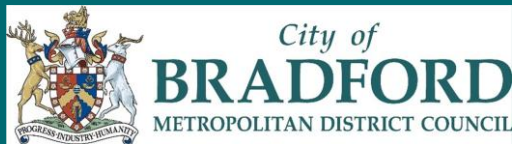


Bingley Neighbourhood Development Plan

REGULATION 16 CONSULTATION (JULY TO SEPTEMBER 2025)

SUMMARY OF REPRESENTATIONS RECEIVED



Contents

1. GENERAL COMMENTS3

2. SECTION 1: FOREWORD6

3. SECTION 2: THE ROLE AND SCOPE OF THE NEIGHBOURHOOD PLAN.....7

4. SECTION 4: SOCIAL, ECONOMIC AND ENVIRONMENTAL CHARACTERISTICS 17

5. SECTION 6: OUR VISION AND DEVELOPMENT OBJECTIVES 21

6. SECTION 6: COMMUNITY PRIORITIES AND ASPIRATIONS..... 23

7. SECTION 7: ENCOURAGING A WELL-DESIGNED BUILT ENVIRONMENT..... 26

8. SECTION 8: IMPROVING BINGLEY TOWN CENTRE 33

9. SECTION 9: CREATING AN ATTRACTIVE ENVIRONMENT FOR BUSINESS INVESTMENT 39

10. SECTION 10: MEETING LOCAL HOUSING NEEDS..... 46

11. SECTION 11: WALKING, CYCLING AND GREEN INFRASTRUCTURE 51

12. SECTION 12: ENHANCING BINGLEY’S LANDSCAPE AND HERITAGE..... 70

13. SECTION 14: APPENDICES TO THE NEIGHBOURHOOD PLAN 77

14. POLICIES MAP 81

15. STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS REGULATIONS ASSESSMENT SCREENING 83

16. BASIC CONDITIONS STATEMENT..... 86

17. BINGLEY TOWN CENTRE AND LOCAL CENTRES – DESIGN CODE..... 88

18. BINGLEY PARISH NEIGHBOURHOOD PLAN MASTERPLAN 93

1. GENERAL COMMENTS

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It should be noted that the National Planning Policy Framework (NPPF) was revised in December 2024. Prior to publication of the referendum draft and made versions of the neighbourhood plan, the document should be reviewed and updated to refer to this most recent version of the NPPF and, where referenced, NPPF paragraph numbers checked and updated. This applies to all other documentation produced to support the plan including the Design Code, Basic Conditions Statement and supporting evidence base.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

Following completion of the independent examination, the neighbourhood plan (and any relevant supporting documentation) should be updated to reflect the stage it has reached.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment

Consultation point:	General Comment		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

CBMDC welcome the submission of the draft Bingley Neighbourhood Development Plan and its supporting documentation. The Council has sought to work closely with the Town Council in developing the Plan to ensure that it has reached current stage. It is further noted that many of the comments provided in relation to the Regulation 14 of the NDP have been addressed in the current version.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

The inclusion of references to relevant paragraphs of the National Planning Policy Framework (2024), adopted Bradford Core Strategy and emerging Local Plan as well as other relevant policy documents/guidance is welcomed it shows are a clear thread running through the planning policy framework for Bingley. However, it should be noted that the policy number/referencing in the emerging Local Plan may be subject to change. These references are drawn from those listed in the Regulation 18 (Preferred Options) version of the emerging Local Plan issued for public and stakeholder consultation in early 2021. Work is ongoing to develop a Regulation 19 (Publication/Submission) version of the emerging Local Plan. It may be appropriate to include a note within the NDP document highlighting the above.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			
There is no mention of the Wildlife Habitat Network in the Neighbourhood Plan, this is the West Yorkshire-wide network of habitats that provide corridors and connectivity for wildlife.			

2. SECTION 1: FOREWORD

Consultation point:	1. Foreword – Sixth Paragraph		
Representation ID:	-	Representation ID:	-
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

This paragraph refers a referendum of Bingley residents and businesses taking place prior to the plan being formally made (adopted). The regulations governing neighbourhood plan referendums does make provision for the conduct of additional “business referendums”. These are required for a neighbourhood area which has been designated as a Business Area and would be in addition to any residential referendum such an area. In the case of the Bingley Neighbourhood Area, it is not designated as a “Business Area” and as such there will be no “business referendum”.

The only referendum that will take place is the “Residential Referendum” where those who are entitled to vote if at the time of the referendum, they meet the eligibility criteria to vote in a local election for the area and if they live in the referendum area. Accordingly, this paragraph should be amended to reflect this in the next version of the Plan.

3. SECTION 2: THE ROLE AND SCOPE OF THE NEIGHBOURHOOD PLAN

Consultation point:	2. The Role and Scope of the Neighbourhood Plan		
Representation ID:	30400	Comment Type:	Comment
Respondent:	Burnett (7669)	Agent:	-

Summary:

-

Full Submission:

The scope of the Neighbourhood Plan should be clearly defined but flexible, complementing the district’s Local Plan while reflecting Bingley’s demographic realities. With an ageing population and declining youth, policies must retain younger families through varied housing, affordable tenures, family facilities and active travel initiatives. The plan should include renewable-energy and business-innovation opportunities, maintain libraries and youth services and set out programmes to engage motorists and promote healthy lifestyles. Continuous community engagement and periodic review will ensure the plan evolves alongside demographic and economic changes.

Consultation point:	2. The Role and Scope of the Neighbourhood Plan		
Representation ID:	30402	Comment Type:	Comment
Respondent:	National Highways (4772)	Agent:	-

Summary:

-

Full Submission:

Many thanks for the consultation regarding the Neighbourhood Plan consultation for Bingley.

Having reviewed the documentation via the links provided (and being mindful of the extensive Local Plan work we have already undertake on the current adopted Local Plan and the emerging future plan), 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 Council will have been accounted for in the consultations between ourselves, and that the council has our extant comments for the current LP engagement which has been taking place. This will obviously extend forward to the next plan period and the work we will be undertaking together, and should include for all the local parish council's own aspirations to be outlined by their individual neighbourhood plans. Should new developments be publicly forthcoming (which sit outside of the existing LP settlement plans i.e. new housing or employment sites), we would look to review these with the Council in the usual manner, and any supporting mitigation they may require.

The current consultation shows the wider aspirations of the neighbourhood plan in a very positive light, and this is welcomed. The proximity of the SRN under my own jurisdiction extends quite a way to the south of Bradford and the ring road - namely the M606 and M62 corridors. As with all development within the Council boundary, it is expected that the aggregated impact of all neighbourhood plans will link to the growing congestion and impacts on the SRN which the Council will need to continue to address in their wider IDP proposal, to ensure a sound local plan infrastructure offering.

Whilst the employment and housing land allocations talked about in the Neighbourhood consultation constitute a number of existing allocations which have effectively been saved from the existing Local Plan and previous sites identified but as yet not built out, there are no new strategic allocations named which would fall outside of those which National Highways has already considered as part of the adopted Bradford Council Plan. As such the previous advice stands in regards the potential impact on the SRN, and that this will be for the Council and land promoters at the time of planning to assess and accordingly mitigate if required. That is not to forget however the need for the Council to have a suitable methodology in place to account for the aggregated impact of a number of smaller housing and or employment related trips on the SRN, and the securing of developer contributions to be able to bring forward those sites in the future.

At this time therefore, I will continue my work with the Council Plan Making Team to identify any specific sites which may have a significant impact to the continued safe operation of the Strategic Road Network, and furthermore ensure the Council then continues to ensure financial contributions are collected from developers to provide any necessary mitigation on the SRN.

Consultation point:	2. The Role and Scope of the Neighbourhood Plan		
Representation ID:	30403	Comment Type:	Comment
Respondent:	Pendle Borough Council (112)	Agent:	-

Summary:

-

Full Submission:

Thank you for giving Pendle Borough Council the opportunity to comment on the submitted Bingley Neighbourhood Development Plan (NDP), in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, as amended.

Having looked at the Bingley NDP and its supporting documents I can confirm that we are satisfied that there are no strategic cross boundary issues for Pendle, arising from the proposals set out in the document.

May we take this opportunity to wish Bingley Town Council and City of Bradford MDC every success in taking the NDP forward.

Consultation point:	2. The Role and Scope of the Neighbourhood Plan		
Representation ID:	30404	Comment Type:	Comment
Respondent:	Canal and River Trust	Agent:	-

Summary:

-

Full Submission:

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 own and manage the Leeds & Liverpool Canal, which runs east-west through the area covered by the Neighbourhood Plan. Our waterways are acknowledged as significant green infrastructure, but they also function as blue infrastructure, serving as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; and a contributor to water supply and transfer, drainage and flood management.

Bingley 5 rise lies on this stretch of canal, and is an important area of historic interest, which attracts visitors to the area. The Trust made previous comments to Bingley Town Council in relation to the regulation 14 consultation. We note that changes have been made to the plan since these comments have been made, which do address our comments to a degree.

Consultation point:	2. The Role and Scope of the Neighbourhood Plan		
Representation ID:	30410	Comment Type:	Comment
Respondent:	Coal Authority (7675)	Agent:	-

Summary:			
-			
Full Submission:			
<p>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.</p> <p>Our records indicate that within the Bingley Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including; mine entries and coal workings. These features may pose a potential risk to surface stability and public safety.</p> <p>However, we note that the Neighbourhood Plan does not propose to allocate any sites for new development and on this basis I can confirm that the Planning team at the Coal Authority has no specific comments to make on this document.</p>			

Consultation point:	2. The Role and Scope of the Neighbourhood Plan		
Representation ID:	30415	Comment Type:	Comment
Respondent:	National Grid Electricity Transmission (7678)	Agent:	Fisher German LLP

Summary:			
-			

Full Submission:

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document 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 Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Please also consult with NESO separately from NGET.

NGET assets within the Plan area

Following a review of the above Neighbourhood Plan, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

Asset Description

- 4ZZ ROUTE TWR (001 - 122): 400kV Overhead Transmission Line route: MONK FRYSTON - PADIHAM 1 BRADFORD WEST - MONK FRYSTON 2
- 4ZZ ROUTE TWR (122 - 157): 400kV Overhead Transmission Line route: BRADFORD WEST - PADIHAM 1 BRADFORD WEST - MONK FRYSTON 2
- YW ROUTE: 275kV Overhead Transmission Line route: BRADFORD WEST - ELLAND 1 ELLAND - KIRKSTALL 'A' 2
- VR ROUTE: 275kV Overhead Transmission Line route: BRADFORD WEST - KIRKSTALL A.
- VR ROUTE: 275kV Overhead Transmission Line route: BRADFORD WEST - KIRKSTALL A 1 ELLAND - KIRKSTALL A 2
- Electrical Substation: BRADFORD WEST 275KV S/S

- Electrical Substation: BRADFORD WEST 132KV S/S
- VR013 - VR014 CABLE SECT: 02-20 275KV ELLAND - KIRKSTALL A
- VR013 - VR014 CABLE SECTION 02-20 275KV BRADFORD WEST - KIRKSTALL A

A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

New Infrastructure

Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Accordingly, we request that the Council is cognisant of the above.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

Consultation point:	2. The Role and Scope of the Neighbourhood Plan		
Representation ID:	30417	Comment Type:	Comment
Respondent:	Natural England (7376)	Agent:	-

Summary:

-

Full Submission:

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.

Consultation point:	2. The Role and Scope of the Neighbourhood Plan		
Representation ID:	30418	Comment Type:	Comment
Respondent:	Historic England (7683)	Agent:	-

Summary:

-

Full Submission:

We have considered the Submission Draft and do not wish to comment further on the proposed Neighbourhood Plan. We look forward to being notified of the Making of the Neighbourhood Plan, following the Examination and Referendum.

Consultation point:	2. The Role and Scope of the Neighbourhood Plan		
Representation ID:	30419	Comment Type:	Comment
Respondent:	Environment Agency (7684)	Agent:	-

Summary:

-

Full Submission:

Thank you for inviting the Environment Agency to comment upon the Submission of the Bingley Neighbourhood Development Plan and supporting documents, including screening of the Strategic Environmental Assessment and Habitat Regulations Assessment.

We note that Bingley Town Council has formally submitted a Neighbourhood Development Plan for the parish area in conjunction with the local community. This process is in accordance with the Town and Country Planning Act 1990, the Localism Act 2011 and the Neighbourhood Planning (General) Regulations

2012 (as amended). We previously commented on the Draft of the Bingley Neighbourhood Plan (Regulation 14). This was formally sent to Bradford Town Council on 12 April 2024. At the Full Council meeting of Bingley Town Council held on 25th February 2025, we understand it was resolved to agree to move to Regulation 15 of the Neighbourhood Plan process. This consultation is the next step in this process.

ENVIRONMENT AGENCY POSITION

The Environment Agency do not have any objections to the Submission of the Bingley Neighbourhood Development Plan (BNDP).

We will take the opportunity to comment on key elements that fall within our land-use planning remit and where we consider it may present a lack of cohesion with the local development plan.

Key headlines will reveal that we continue to support key elements of sustainable development, design and an emphasis on the value of green infrastructure. We remain cautious that the Submission BNDP falls short in raising the profile of climate change, while also failing to maximise the potential role of development that interacts with the water environment.

The Environment Agency maintains its support to contribute towards future development and key issues that have been identified of importance by local communities.

The Environment Agency will not repeat comments made at the previous stage as we did not object to any aspect. We will however underline key omissions that we consider are missed opportunities for positive outcomes and you may want to reflect upon these in the future.

Consultation point:	2. The Role and Scope of the Neighbourhood Plan – Paragraph 2.7		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

CBMDC has creating several Development Frameworks for parts of the District including Bingley. A draft version was issued for community and stakeholder engagement in October/November 2023 and was subsequently approved by CBMDC’s Executive in April 2025. The Development Framework looks to the longer term (next 15 to 20 years) and sets out an overarching vision, objectives and potential interventions for the regeneration of Bingley. The vision, objectives and potential interventions have been shaped by local stakeholders’ views.

As a component of Bradford's Economic Growth Plan, the role of the Development Framework is to act as a guide for development within Bingley, as well as encourage and attract new investment into the area. It provides clear principles which promote social, economic and environmental benefits which are informed by Bingley's local context and are underpinned by the strategic and policy context both nationally and locally.

It is considered that an additional paragraph titled "Bingley Development Framework" should be inserted between sections 2.7 and 2.8 of the NDP document, providing a short summary of the role of the development framework. The following wording is suggested: "*CBMDC has prepared a Development Framework for Bingley to act as a guide for development as well as to encourage and attract new investment over the next 10 to 15 years. It includes vision and objectives and identifies potential development opportunities and interventions, which are indicative only. However, it should be noted that the framework is not a funded programme of activity or a detailed delivery plan*".

4. SECTION 4: SOCIAL, ECONOMIC AND ENVIRONMENTAL CHARACTERISTICS

Consultation point:	4. Social, Economic & Environmental Characteristics – Figure 4		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
It should be noted that the date axis of the graph contains a typographical error – ‘Januaray 2003’ should be amended to read ‘January 2003’

Consultation point:	4. Social, Economic & Environmental Characteristics – Paragraphs 4.5.1 to 4.5.3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
Generally, the environmental characteristics section (and in the plan more generally) refers to the built and/or human environment and does not discuss nature, biodiversity or wildlife. It is considered that much more could be made of the potential to protect and enhance areas for nature.

Consultation point:	4. Social, Economic & Environmental Characteristics – Paragraphs 4.5.1 to 4.5.2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
It should be noted that the Bradford Pennine Gateway National Nature Reserve (NNR) was formally designated in March 2025 as part of series of NNRs to mark the coronation of the King Charles III. It covers 1,272 hectares across eight sites in the Bradford and South Pennines area including within and adjacent to the designated Bingley Neighbourhood Area. These include Baildon Moor and Shipley Glen, Trench Meadows, Bingley North Bog and the St Ives Estate. Accordingly, it suggested that this section of the draft plan is brought up to date to reflect this important new designation.

Consultation point:	4. Social, Economic & Environmental Characteristics – Paragraph 4.5.2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:

The sixth sentence paragraph 4.5.2 refers to the Leeds Liverpool Canal being a designated Local Wildlife Site (LWS). It should be noted that there is a total of fourteen designated LWS's including the Canal within the neighbourhood area. In addition, the neighbourhood area is immediately adjacent to four designated LWS's.

It is recommended that the wording of this sentence be amended to read: *“There are also 14 designated Local Wildlife Sites (LWS) within the Bingley area, including the Leeds-Liverpool Canal and Gilstead Moor Edge & Prince of Wales Park amongst them, with a further 4 LWS's immediately adjacent to the neighbourhood area boundary in neighbouring parishes”*.

The LWS's within the neighbourhood area are:

- Bingley North Bog
- Cottingley Woods – Black Hills
- Ewe Hills
- Gilstead Moor Edge & Prince of Wales Park
- Graincliffe & Compensation Reservoir
- Great Wood – West Wood
- Hazel Beck
- Hollin Plantation
- Milnerfield Traditional Orchard
- Milnerfield Woods
- Rye Loaf Hill
- Shipley Glen
- St Ives Estate
- Transfield Wood

The LWS's immediately adjacent to the neighbourhood area are:

- Baildon Moor
- Hirst Wood
- Marley Wood
- West of Shipley High Moor

It should also be noted that Prince of Wales Park has been designated as a Local Nature Reserve (LNR). See details on the [CBMDC](#) and [Friends of Prince of Wales Park](#) websites.

There is no mention of the Wildlife Habitat Network in the Neighbourhood Plan, this is the West Yorkshire-wide network of habitats that provide corridors and connectivity for wildlife.

5. SECTION 6: OUR VISION AND DEVELOPMENT OBJECTIVES

Consultation point:	5. Our Vision and Development Objectives		
Representation ID:	30420	Comment Type:	Comment
Respondent:	Environment Agency (7684)	Agent:	-

Summary:

-

Full Submission:

The Environment Agency has no critical comment on the Vision or Objectives. 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 omitted in this Submission BNDP.

We again underline that there is a missed opportunity to better reflect and promote the valuable natural asset of water resources, while integrating Green-Blue Infrastructure as potential mitigating solutions.

We welcome the added reference to the River Aire but highlight the limited consideration of other named watercourses, becks or tributaries.

Consultation point:	5. Our Vision and Development Objectives		
Representation ID:	30422	Comment Type:	Comment
Respondent:	Environment Agency (7684)	Agent:	-

Summary:

-

Full Submission:

FLOOD RISK

Flood risk should be a major consideration in your Plan. While we acknowledge that the Submission BNDP will likely seek to avoid duplication with other aspects of the Local Development Plan, we would have expected to see some integration.

Flood, flooding and/or flood risk is entirely omitted from the Submission NDP. This includes both fluvial (river) and pluvial (surface) water flood risk.

These aspects will continue be a challenge of particular relevance to aspects of physical development, such as housing, new business, retail and employment land. Relevant signposting to national and local plan policy and guidance may assist applicants.

Again, we note that there is no reference to either the Strategic Flood Risk Assessment (SFRA) or to Local Plan flood risk policies. At the very least, the Submission NDP should ideally alert all stakeholders to the importance of the SFRA when considering any future development in areas of high flood risk. Our previous reply listed the key flood risk elements we suggested should be added.

It is recommended that you consult your Lead Local Flood Authority (LLFA) regarding the proposed development and management of surface water within the Submission NDP. The LLFA is now the responsible authority for commenting on the surface water drainage arrangements.

Consultation point:	5. Our Vision and Development Objectives – Paragraph 5.1.3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It should be noted that the planning consent for 400 dwellings referred to in the paragraph is an outline planning consent.

6. SECTION 6: COMMUNITY PRIORITIES AND ASPIRATIONS

Consultation point:	6. Community Priorities and Aspirations		
Representation ID:	30395	Comment Type:	Object
Respondent:	Astles (7668)	Agent:	-
Summary:			
-			
Full Submission:			
Bingley Grammar School is not in Crossflatts which is stated in this document it is in Bingley. The Bingley area starts just after the train station and the school is after that.			
Change suggested by respondent:			
Incorrect information which should be corrected			
Consultation point:	6. Community Priorities and Aspirations – Paragraphs 6.1.1 to 6.1.7 and Table 1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			

The inclusion of this chapter is welcomed. Previous comments relating the need to highlight that not all the matters/issues/aspirations identified can be addressed via the neighbourhood plan or the planning system have been addressed. It is also helpful to see reference being made in Paragraph 6.1.3 that many of the priorities/aspirations will be delivered working with a range of other groups, bodies or organisations.

Consultation point:	6. Community Priorities and Aspirations – Table 1 – Crossflatts Community & Leisure		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

This section of the table refers a community aspiration to retain St. Aiden’s Church and its associated hall as well as the local over 50’s club, public house and social club. The action column lists the public house and social club as being “sui generis” in terms of their use class.

It should be noted that “sui generis” is not a use class. It is a term used to cover those uses that do not fit within one of the Use Classes set out in the Use Classes Order 1987 as amended in September 2020, April 2021 and August 2021. There are several circumstances using permitted development rights that those uses within the sui generis category can changes to another use.

The wording within this section should be corrected in the referendum draft version of the neighbourhood plan.

Consultation point:	Policy BING1: Community Facilities		
Representation ID:	30411	Comment Type:	Comment
Respondent:	Theatres Trust	Agent:	-

Summary:

-

Full Submission:

We support this policy and the plan's aspiration to protect valued facilities including Bingley Arts Centre/Little Theatre. For enhanced effectiveness and robustness we recommend extension of the period of evidence to 18-24 months, and an absolute minimum of 12 months. Paragraph 98 of the NPPF (2024) guards against unnecessary loss. We consider six months would be insufficient to demonstrate redundancy, and would make it more challenging for community groups or others to seek to fundraise and bid to take on facilities.

Consultation point:	Policy BING1: Community Facilities		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

The policy and accompanying table set out a range of community facilities falling within Use Classes E and/or F2 as well as those that fall into the “sui generis” category that the plan seeks protect. The latter (“sui generis”) is not a use class, it is a term used to cover those uses that do not fit within one of the Use Classes set out in the Use Classes Order 1987 as amended in September 2020, April 2021 and August 2021. The plan should reflect this.

This section of the plan should potentially include some explanation of use classes and their role, Also it should acknowledge that change of use can be permitted development within a Use Class, especially Class E. Furthermore, it should be noted that Use Class E does not cover ‘community facilities’; that would be Class F: ‘Local Community and Learning’. The list of facilities in the first column of the table should be reviewed to ensure that they fall within the correct Use Class and consequently the correct column in table. For example, the churches listed in Crossflatts (St Aiden’s), Gilstead (St Wilfrid’s), Cottingley (Littlelands) and Bingley (All Saints) fall within Use Class F1 (Learning & Non-Residential Institutions). Also, the Ryshworth Club in Crossflatts is more likely to be listed as “sui generis”.

7. SECTION 7: ENCOURAGING A WELL-DESIGNED BUILT ENVIRONMENT

Consultation point:	7. Encouraging a Well-Designed Built Environment		
Representation ID:	30426	Comment Type:	Comment
Respondent:	Environment Agency (7684)	Agent:	-

Summary:

-

Full Submission:

SITE DESIGN

The Environment Agency welcomes relevant direction presented to developers that all proposals will need to address issues of sustainability. We would like to propose that a positive emphasis here could be revised to promote sustainability opportunities. A drive towards delivering the conservation and enhancement of natural environment elements could still be strengthened however by clearly defining, where and how, tools such as Biodiversity Net Gain and Climate Change Mitigation could deliver meaningful improvement.

We continue to underline that this has not been added or signposted to information elsewhere.

Consultation point:	7. Encouraging a Well-Designed Built Environment – Table 2 – Design Code PR01		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

The proposed design code makes mention of shared spaces. Active Travel England (ATE) (a key consultee) do not support the provision of shared spaces. As such this should be amended. It should also be noted the Design Code (Appendix C) does not refer to shared space under PR01.

Consultation point:	7. Encouraging a Well-Designed Built Environment – Table 2 – Design Code PR09		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is considered that the guidance are all good suggestions for the development to include. CBMDC has a Homes and Neighbourhoods Design Guide which specifies street tree planting, native hedgerows and Sustainable Urban Drainage. These all contribute positively to biodiversity on developments and have benefits for amenity, health and well-being, flood risk and urban heating.

Consultation point:	7. Encouraging a Well-Designed Built Environment – Table 3 – Summary of Concept Masterplans		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is noted that the masterplan makes no reference to Green Infrastructure Improvements such as tree planting in urban or rural areas. There is no mention of the protection or enhancement of green corridors like the canal or river. There are no measures to enhance urban areas for nature. There is no mention of the Wildlife Habitat Network in the Neighbourhood Plan, this is the West Yorkshire-wide network of habitats that provide corridors and connectivity for wildlife.

Consultation point:	7. Encouraging a Well-Designed Built Environment – Table 3 – Summary of Concept Masterplans - Crossflatts		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

The table contains several proposals and interventions relating to the creation/provision of new transport infrastructure in Crossflatts. Point 2 refers to a “*Potential new road connecting south, north and further east*”, whilst Point refers to a “*New cycle route into the site and further east*”. It is not clear what these proposals/interventions refer to and their location and/or purpose. It is queried whether they related to the proposed development at Sty Lane.

Consultation point:	Policy BING2: Design of New Development in Bingley		
Representation ID:	30421	Comment Type:	Comment
Respondent:	Environment Agency (7684)	Agent:	-

Summary:

-

Full Submission:

The Environment Agency recognises that a Climate Emergency was declared by CBMDC in January 2019. We support and welcome an underlined link between climate change resilience and likelihood of extreme weather episodes, including increased flooding events.

This remains of fundamental importance to the remit of the Environment Agency.

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 Bingley NDP. Policies that promote the wider benefits of Green-Blue Infrastructure could be reinforced and supporting text used as a clear justification to combat the negative effects of climate change.

We note and support the Design Code PR10 Sustainable Development and Climate Change. That said, the Key Guidance is limited. It also omits obvious development tools, such as: sustainable drainage systems (SuDS), flood risk standing advice, opportunities for flood storage and integration with natural flood management (NFM) to possibly exploit win-win outcomes with ecology.

Consultation point:	Policy BING2: Design of New Development in Bingley		
Representation ID:	30423	Comment Type:	Comment
Respondent:	Environment Agency (7684)	Agent:	-

Summary:

-

Full Submission:

SITE ALLOCATIONS

We note that a review of the CBMDC Local Plan is ongoing and, based upon the emerging 2021 allocations, each community in the Bradford area will be required to deliver a defined target over the period of the Local Plan. Specifically, the housing allocation for Bingley will likely be met by a mixture of sites within the Settlement Boundary and those that may be newly released from the review of the Green Belt.

In terms of flood risk most housing development remains either a more or highly vulnerable land-use classification. From an advance stage we would prefer that this highlighted when considering future housing proposals, particularly windfall development. These comments may be equally applied to new business, retail and employment land, including reference to the relevant vulnerability classification.

The Environment Agency further notes that, while importantly underlining valued community aims, Neighbourhood Plans are limited in their overall influence.

As such we understand the Plan does not allocate specific sites for development and when supporting existing or promoting any new allocations it will work in accordance with the CBMDC Local Plan. We acknowledge that to allocate within this Neighbourhood Plan would only duplicate the allocation carried out by CBMDC.

Consultation point:	Policy BING2: Design of New Development in Bingley		
Representation ID:	30427	Comment Type:	Comment
Respondent:	Environment Agency (7684)	Agent:	-

Summary:

-

Full Submission:

SUSTAINABLE CONSTRUCTION

The Submission 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 for rainwater harvesting and waste collection in design. We question if adequate scope has been given to both the process and material selection to reflect energy efficiency and climate change adaptation.

We welcome and provide limited support to the Design Codes PR08 Newbuilds and Extensions, PR09 Environmental and Biodiversity and PR10 Sustainable Development and Climate Change. Again, we further question the aspirations here and contest that the Key Guidance measures are overly passive, not prescriptive and do not satisfactorily layout priorities in relation to defined obligations through existing legislation. The measures as listed.

This suggests that future development may not be required to undertake statutory aspects, like flood mitigation, surface water management and/ or BNG.

Consultation point:	Policy BING2: Design of New Development in Bingley		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Policy BING2: Design of New Development in Bingley		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
There two typographical errors with the policy text. There are contained Criterion 1c where ‘chracter’ should be amended to ‘character’, and Criterion 4 where ‘overaching@ should be amended to ‘overarching’

Consultation point:	7. Encouraging a Well-Designed Built Environment – Paragraphs 7.1.1 to 7.4.3 and Policy BING2: Design of New Development in Bingley		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
It should be noted that CBMDC already has an adopted Shopfront Design Guide Supplementary Planning Document, with should be read in conjunction with the adopted Core Strategy. There is also second SPD entitled The Shopkeepers Guide to Securing Premises. The various Conservation Area Assessments for the neighbourhood area also contain advice/guidance that can be applied to development proposals. Other documents that should also be referenced are the National Design Guide and National Model Design Code.

It is therefore suggested that the first paragraph of the policy is amended to read “*Where appropriate, proposals for new development to the general design principles and requirements of the Bingley Town Centre and Local Centres Design Code, and the Concept Masterplans for the towns and village, as well as the relevant local and national design planning policies and guidance:...*”. The wider policy background should also be referenced in the supporting text. At the very least they should be referred to/listed in the policy links beneath the policy box.

8. SECTION 8: IMPROVING BINGLEY TOWN CENTRE

Consultation point:	8. Improving Bingley Town Centre		
Representation ID:	30394	Comment Type:	Object
Respondent:	Astles (7668)	Agent:	-

Summary:

-

Full Submission:

Not thinking of local residents. No more cycle lanes or pedestrian rights if way

Change suggested by respondent:

Remove pedestrianisation

Consultation point:	8. Improving Bingley Town Centre		
Representation ID:	30398	Comment Type:	Comment
Respondent:	Burnett (7669)	Agent:	-

Summary:

-

Full Submission:

Support revitalising the town centre but emphasise addressing empty bank buildings and decaying shopfronts through adaptive re-use, incentives for independent businesses and flexible co-working hubs.

Upgrade community facilities - diversify the arts centre for youth and families, extend library hours and create multi-use learning spaces for adult training. Activate the high street with regular events, markets and performances; use the under-utilised Market Square as a civic space. Implement shopfront improvement guidance and ensure high design standards for any fast-food outlet to promote healthy options and local employment. Re-establish a business networking forum and provide affordable premises to attract start-ups, ensuring regeneration benefits younger families and the wider community.

Consultation point:	8. Improving Bingley Town Centre		
Representation ID:	30401	Comment Type:	Comment
Respondent:	Burnett (7669)	Agent:	-

Summary:

-

Full Submission:

I support efforts to revitalise Bingley town centre but urge stronger action on decaying buildings and empty high-street banks. Introduce maintenance standards and incentives for owners to convert vacant units into co-working spaces, youth and family facilities or affordable housing. Support independent businesses with business rate relief and pop-up markets, and introduce shopfront improvement guidance. Re-energise the arts centre and library with extended hours, adult training and family programmes, and transform the under-used market square into a civic hub. Connect parks to the town centre via attractive green routes and provide toilets and seating. Address the shortage of youth facilities and indoor sports. Take a balanced approach to fast-food outlets by focusing on design quality, healthier menu options and local jobs.

Consultation point:	8. Improving Bingley Town Centre		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

See comments on Paragraphs 7.1.1 to 7.4.3 and Policy BING2 set out above and the need to consider the wider local and national planning policy/guidance context relating to design matters. Again, this wider context should be referenced appropriately within this chapter of the neighbourhood plan.

Consultation point:	8. Improving Bingley Town Centre – Figure 5		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
The Town Centre Masterplan should show a cycle route running along Main Street

Consultation point:	8. Improving Bingley Town Centre – Figure 5		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
<p>Agree with the concepts in the Masterplan; however, there is no active consideration of buses. These could be considered more explicitly.</p> <p>It is also questioned as to whether encouragement should be given to extending the car park at Bingley Station as this will encourage more traffic. It would be more appropriate to show/encourage the provision of more sustainable transport modes and a mobility hub? Increasing the capacity at the Railway Station Car Park is not supported. The focus should be on improving facilities for buses, pedestrians, and cyclists.</p>

Consultation point:	8. Improving Bingley Town Centre – Figure 6		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
It would be useful to show the current town centre boundary as defined in the Bradford Replacement Unitary Development Plan (RUDP) alongside the proposed town centre boundary to allow a comparison to be made

Consultation point:	8. Improving Bingley Town Centre – Paragraph 8.2.9 and Figure 6		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
The proposed Town Centre Boundary excludes the site of the former magistrates’ court. It is currently included within the current town centre boundary. This proposed change/omission is objected to as there is not any compelling planning justification for the site’s exclusion. While currently vacant, the site has active development interest for uses that fall within the definition of ‘main town centre uses’. In addition, there is an extant planning permission in place for a residential development intended for retirement living (Use Class C3).

Town centres are expected to accommodate a wide and complementary mix of uses. According to the National Planning Policy Framework/Guidance residential developments — including specialist housing such as retirement living — are considered appropriate within town centres, as they contribute positively to their vitality. These uses increase footfall, improve access to local services, and support the wider town centre economy. For these reasons, it is recommended that the former magistrates’ court site remain within the defined town centre boundary.

Consultation point:	Policy BING3: Bingley Town Centre		
Representation ID:	30414	Comment Type:	Comment
Respondent:	Holdgate (548)	Agent:	-

Summary:

Full Submission:

Much of the town centre discussion within the Plan focusses on buildings and retail.

I wish to state that in line with Bradford's enlightened view that city centres benefit from residents; people will ensure Bingley remains a vibrant community. Bingley needs to use brownfield sites and to repurpose redundant buildings to create homes which are within easy reach of transport links, shops, schools, recreation opportunities and health provision.

The Plan aims "to enhance Bingley's landscape and heritage". Green Belt must be cherished for future generations. Home building focus should be around the town centre and should not destroy the green spaces which make Bingley a special place to visit and live.

The Green Belt which surrounds Bingley satisfies National Planning Policy in its 5 purposes.

Consultation point:	8. Improving Bingley Town Centre – Paragraph 8.6.14		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-
Full Submission:
This paragraph is referring to better use of the Market Square. Point E refers to recreation proposals at St Ives Estate which is not relevant in this section of the Plan and should be removed or repositioned elsewhere in the document.

9. SECTION 9: CREATING AN ATTRACTIVE ENVIRONMENT FOR BUSINESS INVESTMENT

Consultation point:	9. Creating an Attractive Environment for Business Investment – Paragraphs 9.2.1 to 9.2.5		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

These paragraphs highlight those areas/sites that were safeguard or allocated in the Replacement Unitary Development (RUDP) 2005 for employment purposes. The Regulation 18 (Preferred Options) version of emerging Local Plan, published in early 2021, proposed to retain one employment zone in Bingley, previously identified in the RUDP under the reference S/E6.2: Crossflatts (retained under draft Local Plan Policy EC2d) and allocate two sites – B19/E: Castlefields and B110/E: John Escritt Road.

As correctly identified in the draft neighbourhood plan the Employment Zone reference S/E6.1 has been substantial removed. In relation to the sites referred to as S/E1.10 and S/E1.14, the former has been developed for industrial/employment use, whilst the latter previously formed the overspill car for the adjacent office building.

It should be noted that these designations/allocations have yet to be finalised. Work is ongoing to identify future employment land requirements and potential sites to deliver it as part of developing the Regulation 19 (Publication/Submission) version of the emerging Local Plan. This should be highlighted within the Plan to reflect the currently local planning policy background.

Consultation point:	9. Creating an Attractive Environment for Business Investment – Paragraph 9.2.10		
Representation ID:	-	Comment Type:	Comment

Consultation point:	9. Creating an Attractive Environment for Business Investment – Paragraph 9.2.10		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is noted that this paragraph has been expanded to explain what is meant in the policy text in relation to sites/buildings being “positively marketed” and the level of information that may be required as part of any future planning application. This partly addresses comments made at the Regulation 14 stage.

It is likely much of this would be covered as part of a planning statement submitted alongside the application, including how any marketing/sales exercise would have been undertaken including methods used. It is suggested that a degree of flexibility is added to the wording of second sentence of this paragraph as not all of the listed methods may be appropriate. Accordingly, the following is suggested: *“Applicants will demonstrate the genuine marketing efforts required in Policy BING4 by the following means, where appropriate:...”*

Consideration, however, needs to be given to as to whether the some of the requirements may be too onerous and difficult to enforce/implement through the planning system, in particular the fourth and fifth requirements.

For example, in the fourth requirement relates to *“other suitable alternative uses agreed with the Council”* (which it is assumed means the Town Council) and the applicant needing to submit at least three comparable. It is not considered appropriate for the Council to determine which uses may or may not be suitable and goes beyond the provisions of adopted Core Strategy Policy EC4 and does not allow for any flexibility. The wording *“..agreed with the Council (applicants should submit at least three recent comparables)”* be deleted from the text.

The fifth requirements may not be able to be enforced as much of this information could be classed as commercially confidential and/or sensitive as it potentially relates to transactions and/or discussions between different parties. As such it is not appropriate to mandate this. Accordingly, this paragraph should be deleted from the neighbourhood plan document.

The proposed length that plan requires an employment site/premises to be marketed for a continual period of six months over a 12-month period. This is inconsistent with the requirement of adopted Core Strategy Policy, which requires such sites/premises to be marketed for a two-year period. The timeframe proposed should be explained within the supporting text for the policy.

Consultation point:	Policy BING4: Current and Future Employment Sites and Buildings		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is suggested that this policy could be include further detail. Accordingly, the following wording is suggested for the policy:
“Development proposals for new or enhanced employment uses, particular those that improve the attractiveness, functionality and operational effectiveness of existing employment sites, will be supported, subject meeting all other relevant local and neighbourhood plan policies.
Where possible, the retention of sites and buildings, currently in use for employment in Use Classes E(g), B2 and B8 is encouraged to support local economic development and business growth in the Bingley Neighbourhood Area.
Proposals for development that results in the loss of such sites and buildings will not be supporting unless it can be demonstrated that it is no longer suitable or viable for employment use in terms of its location, accessibility, environmental impacts and surrounding land uses. Evidence should also be provided showing the site and/or building has been marketed for its current use or suitable alternative employment use consistent with the provisions of Core Strategy Policy EC3”.

Consultation point:	Policy BING4: Current and Future Employment Sites and Buildings		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:			
The second paragraph of the policy wording contains a typographical error. The word ' <i>funcionality</i> ' should be amended to read ' <i>functionality</i> '			
Consultation point:	Policy BING4: Current and Future Employment Sites and Buildings		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			
The list of strategic planning policies under the policy text for BING4 should refer to " <i>Core Strategy Policy EC4</i> " rather than " <i>Policy EC3</i> ".			
Consultation point:	Policy BING4: Current and Future Employment Sites and Buildings and BING5: Supporting Small and Start Up Businesses		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			

The draft Plan’s support for indigenous businesses, protecting existing employment assets and provision of new smaller industrial units are all to be encouraged. This approach is broadly supported

Consultation point:	Policy BING5: Supporting Small and Start Up Businesses		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It should be noted that the policy wording contains a typographical error. The word “*proivision*” should be amended to read “*provision*”.

Consultation point:	Policy BING5: Supporting Small and Start Up Businesses		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

Reference should be to the Local Plan within the Policy, not the Local Development Plan.

Consultation point:	Policy BING5: Supporting Small and Start Up Businesses		
Representation ID:	30397	Comment Type:	Comment
Respondent:	Burnett (7669)	Agent:	-

Summary:
-
Full Submission:
<p>Bingley needs to move beyond recognition of its potential for small firms and proactively build an inclusive business ecosystem. Vacant or poorly maintained buildings and high rents make it hard for start-ups, so the plan should provide incentives for landlords to refurbish and offer affordable co working or incubator space. With the Chamber of Commerce gone, a new business network should offer mentoring, training and shared services, particularly for young entrepreneurs.</p> <p>Combining support for start-ups in barns and mills with grants for energy efficient retrofits, digital infrastructure, apprenticeships and regular markets will help retain talent and enliven the town centre.</p>

Consultation point:	9. Creating an Attractive Environment for Business Investment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:

It is noted the draft Plan appears to be light on is the role of the tourism sector within the Bingley area. Whilst there is some recognition the town is visited by tourists there is no commentary on how this could be increased. The number of people taking UK based holidays (long and short breaks) is increasing and expected to continue for the next 5 years, demonstrating strong potential in the market.

Bingley probably has an untapped market for increased tourism – it is queried what is the market for increasing hotels, B&Bs AirBnBs, caravan, motorhome and camping sites, canal facilities etc? The beneficial effects of tourism with spend in retail shops, bars, restaurants etc could be significant over the period of the plan and this sector of the economy may need some further research to assess whether more detail is required.

10. SECTION 10: MEETING LOCAL HOUSING NEEDS

Consultation point:	10. Meeting Local Housing Needs		
Representation ID:	30391	Comment Type:	Comment
Respondent:	Forbes (7667)	Agent:	-

Summary:	-		
Full Submission:	Keep Crossflatts separate from Bingley for it's own identity. There is not enough infrastructure in Crossflatts to support all the new builds that are already here!		

Consultation point:	10. Meeting Local Housing Needs – Paragraph 10.1.1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	-		
Full Submission:	<p>The housing requirement set out for Bingley in the adopted Core Strategy is 1,400 dwellings (between 2013 and 2030) and in the emerging Local Plan is 850 dwellings (between 2020 and 2038), although it is noted that the wording in the second sentence refers to the emerging Local Plan requirement as being 1,000 homes.</p> <p>The wording of this paragraph should be corrected to reflect that above and it should be highlighted that the emerging Local Plan has yet to be finalised.</p>		

Consultation point:	10. Meeting Local Housing Needs – Paragraphs 10.7.1 & 10.7.2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is noted that the supporting text for the policy (Paragraphs 10.7.1 and 10.7.2) refers to adopted Core Strategy Policies HO8 and HO11 in respect of housing mix and affordable housing provision as well as the Strategic Housing Market Assessment.

Paragraph 10.7.2 and the first paragraph of the policy wording could be construed as only requiring a prospective applicant for housing to only have regard to the Bingley Housing Needs Assessment in formulating their proposals. It is suggested that the wording of this paragraph should be amended to better reflect that the applicants should have regard to the wider policy and evidence context. The following is suggested: *“Proposals for new housing in Bingley, subject to viability, should ensure that provision is made for an appropriate mix, size, type and tenure of dwellings, including the provision affordable housing, to meet local needs. Regard should be had to the wider local planning policy context, together with other relevant, robust and up to date evidence of need including the Bradford Strategic Housing Market Assessment and the Bingley Housing Needs Assessment. In particular, the following should be considered....”*

Consultation point:	Policy BING6: New Housing in Bingley		
Representation ID:	30396	Comment Type:	Comment
Respondent:	Burnett (7669)	Agent:	-

Summary:

-

Full Submission:

Bingley’s housing strategy must redress demographic imbalance by prioritising more affordable 1- to 3-bedroom homes to attract young families and first-time buyers. On-site affordable housing is essential to create inclusive communities, and the rent-to-sale split should ensure ample social rent and shared-ownership options. The focus on specialist housing for older people is important but should not dominate. New homes should be energy-efficient with renewable technologies (solar, heat pumps, micro-hydro) and follow lifetime-homes principles. Developments must include green spaces, play areas and community facilities like libraries, adult education and child-friendly venues so residents of all ages can thrive.

Consultation point:	Policy BING6: New Housing in Bingley		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

Criterion 1 of the policy requires affordable housing provision in the Bingley Neighbourhood Plan area to have a tenure split of 65% for rent, with and 35% for affordable home ownership products, based on the recommendations of the Bingley Housing Needs Assessment. It should be noted that Paragraph 5.3.190 of the adopted Core Strategy states that the CBMDC’s preferred tenure mix is 70% social/affordable rent to 30% intermediate tenure is the starting point for all affordable housing negotiations. It should be noted that the exact tenure split/mix will be determined as part of the planning application process.

Accordingly, the following amendment is suggested to address this and ensure the policy is more flexible in nature:

“1. Broad Tenure Split – where appropriate, affordable housing provision should have a tenure split of 65% for rent and 35% for sale, unless evidence demonstrates that other tenure splits are required”

Consultation point:	Policy BING6: New Housing in Bingley		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Policy BING6: New Housing in Bingley		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

Criterion 2 refers to affordable housing being provided on-site as part of development of more than 15 dwellings. This is broadly in line with Core Strategy Policy HO11. It is suggested that the wording should be amended to read “affordable housing provision” as the use of the word “on-site” is un-necessary as the approach is explained in the subsequent text.

It must also be highlighted that the adopted Core Strategy Policy HO11 applies a lower threshold of 11 dwellings, where affordable housing will be sought (subject to viability) in Cottingley, which is covered by the neighbourhood development plan. This lower threshold for Cottingley should be reflected within the policy wording and/or within the supporting text for it to ensure consistent with the wider strategic planning context.

Consultation point:	Policy BING6: New Housing in Bingley		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

Criterion 3 states that proposals should demonstrate how it they meet the requirements for the provision of dwellings of various sizes and seeks to limit the number of dwellings with four or more bedrooms on large sites. It is noted that a threshold of 15 dwellings is used to determine a “large site”.

Paragraph 5.3.123 of the adopted Core Strategy (the supporting text for Policy HO8) states that larger sites of 0.4ha or 10 dwellings (or more) are expected to deliver a mix of housing under the policy. The proposed threshold set out in Policy BING6 is inconsistent with adopted local planning policy. The reasoning/justification for using a threshold of 15 dwellings to define a “large site” should be set out in the plan. If not, the threshold should be amended to reflect that set out in the Core Strategy

Consultation point:	Policy BING6: New Housing in Bingley		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is noted that Criterion 4 relates to the provision of “Homes for Younger Households”, a change from the Regulation 14 draft of the plan, where reference was made to “Newly Forming Households”, although the justification for it set out in Paragraphs 10.6.1 and 10.6.2 remains the same

It is not clear how such households can or will be determined through the planning system, and whether it can be justified or delivered. Further explanation is needed within the policy and/or the supporting text to explain this including thresholds for determining “younger households” and how it is expected to be demonstrated as part of planning applications.

11. SECTION 11: WALKING, CYCLING AND GREEN INFRASTRUCTURE

Consultation point:	11. Walking, Cycling and Green Infrastructure		
Representation ID:	30392	Comment Type:	Comment
Respondent:	Forbes (7667)	Agent:	-

Summary:

Full Submission:

Walkers and Cyclists do not mix. It's only a matter of time before a pedestrian is killed or seriously injured by a cyclist on the canal towpath. If Cyclists must be allowed then they should have an identifier like cars have. Also electric vehicle use on towpaths and footpaths needs to be policed properly before a pedestrian is killed or seriously injured. Walking is free and should take precedence.

Consultation point:	11. Walking, Cycling and Green Infrastructure		
Representation ID:	30393	Comment Type:	Object
Respondent:	Astles (7668)	Agent:	-

Summary:

-

Full Submission:

Absolutely ridiculous to consider making Bingley town centre pedestrian zone. I live in Bingley but work elsewhere, not everybody can drive or use the train.

Change suggested by respondent:

No more cycle lanes or pedestrianisation

Consultation point:	11. Walking, Cycling and Green Infrastructure		
Representation ID:	30399	Comment Type:	Comment
Respondent:	Burnett (7669)	Agent:	-

Summary:

-

Full Submission:

I support the aim of a walkable, cyclable Bingley but emphasise including motorists through education and behaviour-change programmes. Infrastructure must be safe, well-lit and maintained, with safe crossings at the A650 and along routes from Cottingley and Gilstead. Connect parks with play trails and educational features, add seating and inclusive equipment, and improve signage. Provide toilets, water points and visible cycle stands, and address dog-waste issues. Explore renewable energy such as micro-hydro on the River Aire and solar or wind along the bypass to power lighting and demonstrate sustainability. Design routes for all ages and abilities with smooth surfaces and rest areas.

Consultation point:	11. Walking, Cycling and Green Infrastructure		
Representation ID:	30455	Comment Type:	Comment
Respondent:	Canal and River Trust (1508)	Agent:	-

Summary:

-

Full Submission:

Reference to the Canal & River Trust
 Our name is the 'Canal & River Trust'. The document does refer to ourselves (for example in paragraph 11.4.2) as the 'Canal and Rivers Trust', which is not correct. To avoid confusion, we request that our name is corrected to amend 'and' to & and to make 'Rivers' singular.

Consultation point:	11. Walking, Cycling and Green Infrastructure		
Representation ID:	30406	Comment Type:	Comment
Respondent:	Canal and River Trust (1508)	Agent:	-

Summary:

-

Full Submission:

Walking and Cycling

The Leeds & Liverpool Canal towpath provides car free access for pedestrians and cyclists across the Neighbourhood Plan area. The Trust is keen to promote use of our asset, which also provides a space for relaxation and leisure, with associated wellbeing benefits discussed above.

For the consultation at regulation 14, the Trust noted that the approach of the plan sought to strengthen links between Bingley Town Centre and key village centres, and also talked specifically about introducing cycle and pedestrian routes. This is retained in the latest document (for example paragraph 11.2.1).

The canal towpath, by its very nature, is a car free route, and we believe people could be encouraged to utilise this asset. Towpath access points at Ferncliffe Road and on Main Street (close to the fire station) provide direct routes to Bingley Town centre. The latest plan acknowledges the role that the canal towpath plays in providing access between Bingley Town Centre and Crossflats. The general approach of the Plan to make use of these routes is considered by us to be appropriate.

We note that amendments have been made since the previous consultation to refer to opportunities to improve signage between the town centre and the canal towpath in paragraph 11.4.2. We believe this will make the document more effective in meeting its overall aims, as this could help improve legibility from the town centre and promote sustainable travel.

Paragraph 11.9.4 highlights opportunities our observation that there is a need to improve the canal towpath between Bingley 5 rise and Primrose Lane, which we consider could help make this matter more pertinent to decision makers when deciding future applications. Improvements to the canal towpath surface to make it more resilient to increased pedestrian and cyclist use

Consultation point:	11. Walking, Cycling and Green Infrastructure		
Representation ID:	30407	Comment Type:	Comment

Consultation point:	11. Walking, Cycling and Green Infrastructure		
Respondent:	Canal and River Trust (1508)	Agent:	-

Summary:

-

Full Submission:

Green Infrastructure
 The Leeds & Liverpool Canal forms an important wildlife corridor and a specific wetland habitat that enhances the existing green (and blue) infrastructure network within Bingley.
 Wording in paragraph 11.15 highlights the role of the canal as a Green Infrastructure asset, which should help make the role of our network clearer to developers and decision makers to take better account of the benefits and opportunities the canal can provide.

Consultation point:	11. Walking, Cycling and Green Infrastructure		
Representation ID:	30412	Comment Type:	Comment
Respondent:	Holdgate (548)	Agent:	-

Summary:

-

Full Submission:

I fully support the need to maintain the green corridors for wildlife. An important one is between Rombalds moor (SSSI), south through fields to The Prince of Wales Park and across to Gilstead Moor.
 This passage is also featured in Para12 figure 10 as an important area for "distinctive local view and vista".
 The area is Green Belt, and would be sensitive to any development. I agree it must be protected, not only because it is Green Belt, but because of its benefit to wildlife. I strongly agree the Plan must " minimise any loss to Green Belt".

The Green areas surrounding Bingley are what makes Bingley unique and special for so many reasons.

Consultation point:	11. Walking, Cycling and Green Infrastructure		
Representation ID:	30424	Comment Type:	Comment
Respondent:	Environment Agency (7684)	Agent:	-

Summary:

-

Full Submission:

WATER FRAMEWORK DIRECTIVE

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 at our Catchment Data Explorer pages <https://environment.data.gov.uk/catchment-planning/>

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 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.

WATER RESOURCE AND QUALITY

Effective management is important to protect water quality and as a natural resource, both for groundwater and surface water. Drainage misconnections can occur in new developments, redevelopments, extensions or through refurbishment.

Developers must ensure that they do not connect any foul drainage (including sinks, showers, washing machine/dishwasher outlets and toilets) to a surface water sewer, as this can send polluted water into watercourses.

Similarly, developers should ensure that they do not connect surface water drainage (e.g. roof gutter downpipes) into foul sewers as this can cause overloading of the foul sewer during heavy rainfall.

Polluted surface water flows from areas like car parks or service yards should always have sufficient pollution prevention measures in place to ensure the protection of groundwater and watercourses from specific pollutants like petrol (hydrocarbons) and suspended solids. Developers should follow appropriate pollution prevention guidance when designing formal drainage for large areas of hardstanding.

Ideally, applicants should introduce more ‘surface’ or ‘green’ drainage solutions to aid improvements in water quality, such as swales along hardstanding boundaries, or a more advanced reed bed system for larger sites. These solutions are easier to access and maintain than engineered solutions like petrol/oil interceptors, which require regular maintenance to ensure they operate correctly.

We note that our suggested has not been included for a policy or clear signposted reference elsewhere which requires a clear pathway in the delivery of and expectations from Biodiversity Net Gain through all development, as part of the LNRS.

GROUNDWATER

Protecting surface and groundwater from potentially polluting development and activity is a primary responsibility for the Environment Agency. There is a small area in Source Protection Zone (SPZ) 1 within the Plan area.

Sources of groundwater supply will be protected using the SPZs identified in the Environment Agency’s existing mapping. The approach is documented in our Groundwater Protection: Principles and Practice, within SPZ1, we will normally object in principle to certain types of development.

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.

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.

We note that neither groundwater nor where possible the need to connect to the main foul sewer network have been included in the Submission NDP.

Consultation point:	11. Walking, Cycling and Green Infrastructure		
Representation ID:	30424	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust (7686)	Agent:	-

Summary:

-

Full Submission:

Thank you for consulting Yorkshire Wildlife Trust (YWT) regarding The Bingley Neighbourhood Plan consultation. YWT has limited ability to become engaged directly in the preparation of Neighbourhood Plans because there are potentially so many across Yorkshire. We hope, therefore, that this advice note provides helpful guidance to enable those involved in neighbourhood planning to address wildlife issues and in doing this maximise benefits to both to the local environment and the wellbeing of local people.

The 2011 Localism Act enables communities to put together a Neighbourhood Plan for their parish or neighbourhood, giving communities the power to form and shape development in their area. We acknowledge that this Neighbourhood Plan is being prepared in the context of the Bradford Local Plan 2011-2030; with the Neighbourhood Plan itself not being responsible for site allocations for housing and other forms of development. Despite this, Neighbourhood Plans can guide where development such as new homes, shops, offices and open space is located, what it looks like and how it is achieved, their statutory status giving them more weight than some other local planning documents and making them an important tool to help to protect local wildlife.

Neighbourhood Plans also provide an excellent opportunity to improve the local environment, including protecting and enhancing existing assets, such as local parks, nature reserves and other green spaces. This can contribute to Nature's Recovery in Yorkshire, plans for which are being developed through Local Nature Recovery Strategies¹ (LNRS). We welcome the inclusion of Local Green Spaces Plan² proposed, uploaded with the supporting documents. YWT would be happy to comment further, on ways in which the biodiversity of these potential green spaces identified, could be enhanced and how to encourage wildlife in these areas.

With wildlife in decline across Yorkshire, and beyond, and once-common species such as sparrows and starlings being red-listed, i.e. of the highest conservation concern³, the green spaces identified in the Green Spaces Plan (2023) could become vital assets for nature's recovery in Yorkshire. As well as encouraging the biodiverse enhancements within green areas chosen, it is also vital to protect the species of plants and animals currently using sites and habitats in and around Bingley. Some of these species are given legal protection under the planning system or are priorities for nature conservation. Knowing where they are can indicate areas where development would be undesirable or where the focus should be on maintaining and enhancing their habitat.

We welcome the consideration of the natural environment in the Neighbourhood Plan⁴, we view it is important to think about the natural environment and green infrastructure from the onset, when devising the Plan's vision and objectives. We acknowledge the inclusion of an HRA Screening Report⁵, which outlines the Tier 1 Statutory Designated sites with statutory protection as well as Local Wildlife Sites (LWS), assessing what impacts the Plan could pose at a local level.

We would welcome the input of a Natural Environment Group within the Planning team to focus on wildlife and greenspace, applying local knowledge and ensuring the community benefits from Bingley's natural assets. The development of the Plan could further identify the important wildlife assets and greenspaces in Bingley and it's adjoining areas. It is important to include those features identified by and valued by members of the community as well as those in published lists and documents.

Welcome the local plan commits to developing a green infrastructure strategy in and around Bingley and would welcome being consulted in the future, promoting sustainable development from the ground up. The State of Yorkshire's Nature Report 2024⁶ is another resource that could be utilised to further strengthen the environmental factors influencing the development of a Green Infrastructure Strategy for this Neighbourhood Plan. The report states, "Nature in Urban areas plays a crucial role in enhancing quality of life. Both physical and mental health is enhanced in 'green cities' and for many people it is the easiest-sometimes only- way to build a healthy relationship with nature."⁷ With this in mind, local volunteers could be used to do a survey of biodiversity in Bingley and produce a green infrastructure inventory/ wildlife map covering important sites and well as the existence and abundance of species. Migratory and hibernating species need to be surveyed at the appropriate time of year. It is particularly important to look at what is locally special and cared about by local people. These might be species: bats, swifts, barn owls, roman snails, orchids, butterflies, bees, other pollinators, hedgehogs, and habitats, for example hedgerows, woodlands, meadows, individual trees.

The emergent Green Infrastructure strategy might include policies to: protect and enhance these special features; create buffer zones around sites to minimise the impact of nearby developments; identify opportunities to create or enhance wildlife corridors; recommend the creation of new greenspace and enhancement of existing assets to benefit wildlife (planting native trees and shrubs, creating ponds and wetlands, sowing wildflower meadows); incorporate wildlife friendly features into development areas in your neighbourhood such as sustainable drainage schemes (SUDS); use native tree and flower species in landscaping plans; incorporate bird and bat boxes into built developments; Incorporate gaps in walls and fences to allow species such as hedgehog to move through the landscape.

Where new development is proposed, it is also possible to secure specific improvements through Biodiversity Net Gain (BNG). This will be managed by the local authority and is designed to ensure that biodiversity has a 10% gain over any losses due to the development itself. Adopting a BNG approach enables developments to contribute towards the national and global target of halting biodiversity loss and towards local and national strategies for conserving and enhancing wildlife. YWT would be happy to advise on how utilising BNG can award wins for nature through legal agreements such as S106 Agreements, which can secure investment from the LPA through the planning system to fund localised conservation work.

¹ The Statutory Consultation for West Yorkshire LNRS is proposed to be open in late 2025: A Local Nature Recovery Strategy for West Yorkshire | Your Voice

² (2023) Local Green Spaces. Bingley Parish Neighbourhood Plan Local Green Spaces Supporting Evidence

³ Birds of Conservation Concern | BTO - British Trust for Ornithology

⁴ (2025) Regulation 15 Draft Neighbourhood Plan. Bingley Town Council

⁵ (2022) Strategic Environmental Assessment Screening Opinion. Aecom

⁶ (2024) State of Yorkshires Nature Report. Yorkshire Wildlife Trust

⁷ Pg. 29. (2024) State of Yorkshire's Nature Report. Yorkshire Wildlife Trust

Consultation point:	11. Walking, Cycling and Green Infrastructure – Paragraph 11.2.1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	-		
Full Submission:	It is queried whether the cross reference in the first sentence of this paragraph to Figure 5.1 of the Masterplan Supporting Document, should also be linked to Figure 5, shown on Page 50 of the neighbourhood plan document.		

Consultation point:	11. Walking, Cycling and Green Infrastructure – Paragraph 11.3.3		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	-		
Full Submission:	This paragraph should make reference to segregated cycleway that has been provided along this route		

Consultation point:	11. Walking, Cycling and Green Infrastructure – Paragraph 11.4.2		
Representation ID:	-	Comment Type:	Comment

Consultation point:	11. Walking, Cycling and Green Infrastructure – Paragraph 11.4.2		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
The third sentence of the paragraph states that “ <i>The Canal and Rivers Trust has highlighted a need for signage and towpath improvements (between Bingley and Crossflatts) to support greater use of the canal route by cyclists</i> ”. It is worthwhile noting within the neighbourhood plan document that Sustrans are delivering improvements on sections on this route from Bingley 5 Rise to 3 Rise.

Consultation point:	Policy BING7: Walking and Cycling Routes		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
The second sentence of the first paragraph contains a typographical error – “ <i>manual for Streets</i> ” should be read “ <i>Manual for Streets</i> ”.

Consultation point:	Policy BING7: Walking and Cycling Routes		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Policy BING7: Walking and Cycling Routes		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	-		
Full Submission:	It is considered that the each of the eight routes listed within the policy should be given a number as this would be useful for future reference and aid interpretation. For example, “1. <i>Cottingley Village to Bingley Town Centre</i> ” etc		

Consultation point:	Policy BING7: Walking and Cycling Routes		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	-		
Full Submission:	It should be noted that criterion a) under the heading Gilstead to Eldwick contains a typographical error – ‘ <i>Gllstead</i> ’ should be amended to read ‘ <i>Gilstead</i> ’		

Consultation point:	Policy BING7: Walking and Cycling Routes		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Policy BING7: Walking and Cycling Routes		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
It is queried whether criterion (d) should refer to the canal rather than the River Aire.

Consultation point:	Policy BING8: Local Green Space		
Representation ID:	30408	Comment Type:	Comment
Respondent:	Canal and River Trust (1508)	Agent:	-

Summary:
-
Full Submission:
<p>Site 5 (Giles Wood/Crosley Wood) includes some land next to Bridge 205 (LL-181-001) (Scourer Bridge) that is owned and managed by the Trust. Please see figure 1 below.</p> <p>Figure 1 Map showing Trust Land Ownership (Infrastructure Trust Land) in proximity to Bridge 205 – Land included in the Local Green Space designation highlighted in red.</p> <p>The Trust request that the Local Green Space designation boundary is amended to exclude land owned by the Trust as this does pose potential threats to the ability of the Trust to properly manage the canal.</p> <p>We are confident that the designation of this land as Local Green Space is based on a desire to protect this valued asset and we appreciate this. We do, however, have serious concerns about the possible unintended consequences of its designation as local green space.</p> <p>Local Green Spaces are designated in accordance with paragraphs 106-108 of the National Planning Policy Framework.</p>

The National Planning Policy Framework states that policies for managing development within Local Green Spaces should be consistent with those for Green Belts (paragraph 108).

The Local Green Space designation could threaten the ability of the Trust to undertake works on land in its ownership necessary for public benefit and to support active and thriving waterways, for example, to gain consent for works affecting Bridge 205, or works associated with the management of the adjacent canal.

We wish to highlight that the Canal & River Trust is the statutory undertaker with responsibility for regulating navigation on the adjacent waterway. Its primary duty, as set out in S10 of the Transport Act 1962 is to ‘provide to such an extent as they may feel expedient services and facilities on the inland waterways owned or managed by them’. We therefore benefit from permitted development rights under the Town and Country Planning (General Permitted Development) Order 1995. This is unchanged by the designation. As referred to above however, a Local Green Space designation may restrict proposals which are outside of the scope of our permitted development rights but are nonetheless in accordance with our charitable aims of providing wider public benefit.

Consultation point:	11. Walking, Cycling and Green Infrastructure – Paragraphs 11.13.1 to 11.13.5, Policy BING8 and Paragraphs 11.15.1 to 11.15.7		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

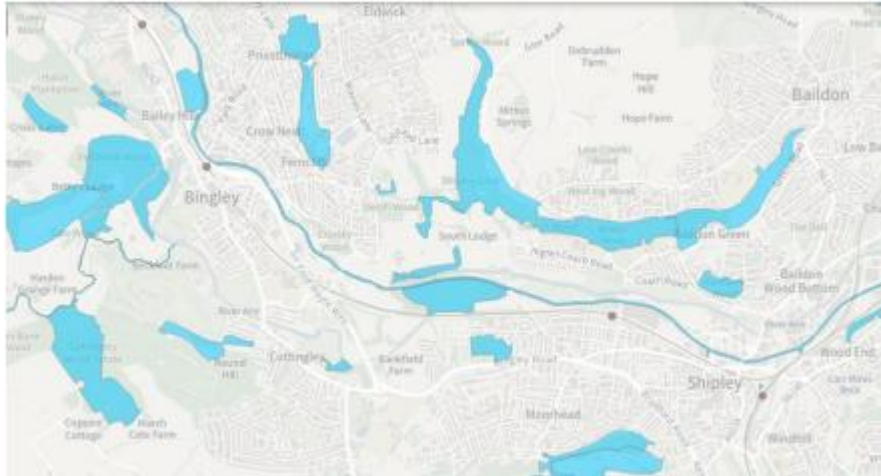
In relation to green spaces, it should be noted that Gilstead Moor and Bingley North Bog are both Local Wildlife Sites (LWS) designated by West Yorkshire Ecology but still appear with this section of the document.

The plan does not mention LWS’s except in the description of Gilstead Moor.

Additionally, whilst the document does not necessarily concern itself with existing designated sites, the following may be of interest:

- The Biodiversity Team is not aware of the Swann Lane Nature Reserve.

- There is no mention of the Site of Special Scientific Interest Bingley South Bog in this plan and it is not included in the Green Infrastructure Mapping.
- Map below shows Local Wildlife Sites in blue:



- Would any of the other greenspaces be potential Local Wildlife Sites? LWS are designated by West Yorkshire Ecology following this guidance <https://www.wyjs.org.uk/media/219673/20250312-wylocal-wildlife-site-selection-criteria-v125.pdf>
- It could be an aspiration for greenspace management to reach LWS standard.
- Would any amenity grass dominated greenspaces be suitable for tree planting? The Woodland Creation Manager would be interested if the town council deem any suitable

Consultation point:	Policy BING8: Local Green Space		
Representation ID:	-	Comment Type:	Support
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			

Full Submission:

The policy wording should be clear that LGS sites can only be developed where proposals are consistent with national and local policy on Green Belt (NPPF paragraph 108). It is suggested that the wording of the policy is amended to read: *“The following sites, listed below and shown in Appendix A as well as on the Policies Map, are designated Local Green Spaces:*

1. *Lyndale Road playing fields.*
2. *Canary Drive wild area.*
3. *Swan Avenue nature reserve.*
4. *Warren Lane allotments*
5. *Giles Wood.*
6. *Stanley Street allotments.*
7. *Queens Road recreation field, Crossflatts.*
8. *Green by canal, Canal Road/Newark Road, Crossflatts.*
9. *Bingley Bowling Club.*
10. *Rose garden, All Saints Church.*
11. *Green area by the Market Cross, Jubilee Gardens.*
12. *Recreation field, Cottingley.*
13. *Gilstead Moor (The Crag).*
14. *Millennium Wood – The Greenwood.*
15. *Woodland between Main Street / Oberon Way, Cottingley.*
16. *Park between Bradford Old Road and Cottingley New Road.*
17. *Beck Lane allotments.*
18. *Fields to the north and west of Five Rise Farm (ruins).*
19. *Jer Wood to Cat Steps.*
20. *North Bog.*

Development proposals within the Local Green Spaces will be consistent with national and local planning policy for Green Belts”

Consultation point:	Policy BING8: Local Green Space		
Representation ID:	-	Comment Type:	Support
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-

Full Submission:
It is noted that two of the proposed Local Green Space designations listed in Policy BING8 and assessed in the Local Green Spaces Supporting Evidence Documents already benefit other protected designations. As such they should be removed from the policy. These are:

- Proposed LGS 13: Gilstead Moor (The Crags) – this area is a designated Local Wildlife Site (LWS) (Gilstead Moor Edge & Prince of Wales)
- Proposed LGS 20: North Bog – this area has been part of the designated National Nature Reserve (NNR) (Bradford Pennine Gateway) since March 2025 and is also designated Local Wildlife Site (LWS) (Bingley North Bog).

Consultation point:	Policy BING9: Green Infrastructure Principles		
Representation ID:	30409	Comment Type:	Support
Respondent:	Friends of Prince of Wales Park (7673)	Agent:	-

Summary:
-

Full Submission:
With reference to the Neighbourhood planning , on the Bingley Neighbourhood development plan;
We are really pleased to see in 11.15.5 the principle of the broad corridors for wildlife , to enable habitat areas to be connected. We feel this this is essential going forward for the increasing urbanization of both Bingley and the surrounding areas.

The woodland running south between Gilstead and Bingley, an area often referred to locally as Gilstead Moor, along with the open access onto the field north west of the Prince of Wales Park (POWP) are critical for ensuring the ability of local deer, badgers, hedgehogs and other local wildlife to safely and freely roam across long established pathways.

Thank you for including this in the development plan, this will help us conserve and promote our newly acquired Local Nature Reserve status and our park.

Consultation point:	Policy BING9: Green Infrastructure Principles		
Representation ID:	30425	Comment Type:	Comment
Respondent:	Environment Agency (7684)	Agent:	-

Summary:

-

Full Submission:

GREEN INFRASTRUCTURE & BIODIVERSITY

Nature does not recognise borders. Strategic approaches and the integration with partnership working in the LNRS will be pivotal to maximise the application of BNG. The water environment and habitats should be identified as key assets, both in terms of resource and quality to support other environmental goals. We continue to provide limited support to the approach for green space and associated infrastructure. The Environment Agency still insists that broader scope is provided, and stakeholder expectations are established, to reflect that the water environment also forms part of the natural environment. Indeed, watercourses can perform an essential role in the enhancement of biodiversity and ecological habitats. We particularly would like to emphasise that watercourses can also benefit from the application of Biodiversity Net Gain and could perform a key role in the adaptation to and mitigation from climate change. Equally, we would suggest that the Bingley NDP should consider reference to and alignment with the emergence of the Local Nature Recovery Strategy (LNRS), which will seek to provide a pivotal link between vision and development across West Yorkshire. We note there is limited reference to LNRS in the Green Infrastructure chapter. Water (and Blue Infrastructure) is not underlined despite reference being made to nature recovery and biodiversity net gain opportunities in broad corridors, such as the River Aire south of A650 from Cottingley to the border with Keighley. We would invite that a greater emphasis is applied to the opportunities of Green-Blue Infrastructure, especially as reference is made to emerging Local Plan 'blue assets'. We are uncertain if adequate links to the Local Plan have been made in the Submission BNDP and that ambiguity has been avoided.

Consultation point:	Policy BING9: Green Infrastructure Principles		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
It is noted that the second sentence of second paragraph of the policy contains a typographical error. - <i>'recoveryand'</i> should be amended to read <i>'recovery and'</i>

Consultation point:	Policy BING9: Green Infrastructure Principles		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
This is a good policy but due to the previous omissions (mentioned above) lacks direction, specific locations and interventions. Will this policy be applied in the absence of mentions of Green Infrastructure and biodiversity in the discussion of other policies.

Consultation point:	Policy BING9: Green Infrastructure Principles		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			
It is queried the whether the section of this policy should include some guidance as to where within the neighbourhood area land for allotments should be provided and the criteria that could be used to identify them.			

12. SECTION 12: ENHANCING BINGLEY’S LANDSCAPE AND HERITAGE

Consultation point:	12. Enhancing Bingley’s Landscape and Heritage – Paragraphs 12.3.1 to 12.2.3, Figure 8 and Policy BING10: Non-Designated Heritage Assets: Bingley Character Buildings and Structures of Local Heritage Interest		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			
It is noted that the section and policy titles have been amended to include reference to Bingley Non-Designated Heritage Assets. However, to ensure full consistency with national and local planning policy, it is recommended that the wording “ <i>Local Character Buildings and Structures of Local Heritage Interest</i> ” is deleted			
Consultation point:	12. Enhancing Bingley’s Landscape and Heritage – Paragraph 12.3.2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			

Full Submission:			
The first sentence of should be amended to ensure the consistent use of terminology. Accordingly, it should be amended to read “Responses from property owners affected by the proposed designation of Non-Designated Heritage Assets were focussed on the proposed designations of walls in Beck Lane, Gawthorpe and Priestthorpe”.			

Consultation point:	12. Enhancing Bingley’s Landscape and Heritage – Paragraphs 12.5.1 to 12.5.6		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is queried whether the plan text and/or the supporting evidence should refer to the importance of Higher Coach Road, which runs through the proposed Milner Field Special Character Area, as a link between Baildon/Saltaire and Gilstead.

Consultation point:	Policy BING11: Milner Field Estate Special Character Area		
Representation ID:	30416	Comment Type:	Comment
Respondent:	The Kingsbridge Directors Pension Scheme (7681)	Agent:	ID Planning

Summary:

-

Full Submission:**INTRODUCTION**

This representation is submitted on behalf of my client The trustees of Kingsbridge Directors Pension Scheme, the owner of Milner Field Estate. The site is in private ownership, and the majority of the site is currently used for agricultural purposes.

Part of the site has been promoted for development through the Bradford Local Plan and the landowner does intend to submit representations to the emerging Bradford Local Plan at the next consultation stage in support of development within suitable areas of the Estate.

RESPONSE TO POLICY BING11 - MILNER FIELD ESTATE SPECIAL CHARACTER AREA

This representation provides a response to proposed Neighbourhood Plan Policy BING11 which identifies the Milner Field Estate as a Special Character Area and states that where relevant, proposals for development within the Special Character Area will be supported where they would:

- a) Improve public awareness and understanding of the historical significance of the Special Character Area described in the Milner Field Estate Special Character Area Supporting Document.
- b) Improve recreational and heritage tourism use of the Milner Field Estate.
- c) Maintain or enhance the character features of key buildings, structures, views and vistas that are listed within the policy. Our client supports the acknowledgement in the policy that development within the Special Character Area can be supported in principle. However, we are concerned that in its current form, Policy BING11 is overly restrictive and does not provide the necessary flexibility to support development that could provide the necessary funding to improve the awareness of the historical significance of the Estate and assist in maintaining the character features and key buildings.

NEED FOR FLEXIBILITY TO SUPPORT DEVELOPMENT

The consultation document states that the aim of the policy is to secure the preservation and enhancement of the historic features within this area and highlights that the estate is in danger of significant deterioration. As a privately owned estate, any enhancement works would require funding and therefore the policy should provide clear support for development that could provide the necessary capital receipt to fund these works. The consultation document highlights the site has a low profile locally and nationally. The estate is not within a Conservation Area and therefore the requirements of the policy need to be proportionate. The principle of enabling development, as recognised in the National Planning Policy Framework (section 16) and the Historic Environment Good Practice Advice in Planning Note 4, provides an accepted planning mechanism whereby carefully managed development is permitted to secure heritage benefits that would not otherwise be achievable. Our client supports the overarching aim of Policy BING11 to support development and raise the profile of the Estate in principle, but the requirements need to be proportional and acknowledge that even to preserve the existing features could incur significant cost. The policy should therefore expressly support enabling development, that would allow for the prospect of development on the site and provide an opportunity to highlight the history of the site and maintain historical features of the site where feasible and viable. Our client has enabled some clearance and exposing of the area of Milner Field Mansion which is ongoing and significant features are being exposed and preserved. Our client is very interested in preserving the industrial heritage of the area and this would be included in any future development.

NATIONAL POLICY AND LOCAL POLICY

The NPPF states that policies should be positively prepared and support opportunities for sustainable development that contribute to the conservation of heritage assets. Paragraph 221 states “Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.”

Braford’s Local Plan contains policies that allow for enabling development in appropriate circumstances, provided proposals are robustly justified and deliver demonstrable heritage benefits.

To ensure consistency with national and local level policy, Policy BING11 should be amended to support enabling development where it would support the preservation or enhancement of the Milner Field Estate.

PROPOSED AMENDMENT TO POLICY BING11

Kingston Directors Pension Scheme are seeking the following amendments to proposed Policy BING11 (changes are shown underlined)

BING11 – Milner Field Estate Special Character Area

The area shown on the policies map is designated as the Milner Field Estate Special Character Area. Proposals for development within the Special Character Area will be supported, particularly where they would:

- a) Comprise enabling development to improve public awareness and understanding of the historical significance of the Special Character Area described in the Milner Field Estate Special Character Area Supporting Document; or
- b) Improve recreational and heritage tourism use of the Milner Field Estate; or
- c) Maintain or enhance the character features of key buildings, structures, views and vistas described in Table 5 and set out below, where technically feasible and viable:
 - Asset Number 1: North Lodge and Gateposts
 - Asset Number 2: South Lodge and Gateposts
 - Asset Number 3: Garden House
 - Asset Number 4: Milner Field Villas
 - Asset Number 5: Farm Lodge Asset Number 6: Farm House
 - Asset Number 7: Farm Buildings
 - Asset Number 8: Main House Ruins
 - Asset Number 9: Conservatory Mosaic Floor
 - Asset Number 10: Orangery

- Asset Number 11: Arch to Courtyard
- Asset Number 12: Steps to Old Milner Field Mansion
- Asset Number 13: Stables and Old Coach House
- Asset Number 14: Lake, Trout Hatchery and Stream Conduits
- Asset Number 15: Ha-Ha Wall
- Asset Number 16: Field Walls
- Asset Number 17: Boundary Wall, Primrose Lane
- Asset Number 18: Kitchen Garden Heated Wall

JUSTIFICATION FOR THE PROPOSED AMENDMENT

The proposed amendment to Policy BING11 would provide flexibility for development within the Special Character Area and would support the aims of the policy which is to secure the preservation and enhancement of historic features within the area.

The associated criteria within Policy BING11 need to be proportional to the site’s existing context. The site is not within a Conservation Area and for the policy to be deliverable it is essential that development can be viably delivered alongside enhancements to improve public awareness of the history of the site and the maintenance of assets within the site.

CONCLUSION

Our client supports the recognition within Policy BING11 that proposals for development within the Milner Field Estate Special Character Area would be supported in principle, but the associated criteria require amendments to ensure flexibility for the landowner as without development there would be no funding for the preservation or enhancement of the Estate. There is national policy support for enabling development and this should be reflected in the policy in acknowledgement that the site is in private ownership.

By ensuring the policy is worded flexibly, the Bingley Neighbourhood Plan will support development on the site providing an opportunity to improve public awareness of the site’s history and preserve features within the Milner Field Estate Special Character Area where possible

Consultation point:	Policy BING11: Milner Field Estate Special Character Area		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:			
-			
Full Submission:			
<p>It is noted that neighbourhood plan now includes the policy statements from the Milner Field Estate Special Character Area supporting document (Table 5). It may appropriate to include an additional criterion with Policy BING11 to provide a link to them. The following is suggested: “<i>The area shown on the Policies Map is designated as the Milner Field Estate Special Character Area. Where relevant, proposals for development within the Special Character Area will be supported where they would:...</i></p> <p><i>d) Be consistent with and reflect the policy statements set out in Table 5 and the from the Milner Field Estate Special Character Area supporting document”</i></p>			

Consultation point:	Policy BING11: Milner Field Estate Special Character Area		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:			
-			
Full Submission:			
<p>Part (c) of the policy refers to the list of key buildings, structures, views and vistas set out in Table 5. It is noted that the list of key buildings, structures, views and vistas set out in the policy is inconsistent with those set out Table 5. The policy should be amended to included asset numbers 19 to 24.</p>			

Consultation point:	12. Enhancing Bingley’s Landscape and Heritage		
Representation ID:	30391	Comment Type:	Comment
Respondent:	Holdgate (548)	Agent:	-

Summary:
-
Full Submission:
<p>Ref Fig 10 and "distinctive local views and vistas"</p> <p>The views and open green vistas from Heights Lane are sensational. It is good that the Plan has recognised this, at least as far south as Tewitt.</p> <p>I recommend however that the green hatchings on the map showing the west view from Heights lane in Fig 10 include the vistas below Tewitt, from the bottom of Heights Lane which are significant for their immediate open green aspects on leaving the built part of Eldwick.</p> <p>The hatchings on Fig10 begin some way away from the road. If not protected, these fields between the road and the hatchings might be used for development, in spite of their protection in Green Belt, rendering the views and openness from the road totally ineffective.</p> <p>I ask that for maximum protection, the hatchings begin at Heights Lane road side and extend westwards towards the Aire valley.</p>

13. SECTION 14: APPENDICES TO THE NEIGHBOURHOOD PLAN

Consultation point:	Appendix A – Local Green Spaces Supporting Document		
Representation ID:	-	Comment Type	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent	-
Summary:			
-			
Full Submission:			
It is suggested that each section and paragraph in the document is given a number. This will assist readers in navigating it			
Consultation point:	Appendix A – Local Green Spaces Supporting Document 19. Fields to the north of 5 Rise Farm Compliance with NPPF Eighth Row – Second Column		
Representation ID:	-	Comment Type	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent	-
Summary:			
-			
Full Submission:			

It should note that this contains a typographical error. The wording “North Bog SSI” should be amended to read “North Bog SSSI”. In addition, wording should be added to reflect the recent National Nature Reserve designation. The following wording is suggested: “*Only insofar as the Bradford Pennine Gateway National Nature Reserve and North Bog SSSI borders it to the south*”.

Consultation point:	Appendix A – Local Green Spaces Supporting Document 20. North Bog Compliance with NPPF Eight Row – Second Column		
Representation ID:	-	Comment Type	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent	-

Summary:

-

Full Submission:

It is noted that site’s designation as a SSSI. However, this should also be amended to reflect the fact it has recently been designated as part of the Bradford Pennine Gateway National Nature Reserve and is also a designated Local Wildlife Site.

Consultation point:	Appendix A – Local Green Spaces Supporting Document Original Proposed Sites – Removed		
Representation ID:	-	Comment Type	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent	-

Summary:

-
Full Submission:
It is queries whether the assessments undertaken for these sites can be made available.

Consultation point:	Appendix B - Character Buildings & Structure of Local Heritage Interest Supporting Evidence		
Representation ID:	-	Comment Type	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent	-

Summary:
-
Full Submission:
It would be appropriate to amend the document title to “Bingley Non-Designated Heritage Assets”. A similar amendment should be made within the document itself. This would be more consistent with terminology used in national and local planning policy.

Consultation point:	Appendix C - Distinctive Views & Vistas Supporting Evidence		
Representation ID:	-	Comment Type	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent	-

Summary:
-
Full Submission:

It would be appropriate to amend the document title to “Bingley Non-Designated Heritage Assets”. A similar amendment should be made within the document itself. This would be more consistent with terminology used in national and local planning policy.

14. POLICIES MAP

Consultation point:	Policies Map		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-

Full Submission:
It is suggested that if the colour base map is to be used, the Town Council boundary (and the Neighbourhood Area boundary) should be picked out in black rather than green. This will be clear for the reader as several elements of the map use green shading.

Consultation point:	Policies Map		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-

Full Submission:
In relation to the cycling and walking routes, the following inclusions on/deletions from the Policies Map are suggested:

1. Higher Coach Road through Milner Field should be shown as a walking and cycling route.
2. Heights Lane and Otley Road are not appropriate to be shown on the Policies Map as a walking/cycling route between Eldwick and Micklethwaite as they are busy fast roads with no footways. It is queried whether Lady Lane/Sty Lane would be a better walking/cycling link which is already shown on the Map?
3. The Leeds Liverpool Canal towpath be shown as a walk/cycle route.

It is queried whether the Map should show a walking/cycling route to St Ives via Myrtle Park and Beckfoot Lane.

Consultation point:	Policies Map - Key		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is suggested that the title for BING10 should be amended to read “*Non-Designated Heritage Assets*”.

15. STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS REGULATIONS ASSESSMENT SCREENING

Consultation point:	Appendix 2a – SEA Screening Opinion (May 2022) Chapter 2 – Paragraph 2.23		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			
The first sentence of the paragraph refers to the Liverpool, Manchester, and West Yorks Green Belt covering most of the Bingley Parish area. This statement is incorrect as only the West Yorkshire Green Belt covers the neighbourhood plan area. This sentence should be amended to read “ <i>The West Yorkshire Green Belt also covers....</i> ”.			
Consultation point:	Appendix 2a – SEA Screening Opinion (May 2022) Chapter 3 – Table 3.1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			

Under the section on discussing the potential effects of the NDP relating to landscape, refers to the Liverpool, Manchester, and West Yorks Green Belt covering most of the Bingley Parish area. This statement is incorrect as only the West Yorkshire Green Belt covers the neighbourhood plan area. This sentence should be amended to read “*The West Yorkshire Green Belt covers....*”.

Consultation point:	Appendix 2b – SEA Screening Opinion (June 2022) Chapter 2 – Table 2.23		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

Under the section on discussing the potential effects of the NDP relating to landscape, refers to the Liverpool, Manchester, and West Yorks Green Belt covering most of the Bingley Parish area. This statement is incorrect as only the West Yorkshire Green Belt covers the neighbourhood plan area. This sentence should be amended to read “*The West Yorkshire Green Belt covers....*”.

Consultation point:	Appendix 2b – SEA Screening Opinion (June 2022) Chapter 3 – Table 3.1		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

Under the section on discussing the potential effects of the NDP relating to landscape, refers to the Liverpool, Manchester, and West Yorks Green Belt covering most of the Bingley Parish area. This statement is incorrect as only the West Yorkshire Green Belt covers the neighbourhood plan area. This sentence should be amended to read “*The West Yorkshire Green Belt covers....*”.

16. BASIC CONDITIONS STATEMENT

Consultation point:	Table 1 – Policy BING4		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	-		
Full Submission:	It is suggested that Core Strategy Policy EC4 is also referenced. This policy provides the circumstances for dealing with the loss of employment land.		

Consultation point:	Table 1 – Policy BING6		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:	-		
Full Submission:	It is suggested that Core Strategy Policy HO11 is also referenced. This policy sets out the overall approach for the provision of affordable housing.		

Consultation point:	Table 1 – Policy BING7		
Representation ID:	-	Comment Type:	Comment

Consultation point:	Table 1 – Policy BING7		
Respondent:	City of Bradford Metropolitan District Council	Agent:	-
Summary:			
-			
Full Submission:			
It is suggested the emerging Local Plan policies TR1, TR3 and DS4 are also referenced.			

17. BINGLEY TOWN CENTRE AND LOCAL CENTRES – DESIGN CODE

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
It is noted that the various design codes have been summarised and embedded within the neighbourhood plan document itself. This step is welcomed and ensures a clear link between the plan’s policies and the design code document.

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
It is suggested that the design code is brought up to date to reflect the current stage of the neighbourhood plan and any changes that have occurred since it was prepared (2020). The introductory text needs be clear about whether the Design Code is part of the plan itself or just a piece of supporting evidence.

Consultation point:	Section 1.1 – Introduction and Purpose		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
The first sentence of the sixth paragraph that the report will “ <i>provide mandatory guidance that supplements policies of the Bingley Neighbourhood Plan</i> ”. It is queried whether guidance can be considered as mandatory.

Consultation point:	Section 1.2 – Planning Context		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
The first paragraph refers to the 2019 National Planning Policy Framework. This has now been superseded by a new version issued in December 2024 (with update in February 2025). Any references within the Design Code document should be updated to reflect this. Furthermore, reference should be made to the national model design code and national design guide as part of the wider policy context within which the document has been prepared. The section covering the local planning policy context should be updated to highlight that CBMDC is currently preparing a new Local Plan for the District that, when adopted will replace the existing Core Strategy and RUDP. In relation to the other documents listed the adopted Homes and Neighbourhoods Design

Guide SPD (February 2020) should be included, whilst the reference to the Bradford City Centre Design SPD should be removed. This not relevant to the Bingley area.
Should it not be possible to edit this document, an addendum should be produced to show potential amendments reflecting the above that should be read alongside.

Consultation point:	Section 2.3 – Landscape and Open Spaces		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It should be highlighted that several of the areas of open space within the neighbourhood areas are also designated Local Wildlife Sites (LWS) (see comments in relation to the NDP document). The Leeds Liverpool Canal is also a designated LWS through the neighbourhood area. It may be appropriate to reference these in the document and/or on Figure 15. Also, it is queried as to none of the open spaces in Cottingley are included.

Should it not be possible to edit this document, an addendum should be produced to show potential amendments reflecting the above that should be read alongside.

Consultation point:	Section 4.10 – Environmental and Biodiversity		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-
Full Submission:
Reference should be made to new developments delivering Biodiversity Net Gain (BNG). BNG is now mandatory. Further guidance can be found in the Government’s on-line Planning Practice Guide.

Consultation point:	Section 4.14 – Improvements to Main Street		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
The document states that any improvements to Main Street should be approved by the Town Council. It is not clear what the context for this to occur. It is likely that any improvements will be the province of the local planning authority and/or highways authority (CBMDC).

Consultation point:	Section 5.5 – Display Space		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:

It is queried whether a planning policy document such as design code can mandate the way in which a business uses the window display. This may be difficult to enforce.

18. BINGLEY PARISH NEIGHBOURHOOD PLAN MASTERPLAN

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
<p>It is suggested that the Masterplan is brought up to date to reflect the current stage of the neighbourhood plan and any changes that have occurred since it was prepared (2020), e.g. changes to national policy, the emerging Local Plan and the Development Frameworks.</p> <p>The introductory text needs be clear about whether the Masterplan is part of the plan itself or just a piece of supporting evidence. It should be consistent with the contents of the design section of the neighbourhood plan.</p> <p>It is understood that it may prove difficult to edit this document, therefore it is suggested that any relevant amendments could be shown in an addendum that should be read alongside the original.</p>

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:

CBMDC has creating several Development Frameworks for a number of parts of the District including Bingley. The Development Framework look to the longer term (next 15 to 20 years) and sets out an overarching vision, objectives and potential interventions for the regeneration of Bingley. The vision, objectives and potential interventions have been shaped by local stakeholders’ views and will continue to be refined following the most recent consultation.

As a component of Bradford's Economic Growth Plan, the role of the Development Framework is to act as a guide for development within Bingley, as well as encourage and attract new investment into the area. It provides clear principles which promote social, economic and environmental benefits which are informed by Bingley's local context and are underpinned by the strategic and policy context both nationally and locally.

The proposed interventions as set out within the Development Framework are indicative only. There is no funding commitment at this stage to deliver the vision. If the proposals are supported by stakeholders, a more detailed delivery plan would be considered as funding opportunities arise.

It may be appropriate for the Masterplan to be reviewed/updated in light the above

Consultation point:	Section 1.1 – Introduction (Study Area)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
The second sentence refers to the Masterplan influencing the design of forthcoming enhancement proposals. Further explanation is required in relation to what these proposals are and when they are likely to come forward. It assumed that it is meant to refer to proposals that come forward through the planning system.

Consultation point:	Section 2.1 – Policy Review		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

The first paragraph refers to the 2019 National Planning Policy Framework. As highlighted previously, this has now been superseded by a new version issued in December 2024 (amended in early 2025). Any references within the Masterplan document should be updated to reflect this. Furthermore, reference should be made to the national model design code and national design guide as part of the wider policy context within which the document has been prepared.

The section covering the local planning policy context should be updated to highlight that CBMDC is currently preparing a new Local Plan for the District that, when adopted will replace the existing Core Strategy and RUDP.

Consultation point:	Section 3.1 - Baseline Study (Movement Network – Non-Vehicular Routes)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is suggested the Masterplan document is updated to refer to the section of segregated cycleway that has just been delivered along the B6265

Consultation point:	Section 3.1 - Baseline Study (Green Infrastructure) and Figures 3.4 & 3.5		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

References to Bradford Wildlife Areas (BWA) and Regionally Important Geological Sites (RIGS) within the Masterplan (and other parts of the plan and evidence base) should be removed and replaced with the most up to date terminology – Local Wildlife Sites (LWS) and Local Geological Sites (LGS). This is particularly significant with regards to the impact to Local Wildlife Sites.

Due to the criteria that these sites are expected to fulfil to qualify – Local Wildlife Sites are considered to have a higher level of protection to the Sites of Ecological & Geological Importance (SEGI's) and Bradford Wildlife Areas (BWAs) that they replaced. In addition, it is the duty under the National Planning Policy Framework and the NERC Act 2006 (as opposed to other statutory bodies) to protect these sites.

The Masterplan document should refer to the fact that there are a number of designated Local Wildlife Sites (LWS) and Local Geological Sites (LGS) within/adjacent to the Bingley neighbourhood plan which together with the SSSI, Registered Parks & Gardens and open spaces form part of the area's Green Infrastructure network. The following sites are designated Local Wildlife Sites within/adjacent to the neighbourhood plan area:

- Baildon Moor
- Bingley North Bog
- Cottingley Woods – Black Hills
- Ewe Hills
- Gilstead Moor Edge & Prince of Wales Park
- Graincliffe & Compensation Reservoir
- Great Wood – West Wood
- Harden Beck
- Hazel Beck, Cottingley
- Hirst Wood
- Hollin Plantation
- Leeds & Liverpool Canal
- Rye Loaf Hill, Cottingley
- Shipley Glen

- St Ive’s Estate
- Tong Park with Hawksworth Spring Wood
- Transfield Wood
- West of Shipley High Moor

The following list of sites are classed as Local Geological Sites (LGS) within/adjacent to the neighbourhood plan area:

- Baildon Moor
- Eldwick Crag & Quarry
- Noon Nick, Shipley
- Shipley Glen

Citation documents may be obtained from West Yorkshire Ecology. Any mapping used within the neighbourhood plan and Masterplan should show the most up to date designations.

Consultation point:	Section 3.1 - Baseline Study (Topography, Watercourses & Key Views)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

The wording and mapping in relation flooding should be review and updated to make sure that the most up to date information is provided. CBMDC have prepared a Level 1 Strategic Flood Risk Assessment (SFRA), dated 2023, as part of the evidence base for the emerging Local Plan. This is available to review on the [Council website](#).

In addition, reference is made to the masterplan avoiding considering development within areas of higher flood risk. This is already covered in the national planning policy as well as the adopted Core Strategy and emerging Local Plan. Based on this it is queried whether the Masterplan is seeking to allocate sites or not. Further explanation is required.

Consultation point:	Section 4.1 - Engagement		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is noted that reference was made during workshops sessions to some potential allocated sites. As mentioned above, site allocations will be addressed in the emerging Bradford District Local Plan.

Consultation point:	Section 5.1 - Conceptual Framework		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

It is noted that the Masterplan’s Conceptual Framework proposes to integrate two residential developments into the holistic vision for the area – Sty Lane and Gilstead Water Works. The Sty Lane already benefits from outline planning permission and is currently the subject of pending reserved matters application for over 300 dwellings, whilst Gilstead Water Works is understood to be unavailable for development, based on discussion with its owners. References to the latter should be deleted.

It would be helpful to understand, whether or not the masterplan/neighbourhood plan is looking to allocate sites for development or whether it is identifying those sites that the community may support, or that it is setting out what could potentially take place in future within the neighbourhood area.

It should be made clear within the Masterplan that any site allocations will be identified and made via the emerging Bradford District Local Plan. Work is currently ongoing to review site allocations and update the evidence base for it, ahead of the Regulation 19 (Publication) version being drafted and issued to allow formal representations to be made.

Consultation point:	Section 5.2 - Masterplan Vision (Proposals & Interventions) and Figure 5.2		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:

-

Full Submission:

One of the proposed design principles is respond to the proposed residential development with its integration into the wider strategic Masterplan.

Figure 5.2 shows two potential residential development areas - Sty Lane and Gilstead Water Works. The Sty Lane already benefits from outline planning permission and is currently the subject of pending reserved matters application for over 300 dwellings, whilst Gilstead Water Works is understood to be unavailable for development, based on discussion with its owners. The document should be updated to reflect this and amended accordingly, with reference to the latter deleted.

It should be made clear within the Masterplan that any site allocations will be identified and made via the emerging Bradford District Local Plan. Work is currently ongoing to review site allocations and update the evidence base for it, ahead of the Regulation 19 (Publication) version being drafted and issued to allow formal representations to be made.

Consultation point:	Section 5.6 - Central Area Villages Appraisal (Higher Communities Village Centre – Gilstead) and Figure 5.6		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
See previous comments in relation to the non-availability of Gilsted Water Works for development.

Consultation point:	Section 5.7 - Village Centres Concept Masterplan (Higher Communities Village Centre – Gilstead) and Figure 5.7		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford Metropolitan District Council	Agent:	-

Summary:
-
Full Submission:
See previous comments in relation to the non-availability of Gilsted Water Works for development.