for being too exhaustive and not offering a summary format. The document has been amended to reflect the comments made. Appendix 2 shows in which sections of the amended document the changes can be found.

2.0 Statement of Sustainability Appraisal

Introduction

- 2.1 Article 9 of the European Directive (2001/42/EC), known as the Strategic Environmental Assessment (SEA) states that on adoption of a plan or programme (in this case a Supplementary Planning Document), a statement should be prepared setting out how environmental considerations have been integrated in to the Plan (the SPD). This is also reflected in the guidance document produced by the ODPM in 2006 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents', and the PPS12 Companion Guide. The statement should also include how the SPD has changed as a result of the appraisal process and the responses to the consultation; or why no changes were made. It should also include information on how the monitoring of the implementation of the document will be carried out.
- 2.2 This report satisfies the requirements of the European Directive and Government legislation and regulations as set out above.

Integration of Environmental Considerations

- 2.3 The Sustainability Appraisal is an iterative process, and continual appraisal of the effects of the SPD enables identification of areas where the SPD can be strengthened to ensure it achieves the sustainability objectives.
- 2.4 The Sustainability Appraisal process was undertaken during preparation of the SPD, and the representations received on both the draft SPD and the Sustainability Appraisal, have resulted in a change to the amended SPD (as adopted).
- 2.5 The sustainability objectives used to appraise the draft SPD contained an objective regarding the reduction of energy consumption and the encouragement of the use of renewable sources of energy. Changes were made to the SPD, within its policy guidance, to ensure that the Council is both complimentary to adjoining authorities policy guidance on renewable energy and adopts a controlled and managed approach to the potential introduction of wind turbines in certain landscape types within the District. This amendment could have a beneficial effect on the districts contribution to renewable energy whilst ensuring that such developments have the least detrimental impact on the natural environment.

Consultations

- 2.6 Consultation was carried out on the Sustainability Appraisal Scoping Report in October 2007 with the statutory consultees and other interested parties.
- 2.7 Consultation on the draft SPD and Sustainability Appraisal Report was carried out for six weeks between 12th May and 23rd June 2008.
- 2.8 Fourteen representations were received on the draft SPD, and a further three representations were received on the Sustainability Appraisal Report.
- 2.9 All comments have been analysed and the Council has provided a response to each one, as well as indicating any changes to the SPD. The summary of representations to the Sustainability Appraisal Report and details of the consultation can be found Appendix 4 at the end of this report.
- 2.10 Amendments were made to the SPD in response to comments made, but none were considered so great as to result in the document being reappraised. Many of the amendments related to inaccuracies or the inclusion of sites or aspects biodiversity. A significant addition to the SPD included a more comprehensive description and account of the built heritage within the district, particularly with regards to Saltaire World Heritage Site and its associated buffer zone around the site.

Selection of the Adopted SPD

- 2.11 During the production of the SPD and Sustainability Appraisal, two options were considered, the first was production of the SPD, and the second was the “business as usual” approach.
- 2.12 If the SPD was not prepared, those involved in the determination of planning applications, would have to rely on the generality of national, regional and local planning policy. The absence of an SPD would adversely affect the implementation of the policies in the Replacement UDP, offer less certainty of stakeholders, and potentially have adverse effects on the sustained protection and enhancement of the natural environment.
- 2.13 Adoption of the SPD would provide further information and guidance to all participants in the development control process and therefore help to implement the two policies of the Replacement UDP.

Monitoring

- 2.14 Monitoring of the implementation of the SPD will be incorporated into the Annual Monitoring Report as part of the Local Development Framework. This Report will give an indication of the performance of the SPD and contains core indicators such as change in areas and populations of biodiversity importance, and renewable energy; however there is a need to establish monitoring arrangements for these indicators. It is anticipated that indicators/targets will be identified in the future. Effective monitoring will allow the Council to identify any issues with the SPD and will enable any work to improve the SPD to be carried out.

Conclusion

- 2.15 The Supplementary Planning Document for Landscape Character has been prepared and has developed simultaneously with the sustainability appraisal of the effects of implementing the SPD. It has been concluded that its implementation will, overall, have a positive impact on achieving the sustainability objectives. Monitoring of the effects of the SPD will highlight any areas where it is felt the SPD is not working properly and is resulting in negative effects, and where review of the document is needed.

CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL**PLANNING AND COMPULSORY PURCHASE ACT 2004****NOTICE OF DEPOSIT OF DRAFT SUPPLEMENTARY PLANNING DOCUMENT FOR PUBLIC COMMENT****LANDSCAPE CHARACTER****LOCAL DEVELOPMENT FRAMEWORK FOR THE BRADFORD DISTRICT**

The City of Bradford Metropolitan District Council have published a draft Supplementary Planning Document called *Landscape Character* for public comment. The Supplementary Planning Document provides a planning framework to guide the conservation and preservation of the District's landscapes and design guidance for development within these areas. The document applies to land within each of the 10 Landscape Character Areas within the Bradford District.

Copies of the Draft Supplementary Planning Document are available for inspection at the Council's Planning Offices at:

- Jacobs Well, Manchester Road, Bradford BD1 5RW (Mon-Thurs 9am to 5pm, Fri 9am to 4.30pm)
- Keighley Information Centre, Town Hall, Bow Street, Keighley BD21 3PA (Mon-Thurs 9am to 5pm, Fri 9am to 4.30pm)
- Shipley Town Hall, Kirkgate, Shipley BD18 3EJ (Mon-Thurs 9am to 5pm, Fri 9am to 4.30pm)
- Ilkley Town Hall, Station Road, Ilkley (Mon-Thurs 9am to 12.30pm & 1.30pm to 5.00pm, Fri 9am to 12.30pm & 1.30pm to 4.30pm)

And at the following libraries:

- Ilkley Library, Station Road, Ilkley LS29 8HA (Mon-Fri 9am to 7pm, Sat 9am to 5pm)
- Bradford Central Library, Princess Way, Bradford BD1 1NN (Mon-Fri 9am to 7.30pm, Sat 9am to 5pm)
- Shipley Library, 2 Wellcroft, Shipley BD18 3QH (Mon-Fri 9am to 7pm, Sat 9am to 5pm)
- Keighley Library, North Street, Keighley BD21 3SX (Mon-Fri 9am to 7pm, Sat 9am to 5pm)
- Bingley Library, Myrtle Walk, Bingley BD16 1AW (Mon-Fri 9am to 7pm, Sat 9am to 5pm)

And on the Council's web site at www.bradford.gov.uk/LDF

Also available for inspection are the Council's Sustainability Appraisal Report and Statement of Matters.

Any person may make representations about the Supplementary Planning Document. Representations must be made in writing and submitted by either email to:

ldf.consultation@bradford.gov.uk or by letter to Local Development Framework Group, Plans and Performance Service, 8th Floor, Jacobs Well, Manchester Road, Bradford BD1 5RW. The closing date for comments is Monday 23rd June 2008. Any representations may be accompanied by a request to be notified at a specified address of the adoption of the Supplementary Planning Document.

Dated this 12th May 2008

Assistant Director Corporate Services (City Solicitor)
Legal and Democratic Services Director
City of Bradford Metropolitan District Council
City Hall Bradford BD1 1HY

APPENDIX 2: SUMMARY OF REPRESENTATIONS TO DRAFT LANDSCAPE CHARACTER SUPPLEMENTARY PLANNING DOCUMENT

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
1.0 Bradford Urban Wildlife Group	1.1	<p>Introduction and Methodology:</p> <p>Page 29 - Wildlife - 7.6.9 -Last sentence, last paragraph</p> <p>“West Yorkshire is the northern limit for some butterflies and insects”</p> <p>The following butterflies have moved north in Yorkshire and beyond into Scotland:-</p> <p>Comma Speckled Wood, the Brown Digces is now moving north and has been sighted in the Shipley Area.</p> <p>Suggestion: “West Yorkshire used to be the northern limit for some butterflies and insets, but now with the climate changing (warming) many species are moving into the Bradford District and the loss of diverse grasslands... etc”</p>	<p><i>Agree with comment. With global warming some species have increased their range northwards; this includes butterflies, other insects, birds and plants. However, the level of detail provided in the 2nd paragraph of this comment would not be appropriate for this report.</i></p>	<p>Amend text to clarify these changes to movement patterns.</p> <p>Section 7.6.9: Wildlife, Page 29, last sentence.</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	1.2	Airedale: Volume 1: Biodiversity Page 4 (Grasslands) & Pg 5 (Wildlife)- Trench Meadows is a SSSI (as well as South Bog).	<i>Agree. Trench Meadows is a grassland SSSI and will be specifically mentioned in the grasslands section of this document.</i> <i>Bingley South Bog SSSI will be included in the wetlands section.</i>	Include Trench Meadow SSSI in Biodiversity Table. Add Trench Meadows to 'Grasslands' section and Bingley South Bog SSSI under 'Wetlands' under Third Tier Sites. Section 2.4, Page 4
	1.3	Airedale: Volume 1: Biodiversity Page 4: Third Tier Sites Nature Reserves include: Shipley Station Butterfly Meadow underneath Stockbridge Nature Reserve.	<i>Agree. Shipley Station Butterfly Meadow is a designated Third Tier Site will be included within the Biodiversity table under 'Nature Reserves'.</i>	Include site within Biodiversity table. Section 2; page 4.
	1.4	Airedale: Volume 1: Biodiversity Page 4: Third Tier Sites Others – Milnerfields (including kitchen garden) very important	<i>Milnerfields and associated site is identified as a Third Tier Site in the table on Page 4 under 'Others'.</i>	No change.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>1.5 Airedale: Volume 1: Biodiversity Page 5: Wildlife, paragraph 5 River Aire– Salmon now in the lower river and Otters now using river.</p>	<p><i>Salmon are indeed returning to the river, but there are a number of barriers to their continued upstream movement. The SPD purposefully neglects to identify sites where otters have been seen as this could lead to persecution by poachers.</i></p>	<p>Include reference to movement of Salmon in the river.</p> <p>Wildlife: Section 2.4, Page 5,last paragraph</p>
	<p>1.6 Airedale: Volume 1: Recreation & Tourism Page 8: Formal Parks – Prince of Wales not just a formal park. It is especially (at its top heathland) a third tier site and managed for its wildlife.</p>	<p><i>Agree. The Prince of Wales Park is a Bradford Wildlife Area (BWA) and is identified as a Third Tier Site under ‘Amenity’ in Section 2.4 on page 4. The park is also mentioned in Section 3.4, page 8 as it is a formal park which is also used for tourism/recreational activities.</i></p>	<p>No change.</p>
	<p>1.7 Airedale: Volume 1: Recreation & Tourism Page 37: 11.2.2 Policy Guidelines, 5th bullet point, Areas of derelict land – those areas are sometimes valuable for insets and butterflies. They should be surveyed before commitment to urban forestry.</p>	<p><i>Agree. However, the Biodiversity Officer would request a ‘survey request form’ on receipt of any application containing vacant land. Therefore no change is required to the SPD.</i></p>	<p>No change.</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	1.8	Airedale: Volume 1: Pg 40: Landscape Strategy –12.1: Condition The word ‘alien’ is too strong a word for Beech and Sycamore. They are not exactly alien trees/plants, although Beech has been planted in the north, its natural to the UK. Substitute ‘undesirable species’ - sycamore and beech.	<i>Agree. A more appropriate phrase would be ‘naturalised non-native’.</i>	Amend wording in text. Section 12.1, page 40 under ‘Condition’.
	1.9	Airedale: Volume 1 Page 52- Landscape Design Provision should be made within the developments (housing) not just recreational open space but a requirement to maintain an area of already existing grassland/woodland for wildlife and manage it as a wildlife area (not as a parkland area). There need to be a change of thinking by developers to allow rough areas of grassland to be managed for wildlife and not reseed with lawn grass.	<i>Agree. Habitat creation is mentioned within the Design Guidance in section 3.2, para. 3. Recreational open space and maintenance of existing areas of established vegetation are considered to be of equal importance.</i> <i>Additionally, reference has also been made to the ‘Postcode Plant Database’ which will ensure that native plant species are used appropriately. .</i>	No change. Additional text: Design Guidance: Section 3.2: Landscape Design Principals
	1.10	South Bradford: Volume 5: Page 4 – Third Tier Sites – Amenity Railway Terrace/Raw Nook – is now designated Bradford’s first nature reserve – Official opening June 28 th 2008	<i>Agree. Railway Terrace/Raw Nook will be included in Section 2.4: Biodiversity on Pages 3 / 4.</i>	Site included within the text. Section 2.4, Table, Pages 3 / 4.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	1.11	South Bradford : Volume 5: Page 8 – Recreation and Tourism Important areas for nature conservation now designated as Local Nature Reserve	<i>Agree. Reference will be made to the designation of Raw Nook/Railway Terrace as a Bradford's first Nature Reserve.</i>	Additional text to highlight new Nature Reserve. Section 3.4: Recreation, last bullet, page 8
	1.12	Wharfedale: Volume 8: Page 4 – Third Tier Sites Nature reserves – Sun Lane, Burley – missed out	<i>Agree. Sun Lane, Burley will be added to the list of Third Tier Sites under 'Wetlands'.</i>	Include site within text. Section 2.4: Third Tier Sites – Page 4.
	1.13	Wharfedale: Volume 8: Page 4 – Wildlife Ringlelet butterfly – which was relatively uncommon in West Yorkshire, now over the last few has moved into the Aire Valley and was present in Shipley Station Butterfly Meadow for the first time in 2006.	<i>Agree. The Ringlelet Butterfly has moved into the Bradford District in recent years and this will be acknowledged within the text.</i>	Alter text to provide this additional detail. Section 2.4: Biodiversity – Wildlife. Page 4
	1.14	On the whole a very good document – needs updating and correction of mistakes.	<i>Accepted. The documents will be updated and correct where appropriate in light of the comments received to the draft documents.</i>	Appropriate changes are resolved in the comments above.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
2.0 British Waterways	2.1	<p>Our comments specifically relate to the areas associated with the Leeds and Liverpool Canal: Airedale and Esholt. (Volumes 1 & 2)</p> <p>The Leeds and Liverpool Canal serves a multitude of functions, including leisure, recreation and tourist resource, sustainable transport route and an important heritage and ecological resource. These functions offer a variety of benefits to the people and district of Bradford. The protection of the existing waterway landscape character is therefore essential. However, we support and encourage new facilities and accommodation for tourists, especially in relation to the waterways.</p>	<i>Accepted. The Landscape Character SPD identifies the Leeds and Liverpool canal as an important historical, cultural and recreational asset within the District.</i>	No change.
	2.2	<p>The Yorkshire and Humber Regional Spatial Strategy recognises the importance that waterways can make to tourism and the economy. Policy E6 (Sustainable Tourism) places an emphasis on ‘promoting tourism and associated development of an appropriate scale and type along waterways in both urban and rural areas.’</p>	<i>Accept. Bradford Council recognises the importance of the Leeds and Liverpool Canal and its wider benefits to tourism and the local economy. The site is designated a Conservation Area and a SEGI therefore any development proposals must take these designations and the SPD into account.</i>	No change to the SPD.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	2.3	The network of inland waterways has an inherent constraint of being a “non footloose” asset, i.e. its location and alignment is fixed, and therefore it requires essential supporting infrastructure, facilities and attractions along its corridor. These essential facilities could include marinas, mooring facilities, service facilities, local tourism attractions etc. Without these facilities, the network will be unable to fully realise the tourism, leisure and recreation benefits that could be generated for the local community, or attract leisure visitors from outside Bradford.	<i>Agree with comment. However it is not the intention nor the role of the SPD to provide or facilitate supporting infrastructure for the canal, but yet it seeks to ensure that any such proposals will protect and enhance the unique quality and setting of the waterway and its associated structures.</i>	No change.
3.0 Burley Parish Council	3.1	Thank you for the opportunity to see and respond to this report. It contains many interesting and well-researched facts which are informative in setting the background.	<i>Noted</i>	No change
	3.2	As a Parish Council we note the omission of the Sun Lane Nature Reserve here in Burley which is an exemplary illustration of what can be achieved by a dedicated band of volunteers in converting what was previously a waste tip into a thriving habitat and public recreation area. It is now classed as a Bradford Wildlife Area.	<i>Agree. Sun Lane, Burley will be added to the list of Third Tier Sites under ‘Wetlands’.</i>	Include site within text. Section 2.4: Third Tier Sites – Page 4.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	3.3	We understand that the Wharfedale Naturalists Society has written to you and we endorse their comments insofar as they affect this parish.	<i>Noted.</i>	No change.
	3.4	On the issue of communication the absence of a paper copy of the report was detrimental to full circulation among the councilors and interested parties. Burley Parish Council is not unique in having no office and some councilors without computers. I would urge this be addressed in future similar exercises.	<i>Due to the extensive size of the SPD documents a decision was made to limit its reproduction, however hard copies were made available for viewing at the four main local libraries and at three planning offices within the District. Additionally, it was made available on the Council's website. Statutory consultees were sent a CD to view the SPD, and all other consultees were notified of the consultation.</i>	No change.
4.0 Campaign to Protect Rural England (CPRE Bradford)	4.1	Bradford CPRE would like to commend the LDF office for a successful and sympathetic landscape character assessment. It brings out, as it should, the real distinctiveness of Bradford's countryside.	<i>Noted.</i>	Supporting comment, no changes to SPD.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
District)	4.2	Design Guidance: 2.0 Preliminary Work We would like to be sure that the term 'archaeology' covers later industrial structures. We particularly cite, as an example among many, the water bearing goits for powering mills or for water catchment. Many of these later structures are vulnerable to interference, even destruction, sometimes on the grounds of safety.	<i>The term encompasses all archeological structures within the District. Any developments affecting archeology will be referred to West Yorkshire Archeology Advisory Service (WYAAS) for consultation. No change is required to the SPD.</i>	No change.
	4.3	Design Guidance: 3.2: Design Principles: surface water drainage. We suggest separate drainage from driveways and roads, which can be polluted with asphalt, oil and salt, into some form of natural filtration before returning that water to the ground. The much cleaner water from roofs should run into soakaways, replenishing groundwater directly.	<i>Accept comment. Sufficient detail has been provided within section 3.2, last point and support is provided for sustainable drainage systems within proposals.</i>	No change.
	4.4	Design Guidance: 3.2.2: Landscape Design Details: drainage We are sure you could produce a better term than 'Conservation water'.	<i>Agree. This is an error and should be amended to 'Drainage and the need to conserve drain water'.</i>	Amend text as per response statement. Landscape Guidance Section 3.2.2: Landscape Design Details: drainage

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
5.0 Commission for the Built Environment (CABE)	5.1	Unfortunately, due to limited resources, we are unable to comment on this document. However we would like to make some general comments which you should consider.	<i>Accepted.</i>	No change.
	5.2	1) Design is now well established in planning policy at national and regional levels, and LDF's offer an opportunity to secure high quality development, of the right type, in the right places, at the right time.	<i>Agree. The SPD aids good design principals within each volume through policy guidelines provided for each Landscape Character Type and also within the accompanying Design Guidance.</i>	No change.
	5.3	2) Robust design policies should be included within all LDF documents and the Community Strategy, embedding designs as a priority from strategic frameworks to site-specific scales	<i>Agree. This SPD aids good design principles within each volume through policy guidelines provided for each Landscape Character Type and also within the accompanying Design Guidance.</i>	No change.
	5.4	3) To take aspiration to implement, local planning authorities' officers and members should champion good design	<i>Agree. Bradford Council has a Design Champion and all officers aspire to achieve and implement good design..</i>	No change.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	5.5	4) Treat design as a cross-cutting issue- consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm.	<i>Agree. The SPD encompasses many features within the natural environment and these are acknowledged within the SPD. The accompanying Design Guidance encourages developers to explore good sympathetic design into all aspects of schemes.</i>	No change.
	5.6	5) Design should reflect understanding of local context, character and aspirations.	<i>Agree. Whilst the SPD sets out the context of the landscape, the Design Guidance ensures that all elements are brought together for consideration within a development proposal.</i>	No change.
	5.7	6) You should include adequate working or 'hooks' within your policies that enable you to develop and use design tools and mechanisms, such as design guides, site briefs, and design codes	<i>Agree. The SPD is a comprehensive piece of work, which will aid the preparation of any future design schemes.</i>	No change.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
6.0 English Heritage	6.1	The Council has undertaken a great deal of work on assessing the character and, in respect of this particular SPD, the landscape setting of Bradford's numerous Conservation Areas. However, there seems to be little reference made within this emerging SPD to these Assessments. In many cases, the Conservation Area Appraisals provide detailed analysis of the relationship of the built-up area of the settlement to its surrounding landscape including an identification of key views into, and out of, each of the Conservation Areas.	<i>Agree. The SPD will make explicit reference to the Conservation Area Assessments / Appraisal throughout. Background to the Conservation Area Assessments and Appraisals will be highlighted in the Built Heritage section of the Introduction and Methodology section. Reference will be made to the assessments within Section 3.0 of the 10 Landscape Character volumes.</i>	Additional text throughout the SPD. Introduction & Methodology, Section 5.11, Page 11 Each Volume 1 – 10: Section 3.1, table - within Conservation Area section.
	6.2	Given that one of the purposes of the SPD is to achieve “an integrated approach to development which includes a comprehensive consideration of landscape issues”, the lack of any meaningful reference to the work undertaken on assessing the landscape setting of the District's Conservation Areas (and the management guidelines that those documents provide) is a significant omission.	<i>Consideration of the 'setting' of key designated sites, including Conservation Areas, will be taken into account within Section 2.1 of the Design Guidance.</i>	Addition of 'Setting' criteria within Site Survey and Appraisal in Design Guidance. Section 2.1: Design Guidance – to form part of table.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>6.3 The Council has undertaken a great deal of work identifying a buffer around the World Heritage Site at Saltaire and, in its Management Plan and the Saltaire Capacity Study, has outlined a strategy for ensuring that developments within the landscape setting of the World Heritage Site will not adversely affect the outstanding universal character of Saltaire. However, there seems to be little reference made within this emerging SPD about this work.</p> <p>Given that one of the purposes of the SPD is to achieve “an integrated approach to development which includes a comprehensive consideration of landscape issues”, the lack of any meaningful reference to the work undertaken regarding the World Heritage Site and its buffer zone is a significant omission.</p>	<p><i>Agree. The World Heritage Site at Saltaire and its buffer zone will be fully identified and acknowledged within the relevant volumes of the SPD, along with the Management Plan and Environmental Capacity Study. The buffer zone for the World Heritage Site will be identified on the Cultural Heritage map within the introductory section.</i></p>	<p>Include explanatory text and references to Saltaire WHS and buffer zone throughout SPD and include on Map.</p> <p>Introduction & Methodology, Section 5.9, Page 11</p> <p>Cultural Heritage Map: Page 15</p> <p>Each Volume 1 – 10: Section 3.1, table - within Conservation Area section.</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	6.4	<p>It is likely that developers proposing sites for development will seek to use this emerging SPD to justify allocations within the LDF.</p> <p>However, the degree of detailed guidance which this document provides is, by necessity, very high-level. In order to identify areas for development which are likely to be acceptable in landscape terms, a more detailed assessment will need to be undertaken on the sensitivity of the countryside around a particular settlement to change.</p>	<p><i>Agree. However, landscape sensitivity can be determined by utilising all the information contained within the SPD, particularly the analysis of section within each Landscape Character Type.</i></p> <p><i>The Landscape Design Unit will be undertaking work on the sensitivity and capacity of the landscape for change in due course.</i></p>	No change.
	6.5	<p>It would be helpful to set out within this document how this SPD relates to any more detailed work the Council will be undertaking as part of the evidence base of the LDF.</p>	<p><i>Agree. Reference to the emerging Local Development Framework (LDF) and its supporting evidence base will be referred to within the Introduction and Methodology section of the SPD. A comprehensive list of the evidence base will be provided.</i></p>	<p>Additional text to the policy section outlining the evidence base of the LDF.</p> <p>Section 4.0: Planning Policy Context, page 5</p>
	6.6	<p>The landscapes of Bradford are largely the product of man's interaction with his environment. We are concerned that the historic dimension is somewhat weak and is confined, in the main, to designated assets. We would suggest that WYAS is fully engaged in the development of this SPD.</p>	<p><i>Noted. West Yorkshire Archaeology Advisory Service (WYAAS) are a general consultee in the preparation of this SPD.</i></p>	No Change.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>6.7 Introduction & Methodology – Pg.11 Para 5.9:</p> <p>This section should also include reference to the World Heritage Site at Saltaire, the District's 13 Historic Parks and Gardens, and the Registered Battlefield at Adwalton.</p>	<p><i>Agree. Specific reference will be made to Saltaire World Heritage Site, Historic Parks and Gardens and the Registered Battlefield at Adwalton Moor within the Built Heritage section of this document.</i></p>	<p>Reference to these designated sites within Built Heritage Section.</p> <p>Introduction & Methodology, Section 5.9, Page 11</p>
	<p>6.8 Introduction & Methodology – Figure 2:</p> <p>This map should also identify the World Heritage Site at Saltaire, the District's 13 Historic Parks and Gardens, and the Registered Battlefield at Adwalton.</p>	<p><i>Agree. Figure 2: Cultural Heritage Map will be revised to include Saltaire World Heritage Site and the buffer zone, Historic Parks and Gardens and the Registered Battlefield at Adwalton Moor.</i></p>	<p>Amend Cultural Heritage Map to include designated sites.</p> <p>Figure 2, Page 15</p>
	<p>6.9 Volume 1 Airedale: Section 3</p> <p>The eastern part of this area includes the Saltaire World Heritage Site. Therefore, it is somewhat surprising that Section 3.1 not only omits to mention it, but also considers that the area does not have a wealth of historical and cultural links. Reference to the World Heritage Site should be included as part of the introductory Paragraph of this Section and in the Table on page 7.</p>	<p><i>It is agreed that Airedale does have a wealth of historical and cultural links within the District, in particular the internationally, nationally and locally important World Heritage Site at Saltaire. The text will be revised and will include this important site.</i></p>	<p>Revision of text and reference to Saltaire WHS within text.</p> <p>Volume 1: Airedale: Section 3.0; para. 3.1, page 6; and within Table on Page 7</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>6.10 Volume 1 Airedale: Section 6</p> <p>Proposals for this landscape area, in Section 6, should be consistent with any proposals within the World Heritage Site Management Plan for both that part of the area which lies within the World Heritage Site and also that part which falls within its defined buffer zone.</p> <p>Reference should also be made of any key views towards the World Heritage Site from this area and, in particular, those from the World Heritage Site itself across this landscape area.</p>	<p><i>Agree. An additional policy guidance note will be included within each relevant Landscape Area Type, which will provide consistency with proposals in the Management Plan.</i></p> <p><i>The Environmental Capacity Study and Saltaire Conservation Area Assessment both identify key views and vistas into and out of the World Heritage Site. Clear reference will be made to these documents within this Landscape Character Assessment Volume.</i></p>	<p>Additional text to refer to Management Plan and key views.</p> <p>Volume 1: Airedale; Sections 8 / 9 / 11 / 12 / 13 – policy guidance</p> <p>Volume 1: Airedale; Section 4.2</p>
	<p>6.11 Volume 4 Rombalds Ridge, Section 3, Pg 5,</p> <p>The southern part of this area includes part of the designated buffer zone around the Saltaire World Heritage Site. Mention should be made of this within Section 3.</p>	<p><i>Agree. Reference to Saltaire World Heritage Site and its buffer zone will be made within this Character Area within section 3.0.</i></p>	<p>Include of reference to Saltaire WHS within text.</p> <p>Volume 4: Rombalds Ridge: Section 3.0; para. 3.1, page 6.</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>6.12 Volume 4 Rombalds Ridge, Section 6, Pg 12</p> <p>Proposals for this area, in Section 6, should be consistent with any proposals within the World Heritage Site Management Plan.</p> <p>Reference should be made of any key views and vistas from within the World Heritage Site across this landscape area,</p>	<p><i>Agree. An additional policy guidance note will be included within each relevant Landscape Area Type, which will provide consistency with proposals in the Management Plan.</i></p> <p><i>The Environmental Capacity Study and Saltaire Conservation Area Assessment both identify key views and vistas into and out of the World Heritage Site. Clear reference will be made to these documents within this Landscape Character Assessment Volume.</i></p>	<p>Additional text to refer to Management Plan and key views.</p> <p>Volume 4: Rombalds Ridge; Sections 7 and 8 – policy guidance</p> <p>Volume 4: Rombalds Ridge; Section 4.2</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>6.13 Volume 7 Tong Valley: Section 3, Page 4</p> <p>One of the most significant historic events which took place in this Landscape Area is the Battle of Adwalton Moor. This Battle, on 30th June, 1643, is considered to be one of the most important battles of the Civil War and is one of only 7 Registered Battlefield within the Region. Reference should be made to this Registered Battlefield within Section 3 and in the Table on page 5.</p> <p>Although the A650 has undoubtedly altered the character of the eastern part of the battlefield, nevertheless, the remaining topography of this part of the Battlefield and, in particular, the lines of hedgerows running across the fields rising up to the hillside to which the Royalists initially fell back, are still clearly evident with several of the hedgerows in this area likely to have been features of the 1643 scene. Thus, it is still possible to experience and appreciate the landscape within which the battle took place.</p>	<p><i>Agree. The registered battlefield site at Adwalton Moor will be acknowledged and referenced in the Introduction and Methodology section as well as the Landscape Character Area Volume</i></p>	<p>Include reference to Battlefield site within text.</p> <p>Introduction & Methodology</p> <p>Section 5: Built Heritage</p> <p>Volume 7: Tong Valley</p> <p>Section 3, Page 4</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>6.14 Volume 7 Tong Valley: Section 3, para. 3.4, Page 4</p> <p>The potential for this [Battlefield] site for recreation/tourism should be acknowledged in Section 3.4</p>	<p><i>There is only limited potential for the Battlefield site to serve as a recreation/tourism facility, however this will be acknowledged within the document.</i></p>	<p>Recognition of the potential role of the site for recreation and tourism.</p> <p>Section 3; Para 3.4, Page 4</p>
	<p>6.15 Volume 7 Tong Valley: Section 6, Page 10</p> <p>The opportunities to reinforce hedgerows/ field boundaries across battlefield should be included within Section 6.</p>	<p><i>Agree. This will be added to the policy guidelines within this Landscape Character Assessment volume.</i></p>	<p>Additional policy guidance note to be added.</p> <p>Vol 7: Tong Valley Section 6, Page 10</p>
	<p>6.16 Volume 7 Tong Valley: Map Page 9/10</p> <p>The extent of the area of the Battlefield that ought to be allocated for employment development was considered at some length at the UDP Review Inquiry in 2003. The Council will recall that only a fraction of the area identified on the Proposals Map for employment development in the vicinity of the Registered Battlefield was considered appropriate for development with the remainder of the area to remain undeveloped. That part of the Battlefield which is to remain open should be identified on the map in this Landscape Character Area.</p>	<p><i>The Battlefield site will be included in Figure 2: Cultural Heritage Map along with other designations, reference will be made to the site within Volume 7. .</i></p>	<p>Amend Cultural Heritage Map to include designated sites.</p> <p>Figure 2, Page 15</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	6.17	Volume 9: Wilsden: Section 3, Page 7 The eastern part of this area includes part of the designated buffer zone around the Saltaire World Heritage Site. Mention should be made of this within Section 3.	<i>Agree. Reference to Saltaire World Heritage Site and its buffer zone will be made within this Character Area within section 3.0.</i>	Reference to be made to Saltaire WHS and buffer zone within text. Volume 9: Wilsden: Section 3.0; para. 3.1, page 8.
	6.18	Volume 9: Wilsden: Section 6, Page 16 Proposals for this area, in Section 6, should be consistent with any proposals within the World Heritage Site Management Plan. Reference should be made of any key views and vistas from within the World Heritage Site across this landscape area,	<i>Agree. An additional policy guidance note will be included within each relevant Landscape Area Type, which will provide consistency with proposals in the Management Plan.</i> <i>The Environmental Capacity Study and Saltaire Conservation Area Assessment both identify key views and vistas into and out of the World Heritage Site. Clear reference will be made to these documents within this Landscape Character Assessment Volume.</i>	Additional text to refer to Management Plan and key views. Volume 9: Wilsden; Section 10.0 – policy guidance Volume 9: Wilsden; Section 4.2
7.0 Environment Agency	7.1	The Agency has no comments to make.	<i>Accepted.</i>	No Change.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
8.0 Lancashire County Council	8.1	To facilitate effective cross border working and ensure consistency it is important that Bradford's <i>Landscape Character SPD</i> and Lancashire County Council's <i>Landscape and Heritage SPG</i> share a common methodology and approach and, contain broadly similar policies and strategies. To some extent this should be inevitable as the process of landscape character assessment can be undertaken using recognised methodology and guidance. It is a surprise however that there is a fundamental difference between the two documents approach to landscape character type/area hierarchies.	<i>Bradford Council welcomes the opportunity for cross-border working, particularly in respect of landscape character planning guidance and endeavors to produce documents that compliment adjoining authorities guidance and strategies.</i> <i>The Landscape Character SPD conforms to national planning guidance, and more specifically the Countryside Agency's 'Landscape Character Assessment: Guidance for England & Scotland' (2002). In addition, we have received complimentary comments from statutory bodies regarding the robustness of the document as a whole; therefore it is considered inappropriate to alter the methodology adopted in this SPD.</i>	No Change.
	8.2	The County Council's landscape SPG uses a hierarchy of broad scale landscape character types subdivided into local landscape character areas whereas the Bradford SPG uses exactly the opposite.	<i>The principal of using generic landscape types which occur throughout the District is the same approach as Lancashire County Council.</i>	No change.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>8.3 I am confused by some aspects of the approach used in the production of Bradford's SPD which appears to be contrary to current good practice guidance particularly that set out in <i>Landscape Character Assessment Guidance for England and Scotland</i> (The Countryside Agency and Scottish Natural Heritage). Landscape character types have a relatively homogenous character and being generic in nature occur in different areas in different parts of the country. According to the above guidance landscape character areas are "single unique areas and are the discrete geographical areas of a particular landscape type". This helps to explain why I am confused by Bradford's approach which has identified landscape character areas at a district scale that appear not to be single unique areas of a particular landscape type.</p>	<p><i>Disagree. The Bradford District contains 10 individual Landscape Character Areas (Figure 10: Introduction & Methodology), within these there are up to 10 different landscape types (including settlement) that distinguish between different natural elements of the landscape and contain specific policy guidelines for their protection and enhancement. This approach conforms to the guidance outlined in the Countryside Agency's 'Landscape Character Assessment: Guidance for England & Scotland' (2002).</i></p>	<p>No change.</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>The only level of landscape character classification and mapping at a larger scale than Bradford's is that produced by the former Countryside Agency which of course identifies more areas. This begs the question: what landscape character types are Bradford's landscape character areas unique geographical areas of? There does not appear to be any which is in complete contrast to the Lancashire SPG approach which identifies broad character types.</p>	<p><i>The methodology used has been endorsed by Natural England. The Landscape Character Areas of the Bradford District are unique geographical areas within which generic landscape types occur.</i></p>	<p>No change.</p>
	<p>8.4 The problem I can see arising from this fundamental difference of approach is that it may reduce the effectiveness of cross border working particularly on planning applications which could have significant landscape and visual impacts over a wide area. Coordinating an agreed approach and response would be difficult as these fundamental differences would need to be reconciled first.</p>	<p><i>Bradford Council welcomes the opportunity for cross-border working, particularly in respect of landscape character planning guidance and endeavors to produce documents that compliment adjoining authorities guidance and strategies.</i></p>	<p>No change.</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>8.5 Volume 3 Pennine Upland; para. 6.3.3, page 16 Volume 4: Rombalds Ridge; para. 7.3.3, page 19</p> <p>A number of policies proposed for the landscape character types adjacent to Lancashire's landscape character types would likely to be contrary to those of contained within the County Council's landscape SPG. Again, this potentially could cause problems for cross border working. One of the most significant examples of this relates to the identifies Gritstone Moorland landscape character type policy which state "There is no scope for development within the remote moorland areas" and "any form of development which gives rise to vertical elements would be inappropriate". By comparison the County Council's SPG states the following for the adjacent Moorland Plateaux landscape character type: "severely restrict all forms of development" and "vertical structures should be located where topography constraints views of the site, and should avoid the interruption of prominent ridge and summit skylines".</p>	<p><i>Accepted. As mentioned above, Bradford Council welcomes the opportunity for cross-border working and the production of complimentary planning documents.</i></p> <p><i>The example provided by Lancashire County Council has highlighted an important and sensitive issue that needed to be reconsidered by Bradford Council. Following discussions regarding the policy guidance relating to vertical elements within Gritstone Moorlands provided in the draft SPD, it was considered appropriate to revise the wording to compliment Lancashire County Councils policy and also for the SPD to conform to government guidance as contained within PPS 1 Companion Guide on Climate Change.</i></p>	<p>Amend policy guidance note within the relevant volumes.</p> <p>Volume 3: Pennine Upland; para. 6.3.3, page 16; & Volume 4: Rombalds Ridge; para. 7.3.3, page 19</p> <p>Revised text: "Any form of development should be severely restricted; and vertical structures should be located where topography constrains views of the site, and should avoid the interruption of prominent ridge and summit skylines."</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	8.6	It is recommended that more joint work is undertaken to ensure that policies for essentially the same or very similar landscape character types separated by a boundary only are carefully integrated.	<i>Bradford Council welcomes the opportunity for cross-border working, particularly in respect of landscape character planning guidance and endeavors to produce documents that compliment adjoining authorities guidance and strategies.</i>	No change.
	8.7	Volumes 1 / 3 / 4 / 6 / 9 / 10:- Upland Pasture Landscape Character Type It is recommended that consideration be given to removing none native Sycamore from the proposed conservation policy guidelines for this character type. A replacement tree which is appropriate for the area e.g. Oak would be much more suitable.	<i>Large 'specimen' size sycamores are often associated with isolated farm buildings and are an important landscape component. Thinning of smaller self set groups with the replanting of oaks would be appropriate.</i>	BMDC's response will be included within the policy guidelines of the specified volumes which contain Uplands Pasture type. Volumes: 1/3/4/6/9/10
9.0 Natural England	9.1	We welcome the production of this landscape character SPD, which supports the UK's commitment to implementing the European Landscape Convention. We feel that the draft SPD has been very well researched, adopts a robust methodology for appraising landscapes and translates the landscape context into useful policy guidelines.	<i>Accepted.</i>	Supporting comment, no changes to SPD.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>9.2 The Document as a Whole</p> <p>We welcome the attention to detail in this report, which is clearly necessary to ensure the robustness of the document. However, the full document could also be usefully summarised in a non-technical format in order to promote the full document and to give an accessible and basic understanding for everyday use by, for instance, the public and development control staff.</p>	<p><i>Agree in part. A basic 'User Guide' will be produced and incorporated into the front end of the SPD to promote its use and ensure that all users use it effectively. It was deemed inappropriate to reproduce the SPD in a non-technical format as this could potentially cause confusion and not add value to the documents as a whole.</i></p>	<p>Production of an addition 'User Guide' to facilitate use of the SPD.</p> <p>Inclusion within the front end of each volume.</p>
	<p>9.3 Introduction & Methodology: para. 4.1, Pg 5:</p> <p>There are a number of references to the Countryside Agency and English Nature in the document. Unless they are citing references to publications by our legacy bodies, these references should be changes to Natural England.</p>	<p><i>Accepted. Where the document is not citing references to the Countryside Agency or English Nature, the SPD will ensure that Natural England are appropriately referenced.</i></p>	<p>No changes deemed necessary. All references to the Countryside Agency and English Nature in the SPD cite references.</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>9.4 Introduction & Methodology: para. 5.8.3, Pg 10:</p> <p>In the biodiversity designations we should advise that Special Protection Areas (SPA's) are designated by the UK Government (rather than English Nature, who, as Natural England identify the sites they wish to put forward to be designated), after having been formally adopted as sites of community importance by the European Commission. They are part of a network of sites important at the European level.</p>	<p><i>Agree. The text will be amended in the SPD to state that it is the Government that is responsible for designating Special Protection Areas. .</i></p>	<p>Amend text appropriately.</p> <p>Introduction & Methodology, Section 5.0 – 5.8 Biodiversity Designations, 5,8,2, page 10</p>
	<p>9.5 Introduction & Methodology: para. 5.8, Pg 10:</p> <p>Also, in the biodiversity designations section we would advise that the South Pennine Moors also has the status of Special Area of Conservation (SAC). SACs are designated under the European Habitats Directive because of their importance for habitat types and species other than birds. Details of the important habitats at the South Pennine moors are available from the JNCC website.</p>	<p><i>Agree. Special Area of Conservation (SAC) will be included with the SPD and will be included within the accompanying maps.</i></p>	<p>Explanatory paragraph in text</p> <p>Introduction and Methodology; Section 5.8, Page 10.</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	9.6	Bradford also has Local Nature Reserves within its area. These are designated under National Parks and Access to the Countryside Act (1949) usually by the local authority for conservation or geological interest or to provide local opportunities for study and research purposes. They can contain important habitats, but may also be of particular importance to the local community. More information on LNRs is available at www.english-nature.org.uk/Special/lmr/lmr_why.htm . They are also mapped on the Nature on the Map website: http://www.natureonthemap.org.uk/ . There may also be detailed information on Bradford's LNRs held by Bradford Council.	<i>Agree. The first Local Nature Reserve to be designated in Bradford was Raw Nook, Low Moor on 28th June 2008. This will be incorporated into the South Bradford document.</i>	Amend text. Vol. 5: South Bradford; Section 2.4: Biodiversity, Page 4.
	9.7	Introduction & Methodology: Figure 1, Ecology, page 41: It would be useful to include Special Areas of Conservation on the map. Their boundaries are the same as Bradford's SPAs.	<i>Agree. Bradford Council has obtained this data from Natural England and will incorporate this onto Figure 1: Ecology map.</i>	Amend Map. Figure 1: Ecology, page 41, amended to include SAC's.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	9.8	Introduction & Methodology: para. 6.8, page 17: We welcome that settlement studies will be produced for Bradford City Centre, Shipley, Keighley and Ilkley. We would advise that Natural England will shortly be producing guidance on townscape character assessment. This may usefully help inform these studies, bringing elements of the landscape character appraisal process to townscapes.	<i>Accepted. The Council's intention is to carry out Townscape Character Assessments following the publication of Natural England's guidance notes which will enable a link to be made between the Landscape Character Areas and Conservation Area Assessments / Appraisals.</i>	No change to the SPD.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>9.9 Introduction & Methodology, Section 8</p> <p>We welcome the process by which landscape strategies for each landscape type within each area are arrived at, including the analyses of sensitivity. However, one issue could be given more attention and that is the analysis of those changes which are already occurring or can be anticipated – ‘forces for change’. In addition to the changes that are mentioned on p.36 under ‘Cultural History’, other factors could include climate change, mitigation measures to address climate change and flood management, renewable energy initiatives, housing expansion and associated infrastructure. A more rigorous assessment of these factors that are likely to impact on the character of the landscape can assist in the process of drawing up appropriate landscape strategies.</p>	<p><i>Agree. This is a valid point and should be included within Section 8 of the Introduction and Methodology section of the SPD. As indicated in the comment, an additional heading ‘Forces of Change’ will be used to explain the various elements that are changeable and that may cause changes to the landscape in the future.</i></p>	<p>Addition text under the heading of ‘Forces for Change’ will be included.</p> <p>Introduction & Methodology, Section 8, at the end.</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>9.10 Design Guidance</p> <p>The attention given here to landscape design principles is welcome, in particular the inclusion of site survey and appraisal. However, in order to link this appraisal to the landscape character assessment, it could be helpful to require developers to set out how the proposed development will at least not adversely effect local landscape character, and where possible will enhance it. The detailed site layout could also usefully address built form – its form, scale, proportions, materials and detailing – to retain local distinctiveness.</p>	<p><i>Agree. The Design Guidance will require developers to set out how their proposal will not have an adverse impact on the landscape.</i></p> <p><i>Paragraph 3.1, Landscape Design Principals, point 1 addresses the built form, however the wording will be amended make reference to the retention of local distinctiveness.</i></p>	<p>Include new criterion: Design Guidance Section: 2.2.2: General Information and Landscape Approach.</p> <p>Amend Text: Design Guidance Section 3.1, Landscape Design Principals, point 1</p>
	<p>9.11 Design Guidance: para 2.1, Page 86:</p> <p>In the table it may be useful to include scheduled monuments in the list of designations.</p>	<p><i>Agree. Scheduled Ancient Monuments will be included in the designations list within the Table in section 2.1 within the Design Guidance. .</i></p>	<p>Include Scheduled Ancient Monuments to list of designations.</p> <p>Design Guidance: 2.1 – Table: Designations, Page 86</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	9.12	Design Guidance: Section 4, para 4.2, page 91, Maintenance Responsibilities: It may be useful to consider how green waste will be handled (off site or on site) to encourage the use of on site composting or composting of green waste off site, rather than it being mixed with general waste.	<i>Agree. Green waste should be encouraged on site. This will be incorporated into Section 4.2: Maintenance Responsibilities of the Design Guidance.</i>	Additional text to be included in Design Guidance. Section 4: Para 4.2
10.0 The Theatres Trust	10.1	Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theaters and as this consultation is not directly relevant to the Trust's work, we have no comments to make but look forward to being consulted on the next Core Strategy Stage, development control Policies and the next stage of the City Centre Area Action Plan.	<i>Accepted.</i>	No Change.
11.0 Walton & Co	11.1	We do not wish to make representations to the above document. However, please notify us of the adoption of the SPD.	<i>Accepted.</i>	No Change
12.0 Wharfedale Naturalists Society	12.1	Wharfedale: Volume 8: Biodiversity, Page 2 & 3 The report refers to a SEGI namely Ben Rhydding Gravel Pits and reflects on its wildlife importance in a variety of ways. The reality is now very different due to neglect of the site by the Council and its consequent deterioration, not least due to the spread of Himalayan Balsam.	<i>This site is currently in the process of being improved by both Ilkley Angling Club and Wharfedale Naturalists Society</i>	No change.

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD	Bradford MDC Response	Outcome
	<p>12.2 Wharfedale: Volume 8: Third Tier Sites, Page 4</p> <p>It is disappointing that the document makes no mention of the tremendous biodiversity of the Sun Lane Reserve which is currently officially classes as a Bradford Wildlife Area (an application is under consideration for raising its status to Local Nature Reserve)</p>	<p><i>Agree. Sun Lane Reserve in Burley is a good site and is destined to become Bradford's second Local Nature Reserve. This site is Third Tier Sites and will be added to the list of under 'Wetlands'.</i></p>	<p>Site to include site within text.</p> <p>Section 2.4: Third Tier Sites – Page 4.</p>
	<p>12.3 Wharfedale: Volume 8: Wildlife, Page 4</p> <p>Contains some important inaccuracies which understate the adverse trend for biodiversity in the valley in recent years. For example: the Water Vole is quite probably extinct in that section of the Wharfe within the Bradford Boundary.</p>	<p><i>True, there are now no current records of Water Vole in the District.</i></p>	<p>Delete text which refers to Water Voles.</p> <p>Volume 4: Wharfedale; Section 2.4; Page 4.</p>
	<p>12.4 Wharfedale: Volume 8: Wildlife, Page 4</p> <p>In addition, the reference to butterflies gives an example of an immigrant which has actually flourished in recent years whilst ignoring the declines occurring in many of the long-established species, such as Common Blue, probably as least in part linked to habitat loss.</p>	<p><i>Agree with comment. The text will be amended to take these changes into consideration.</i></p>	<p>Alteration to text to provide accuracy.</p> <p>Volume 4: Wharfedale; Section 2.4; Page 4.</p>

Consultee (Name/Organisation)	Representation(s) to Draft Landscape Character SPD		Bradford MDC Response	Outcome
	12.5	Wharfedale: Volume 8: Wildlife, Page 4 The document makes no mention of one of the most significant threats to biodiversity along the River Wharfe namely the rapid spread of Himalayan Balsam with all associated adverse impacts such as the shading out of native species and a likely increase in the rate of erosion of the river side banks.	<i>Agree with comment. The text will be amended to take these changes into consideration.</i>	Alteration to text to provide accuracy. Volume 4: Wharfedale; Section 2.4; Page 4.
13.0 Yorkshire Forward	13.1	We do not have any comments to make on the Landscape Character SPD.	<i>Accepted</i>	No change.
14.0 Yorkshire & Humber Assembly	14.1	On this occasion the Assembly does not wish to submit any comments.	<i>Accepted</i>	No change.

SUMMARY OF ADDITIONAL CHANGES/AMENDMENTS TO DRAFT LANDSCAPE CHARACTER SUPPLEMENTARY PLANNING DOCUMENT

Landscape Character SPD Document	Proposed Change to Landscape Character SPD	Reason for Proposed Change	Outcome
All Documents	Correction of spelling / grammatical errors	For accuracy of text.	Various minor changes to spelling and grammar throughout document.
Volume 1: Airedale	Change photograph on Page 43 (Section 13)	Incorrect image to portray Airedale Wooded Incline	Change to correct image of Airedale Wooded Incline.

APPENDIX 4: SUMMARY OF REPRESENTATIONS TO SUSTAINABILITY APPRAISAL REPORT FOR THE LANDSCAPE CHARACTER SUPPLEMENTARY PLANNING DOCUMENT

Consultee (Name/Organisation)	Representation(s) to Sustainability Appraisal Report		Bradford MDC Response	Outcome
1.0 Burley Parish Council	1.1	Section 4.1; Table 1, Page 13 Having recently been made aware of the Natural Environment and Rural Communities Bill (NERC) we note that the report seems to concentrate on the Council's responsibilities on protection rather than enhancement of diversity.	<i>Accepted. One of the main aims of the Landscape Character SPD is to preserve and enhance the natural landscape and biodiversity of the District and this is a major elements of each of the Landscape Character Area volumes.</i>	No change
2.0 English Heritage	2.1	As you will be aware, in terms of the historic environment, we considered that the Scoping Report identified the majority of plans and programmes which are likely to be of relevance to the development of the SPD, that it established an appropriate baseline against which to assess the SPD's proposals, and that it put forward a suitable set of Objectives and Indicators. Overall, therefore, we believed that it provided the basis for an appropriate framework for assessing the significant effects which the SPD might have upon the historic environment.	<i>Accepted.</i>	No change

Consultee (Name/Organisation)	Representation(s) to Sustainability Appraisal Report		Bradford MDC Response	Outcome
	2.2	Given the scope of the document which is being assessed, we would broadly concur with the conclusions reached regarding the likely significant effects which the SPD might have upon the historic environment.	<i>Noted.</i>	No change.
3.0 Natural England	3.1	Natural England welcome the production of the Sustainability Appraisal for this SPD. We welcome the thorough appraisal of relevant plans, policies, programmes and sustainability objectives in Section 4 as well as the background, trends and baseline information section of the report.	<i>Noted.</i>	No change.

Consultee (Name/Organisation)	Representation(s) to Sustainability Appraisal Report	Bradford MDC Response	Outcome
	<p>3.2 Section 6 & 7</p> <p>We also broadly welcome the sustainability objectives and indicators (Section 6), which link sustainability criteria to more focused objectives and key indicators. However, the table is unclear as to whether it is the objectives or the sustainability criteria, or both, which constitute the sustainability objectives of this SA. This makes the later Table 2, 'Comparing the SPD Objectives and the SA Objectives', in Section 7 less easy to read. This could be clarified by stating whether the sustainability objectives are the same as the sustainability criteria in Section 6.</p>	<p><i>Accepted. The report maintains the structure and format which has been adopted for previous Sustainability Appraisals that have been carried out by the Council which like to the RUDP. A more suitable format will be adopted for any subsequent appraisals.</i></p>	<p>No Change.</p>
	<p>3.3 Section 8, para 8.3, pg 37</p> <p>We agree that comparing a 'business as usual approach' to an approach whereby this SPD is produced is an appropriate basis for comparing options for their sustainability. However, the relationship between the tables summarising the effects of the SPD options to the subsequent analysis is at times not clear.</p>	<p><i>Accepted.</i></p>	

Consultee (Name/Organisation)	Representation(s) to Sustainability Appraisal Report	Bradford MDC Response	Outcome
	<p>3.4 We would advise that the ODPM publication 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance for Regional Planning Bodies and Local Planning Authorities' contains useful guidance on presenting the appraisal of options in SPDs. On page 126, it encourages planning authorities to use a matrix similar to examples that they provide to document the prediction and appraisal of plan options against the SA Framework, and to summarise the assessment results in one table. This may make it easier to see the relationship between sustainability objectives and the effects of pursuing different options.</p>	<i>Noted.</i>	No change.

Consultee (Name/Organisation)	Representation(s) to Sustainability Appraisal Report		Bradford MDC Response	Outcome
4.0 Wharfedale Naturalists Society	4.1	Page 10 & 13 – Implications for the SPD The references to PPS 9 and the Natural Environment and Rural Communities Act (2006) are welcome but give insufficient emphasis to the Council's responsibilities not only to maintain biodiversity but to ' <i>enhance</i> ' it. Conserving biodiversity includes restoring and enhancing species populations and habitats, as well as protecting them.	<i>Accepted. One of the main aims of the Landscape Character SPD is to preserve and enhance the natural landscape and biodiversity of the District and this is a major elements of each of the Landscape Character Area volumes.</i>	No change.

APPENDIX 5: LIST OF OTHER CONSULTEES

Bradford Councilors	CPRE West Yorkshire
Bradford MP's and MEP's	David Wilson Homes Northern
	DEFRA
Aire & Calder Rivers Group	Depol Associates
Aire Valley Conservation Society	DevPlan UK
Ancient Monuments Society	Dialogue Communicating Planning
Andrew Martin Associates	DPDS Consulting Group
Baildon Community Link	Dunlop Haywards Planning
Barton Willmore Planning	Eddisons
Ben Bailey Homes	F M Lister & Son
Ben Rhydding Action Group/Save Us Pub	Firstplan
Bradford Botany Group	Future Energy Yorkshire
Bradford Community Housing Trust	Garbe Real Estate Ltd
Bradford District Chamber of Trade	George Wimpey Northern Yorkshire Ltd
Bradford Ornithological Group	Goldfinch Estates Ltd
Bradford Ramblers Association Group	Greenway Amenity Group
Bradford University (Environmental Services Department)	Hartley Planning Consultants
Bradford Urban Wildlife Group	Haworth & Oxenhope District Bridleway Group
British Waterways	How Planning
British Wind Energy Association	Hurstwood Group
Brooke Properties	Indigo Planning
Brookhouse Group	Indigo Planning Ltd
Bruce Barnes	Inland Waterways Association
Burnett Planning & Development	Jeff McQuillan Consulting
Campaign For Real Ale	Joanne Besford and Tony Zacharczuk
Carter Jonas	John Wilkinson
CB Richard Ellis Ltd	Lambert Smith Hampton
Charlie Webber	Land & Development Practice
Chris Thomas Ltd	Laura Haworth
Commission for Architecture and the Built Environment	Laura Haworth
Council for British Archaeology	Leeds Friends of the Earth
Countryside Properties (Northern) Ltd	Leith Planning Ltd
CPRE Bradford District	Littman Robeson
	Martin Spiers

Matthew Brooke	South Pennines Packhorse Trail
Mr C Narrainen	Sport England
Mr G E Tattersall	St Aidan's Presbytery
Mr J P Lloyd	Strutt & Parker
Mr Kurt Kunz	Taylor Young
Mr T Bendrien	The Abbeyfield Society
Mrs B Smith	The Co-operative Group Ltd
National Farmers Union	The Emerson Group
National Offender Management Service	The Garden History Society
North Country Homes Group Ltd	The Georgian Group
Npower Renewables	The St John's Centre
Patchett Homes Ltd	The Theatres Trust
Peacock and Smith	The Twentieth Century Society
Penny Trepka	The Victorian Society
Planning & Development	Tom Jones
Planning Potential	Tony Kilcoyne
Planning Prospects Ltd	Tribal MJP
Plot of Gold Ltd	Trust House
Purearth PLC	Turley Associates
Railtrack Property	Vincent and Gorbing Ltd
Ramblers Association	Walton & Co
Reverend John Nowell	West Yorkshire Archaeology Advisory Service
Reverend Sarah Groves	West Yorkshire Ecology
RPS	West Yorkshire Ecology (Biodiversity Co-ordinator)
RSPB	Yorkshire Gardens Trust
RSPB (Northern England region)	Yorkshire Rural Community Council
Sanderson & Weatherall	Yorkshire Union of Golf Clubs
Scott Wilson	Yorkshire Wildlife Trust
Society for the Protection of Ancient Buildings	
South Pennines Association	

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