

1: COAL AUTHORITY



200 Lichfield Lane
Mansfield Nottinghamshire
NG18 4RG
T: 01623 637 119 (Planning Enquiries)
E: planningconsultation@coal.gov.uk
W: www.gov.uk/coalauthority

For the attention of: Ms H Thornton – Clerk

Baildon Town Council

[By email: ndp@baildowntowncouncil.gov.uk] 8th December 2025

Dear Ms Thornton

Re: Baildon Neighbourhood Development Plan

Thank you for your notification of the 7th November 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.

We note however that it does not appear that the Neighbourhood Plan proposes to allocate any new sites for development. On this basis we have no objections to, or specific comments to make on, the Neighbourhood Plan.

Yours sincerely

Melanie Lindsley

Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Principal Planning & Development Manager

2: CANAL & RIVER TRUST

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.

1. Personal / agent details		
	Person / organisation Details*	Agent Details (if applicable)
Title	MR	
Full Name	Simon Tucker	
Job Title (where relevant)	Area Planner	
Organisation (where relevant)	Canal & River Trust	
Address	21 The Calls. Leeds	
Post Code	LS2 7EH	
Email Address	Simon.tucker@canalrivertrust.org.uk	
Telephone Number	07885241223	

2. FUTURE NOTIFICATION

Please tell us if you would like to be of the progress of Baildon's Neighbourhood Development Plan.

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/>

PART B – YOUR COMMENTS

Statutory Consultation Responses Excluding CBMDC Regulation 14 2025



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)	☒ (Baildon NP)	Appendix No. (please specify)	
Policy Maps (Please Specify)		Other (please specify)	

4. To which Policy does your comment relate?					
Whole document	☒	Section		Policy	
Page Number		Paragraph			

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

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.
We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green -blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework. The Trust do not directly own or manage any waterway within the area covered by the proposed Neighbourhood Plan. However, we do own and manage the Leeds & Liverpool Canal, which runs east - west to the south of the Neighbourhood Plan area, and is a green (and blue) infrastructure asset that we believe is accessed by the Local Community of Baildon. <u>Baildon Policy 4: Footpaths & Baildon Policy 5: Walking and Cycling</u> Our waterway corridors and towpaths form an important green and blue infrastructure asset, which provide a freely accessible resource for recreation and leisure activities in addition to providing opportunities for active travel in a largely traffic free environment. The Trust's Outcomes Report (2022) https://canalrivertrust.org.uk/about-us/valuing-our-waterways highlights that the annual social value generated by our waterways is £4.6bn, including £1.1bn cost savings to the NHS derived from active use of the waterways and towpaths, and £2.9bn from improved mental health and wellbeing through access to our spaces for leisure and recreation. We therefore believe that improved access to our spaces can result in wellbeing benefits for communities . The proposed draft for both these policies highlight opportunities to improve access to

our spaces, which could make the document more effective in meeting local needs. Specifically, reference in part BP5/4 of draft Policy 5 makes specific comment on the opportunity of improving access to nearby spaces, including the canal which, although outside of the Neighbourhood Area Boundary, still provide opportunities for access to blue and green infrastructure.

We wish to highlight the increased use of our towpaths could result in a need to improve the towpath surface to ensure that it can accommodate additional usage . The Trust maintain our towpath network to a 'steady state' based on existing use. Additional use of our towpaths brought by new development may require improvements to the surface so as to minimise risks of erosion, and to encourage use by new users. We therefore would recommend that reference to the need to improve off -site walking and cycling routes should be considered for large developments, to ensure that neighbouring and nearby blue and green infrastructure is appropriately protected.

7. Signature:

Date:

10.11.2025

3: ENVIRONMENT AGENCY



Baildon Town Clerk ([via email](#))
Baildon Town Council

Our ref:
Your ref:

Bradford/ Baildon NDP Reg 14
Baildon Town Council NDP

cc [Planning Policy Team](#)
[Bradford Metropolitan District Council](#)

Date:

29 December 2025

Dear Baildon Town Council

BAILDON NEIGHBOURHOOD DEVELOPMENT PLAN (2025-2040)

REGULATION 14 – PUBLIC CONSULTATION

TOWN AND COUNTRY PLANNING ACT 1990, THE LOCALISM ACT 2011 AND THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS AMENDED)

Thank you for inviting the Environment Agency to comment on the draft version of the Baildon Neighbourhood Development Plan and the associated consultation supporting documents. We agreed a short extension with you by email to provide comments no later than 29 December 2025.

We note that Baildon Town Council has prepared a Neighbourhood Development Plan for the parish area in conjunction with the local community. This process has been undertaken in accordance with the Town and Country Planning Act 1990, the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012 (as amended).

SEA/ HRA Screening

We note and support the process undertaken and presented in the report titled '*Baildon Neighbourhood Development Plan SEA/HRA Screening (October 2025)*'.

Assuming the emerging Baildon Neighbourhood Development Plan performs in accordance with the wider Development Plan, we have no objections and agree with the conclusion in paragraph 5.5 and reasons in 5.6 that confirm a SEA is not necessary.

Similarly, we agree with the statement in paragraph 6.7 that there is no need for a HRA, provided the emerging Baildon Neighbourhood Development Plan remains in conformity with the wider Development Plan.

Environment Agency position - summary

The Environment Agency does not object in principle to the draft Baildon Neighbourhood Development Plan.

We will take the opportunity to specifically comment on key matters that fall within our land-use planning remit and where we consider there may be a lack of cohesion with national policy, the Bradford Local Plan and relevant evidence bases. While we recognise that the Plan references a number of environmental considerations within the supporting text, these are not always carried through into policy wording. We will summarise these in the following sections.

Overall, we remain supportive of the Plan's ambition. However, we consider that there are missed opportunities to raise the profile of climate change, flood risk and the role of the water environment, and to maximise the potential of development to deliver wider environmental benefits.

Vision and objectives

The Environment Agency welcomes Baildon's Neighbourhood Development Plan (BNBP) vision and objectives, particularly the emphasis on protecting and enhancing the countryside, local green spaces and the natural environment. We note that climate change and flood risk are each considered as major issues for the Bradford area in the Local Plan and yet remain peripheral in this draft BNDP.

We would welcome stronger and more explicit reference to the water environment, flood risk management and climate change adaptation. We underline that there may be a missed opportunity to better reflect and promote the valuable natural asset of water resources, while integrating Green-Blue Infrastructure as potential mitigating solutions.

Climate change

We welcome reference to the declaration of a climate emergency in 2019 and the Council's Environmental Policy (2021).

However, at this draft stage, these strategic aspirations are not adequately translated into any clear development requirements within the draft BNDP.

Recommended updates – climate change

We continue to strongly advocate that in the context of climate change mitigation and/ or resilience, appropriate reference should be provided to adequately reflect measures that seek to conserve and enhance the water environment, natural resources and biodiversity.

Such an approach should be integrated through all future Local Plan documents and cascaded to the BNDP as it evolves. We note fleeting cross-reference to Appendix B: Baildon Design Codes in some sections of the draft NDP. While we support the aspirations in Chapter 4 of the Baildon Design Codes, we observe that there is a missed opportunity in the draft BNDP to link details on flood risk, green-blue infrastructure (biodiversity and SuDS) and sustainability (climate resilience).

Flood risk

Flood risk should be a major consideration in the Plan due to the presence of the River Aire and its associated floodplain within the neighbourhood area, alongside the potential for surface water flooding, which is likely to be exacerbated by climate change. These factors present ongoing challenges for physical development, particularly more vulnerable uses such as housing, as well as business, retail and employment land. While we acknowledge that the emerging BNDP will likely seek to avoid duplication

with other aspects of the Local Development Plan, we would have expected to see more integration.

These aspects will continue be a challenge. Relevant signposting to national and local plan policy and guidance may assist applicants and local residents.

We acknowledge the inclusion of Policy BP2/7 to require consideration of flood plains, surface water runoff and underground streams and Policy BP11 to protect and enhance the River Aire Corridor. The current wording lacks clarity and does not explicitly reference the Sequential Test or the Bradford Strategic Flood Risk Assessment (SFRA). Similarly, the objectives of Policy BP11 to protect and enhance the River Aire Corridor, improve green infrastructure networks and retain access routes are supported. However, the policy would benefit from explicitly recognising the river corridor's functional role in flood risk management and climate change adaptation.

Recommended updates – flood risk

Flood risk, including both fluvial and pluvial sources, should remain a key consideration for new development, particularly housing, which is typically classed as a more vulnerable land use. Where required, we recommend amending text to reflect the need for the consideration and assessment of *flood risk*.

We also recommend that Policy BP2/7 is strengthened to require application of the sequential approach set out in the NPPF and Local Plan Policy, avoidance of inappropriate development within Flood Zone 3, and explicit reference to the Bradford SFRA. At the very least, these should be referenced in the supporting text. Clear expectations around the assessment of all sources of flood risk would further improve policy clarity and, where suitable, the use of sustainable drainage systems designed in accordance with Lead Local Flood Authority guidance.

The use of the term '*underground streams*' is also vague. We recommend a review to clarify if this captures groundwater sources/ pathways and/ or man-made culverts.

Water Framework Directive

We welcome the emphasis placed on river, beck and canal corridors and the recognition of green infrastructure opportunities. The water environment plays a critical role in this aspiration. There is no reference to water quality, the Water Framework Directive (WFD) or to River Basin Management Plans, despite the River Aire and its tributaries forming key environmental assets within and adjacent to the Neighbourhood Area.

Any new development should take the objectives of the Water Framework Directive into account. The Water Framework Directive (WFD) is a European Directive that seeks improvements to the water environment to ensure that they are achieving a 'good' overall ecological status (or potential). The WFD sets targets for all waterbodies to achieve 'good' status or potential by 2027 at the latest (unless a lower status objective is proposed). The WFD is implemented regionally by way of River Basin Management Plans (RBMPs). You can access the details of the relevant catchments and watercourses on our Catchment Data Explorer pages (<http://environment.data.gov.uk/catchment-planning/>).

Recommended update – water management and quality

Water resource management and quality could be a fundamental aspect for all built development. This may include consumption supply and demand. We would strongly support a requirement for developers

to carry out WFD actions when they are developing on sites adjacent to the relevant stretches of river. Where applicable, your Plan could include supporting text, cross-reference to Design Codes and/ or a policy encouraging the removal of weirs, installation of fish passes and improvements to the morphology of the rivers to improve watercourses so that they achieve 'good' status.

Groundwater protection

Protecting surface and groundwater from potentially polluting development and activity is a primary responsibility for the Environment Agency. Sources of groundwater supply will be protected using the Source Protection Zones (SPZs) identified in the Environment Agency's existing mapping. The approach is documented in our Groundwater Protection: Principles and Practice

There is a small area in SPZ 1 within the draft Plan area. We will normally object in principle to certain inappropriate types of proposed development in these identified zones.

Within Source Protection Zones 2 and 3, a risk-based approach will be applied to the consideration of development proposals. If neither the use of a soakaway or a direct discharge is possible, a system without any discharge (such as a sealed cess pool or chemical toilet) may be considered. Given their capacity to overflow and discharge raw sewage directly into the water environment, such systems are usually a last resort. These types of systems also require regular maintenance, they can create additional carbon emissions through excess traffic movements, which can impact on the overall sustainability of a proposal.

Recommended updates – groundwater

We would welcome these details are reflected in your Plan so that applicants are aware of the most sustainable options for their foul drainage when they are not able to connect to the main foul sewer network. In particular, we would like you to highlight that where a non-mains drainage solution is proposed, the applicant must submit the relevant Foul Drainage Assessment form with their planning application

Site design

The Environment Agency welcomes the direction and measures set out for all development in Baildon Policy 17 (Baildon Design Guidance and Codes). We particularly support the emphasis in the supporting text at 9.20, focusing on a range of themes that planning applications for new housing development will be expected to address. Also, a drive towards delivering the conservation and enhancement of natural environment elements could still be strengthened by clearly defining/ linking, where and how, tools such as Biodiversity Net Gain and Climate Change Mitigation could deliver meaningful improvement.

Recommended updates – site design

Despite the draft BNDP highlighting climate change as a major issue, we again underline that practical solutions have not been added or signposted to key links and information elsewhere, such as the Design Codes. This could be rectified in either the supporting text or emerging policy wording.

Sustainable construction

The draft BNDP could also positively contribute to your community by reducing costs through sustainable construction. Neighbourhood planning is an opportunity for communities to encourage efficient water and waste management systems in new buildings. You could also help to promote the use of sustainable materials in construction and encourage energy efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for those occupying the building. This will also contribute to the efficient environmental management by reducing emissions and improving air quality.

We support the inserted details in Chapter 4 of the Baildon Design Codes for climate change resilience, the drive towards Net Zero, the use of SuDS, rainwater harvesting and waste management.

Recommended updates – sustainability

We invite consideration that throughout the lifetime of the BNDP, nature and the water environment are given stronger links to all proposed development, particularly through the aspirations of the Baildon Design Guides and a need to intuitively draw in a connection with climate change adaptation and mitigation.

Conclusion

We support the preparation of the Baildon Neighbourhood Development Plan and the community ambition it represents. There are many central themes and issues that you have correctly identified and have prepared policies to address. We consider that there are clear opportunities to strengthen the Plan by further integrating climate change, flood risk and the water environment into emerging policy wording.

In particular, we consider the effectiveness of the Plan would be improved through the following:

- inclusion of a dedicated (and over-arching) climate change policy,
- a strengthened flood risk policy (or supporting text) that is clearly aligned with the NPPF and the Bradford SFRA/ flood risk policies,
- explicit reference to the Water Framework Directive either in supporting text or policy wording related to water resource management and quality,
- clearer expectations for water resources and groundwater protection, and
- a stronger Green–Blue Infrastructure approach linked to the statutory requirement for Biodiversity Net Gain and its use in delivering the Local Nature Recovery Strategy.

We trust these comments will assist Baildon Town Council in refining the Plan towards and beyond Regulation 16, so that it becomes an integral component of the Local Development Plan framework.

Yours sincerely

Mr. Neil Wallace Planning Specialist

Direct e-mail: Neil.Wallace@environment-agency.gov.uk Direct team email:
sp-yorkshire@environment-agency.gov.uk

4: HISTORIC ENGLAND

HISTORIC ENGLAND DOCUMENT 1:

Helen Thornton CiLCA
Clerk
Baildon Town Council
2 Northgate
Baildon
BD17 6JX
clerk@baildowntowncouncil.gov.uk

Our ref: PL00800421
Your ref :
Telephone 01904 601879
07502 737925

17th December 2025

Dear Ms Thornton,

Historic England Regulation 14 response Baildon Neighbourhood Development Plan (NDP) 2025 –2040 – Pre-Submission consultation – October 2025

Historic England as the Government’s statutory advisor on the historic environment, welcomes the opportunity to comment on pre-submission draft Baildon Neighbourhood Development Plan (NDP) – October 2025 and its evidence base. Our representations focus on policies and proposals affecting designated and non-designated heritage assets (including their settings), townscape character and design quality, and the way these are expressed on the Policies Map and in supporting appendices .

We have reviewed the consultation documents on your website: the draft NDP; the Policies Map (Wider Area and Village Centre inset); and Appendices A–I including the Design Codes, local heritage lists, views, footpaths and Local Green Spaces (LGS) assessments, plus the published Addendum to the Design Code.

Summary

- I. Overall support: We strongly support the Plan’s intention to conserve and enhance Baildon’s historic environment through dedicated objectives and policies on conservation areas, local heritage assets, design and views. The policy structure plus detailed evidence in appendices aligns well with good practice
- II. Design Codes (Appendix B): We welcome the publication of the Design Codes and the separate Addendum correcting material references (sandstone, not limestone), terminology and placename errors. We recommend that the Addendum’s corrections are fully incorporated into the final PDF and that the NDP’s policy and monitoring text is updated to cross-reference the corrected version.
- III . Non-Designated Heritage Assets (NDHAs): The methodology and resulting local list in Appendix G are positive. When the opportunity arises, we suggest that you put forward your list of non-designated heritage assets for inclusion in the West Yorkshire Local Heritage List. This would ensure robust use in development management and alignment with national guidance on local listing
- IV . Views and Vistas (Appendix E): This is a strong evidence base for a setting focused policy. Minor refinements are suggested to ensure consistency between view numbers/descriptions, the Policies Map and decision-making criteria.

V. Policies Map: We support the clarity of the Wider Area and Village Centre inset. We suggest small cartographic enhancements so that conservation boundaries, key views, and heritage assets read unambiguously alongside other environmental designations.

VI. Design and shopfronts: The shopfront and streetscape approach is broadly supported. We suggest that a reference to the Bradford Shopfront Design Guide is added to page 182 of the Design Code. Minor wording changes are suggested to secure materials and details characteristic of Baildon (notably local sandstone, traditional roofing and shopfront proportions), in line with the corrected Design Codes.

VII. Evidence cross-referencing: Where the Plan lists designated assets (Appendix F.1/F.2), please ensure direct cross-references to the National Heritage List for England (NHLE) entries are retained and regularly checked for currency.

VIII. The photographic underlay of Figure 41 on page 129 of the Design Code appears inconsistent with the sketch overlay and written commentary. We suggest checking this before publishing the final version of the document.

Conclusion

The pre-submission draft presents a coherent, positively prepared framework to conserve Baildon's historic environment while guiding high quality, locally distinctive design. With the targeted modifications suggested above, in particular: the corrected Design Codes, strengthening of the NDHA policy, tightening of shopfront expectations and ensuring map/appendix

consistency, the Plan will provide robust heritage policy for applicants, the community and the local planning authority.

If you have any queries regarding these representations, please do contact me, as we look forward to continued engagement as the Plan progresses to submission.

Yours sincerely

John Lambe John Lambe
Historic Places Adviser

E-mail: john.lambe@HistoricEngland.org.uk

HISTORIC ENGLAND DOCUMENT 2:

Helen Thornton CiLCA
Clerk
Baildon Town Council
2 Northgate
Baildon
BD17 6JX
clerk@baildowntowncouncil.gov.uk

Our ref: PL00800421
Your ref :
Telephone 01904 601879
07502 737925

17th December 2025

**Environmental Assessment Regulations 2004: Regulation 9
Baildon Neighbourhood Plan: SEA Screening Opinion, October 2025**

Thank you for consulting Historic England on the above Strategic Environment Assessment (SEA) Screening Opinion. Historic England is a public organisation that protects and brings new life to the heritage that matters to us all, so it lives on and is loved for longer

Based on the analysis set out in the Screening Opinion, and within the areas of interest to Historic England, we disagree with the conclusion and advise that the emerging plan is likely to result in significant environmental effects (positive or negative) and, therefore, it does need SEA. In coming to this view we have taken the following factors into consideration

- The plan area contains a number of heritage assets including part of a World Heritage Site and its buffer zone, a registered park and garden, conservation areas, listed buildings, and the potential for non-designated assets
- Heritage assets are fragile and irreplaceable and can be damaged by change through development both directly and indirectly by development in their setting
- The plan is not expected to allocate sites for development.

As such, from the perspective of our area of interest, the need for SEA of the draft plan cannot be screened out as it is likely to result in significant environmental effects (positive or negative). However, the views of the other two statutory consultees should be taken into account before you conclude on whether SEA is needed. According to Regulation 11 of the above Regulations, I look forward to receiving a copy of your determination in this case

I draw your attention to our guidance on the SEA process (Sustainability Appraisal & Strategic Environmental Assessment, Historic England Advice Note 8, 2016). Paragraph 3.3 sets out ways of identifying and predicting significant effects on the historic environment to produce a rounded, compliant assessment. Paragraphs 3.4 and 3.5 set out the importance of clear, evidence-based assessment to show that proposals can be accommodated without harm, and benefits to the heritage are optimised. Paragraphs 3.6 and 3.7 show how this leads to policy development in the draft plan (or other mitigation) plus effective monitoring (paragraphs 2.13 to 2.17). In addition, we advise that conservation and archaeological staff of relevant local authorities are closely involved in preparation of the plan and its SEA. They are well placed to advise on local historic environment issues and priorities, access to data and evidence, how modifications can be made to minimise potential adverse impacts on the historic environment, any mitigation measures required, and opportunities to secure wider benefits for conservation and management of heritage assets

An SEA need only be proportionate, and the evidence needed for the assessment is likely to be similar to that needed for the plan itself. In this case, the likelihood relates principally to the World Heritage Site and its setting and buffer zone, so we recommend this is given due consideration through the SEA mechanism.

We reserve the right to review our opinion should the plan change materially in its content and direction. Please do not hesitate to contact us if you have any queries relating to our comments or would like any further information .

Yours sincerely

John Lambe John Lambe
Historic Places Adviser

E-mail: john.lambe@HistoricEngland.org.uk

5: KIRKLESS COUNCIL

Good morning,

Thank you for giving Kirklees the opportunity to comment on the draft Baildon Neighbourhood Development Plan. We have reviewed the document and have no comments to make.

Kind regards,

Lucy

Planning Policy Group
Planning and Building Control
Place – Skills and Regeneration

Tel: 01484 221000

Website: www.kirklees.gov.uk/localplan



6: NATIONAL GAS

**AVISON
YOUNG**

Our Ref: MV/ 15B901605
04 December 2025
Baildon Town Council ndp@baildowntowncouncil.gov.uk
via email only

Dear Sir / Madam
**Baildon Neighbourhood Plan Regulation 14 Consultation
November – December 2025
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

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

Proposed sites crossed or in close proximity to National Gas Transmission assets

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director
nationalgas.uk@avisonyoung.com
Avison Young
Central Square

Kam Liddar, Asset Protection Lead
box.assetprotection@nationalgas.com
National Gas Transmission
National Grid House

Forth Street
Newcastle upon Tyne
NE1 3PJ

Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

Matt Verlander MRTPI
Director
0191 269 0094 3
matt.verlander@avisonyoung.com
For and on behalf of Avison Young

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

7: NATIONAL HIGHWAYS

Thank you for the consultation regarding the Neighbourhood Plan consultation for Baildon.

Having reviewed the documentation (and being mindful of the extensive Local Plan [LP] work we have already undertaken over the years with the team at Bradford MDC), there is little formal comment to make at this point on behalf of the Secretary of State for Transport, and their primary interests.

It remains that any planned development already identified in the wider LP consultations for Bradford have already been accounted for between National Highways [NH] and themselves through the last adopted plan, and that the council has our extant comments for the current LP proposals (including the new targets set through the NPPF) and those sites which are identified for housing and employment within Baildon.

This will extend forwards to the next plan period, and the work underway currently with the Bradford MDC [BMDC] planning team. This will subsume all the local parish council's aspirations throughout the district, to be outlined by the neighbourhood plan documents the BMDC receives from them/yourself. The recently revised NPPF may or may not bring about a future review of housing numbers identified and the locations for such sites, and it would be for BMDC to address this as they see fit.

I note that the published documents outline the aspirations for the area, with a focus on maintaining the feel and character of the local area when considering future development. The Neighbourhood Plan does identify the previous adopted plan target and the new NPPF aspiration for new housing sites. The quantum of this proposed development in geographical proximity to the Strategic Road Network [SRN] is such that it is expected by itself to not cause any discernible operational issue. As such any impact from new employment and/or housing sites proposed would however have to be subsumed into the BMDC's existing calculations and evidence base to define any aggregated impact on the operation of our asset – and mitigated accordingly through the Local Plan if required.

Should new developments be forthcoming which sit outside of the existing LP settlement plans i.e. new housing, employment, or retail sites, we would look to review these with BMDC also identifying any supporting mitigation that could be required on the SRN. Similarly with the proposed employment land uses and sites outlined by the 'Baildon Policy 21' statement in the document, whilst job numbers are not identified nor specific sites discussed, it would be expected as part of the overall employment land review that BMDC will be required to account for any adverse impact on the SRN as a result of employment aspirations across the entire district.

The current consultation shows the wider aspirations of the neighbourhood plan in a positive light, and this is welcomed. The proximity of the SRN under our jurisdiction is to the southeast (M606 and M62), which are accessed via the local road network under the control of BMDC. As with all development within the Bradford district boundary, it is expected that the aggregated impact of all neighbourhood plans will link to the growing congestion and impacts on the SRN, which Bradford MDC will need to continue to address in their wider Infrastructure Development Plan proposals to ensure a sound local plan. At this time therefore I will continue my work with them to identify any specific sites which may have a significant impact to the continued safe operation of our network, and furthermore, ensure BMDC collects any necessary financial contributions from developers and promoters to provide any necessary mitigation on the SRN.

Statutory Consultation Responses Excluding CBMDC Regulation 14 2025



Kindest regards

Simon Jones Esq. , Spatial Planner Operations

National Highways | Calder Park House | Calder View | Calder Business Park | Wakefield | West Yorkshire |
WF2 7UA | United Kingdom

Tel: +44 (0) 300 4702472 | **Mobile:** + 44 (0) 7710 958399 [a] **Web:** nationalhighways.co.uk

8: NATURAL ENGLAND

Date: 16 December 2025

Our ref:533651

Your ref: Baildon Neighbourhood Plan



Ms Helen Thornton Baildon Town Council

**Hornbeam House Crewe Business Park Electra
Way**

BY EMAIL ONLY

Crewe Cheshire CW1 6GJ

ndp@baildowntowncouncil.gov.uk

T 0300 060 3900

Dear Ms Thornton

Baildon Neighbourhood Plan - Pre-submission Regulation 14 Consultation

Thank you for your consultation on the above dated 07 November 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Sally Wintle

Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be [found here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

9: NORTH YORKSHIRE COUNTY COUNCIL

Dear Helen,

Many thanks for consulting North Yorkshire Council on the Baildon Neighbourhood Development Plan.

We have reviewed the plan and can confirm that we have not identified any cross-boundary issues and as such have no comments to make.

Kind regards

James

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